

# **Monroe County**

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

January 01, 2024 - December 31, 2025

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# 1. Administration

## 1.1 Administrative Structure

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

See Biannual Employment Plan Attachment A.

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

1. Monroe County Department of Social Services (MCDSS) The Financial Assistance Director oversees Temporary Assistance, SNAP, Medicaid, Employment Services, Domestic Violence, Home Energy Assistance Program (HEAP), Child Support Enforcement Unit (CSEU) and Daycare. The Employment Coordinator has responsibility for: Front door job search activities, the operations of the Self-Sufficiency workgroup, the employment related activities of the financial assistance teams, oversight of all SUD treatment activities and all contracts which are part of the Monroe County's Welfare to Work Case Management System (WTWCMS).

2. The work of the Self Sufficiency Unit is organized in a Task-Based Case-management model. Within this framework there are three distinct groups. These three groups are comprised of:

### Employment Interviewers

- Employment Assessments (in house as well as contractors)
- Restoration to Self Sufficiency Plans (RSSP) (in house as well as contractors)
- Diversion

### Employability Examiners

- Participation/Engagement/Accountability
- DART (Disability Review and Assessment)
- RSSP (Restoration to Self Sufficiency) (as well as contractors)
- Conciliation
- Subsidized Employment

### Clerical Support

- Appointment scheduling
- Document management
- WTWCMS List reviews

Employment Interviewers - Perform and deliver all functions related to orientations, employability assessments, reassessments, determination of employability, create employability development plans, addressing short term and long-term goal development as well as specific plans for individual to progress towards successful completion, and assign to employment activities, refer to case-management. Employment Interviewers also review

contractors Assessment packets, and request/issue supportive services. Interviewing Staff also perform Employability Assessments for our disabled population (TANF/SN Moe EU codes 32, 36, 41, 42), and Timing Out interviews for TANF recipients who are about to reach sixty (60) months of TANF assistance received. These interviews include an eligibility interview complete with Job Search expectations as appropriate. Assessments also address short term and long-term goal development as well as specific plans for individual to progress towards successful completion. This group also interviews individuals to develop Restoration to Self Sufficiency Plans (RSSP) and keeps a caseload of individuals that have been determined to be temporarily disabled > six months. This group also responds to questions regarding assessments from our contractors and offers bi-monthly refresher trainings for contracted assessors that include presentations from local resources for employment activities and State and Federal regulation updates.

Employability Examiners - This team uses COGNOS and WTWCMS lists to monitor client participation and compliance. The staff in this area schedule assessment appointments as appropriate for active Temporary Assistance individuals. They also review attendance reports, generate conciliations, perform employment code updates, issue supportive services as appropriate and respond to employment related inquiries from other Temporary Assistance Staff. Employability Examiners also organize hiring events hosted in the agency as well as throughout the community. Staff monitor requests for medical documentation or other information needed to determine employability. The Employability Examiners are responsible for monitoring the progress and participation for all adults enrolled in substance use disorder treatment program which includes monitoring our Recovery Attendance System (RAS) electronic attendance system. This group also handles all Self Sufficiency customer service inquiries including rescheduling appointments, case specific or general questions from clients, providers, and the community. Staff in this area document all client interactions in WTWCMS and OTDA's Imaging and Enterprise Document Repository (IEDR) and complete actions resulting from the phone calls.

The DART Examiners - Are dedicated staff that review medicals and schedule RSSP interviews to develop plans with the clients to help return them to employability when appropriate. In cases where the individuals are permanently disabled, DART Examiners assists in the SSI application process and linkage to our Law Department's SSI Advocacy Team for follow through on SSA applications. The district utilizes ACCES-VR, Industrial Medicine Associates (IMA), and medical professionals to aid in the development of successful RSSP plans for individuals.

The Conciliation Examiners - Are dedicated staff that review all instances of noncompliance for willfulness and good cause for both Temporary Assistance and SNAP. Each Conciliation Examiner is responsible for the entire conciliation process. All non-compliant actions are reviewed, conciliations mailed, responses are reviewed regarding willfulness and good cause. If an individual demonstrates good cause the individual is re-engaged in appropriate employment program. If good cause is not established and noncompliance is willful by regulation this team is responsible for the data entry of the sanction action. Each Conciliation Examiner is responsible for conciliation response calls, faxes, letters, and walk-ins.

Clerical Support- The clerical unit is responsible for receiving incoming mail and documentation that comes directly to the Self Sufficiency Unit, scanning it into I/EDR and tasking it to workers via Annex, our task-based management system. This unit is also responsible for issuing bus passes, scheduling, or rescheduling employment related

activities, and some scheduling of Employment Assessments. Clerical Support also reviews COGNOS lists to ensure appointments are scheduled appropriately in our appointment database and Contractors are aware of expected appointments.

Other functional areas employment responsibilities:

3. The MCDSS Temporary Assistance Examiners maintain active TA and SNAP cases in the Care Management (CM) Workgroup. Rehabilitation discharge sanctions are referred to our CM Examiners for processing in two ways 1) directly through RAS to our Annex system when provider advises of program failure, or 2) from Employability Examiners after determination has been made.

4. The Income Eligible Day Care team issues Transitional childcare for Temporary Assistance cases that close due to excess income.

5. MCDSS currently contracts with 3 assessment providers, Career Systems Development Corp, Rochester Works and Catholic Charities Family and Community Services (CCFCS) centers to deliver a portion of MCDSS orientations, in depth assessments, Employability Development Plans and referrals to work activities for applicants and recipients of TANF or SN assistance. The assessment centers enter the completed assessments and Employment Plans directly into WTWCMS.

6. Self Sufficiency staff is responsible for delivering the remaining portion of orientations, in depth assessments, Employability Development Plans and referrals to work activities for applicants and recipients of TANF or SN assistance. The Examiners enter the completed assessments and Employability Plans directly into WTWCMS.

7. MCDSS contracts with community agencies to provide employment related services. The agencies currently delivering those services are:

a. Monroe County contracts with Career Systems Development Corp for Applicant Job Search, Job Placement and Retention for SN recipients, Supervised job search and Job Readiness Training (JRT).

8. Monroe County contracts with NYSID to collect and enter actual attendance from most work activity providers for eligible participants in the district. The responsibilities of this function include calling providers weekly to obtain attendance data when not submitted, entering the data, and maintaining the paper records.

9. MCDSS currently has a Revenue Intercept process to utilize the New York State OTDA Industrial Medicine Associates contract to provide independent health examinations, mental health evaluations, and cognitive testing.

10. Monroe County utilizes ACCES-VR services for work limited individuals as well as individuals that are deemed temporarily disabled.

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

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

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

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

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

Provider	Total Contract Cost per Year	Funding Source(s)	Categories of Clients Served	Programs, Services or Activities Provided
Career Systems Applicant and Supervised Job Search	\$330,000	FFFS SNAP E & T Local	FA SNA Family SNA Individual SNAP	Job Search Orientation, Assisted Job Search, Job Readiness Training and Directed Job Referrals
Career Systems-Work Now	\$270,000	FFFS SNAP E & T Local	FA SNA Family SNA Individual	In-depth employability assessments, creation of EDP and assignment to work activities, WTWCMS data entry
Catholic Charities Family and Community Services EA's	\$40,000	FFFS SNAP E & T Local	FA SNA Family SNA Individual	In-depth employability assessments, creation of EDP and assignment to work activities, WTWCMS data entry

<b>Provider</b>	<b>Total Contract Cost per Year</b>	<b>Funding Source(s)</b>	<b>Categories of Clients Served</b>	<b>Programs, Services or Activities Provided</b>
Rochester Works Employment Assessments	\$225,000	FFFS SNAP E & T Local	FA SNA Family SNA Individual	In-depth employability assessments, creation of EDP and assignment to work activities, WTWCMS data entry
Rochester Works Wage Subsidy and Job Placement and Retention	\$50,000	Others: OJT Funding	FA SNA Family SNA Individual	Job Search, Job Placement, Retention. Placement is performance based on meeting placement and retention milestones
Coordinated Care Services, Inc (CCSI) RSSP	\$270,000	FFFS Local	FA SNA Family SNA Individual	Restoration to Self Sufficiency plan development and monitoring
Rochester Rehabilitation -Paths to Empowerment	\$250,000	FFFS Local	FA SNA Family SNA Individual	Aftercare program for individuals closed from TA due to excess income
Rochester Works-Strength/Training/Experience Program (STEP)	\$298,411	FFFS SNAP E & T Local	FA SNA Family SNA Individual	Work Experience Program working with community partners to provide work experience, skills development and hiring opportunities.
Career Systems JRT, Job Placement and Retention Services	\$50,000	SNAP E & T Local	SNA Family SNA Individual	Job Readiness Training, Job Placement and Retention services



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

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

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

<b>Provider</b>	<b>Funding Source(s)</b>	<b>Categories of Clients Served</b>	<b>Programs, Services or Activities Provided</b>
ABC	Others: Unknown	FA SNA Family SNA Individual	TASC, ABE, HSE, JRT
Rochester City School District (OACES)	Others: NYS Department of Education, SNAP opportunities, OTDA-Bureau for Refugee Assistance	FA SNA Family SNA Individual	TASC, ESOL, ABE, Alternative High School with case management for 16-20 year olds. and pregnant or parenting teens, vocational education
BOCES I	Others: NYS Department of Education	FA SNA Family SNA Individual SNAP TANF 200%	Vocational Education, ESOL, ABE, TASC, HSD
BOCES II	Others: NYS Department of Education	FA SNA Family SNA Individual SNAP TANF 200%	Vocational Education, ESOL, ABE, TASC, HSD
Greece Community Education	Others: NYS Department of Education	FA SNA Family SNA Individual SNAP TANF 200%	TASC, HSD
ACCESVR	Others: NYS Department of Education-SUNY	FA SNA Family SNA Individual	Vocational Rehabilitation, assessment, testing, work tryouts, job coaching
Dress for Success	Others: Unknown	FA SNA Family SNA Individual	Workshops on dressing and grooming for employment along with one on one consultations, interview attire and outfits to begin work
IBERO	Others: Unknown	FA SNA Family SNA Individual	ESOL, TASC

<b>Provider</b>	<b>Funding Source(s)</b>	<b>Categories of Clients Served</b>	<b>Programs, Services or Activities Provided</b>
Urban League	Others: Unknown	FA SNA Family SNA Individual	TASC, Life Skills, JRT, YouthBuild, Mentoring
Monroe Community College	Others: NYS Ed. SUNY	FA SNA Family SNA Individual SNAP TANF 200%	Post Secondary Education, TASC, Vocational Education
REOC	Others: NYS Ed. SUNY, SNAP Ventures	FA SNA Family SNA Individual SNAP TANF 200%	Vocational Education, TASC
Refugees Helping Refugees	Others: Unknown	FA SNA Family SNA Individual	English for Speakers of Other Languages (ESOL)
Mary's Place	Others: Unknown	FA SNA Family SNA Individual	English for Speakers of Other Languages (ESOL)
Job Corps	Others: DOL	FA SNA Family SNA Individual SNAP	Vocational Education, Academic Education
Bryant and Stratton	Others: Unknown	FA SNA Family SNA Individual	Vocational Education, Job Skills Training
Continental School of Beauty	Others: Unknown	FA SNA Family SNA Individual	Vocational Education, Job Skills Training
YAMTEP	Others: Unknown	FA SNA Family SNA Individual	Vocational Training (CNC), Job Readiness Training, Job Skills Training
Rochester Rehabilitation	Others: Unknown	FA SNA Family SNA Individual	Job Readiness Training
Foodlink-Culinary Fellowship	Others: DOL/Private Donations	FA SNA Family SNA Individual SNAP TANF 200%	Vocational Education

<b>Provider</b>	<b>Funding Source(s)</b>	<b>Categories of Clients Served</b>	<b>Programs, Services or Activities Provided</b>
Beyond the Sanctuary	Others: American Rescue Plan - ARPA funding	FA SNA Family SNA Individual SNAP TANF 200%	Job Readiness Training
ABC Early Head Start- Hart St, Joseph Ave, and North St	Others: Headstart	FA SNA Family SNA Individual SNAP TANF 200%	Home Visiting
Ibero- Early Head Start	Others: Headstart	FA SNA Family SNA Individual SNAP TANF 200%	Headstart
Volunteers of America- Early Head Start	Others: Headstart	FA SNA Family SNA Individual SNAP TANF 200%	Home Visiting
Healthy Baby Network (formerly Perinatal Network of Monroe County)	Others: Unknown	FA SNA Family SNA Individual SNAP TANF 200%	Home Visiting
Healthy Families Monroe County	Others: Unknown	FA SNA Family SNA Individual SNAP TANF 200%	Home Visiting
Monroe County Department of Public Health Nurse-Family Partnership	Others: Unknown	FA SNA Family SNA Individual SNAP TANF 200%	Home Visiting
Parents as Teachers- YWCA of Rochester	Others: Unknown	FA SNA Family SNA Individual SNAP TANF 200%	Home Visiting

<b>Provider</b>	<b>Funding Source(s)</b>	<b>Categories of Clients Served</b>	<b>Programs, Services or Activities Provided</b>
Parents as Teachers-Hillside Children's Center	Others: Unknown	FA SNA Family SNA Individual SNAP TANF 200%	Home Visiting

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

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

At the onset of contracting with employment service providers, MCDSS sets measurable outcomes for the service being procured. In some cases, the contract delivers a specific service -- i.e., employment assessment. Measures are set that align with that service i.e., client seen and assigned to appropriate activities. In other contracts, we are purchasing services that provide skills i.e. -- job readiness training. In those contracts, we work with the provider to develop measurable, realistic outcomes that will prepare participants for work. MCDSS reviews the performance of contracted providers to determine which have the best performance and seek to replicate those programs whenever possible. When TANF or SNAP E&T employment services outcomes are not being met, MCDSS will meet with program staff, explore opportunities to improve and will restructure the contracts, if necessary, to achieve the stated outcomes. We assign liaisons to work with the contracted employment program providers to identify gaps, implement solutions and best practices. MCDSS monitors program compliance and takes corrective action when necessary. Our current process consists of the following steps:

- A. Advise contractor verbally of corrective action needed
  - B. Develop a plan with contractor for required improvements
  - C. Follow up with formal timeline for improvement
  - D. Implement formal review process to measure improvement and expectations
- If improvement and expectations are unable to be achieved, MCDSS will act to restructure, or terminate the contract accordingly.

Monroe County has developed a process that involves the submission of a locally developed excel spreadsheet from the contractor. Contractor is responsible to provide all required info (Vendor Employee, Vendor, Claim date, Event, Name, Case Number, Case Type, CIN, percentage of payment, placement or retention payment and date of activity requesting payment for) on our locally developed spreadsheet that can be input into a locally developed application for verification and tracking. That information is verified by Self Sufficiency staff and Administration before sent on to Director for authorization of payment. Please see attached 2023 Employment subrecipient Monitoring Review Form for additional information (Attachment C).

### 1.3 OTDA Jobs Staff Agreement

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

**Services Provided by Jobs Staff**

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

**Jobs Staff Target Groups**

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

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

MCDSS does not currently have an OTDA Jobs Program Staff member.

### 1.4 Access to Services at New York State Career Centers

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

**Programs and Services Provided at Career Centers**

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

<b>Yes or No:</b>	<b>Programs and Services Provided:</b>
Yes	The district has contract staff physically present at a Career Center
Yes	The district makes available direct access to its program staff via phone or technology at a Career Center
Yes	The district makes available copies of the LDSS-2921 (Common Application) at a Career Center
Yes	Other (described here): At the co-located WIOA Career Center, applications are available to individuals that request one. This Center is located within a DSS building

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

Through our locally established WIOA referral process when a TANF individual requests services a referral is faxed to our designated liaison and a LDSS-2921 is directly mailed via USPS to the individual requesting the information. The District currently shares a location with one of our WIOA Career Center offices. At this joint location we collaborate on a job postings wall that lists community employment opportunities. The District advises TANF and SNAP eligible individuals of the services available through the Career Center including training assistance, available jobs, open opportunities for the computer lab, resume and job search services as well as other available programs through WIOA partners. The District holds seats on the WIOA Board as well as the Advisory Board and One Stop Partners Group to improve communication and availability of resources.

## 2. Orientation, Assessment and Employment Plan

### 2.1 Orientation (Reference 18 NYCRR 385.5)

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

#### District Orientation Procedures

<b>Yes or No:</b>	<b>District Orientation:</b>
No	The district provides orientation in accordance with 18 NYCRR 385.5 and no additional information is provided at orientation.
Yes	In addition to the requirements outlined in 18 NYCRR 385.5 of the regulations, the district's orientation provides the following: Monroe County DHS staff, as well as our contractors, provide information and literature during orientation about responsible fatherhood programs and services, free banking, credit and savings, bonding for convicted felons, nutrition programs, maintaining a healthy home (lead abatement, and asthma-prevention environment), community resources for cars, clothing, and food as they are available in our community

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

Exempt clients received required orientation during various contact points with agency and contracted staff such as CASAC assessment, RSSP Interview, or Disability Interview. Orientation is done individually within all these groups. The contracted assessment centers also provide clients with a comprehensive orientation, as do all our JRT and JS contracted providers. Orientation is given both verbally and in written form.

Non-exempt - For those clients that are scheduled an employment assessment with DHS staff or CFC the orientation is delivered one-on-one during the Employment Assessment. For those clients scheduled at one of the other assessment centers (Career Systems/Rochester Works), the orientation may be given in a group setting prior to the individual assessment or one-on-one during the Employment Assessment.

## 2.2 Temporary Assistance (TA) Employment Assessment

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

### District Assessment Procedures

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

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

The Assessment Centers all follow the same basic processes for TANF-eligible and Safety Net applicants or recipients

1. Clients participate in a group orientation and receive an overview of the Assessment process including all forms that are used for development of the Employability Plan as well as the required documentation. The forms include the Employability Development Plan Part A Questionnaire, Employability Development Plan Supplement, child Care Rights and Responsibility's, and Request for Supportive Services.

2. Clients then have an opportunity to independently fill out the EDP Part A, EDP Part A Supplement, and Request for Supportive Services if able before meeting with an Assessment specialist.
3. TANF eligible applicants fill out the Self-Directed Job Search. TANF, SN-MOE and SN Non-MOE applicants and recipients only TABE test on an as needed basis. An Assessment specialist meets individually with each client to discuss goals and barriers to meeting those goals, review of the required forms and the necessity of supportive services. During the plan development and goal review Assessment staff make a determination on a SN Non-MOE individual's basic skills proficiency based first on self-disclosure by the individual that there is an educational deficit and/or the educational background information provided and/or observation of the individual's ability to read and complete DHS required paperwork. They then develop an appropriate plan that can assist the individual in meeting their goals as well as meeting programmatic requirements.

The Assessment specialist enters the evaluation in WTWCMS and complete the optional sections on Educational Level, Veteran Status, Criminal Background, Job History, and Health Status.

4. Clients who are determined to be medically exempt are referred back to DHS for either development of a Restoration to Self Sufficiency Plan (RSSP) or an assessment with our Disability Assessment Review Team (DART) and a time frame is established to re-determine employability. A 4005 or 4005a-Notice of Employability Form is issued to apprise the individual of their employability status and advise them of their rights relative to a fair hearing.

Employability Assessments conducted by MCDSS examiners are all done in a one-on-one setting. Examiners provide individuals with an orientation and overview of their rights and responsibilities. Individuals receive an overview of the assessment process including all forms that are used during the assessment for development of the plan as well as required documentation. The forms include the Employability Development Plan Part A Questionnaire, Employability Development Plan Supplement, Child Care Rights and Responsibilities, and Request for Supportive Services. MCDSS examiners do not administer any testing Assessment specialists discuss goals and barriers to meeting those goals, review of the required forms and the necessity of supportive services. During the plan development and goal review Assessment staff make a determination on a SN Non-MOE individual's basic skills proficiency based first on self-disclosure by the individual that there is an educational deficit and/or the educational background information provided and/or observation of the individuals' ability to read and completed DHS required paperwork. They then develop an appropriate plan that an assist the individual in meeting their goals as well as meeting programmatic requirements.

The Assessment specialist enters the evaluation in WTWCMS and completes the optional section son Educational Level, Veteran Status, Criminal Background, Job History, and Health Status.

Individuals seen at the local district who are determined to be medically exempt, or work limited are referred as appropriate to develop a Restoration to Self Sufficiency Plan (RSSP) or an assessment with our Disability Assessment Review Team (DART) and a time frame is established to re-determine employability. A 4005 or 4005a Notice of



Employability form is issued to apprise the clients of their employability status and advise them of their rights.

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

Assessments are conducted by contractor staff as well as internal MCDSS staff within the Self-Sufficiency workgroup. They include:

- Career Systems Development
- Catholic Family Centers
- Rochester Works
- MCDSS-Self Sufficiency Unit

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

The minimum requirements necessary to perform assessments are the same qualifications as those of the MCDSS Examiner position. MCDSS and its contractors use designated trained staff or providers with demonstrated effectiveness in assessment and employability development to prepare the assessments and plans. Employment contractors are also required to participate in all appropriate security trainings developed and delivered by OTDA.

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

Yes

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

Yes

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

No

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

Assessments are updated at least every 6 months. They are also updated as individuals report changes to the agency regarding their employability. Updates may also be made to align with an individual's goals and adhere to regulations and requirements.

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

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

### District Employment Plan Procedures

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

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

### District Employment Plan Development

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

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

Assessment specialists and Examiners discuss goals and barriers to meeting those goals, review required forms and need for supportive services with the individuals during the assessment process for the completion of the participants employment plan. During the plan development and goal review Assessment staff and or Examiners decide on an individual's basic skills proficiency based on self-disclosure by the individual that there is an educational deficit and/or the educational background information provided and/or observation of the individual's ability to read and complete DHS required paperwork. Using this assessment, an appropriate plan is developed that will assist the individual in meeting his/her goals as well as meeting programmatic requirements, with linkage to appropriate community resources and supports. At creation and updates all participants are given a copy of the plan for their records.

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

Employment plans are updated during every new assessment. Plans are also updated as individuals report changes to the agency regarding their employability. Updates may also be made to align with an individual's goals and adhere to regulations and requirements. At creation and updates all participants are given a copy of the plan for their records.

### 3. Engagement

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

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

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

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

1. For the purposes of monitoring the progress of applicants/recipients mandated to SUD treatment, the district will utilize the Recovery Attendance System (RAS) to monitor individual treatment compliance and progress towards self -sufficiency. Individuals deemed able to work with no other exemption will be required to participate in employment activities in conjunction with treatment.

2. The Rapid Engagement Demonstration (RED) Team is a collaboration between DHS Temporary Assistance and Monroe County Office of Mental Health. The RED Team assists individuals with a history of a substance use disorder diagnosis to complete the eligibility process for Public Benefits and start the recovery process. Recipients of RED services must have a history of substance use disorder diagnosis and or serious mental health diagnosis; have 3 or more applications for public assistance, or 3 or more Emergency Housing placements in the past 12 months. Individuals must also be eligible for public assistance and be residents of Monroe County. The team meets with clients in the community where they live with a goal of engaging effectively with them. One of the goals of the RED team is for their clients to establish stable housing in the community. If it is determined that an individual is going to be permanently disabled, the RED team works to support the SSI application process.

3. MCDSS reviews medical documentation received to determine whether an individual's qualified healthcare provider has recommended some form of treatment or therapy to improve their ability to work. Once the disability review has been completed, a Restoration to Self Sufficiency Plan employment assessment is scheduled as appropriate and a RSSP developed with the participation of the individual. This RSSP treatment plan is reviewed and signed by the client and then monitored for compliance. RSSP plans are currently tracked by our local contractor in a robust Shareforce application to ensure updated medical information is provided at the appropriate interval and at MCDSS through our locally developed application and our Annex system for individuals that remain with the local district for RSSP. When clients have complied with the RSSP for a time frame and are still determined to be exempt a referral is made to the DART unit to begin the SSI application process. When individuals comply with the RSSP plan and are deemed able to work they are scheduled for an employment assessment and engaged in employment activities.

4. The Disability Assessment Review Team (DART) reviews medicals and related documentation for disability status, assists disabled applicants/recipients with online application for SSI/SSD and refers individuals to the Monroe County Law Department's SSI Advocacy Unit and attorneys to follow up the application and appeal process. When necessary, the SSI Advocacy Unit provides legal assistance with SSI appeals. DART follows the National SOAR model to increase access to SSI/SSDI benefits for people who are homeless or at risk of homelessness. The goal is to present comprehensive documentation of the disability so that the application is approved without need for a hearing or appeal.

5. Non-exempt adults who are work ready will be referred to one of our placement contracts to help them to become employed and self-sufficient. The district will utilize employment subsidies such as TEAP, Monroe County funded OJT, and tax credits to assist with job placement and incentivize employers.

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

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

Our Employment Assessment Group and our Employment Assessment contractors employ bi-lingual employees to assist with assessments for individuals with Limited English Proficiency.

Our contracted vendor for Applicant Job Search conducts weekly orientations in Spanish. Our District has also entered into a Memorandum of Understanding (MOU) with Catholic Charities Family and Community Services (CCFCS) for applicant Job Search for refugees outside of the 12-month arrival exemption, recognizing the challenges this population faces becoming self-sufficient. CCFCS has relationships with area employers to hire non-English speaking individuals.

Bilingual District staff compile and regularly update a list of employers who hire individuals with Limited English Proficiency. The list is shared with employable LEP clients at any contact.

The district contracts for interpreter services for all individuals with Limited English Proficiency. Interpreting services are provided in-person by Catholic Charities Family and Community Services (CCFCS) and through the electronic phone system (Proprio) for telephonic interpretation. Proprio also provides video conferencing for individuals who use American Sign Language.

### **3.3 Strategies/Procedures for Increasing Program Attendance**

- a. Described below are the district policies and/or procedures used to reduce the number of times participants fail to participate in work activities. This includes absences with good cause:

MCDSS continues to increase attendance and participation by:  
Reviewing the performance of contracted providers to identify the most successful aspects of the programs and implement those aspects in other programs as able to maximize everyone's chances of success.

Assigned liaisons to work with the contracted employment program providers to identify gaps, implement solutions and best practices.  
Utilize a team to monitor program compliance and explore ideas to enhance participation in the program.

MCDSS was selected to participate in a research study funded by ACS, to study behavioral interventions that lead to increased compliance with employment activities. Federal researchers with the BIAS Next Gen project have reviewed appointment letters and assessment/orientation materials from a behavioral science aspect to create changes that may result in increased compliance. Study launched in 2018 and ended November 2019. Results should be published Fall 2023 from this study. We hope to continue to implement successful interventions using what was learned in this study.

In an attempt to identify barriers and improve individuals experience, for those that have received 60 months of assistance, MCDSS is using the Mini Mental Health screening tool during timing out interviews on a voluntary basis.

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

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

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

Yes or No:	Strategies and Procedures for Engaging Sanctioned TA Participants
Yes	Described here are the strategies the district uses to attempt to engage sanctioned participants as soon as they are sanctioned: While monitoring COGNOS durational reports MCDSS will engage individuals that are sanctioned w/o a duration (at least monthly) to invite them to comply and engage in programming. At all client contact, agency staff will provide clear information about the sanctions, their consequences, and the steps required for compliance. Discussing opportunities for compliance to encourage recipients to re-engage in employment programming, maintaining open and respectful communication to address their concerns and questions. At recertification sanctioned individuals are scheduled for an employment assessment, attendance at this assessment will provide resources or programs that can assist them in meeting compliance requirements. If the individual does not attend the assessment or refuses an activity, they will remain sanctioned. We will continue small scale pilot options to foster and encourage engagement by collaborating with community organizations and support networks to provide additional assistance and resources.
Yes	Described below are the strategies the district uses to attempt to engage sanctioned participants when the durational period of the sanction is completed: We will carefully consider any barriers that individuals may face while attempting to assist with compliance. Our approach will be tailored to address these barriers, ensuring that we provide the necessary support and resources to help individuals overcome obstacles and achieve compliance successfully
Yes	Described below are the strategies the district uses to attempt to engage sanctioned participants during different times in the sanction period: We will continue to seek out opportunities that encourage individuals to participate and cure the sanction. Using monthly lists of sanctioned participants, we will reach out, by mail or phone, to sanctioned individuals, encouraging them

Yes or No:	Strategies and Procedures for Engaging Sanctioned TA Participants
	<p>to comply with employment requirements so that the sanction can be lifted. During these interactions we will explain the financial effects of the sanction as well as provide access to resources and supportive services to remove barriers participants face to participating in activities. If individuals would like to comply, we will conduct an Employment Assessment and assist with engagement in employment activities. Participants will also be encouraged to advise the agency if there has been a change in their employment status, resulting in the possibility they would be exempt from employment activities. In addition to periodic solicitations during the sanction period, we will encourage participation in employment activities during recertifications and other client contacts.</p>

### 3.5 Strategies for Reducing the Need for TA

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

Addressing the unique needs and circumstances of individuals is crucial when implementing strategies for the need for TA and one size fits all solutions may not be effective. Locally we have:

- Invested in education and training programs that equip individuals with the skills and qualifications needed for better job opportunities
- Provide job placement services, resume building, interview coaching, and networking opportunities to help individuals find stable employment
- Provide Childcare Support by offering affordable or subsidized childcare services to enable parents to work or attend job training programs or schooling
- Financial Empowerment Center-Financial Literacy Education to teach budgeting and financial management skills to help individuals make informed decisions and manage their finances more effectively
- Access to Healthcare-Ensure access to affordable healthcare, which can reduce medical-related financial burdens
- Mental Health and Counseling Services-to address mental health issues, addiction, or other barriers to employment through counseling and support programs
- Tax Credits-encourage work by educating on tax credits or incentives for low-income individuals and families
- Aftercare Program-Case Management-Provide personalized case management services to assess individual needs and connect them with appropriate resources, this would include long term planning, developing individualized plans with specific goals and milestone to encourage self-sufficiency over time
- Community partnerships -collaborate with local organizations, employers, and community resources to create a comprehensive support system
- Supportive Services-
- Background checks
- Assistance with legal issues in collaboration with community organizations
- Bonding for convicted felons through DOL
- Assistance with Child Support
- One time only assistance payments for: rent, energy, transportation, car insurance or repairs, tools, etc. to avoid ongoing assistance.
- Continually monitoring our caseload of disabled individuals for medical documentation that will support for an application and award for SSI/SSD.

## 4. Work Activities

### 4.1 Allowable Work Activities

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

#### Allowable Work Activities by Case Type

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

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



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

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

## 4.2 Job Development

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

Yes

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

### How the District Participates in Job Development Activities

Yes or No:	How the district participates in job development activities
Yes	<p>District staff contacts employers to solicit jobs for TA and/or SNAP participants. Describe how this is done, including number of staff, frequency of contact, etc.: Self Sufficiency Supervisory Staff members promote the hiring of Temporary Assistance clients through the use of the Transitional Employment Advancement Program (TEAP). MCDSS offers periodic job interviews with 60 - 75 TA recipients (concentrating on the Safety Net Singles) to fill vacant positions with companies who may participate with TEAP or OJT.</p> <p>Daily, job openings are received from area employers and reviewed by the Self Sufficiency staff for possible applicant matching. All jobs are posted in our waiting rooms, handed out at our front windows, given during recertification interviews or employment assessments for clients and applicants to review and submit applications to.</p> <p>To find additional employers, intranet searches of employment web sites, phone calls, cold calls, and mailings are made to employers in the area to explain the TEAP and OJT contracts along with information about Tax Incentives. Self Sufficiency staff also attend Job Fairs, as they arise to speak with employers and discuss the benefits of hiring a client currently on Public Assistance. Individuals that are eligible for TEAP or OJT are also given a TEAP brochure and OJT literature to use to advise potential employers that they are eligible for TEAP or OJT if they are hired.</p> <p>The Employment Coordinator receives notifications of job postings from various Monroe County vendors, we then try to match clients with these positions. MCDSS screens recipients for job skills matching current openings at an employer. MCDSS then schedules recipients to come to office and have a job interview here in the building. We assist with online application filing and interview preparation before the interview is conducted with the employer.</p> <p>MCDSS receives notifications of community job fairs and advises employable individuals to attend. MCDSS is able to have a sign in table at these events and are able to mentor individuals and offer support during the fair.</p>
Yes	<p>District contacts or has an agreement with another agency to contact employers and solicit jobs for TA and/or SNAP participants. Described here is how this is done, including number of staff, frequency of contacts, etc.:</p> <p>RochesterWorks, Inc. - There are 3 full-time staff dedicated to employer outreach on the RochesterWorks Business Services team. Outreach is done on a daily basis in a variety of ways such as through daily job posts on behalf of businesses, presentations</p>

Yes or No:	How the district participates in job development activities
	to business/industry associations and groups like the local Chamber of Commerce, Pro-ROC (Professional Recruiters of Rochester) and other networks; one-on-one meetings at employer worksites, virtually, over the phone or via email; virtual and in-person recruitment events; and periodic business newsletters. RochesterWorks also engages employers referred by our local county Economic Development Department as well as the Department of Labor, to promote and connect job seekers with hiring companies. In addition to free job posting, recruitment events, and promotion, RochesterWorks offers work-based training grants in the form of On-the-Job Training (partial wage subsidy) and Transitional Jobs (fully subsidized).

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

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

MCDSS completes a process for local area educational providers to apply to be approved for referrals. Providers submit information regarding their accreditation, staffing, and numbers served, outcome measures as well as attendance tracking and student performance policies. Programs that demonstrate reasonable performance measures and comply with attendance tracking will be considered. Programs must agree to gather and report attendance weekly to MCDSS on any of our clients in program.

- b. Described below is how the district identifies appropriate program providers of Vocational Education and Job Skills Training programs that are available to clients whose assessment indicates such services would be an appropriate work activity assignment. Please ensure to include the current providers the district partners with for the provision of Vocational Education and Job Skills Training in Table 1 or Table 2 under section 1.2 of this Plan.

MCDSS completes a process for local area Vocational education providers to apply to be approved for referrals. Providers submit information regarding their accreditation, staffing, numbers served, outcome measures including percentage of enrollees who complete program and percentage of graduates who obtain employment. They must also submit attendance tracking and student performance policies. Programs that demonstrate reasonable performance measures and comply with attendance tracking will be considered. Programs must agree to gather and report attendance weekly to MCDSS on any of our clients in program.

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

Clients who have not attained a HS credential or are in need of ESL or literacy education are offered the opportunity and are encouraged to engage in educational activities during the employment assessment.

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

Clients who read and perform math below a 9th grade level are encouraged to participate in educational activities. Clients performing above those levels are encouraged to participate in TASC or if they are not interested in TASC are informed of vocational education offerings, and/or job readiness and placement opportunities. Clients that have had multiple unsuccessful attempts at educational activities may not be re-referred after thoughtful and careful review of individual circumstances.

- e. Described below is the district's process and policy for determining whether a participant is approved/assigned to participate in job skills or vocational education activities.

A recipient who has completed an approved vocational training program in the past 2 years without obtaining employment will not be approved for further training unless administratively approved. A recipient seeking administrative approval should submit a written request to the Self Sufficiency Workgroup documenting why the program they recently completed did not result in employment and a reason why they feel additional training will result in employment. This will be forwarded for review to the Employment Coordinator.

A recipient who enrolls in a program that is unable to be an approved vocational training program will be ineligible for training related expenses. The recipient, depending on enrollment status in training, may be deferred from other required employment-related activities for the duration of the current session, at the discretion of the Employment Coordinator. When appropriate concurrent work activities will be assigned.

- f. Described below are the standards by which education and training providers are evaluated.
  1. Education providers must be licensed by the state of NY.
  2. Attendance is documented and reported weekly and accurately.
  3. Participants in TASC, ESL, and ABE achieve appropriate educational attainment milestones in a timeframe that is reasonable given the individuals abilities.
  4. Vocational training offered continues to be for in demand occupations in the local labor market.

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

Applicants and recipients are made aware of the possibility of training or education through the orientation and assessment process. Marketing materials for training providers are posted and available as handouts throughout the waiting rooms and interviewing areas. Copies of approved program listings will be available in the orientation area and are available for study at the client's request. Marketing materials and copies of the approved training lists are distributed to contracted assessment centers and community agencies that serve TANF and Safety Net recipients

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

Recipients and applicants will be notified verbally and in writing of their program assignment and the minimum standards for participation in that program. This notification will generally take place after the development of the Employability Plan.

Recipients and applicants will receive a Notice of Decision informing them of any supportive services that are approved to receive. All work activity enrollment, approval, required number of hours in program, and duration of approval will be detailed in the Employability Development Plan.

- i. Described below is how the district will monitor the high school attendance for 16-18 year-olds in order for them to retain their TA exempt status.

MCDSS requests school attendance at Intake, recertification, and review for each school age child. The district has an MOU with The Rochester City School District (the largest number of MCDSS youth attend RCSD) to provide attendance for high school students via a case specific request, this is centralized within Self-Sufficiency clerical staff. We will continue to request verification for students in suburban school districts manually. All teenage heads of household on their own case are referred for case management services to agencies such as the Center for Youth Services, Hillside, etc.

- j. Described below is the district's procedure for ensuring that an individual's health related limitations are accommodated when assigning the individual to a work activity.

The individual's medical and or psychological evaluation is reviewed, 4005/4005a sent to client, and considered when choosing a work activity and establishing the individual's Employment Plan. When the assignment is made to a work site the referral form documents the person's restrictions and is used to inform the site supervisor.

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

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

Up to a two-year college program, depending on course of study, will be approved as a work activity. Requests or approval of a four- year degree program will be reviewed on a case by case basis for administrative approval.

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

**Conditions For Disapproval of Work Activities For Individuals Enrolled in College**

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

**5. Work Requirements**

**5.1 Meeting TA Work Requirements**

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

1. Non-exempt individuals who apply for assistance in Monroe County are immediately referred to supervised job search activities during the application period. Applicants go through the complete employability assessment within 10 days of providing all required documentation to determine eligibility. The required number of contacts for SN single applicant is 10 per week and can be on line or in person. The required number for Applicants of TANF or SN-MOE is 10 may be any combination of on line and in person applications. The numbers are flexible depending upon individual circumstances, work experience and type of employment sought.

2. TANF and SN family assessments in some cases are a 2-day process including all testing and completion of the Employability Development Plan. The assignment to activity is made upon completion of the assessment and clients are given an activity start date usually within 7 days.
3. TANF and SN family recipients are assigned depending on individual circumstance to appropriate hours of activity for case participation which is determined on a case-by-case basis. The standard assignment of hours for a parent/caretaker of a child is up to 35 hours/week with Work Experience being limited to the hours determined by dividing the households TA grant plus SNAP allotment divided by the higher of the Federal or State minimum wage plus an additional activity as appropriate. SN-non-MOE recipients are assigned depending on individual circumstance to appropriate hours of activity for case participation which is determined on a case-by-case basis. The standard assignment of hours for this population is up to 35 hours/week with Work Experience being limited to the hours determined by dividing the households TA grant plus SNAP allotment divided by the higher of Federal or State minimum wage.
4. Assessments for SN recipients with no dependents are completed in one day and the individual is assigned to a work activity usually within 7 days depending upon the availability of openings.
5. Individuals in households without children are typically assigned to up to 35 hours per week of activity. Single individuals can participate in a combination of Core and non-Core activities. The number of hours of work experience depends on the size of their public assistance grant plus SNAP allotment divided by State minimum wage and the non-core activity depends on their skill level.
6. Monroe County provides information from the local day care referral agency to clients to facilitate obtaining day care in time to participate in activities and or to accept employment. Monroe County prioritizes daycare tasks to ensure timely approval for participation in required activities or to accept employment.
7. Monroe County promotes up front diversion at Intake. This includes training community advocates, vendors, staff, and clients on opportunities to divert applicants through supportive services, rent, heat and utility payments, and landlord negotiations as well as other community resources.
8. Clients in our St Paul Street waiting room are notified of open lab hours at the local WIOA American Jobs Center-Rochester Works by daily announcements over the intercom system as well as schedules made available in the waiting rooms and distributed throughout the community.
9. Contracted provider agencies have varying specialties which permit staff options for referral of individuals with barriers to employment such as, mental illness, chemical dependency, limited English proficiency or other basic skills. This allows the county to provide more employment opportunities for some work limited individuals.

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

**Number of Individuals Who Receive Employment Services**

Household Type	Number Served
Households with Dependent Children Average Monthly	2,000
Households without Dependent Children Average Monthly	3,200

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

MCDSS internal task-based management computer system, Annex, allows agency staff to advise Self Sufficiency Staff when clients need employment related action, this includes the need for assessments, enrollment in an activity, enrollment changes, are not participating, are under-enrolled, under-employed, need reassignment to a new activity, or need a code change. MCDSS Self Sufficiency Unit also utilize current Employment Reports in COGNOS to identify clients who: are not participating, are under-enrolled, under-employed, need reassignment to a new activity, or need a code change. For those purposes the following reports are reviewed at least monthly by supervisors and the work on those cases is distributed to the task group that generates appointments, code changes, and conciliations:

Activity Status of Adults

- Adults in Work Experience
- Job Search/Readiness > 6 weeks
- Adults in Vocational Education 9 Months or More
- Adults in Sanction Status/Process
- Exempted Caretaker of Child < 1 Exceeding 12 Month Limit
- Adults with No Activity Status > 3 Months

MCDSS Self Sufficiency Unit utilizes the Adults with Earned Income Reports to ensure that ABEL budgeting and WTWCMS schedules accurate. The following reports are cross-referenced:

- Adults with Current Employment Schedule
- Adults with Budgeted Earned Income and Current Employment Schedule
- Adults with Budgeted Income and No Current Employment Schedule
- Adults with No Budgeted Income and Current Employment Schedule

MCDSS also utilizes the COGNOS monthly detail reports for SN Non-MOE, TANF, and SN MOE to identify and analyze which individuals are engaged but not counting in order to engage them fully if possible and increase participation.

MCDSS Self Sufficiency Unit looks at the WTWCMS listing reports No Sanctions Imposed, and Client No Shows to impose and keep track of non-compliance actions. The report Schedules without hours is used to ensure that attendance and non-attendance is being entered timely.



The RAS system generates reports that are used to track drug and alcohol rehabilitation completions to then refer to additional employment activities and change employment coding.

The RAS system generates reports that are used to track drug and alcohol rehabilitation discharges to ensure appropriate action is taken on participation.

Reports are pulled from the RSSP database to initiate disability reviews and engage formerly exempt individuals in employment activities or refer to SSI if appropriate. SSI application status is tracked in the local DART database.

d. Does the district assign TA applicants to Job Search?

Yes

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

**Applicant Job Search**

<b>Applicant Job Search</b>	<b>Min. Contacts</b>	<b>Min. Hours</b>	<b>Additional Information</b>
TANF and SNA MOE	10	20	TA applicants are assigned to job search activities for up to four (4) weeks (if needed). Contracted job search providers meet weekly with job search participants for case management to discuss progress with the clients, assist with referrals and guidance and to review reasonableness and completeness of the job search attestation log. Applicants in a full-time job search are expected to spend up to 30 hours per week working on job search activities including: looking for job openings, sending out resumes, filling out applications, going on interviews, etc. Applicants enrolled in Job Search are expected to make at least 10 (SN) 10 (TANF) job search contacts per week of which an appropriate number of on-line applications will be accepted. The minimum required number of hours per week is 20 and the number of contacts may vary depending upon the time the clients attest that they have actually spent on each individual job search contact on their log.
SNA Individuals	10	20	TA applicants are assigned to job search activities for up to four (4) weeks (if needed). Contracted job search providers meet weekly with job search participants for case management to discuss progress with the clients, assist with referrals and guidance and to review reasonableness and completeness of the job search attestation log. Applicants in a full-time job search are expected to spend 30 hours per week working on job search activities including: looking for job openings, sending out resumes, filling out applications, going on interviews, etc. Applicants enrolled in Job Search are expected to make at least 10 (SN) 10 (TANF) job search contacts per week of which an appropriate number of on-line applications will be accepted.

<b>Applicant Job Search</b>	<b>Min. Contacts</b>	<b>Min. Hours</b>	<b>Additional Information</b>
			The minimum required number of hours per week is 20 and the number of contacts may vary depending upon the time the clients attest that they have actually spent on each individual job search contact on their log.

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

Yes

**TA Recipient Job Search**

<b>Recipient Job Search</b>	<b>Min. Contacts</b>	<b>Min. Hours</b>	<b>Additional Information</b>
TANF and SNA MOE	10	20	TA/SNAP recipients are assigned to job search for up to four (4) weeks (if needed) at a time with a limit of twelve weeks in a year in addition to the core work activity. Contracted job search providers meet weekly with job search participants for case management to discuss progress with the clients, assist with referrals and guidance and to review reasonableness and completeness of the job search attestation log. Recipients in a full-time job search are expected to spend 30 hours per week working on job search activities including: looking for job openings, sending out resumes, filling out applications, going on interviews, etc. Recipients enrolled in Job Search are expected to make at least 10 (SN) 10 (TANF) job search contacts per week for up to four (4) weeks of which an appropriate number of on-line applications will be accepted for up to four weeks (if needed). The minimum required number of hours per week is 20 and the number of contacts may vary depending upon the time the clients attest that they have spent on each individual job search contact on their log.
SNA Individuals	10	20	TA/SNAP recipients are assigned to job search for up to four (4) weeks (if needed) at a time with a limit of twelve weeks in a year in addition to the core work activity. Contracted job search providers meet weekly with job search participants for case management to discuss progress with the clients, assist with referrals and guidance and to review reasonableness and completeness of the job search attestation log. Recipients in a full-time job search are expected to spend 30 hours per week working on job search activities including: looking for job openings, sending out resumes, filling out applications, going on interviews, etc. Applicants enrolled in Job Search are expected to make at least 10 (SN) 10 (TANF) job search contacts per week of which an appropriate number of on-line applications will be accepted. The minimum required number of hours per week is 20 and the number of contacts may

<b>Recipient Job Search</b>	<b>Min. Contacts</b>	<b>Min. Hours</b>	<b>Additional Information</b>
			vary depending upon the time the clients attest that they have spent on each individual job search contact on their log.

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

An individual that is self-employed and who receives less than the hourly minimum wage in payment will be required to participate in an appropriate number of hours of activity each week, not including the hours of provision of self-employment. MCDSS will allow two months to all self-employed individuals to increase their business income, additional time may be permitted as determined by the district based on case circumstances. A recipient who provides unregistered childcare is encouraged to register through the Child Care Council to become a legally exempt childcare provider in order to receive payment from the agency and a higher rate of payment. MCDSS will budget this childcare income as appropriate.

## 5.2 Informing SNAP Applicants and Recipients of Work Requirements

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

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

### Written Information Provided to SNAP Applicants and Recipients

<b>Yes or No:</b>	<b>How written information is provided to SNAP applicants and recipients</b>
No	Eligibility staff use the LDSS-5193 <i>Important Information about SNAP Work Rules (General, Mandatory E&amp;T, and ABAWD)</i> and the LDSS-5193A <i>Important Information about SNAP Work Rules (General and Mandatory E&amp;T)</i> as appropriate.
Yes	Eligibility staff use a local equivalent consolidated work requirements notice to inform SNAP applicant and recipient households of their work requirements. Please attach a copy of the district's OTDA approved local equivalent.

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

Monroe County will conduct the comprehensive oral explanation as appropriate with SNAP households via phone and in person as able and appropriate.

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

**How the District Documents the Written Requirement in the Case Record**

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

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

**How the District Documents the Oral Requirement in the Case Record**

<b>Yes or No:</b>	<b>How oral information is provided to SNAP applicants and recipients</b>
No	Eligibility staff complete the LDSS-4826C and retain a copy in the case record.
Yes	Eligibility staff use a locally developed oral explanation tool and retain a copy in the case record.
Yes	Eligibility staff document the case record through case notes/comments.

**5.3 Meeting SNAP Work Requirements**

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

MCDSS does not currently require NTA SNAP recipients to participate in SNAP E&T work activities.

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

N/A

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

MCDSS will send all Non-TA-SNAP non-exempt work registrants the MCDSS Voluntary Employment/Training Opportunities literature at case opening, recertification, or per client request. Non-exempt SNAP work registrants may also request referral to Career Systems Employability Job Readiness Training and Job Search Program. This program consists of, but is not limited to, 5 days of job readiness and up to 15 weeks of supervised job search

activities If a referral to this program is requested, MCDSS will hand deliver or send via USPS a referral for the next available start date for the Career Systems Employability Job Readiness Training and Job Search Program.

## 5.4 Advising Households of Employment and Training Services

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

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

### Who the District Provides Employment and Training Services Information to

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

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

### How the District Provides Employment and Training Services Information

Yes or No:	How the district provides employment and training services information
Yes	Materials and information provided in print form
Yes	Materials and information provided on a website. Described here is how individuals are made aware the information is available on the website: At every request for available employment and training opportunities MCDHS mails out a pamphlet of available resources and linkage to website for in-depth inquires.
No	Material and information provided via email.

## 5.5 Provider Determinations

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

The district and its contractors discuss local activities that are available to assist an individual in meeting his/her goals. At this meeting the decision is made between the Assessor and the individual what activity seems appropriate to the person's success. The Assessor will review the Providers requirements and ensure the individual is aware of requirements and all providers requirements are met. Once a provider determination is determined to be accurate agency will schedule an assessment with the individual, re-review goals and ways to achieve those goals using updated skills learned (if applicable) and this experience to engage with a different program that will still assist with the individual's goal attainment.

- b. Described below is the district process for informing providers of their authority and responsibility to determine if an individual is not a good fit for a particular activity or program.

Depending on the activity a provider could be a contracted provider, a provider that would enter into a memorandum of understanding or other. Contracted providers and those entering into MOU's will have the information spelled out in their documentation. Other providers will receive this information either in an in-person orientation or via phone or email of the requirements of being a provider site. Providers are given access to phone/emails/computer systems to communicate with us regarding provider determinations, verification on information and attendance reporting.

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

Agency staff as well as contractors will conduct at least annually scheduled and unscheduled visits. During these visits we will review documentation from provider to ensure a well-documented participation history including any issues/concerns. During these visits we will also talk to participants regarding successes, challenges to ensure accuracy of information being received. We will include this qualitative information during our review of any provider determinations that may occur.

## 6. Quality Assurance/Work Verification

### 6.1 Quality Assurance Process - Random Case Sampling

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

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

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

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

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

- Ensure that documentation of wages and actual hours of employment is verified and accurately projected/reported and present in the case file, is actual and is projected correctly;
- Ensure that the documentation for actual hours, supervision/attendance, excused absences, and holidays in other activities is present in the case file;
- Assess whether participation in the work activities reported for work eligible individuals meets the approved federal definition for the activity;
- Assess that the data entered into either WTWCMS, the Self-Sufficiency, Employment, Assessment and Management System (SEAMS) or other automated systems used for reporting work activities is accurate, including actual hours, excused absences and holidays; and is based on documentation in the case record; and

- Ensure that documentation necessary to determine an individual to be exempt due to being the parent caretaker of a disabled household member (TA Employability Code 38 or 48), and/or parent or caretaker relative of a child in the household under 12 months of age, (TA Employability Code 31), is present in the case file and that individuals meet the exempt status based on the required documentation.
- a. Below is the number of random sample cases of participation in paid work activities the district will review semi-annually. Refer to the Instruction Guide for the minimum number of cases per district and guidance regarding review requirements.

24

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

24

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

12

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

12

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

## 6.2 Use of Outside Providers/Vendors

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

Yes

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

Yes



c. If No, describe below the process used:

N/A

## **7. Supportive Services**

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

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

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

1. Monroe County has a Memorandum of understanding with Dress for Success to provide clothing. The agreement states The DFS will furnish clients with up to 3 appropriate outfits for job interview attire or for clients to begin or maintain employment. Under the MOU Dress for Success will also conduct one on one consultations and monthly dressing for success, grooming and appearance workshops.
2. MCDSS will provide participants with a Clothing Allowance in the amount of \$150 when needed to secure or maintain employment or when essential for other assigned employment activities.
3. The district will assist participants in need of supplies and or books with a maximum allowance of \$500 when those items are necessary to secure or maintain employment or for other assigned employment activities such as training.
4. MCDSS will assist participants in need of licensing or testing fees that are job specific and are necessary to secure or retain employment. The district will authorize a maximum allowance of \$300 for this purpose.
5. MCDSS will provide participants with a maximum allowance of \$500 for the purchase of tools necessary to obtain, maintain, or resume employment.
6. MCDSS will provide participants with an allowance of \$56 for transportation for the purchase bus pass necessary to obtain, maintain, or resume employment. Transportation allowances for participants who own their own vehicle will vary based on mileage to the approved activity.
7. MCDSS will provide participants with a maximum allowance of \$500 for car insurance/car repairs for the purchase of automobile insurance.

This list is not meant to be exhaustive of all available support services. MCDSS will review requests for supportive services and evaluate each request on a case-by-case basis to best address the needs of the client to be able to participate in assigned activities and to start or maintain employment. Any requests made over the maximum allowances will be reviewed by the Employment Coordinator for appropriateness. Requests for funds over the stated amounts will be reviewed on a case by case basis taking into account current inflation, average costs of these items/services in the area and will issue appropriate funding to current local expense amounts.

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

**Transportation Services Provided to Clients**

<b>Yes or No:</b>	<b>Transportation Assistance Provided</b>
Yes	Bus pass/token
No	Gas card/voucher
Yes	Mileage reimbursement at the IRS Business rate (effective 1/1/2023 is 65 cents per mile)
No	Mile reimbursement at the IRS Medical/Moving rate (effective 1/1/2023 is 22 cents per mile)
Yes	Other mileage rate (the methodology used to establish reimbursement rate is described here): Monroe County has a robust public transportation system and other transportation resources with many residences on or near public transportation. There are a limited number of Monroe County Temporary Assistance recipients with documented transportation hardships

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

In accordance with OTDA policy, MCDSS has established the maximum distance a non-exempt individual would be required to walk to participate in a work activity assignment or to access public transportation is up to one mile. Individuals with disabilities will be accommodated. Monroe County has a robust public transportation system and resources and residences on or near public transportation. There are a limited number of Monroe County Temporary Assistance recipients with documented transportation hardships that prevent active participation. Persons claiming these hardships will be counseled and offered available transportation and relocation services. It is the district's expectation that these individuals will make themselves available for employment programs.

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

1. Transportation (bus pass, gas allowance)
2. Vehicle repair
3. Clothing/Uniforms
4. Tools
5. Licensing fees-driver/skilled trade
6. Applicant Job search program
7. One time rent payment
8. Heat and Utility payments
9. Assistance with certificates of relief
10. Payment for background checks

This list is not meant to be exhaustive of all available support services. MCDSS will review requests for supportive services and evaluate each request on a case-by-case basis to best address the needs of the client to be able to participate in assigned activities and to start or maintain employment. Any requests made over the maximum allowances will be reviewed by the Employment Coordinator for appropriateness.

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

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

MCDSS has built paid performance incentives for retention into all job placement and job development contracts to encourage placement contractors to provide case management and additional retention services including financial literacy, CASH services, etc. MCDSS works closely with Child Support Enforcement to help our families get the support in place to help transition from welfare to self-sufficiency. MCDSS utilizes all wage subsidies to encourage employers to work with participants to achieve better outcomes. The Self Sufficiency Workgroup is equipped to intervene if an employee is struggling before the client is terminated.

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

MCDSS will determine eligibility for diversion payments during the 90-day period after case closing due to employment. If eligible, payments will be issued to prevent loss of employment or return to Temporary Assistance. MCDSS has also contracted for an aftercare program "Paths to Empowerment" case management program where individuals closed for excess income can avail themselves of transitional support and resources for up to 6 months after case closure. These services include, but are not limited to, budgeting, financial literacy education, transportation assistance, rental assistance, life skills education.

### 7.3 Extended Support Services

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

The district will provide transitional childcare for at least 12 months for eligible households.

## 8. Conciliation, Sanction and Dispute Resolution Procedures

### 8.1 Conciliation

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

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

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

The districts process for conduction TA conciliations is described below:

MCDSS Examiners in Self Sufficiency will send client a letter developed using human behavioral research methods to encourage compliance along with Conciliation Notice (LDSS-4230). Clients will be given 10 days to respond to the conciliation in one of the 3 methods above and the response is reviewed initially within a small, specialized group of Examiners in the Self Sufficiency Workgroup and conferenced with an even smaller group of Seniors and Supervisors.

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

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

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

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

**How the District Conducts Conciliation for SNAP Applicants and Recipients**

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

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

MCDSS Examiners in Self Sufficiency will send client a letter developed using human behavioral research methods to encourage compliance along with Conciliation Notice (LDSS-4230). Clients respond to the conciliation in one of the 3 methods above and the response is reviewed initially within a small, specialized group of Examiners in the Self Sufficiency Workgroup and conferenced with an even smaller group of Seniors and Supervisors.

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

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

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

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

MCDSS Conciliation Team will send client a letter developed using human behavioral research methods to encourage compliance along with Conciliation Notice (LDSS-4230) selecting option 3, giving the opportunity to avoid the SNAP sanction. The LDSS-4230 along with a Job Search worksheet will be mailed via USPS to client advising of opportunity to avoid SNAP sanction by doing a valid Job Search of up to 2 job searches per day and submit with conciliation response within 10 calendar days.

## 8.2 Sanction

- a. Described below is the district's procedure for determining compliance for those TA recipients who wish to end their employment sanction (18 NYCRR 385.12, 385.13), including the time period established for demonstrating compliance to the satisfaction of the district:

Individuals are determined to be in compliance on the day that they participate in a rescheduled work activity. Individuals who are sanctioned for failure to participate in an assessment must complete the rescheduled assessment process. Individuals who become employed will be reviewed for compliance and to have sanctions lifted. Benefits are restored retroactive to the date the individual indicated a willingness to comply but, not before the end of the durational sanction period. If an individual is determined after the fact to have been exempt at the time of the incident, the sanction will be removed, and benefits restored retroactive to the date of sanction.

- b. Describe below the district's procedure for determining compliance for those SNAP recipients who wish to end their employment sanction (18 NYCRR 385.12, 18 NYCRR 385.13), including the time period established for demonstrating compliance to the satisfaction of the district:

Recipients must request to be added back to the case after the minimum duration has ended and comply with rescheduled work requirements as required by Federal and State regulation. Benefits are restored retroactive to the date the individual indicated a willingness to comply but, not before the end of the durational sanction period. Individuals are determined to be in compliance on the day that they participate in a rescheduled work activity. Those who document an exemption may have their SNAP sanction lifted before the end of the durational sanction period.

## 8.3 Dispute Resolution

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

### Grievance Mediation

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

## 9. Disability Determinations, Documentation and Requirements of Exempt Individuals

### 9.1 Disability Determination Process and Tools

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

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

Yes or No:	How the district determines an individual's disabilities and/or work limitation
Yes	District participates in the OTDA managed contract for independent medical evaluations.
No	District contracts directly with a physician to provide independent medical evaluations.
Yes	District accepts physician's statement provided by participant.
Yes	District accepts physician's statement provided by participant but refers for an independent evaluation when deemed necessary.
Yes	Other process: Self Sufficiency staff, temporary assistance examiner staff, or contracted assessment staff may review medical documentation and make determinations on whether individuals are exempt, nonexempt, or work-limited and complete the LDSS-4005 (Notice of Disability Determination) accordingly. In situations where the individuals have previously been coded exempt and are being re-evaluated, the medical statements and determinations will be handled by the designated Self Sufficiency Examiner staff. In situations that are complex or an individual is contesting the determination, MCDSS may request additional testing or evaluations from IMA or from another appropriate community resource to make a determination.

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

Self Sufficiency staff, temporary assistance examiner staff, or contracted assessment staff may review medical documentation and make determinations on whether individuals are exempt, nonexempt, or work-limited and complete the LDSS-4005 (Notice of Disability Determination) accordingly. In situations where the individuals have previously been coded exempt and are being re-evaluated, the medical statements and determinations will be handled by the designated Self Sufficiency Examiner staff.  
In situations that are complex or an individual is contesting the determination, MCDSS may request additional testing or evaluations from IMA or from another appropriate community resource to make a determination.

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

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

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

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

**Process for Reviewing Medical Documentation**

Yes or No:	District’s process for reviewing medical documentation
Yes	District directs the contracted physician or individual’s physician to determine status.
No	District review team reviews and determines status (described here):
Yes	Specialized disability/medical staff or unit reviews and determines status (described here):
Yes	Other process: Self Sufficiency staff, temporary assistance examiner staff, or contracted assessment staff may review medical documentation and make determinations on whether individuals are exempt, nonexempt, or work-limited and complete the LDSS-4005 (Notice of Disability Determination) accordingly. In situations where the individuals have previously been coded exempt and are being re-evaluated, the medical statements and determinations will be handled by the designated Self Sufficiency Examiner staff. In situations that are complex or an individual is contesting the determination, MCDSS may request additional testing or evaluations from IMA or from another appropriate community resource to make a determination.

**9.2 Mental Health Screening and Assessment**

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

Yes

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

We are offering screening to participants during the Timing Out Interview and Safety Net application process.



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

**Screening Tools the District Uses**

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

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

MCDSS will refer for a mental health evaluation as well as a Health Home Care Management referral for any individual scoring 9 or above.

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

If an individual scores 9 or above the LDSS, working with the local Office of Mental Health, will refer the individual for a mental health evaluation at an available community provider. Compliance and treatment recommendations will be reviewed by Self Sufficiency staff and appropriate referrals will be made.

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

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

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

1. MCDSS requests that individual provides documentation from their own practitioner as specified in 18 NYCRR 385.2 within the allowable time frames. MCDSS contracts with Industrial Medicine Associates via the NY State contract to provide medical evaluations, psychological evaluations, and IQ testing for individuals to determine if they have the potential to be restored to self-sufficiency.

2. Currently the determination of exemption, and/or restoration to self-sufficiency is made by the Disability Assessment Review Team, the TA Supervisors and Sr. Examiners, or the Employment Unit staff with consultation from medical or mental health professionals who are involved with the individual.

3. MCDSS has dedicated staff on the D.A.R.T. team whose function is to review medicals, communicate with clients, the TA workers, Employment workers, medical professionals involved in the case. They make the disability determinations and develop plans to restore individuals to employability when appropriate or assist with the filing of the SSI application.

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

Restoration to Self Sufficiency Plan (RSSP)-

MCDSS staff dedicated to the disability review process review medical evaluations to determine whether to work with clients to restore them to employability or to assist them in obtaining SSI. Whenever necessary the staff will seek input from: the TA workers, Employment workers, medical professionals or any case managers involved in the cases to gain a better understanding of the individual's situations. RSSP, our contracted staff of RSSP Facilitators or Self Sufficiency examiner staff will develop plans together with the clients. Plans may include such activities as: participation in any treatment programs recommended in their medical evaluations, physical or mental health therapy, and Vocational rehabilitation activities, working with case-managers, and/or participating in regular group meetings. As well as offer referrals to local Health Home Care Management. As the individual progresses through the RSSP process the plan is revised and the work activity requirements increase, as appropriate after LDSS 4005 is mailed. Once an individual is determined to be able to work or becomes work limited the RSSP Facilitators refer client back to Self Sufficiency Unit for an Employment Assessment and enrollment in appropriate work activities.

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

Treatment such as physical therapy or mental health is tracked regularly by dedicated RSSP-Facilitators through a current system in place at the contracted site. Treatment such as physical therapy or mental health is tracked monthly by our RSSP Team and direct data entered into the WTWCMS system by our NYSID data entry contractors. Clients with active cases on the case-management teams, RED, or Transitional Housing are monitored by their case-managers.

## **10. District Certification**

### **10.1 Certification**

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

1/10/2024  
Thalia Wright  
Commissioner