

Orleans 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.)

Both the Orleans County DSS and Orleans County Job Development organizational charts are uploaded.

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

The Orleans County Department of Social Services has a long-standing contractual relationship with Orleans County Job Development in providing employment services to Temporary Assistance and SNAP individuals. Over the years and continuing today, the two Departments have worked very closely together to develop policy, train staff, and implement changes as quickly as possible to address ever-changing challenges and opportunities. Both Departments are located in the County Administrative Building. This promotes easy access for applicants/recipients and the ability to collaborate at both the administrative and operational levels. Another positive to note is the ability to refer TA applicants at intake to Job Development. The Welfare-To-Work (aka "Hire") contract is a calendar year contract and delineates each Department's responsibilities. It incorporates all the funding for the district's employment programs in compliance with State directives. Included in the contract responsibilities are client-focused activities such as: employment orientations, employment readiness activities, assessment, and employment plan development. In addition, the contract defines responsibilities to develop and implement a broad range of work activity options, to enroll sufficient clients in work activities to meet participation rates, and to conduct data collection activities in sufficient depth to meet State and Federal reporting requirements.

Orleans County Job Development Staff (Employment & Training Counselors, Employment & Training Coordinator) complete Orientation, Assessments, and monitor job searches, work related activities, job readiness training, treatment progress etc. Department of Social Service (Social Welfare Examiner and Principal of Public Assistance) determine employability.

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
Orleans County Job Development	\$435,970	FFFS, SNAP E&T, Local	FA SNA Family SNA Individual SNAP	Orientation, Assessment, Employment Plan, Work Activities, Access to laptops/Wi-Fi if needed.

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

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

Agencies and Providers to whom the District Refers for Employment Services

Provider	Funding Source(s)	Categories of Clients Served	Programs, Services or Activities Provided
Industrial Medical Associates (IMA)	Local	FA SNA Family SNA Individual	Exemption of clients from work requirements, and/or referrals for Social Security Administration disability determinations, and/or Medicaid Aid to Disabled Determinations.
Orleans/Niagara BOCES	Others: NYSED, Title II, EPE, Venture	FA SNA Family SNA Individual SNAP TANF 200%	Job Readiness Training, Literacy/ESL, HSE, TABE-testing, Customer Service & Other Certifications, Job Search.
GLOW Workforce Development Area	Others: WIOA, Trade Act, Orleans County	FA SNA Family SNA Individual SNAP TANF 200%	Employment and Training Services, such as Individual Training Accounts (ITAs), Work Experience (Work "Tryouts"), On-the-Job trainings (OJTs), Job Shadowing, Supportive Services, and other resources, are available for job ready participants pending funding availability and client eligibility.
Albion Career Center (aka NYS DOL-Albion)	Others: Wagner-Peyser	FA SNA Family SNA Individual SNAP	Veteran services, virtual workshops and career services, labor market information, job openings and referrals.
ACCES-VR	Others: NYSED, Title IV	FA SNA Family SNA Individual SNAP	Helps individuals with a permanent disability who want to obtain employment.
Core (formerly Literacy Genesee/Orleans)	Others: NYSED, Title II	FA SNA Family SNA Individual SNAP	Literacy/ESL, HSE.
Associates for Training & Development (A4TD)	Other: SCSEP	FA SNA Family SNA Individual SNAP	Assists individuals 55 years of age or older in obtaining employment.
Rochester Regional Transit Service (RTS) Orleans	Other: OTDA	FA SNA Family TANF 200%	Bus Transportation.
Iroquois Job Corps	Other: WIOA	FA SNA Family SNA Individual SNAP	Education offered concurrently with workforce preparation for eligible youth ages 16 to 24.

Provider	Funding Source(s)	Categories of Clients Served	Programs, Services or Activities Provided
Orleans Digital Literacy Initiative	Other: Private Foundation	FA SNA Family SNA Individual SNAP TANF 200%	Digital Literacy mentoring and assistance.
Genesee Community College	Others: NYSED, SUNY, WIOA, Trade Act, Others	FA SNA Family SNA Individual SNAP TANF 200%	Post-Secondary Education & Training.
Community Action of Orleans & Genesee	Others: USD HHS	FA SNA Family SNAP TANF 200%	Home Visiting Services through Early Head Start.
Pinnacle Community Services/ Healthy Families	Others: OCFS - Healthy Families NY	FA SNA Family SNAP TANF 200%	Home Visiting Services.

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

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

The District follows all Orleans County fiscal processes, procedures, and cost allocation methodologies to ensure proper monitoring and oversight.

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)

Yes or No:	Services Provided:
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).

N/A

1.4 Access to Services at New York State Career Centers

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

Programs and Services Provided at Career Centers

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

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

As an Affiliate Site in the GLOW Workforce Development Area (due to co-location of TANF & WIOA), officially the "Orleans County Career Center," Job Development is uniquely positioned to provide referrals for WIOA-funded services and other Career Center partners as WIOA staff are co-located in Job Development, and strong relationships have long been established with DOL and other agency counterparts within the One-Stop System. In accordance with the MOUs in place along with the approved GLOW Local Plan, Job Development works closely to improve upon service delivery within the system on behalf of the local district. Currently, Orleans County Job Development works closely with Career Center partners by appropriately referring participants for services, as identified through the assessment process, and using the NYS DOL Referral Form, when appropriate. With appropriate client release, his/her Assessment and Individual Employment Plan is shared. Job Development staff advise individuals of the services available throughout the One-Stop System such as training assistance, available jobs and job referrals, virtual workshops and job fairs hosted by DOL, and potential education or training when available through WIOA or other resources. When appropriate, clients may be referred to ACCES-VR, the Commission for the Blind, or other agencies that offer assistance specific to the client's needs. In addition, staff regularly refer clients to our Title II partners, particularly Orleans/Niagara BOCES which provides scheduled Job Readiness Trainings and individualized assistance with resume development, interview skills, customer service certification, HSE achievement, job placement and other employment- and education-related skills. We make every effort to partner with community-based organizations, e.g., our strong relationship with Community Action of Orleans and Genesee which offers CSBG-funded employment and training opportunities for our clients, and to not only build upon existing partnerships but to identify new resources that will help us to better serve clients. The Orleans County JDA Director actively participates in all GLOW Workforce Development Area committee and board meetings as well as attending the regional Business Services meetings, whenever possible. The Director has also participated on work teams related to the Finger Lakes Regional Economic Development Council (REDC).

2. Orientation, Assessment and Employment Plan

2.1 Orientation (Reference 18 NYCRR 385.5)

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

District Orientation Procedures

Yes or No:	District Orientation:
Yes	The district provides orientation in accordance with 18 NYCRR 385.5 and no additional information is provided at orientation.
No	In addition to the requirements outlined in 18 NYCRR 385.5 of the regulations, the district's orientation provides the following:

- 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:

All applicants (exempt and non-exempt) are scheduled to participate in a one-on-one orientation with Job Development staff. Most times, the 1:1 appointment is in conjunction with the completion of the Assessment. Information is verbally provided to the individual. Job Development staff also explain the job search requirements. Orientations are done by phone or in person, as appropriate. We now also offer an online version of orientation that clients can access or reference, as needed and able. Clients are notified by phone, email, document provided with QR code and/or mail orientation material, as appropriate.

2.2 Temporary Assistance (TA) Employment Assessment

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

District Assessment Procedures

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

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

An assessment is completed within 90 days from when recipients are determined to be eligible for TA, including 16- and 17-year-olds not in school. Usually, the assessment is completed within 30-45 days upon case opening and is updated on an on-going basis. Also, non-exempt households without dependent children receive assessments within a year following their application. Normally, this is also completed within 30-45 days. Based on the assessment, an Employability Plan is developed on WTCMS in consultation with the recipient(s) to lead them to economic independence, and it is updated on an on-going basis when addressing the needs of families with multiple and significant barriers. Appropriate referrals are made, e.g., to ACCES-VR, veteran services, and various literacy programs. Based on the assessment, DSS will refer recipients to GCASA, Mental Health, and IMA if deemed necessary.

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

Orleans County Job Development

- 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 Employment & Training Counselors will have at least a 2-year college degree or the equivalent in work experience in a related field with similar duties of Job Development, DOL, or Social Welfare Examiner, as approved by Orleans County Civil Service.

- 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 annually at a minimum or as needed if precipitated by changes, such as medical issues, family circumstances, childcare, household composition, becoming non-exempt when previously exempt, becoming exempt when previously non-exempt, or a need for supportive services has become evident.

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:

In conjunction with completion of an individual's assessment, the employment plan is developed with client input on short- and long-term goals to gain self-sufficiency and inputted into WTWCMS by the Counselor during the interview process. Clients are provided copies of their employment plan.

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

Plans are updated as needed at the Counselor's discretion and with client input if precipitated by changes, such as medical issues, family circumstances, childcare, household composition, becoming non-exempt when previously exempt, becoming exempt when previously non-exempt, or a need for supportive services has become evident. Also, employment plans are updated upon completion of an assignment, and the client is provided a copy.

3. Engagement

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

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

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

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

N/A

3.2 Strategies/Procedures for Accommodating Individuals with Limited English Proficiency

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

Job Development staff has access to the Language Line. They have also received training on accommodating non-English speaking participants, including how to utilize Language Line. A shared spreadsheet with DSS staff is utilized to track usage. In addition, there are local providers who teach ESL who can sometimes assist during client interviews, as needed and with client approval (e.g., Orleans/Niagara BOCES). Participants are also informed that they may bring their own interpreter, if that's more comfortable for them. For WIOA clients, the Albion Career Center (NYS DOL) also subscribes to Language Line and provides access for our staff, when needed.

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:

Counselors work with participants to determine if supportive services or alternative placements, for instance, may assist the participant in meeting work activity goals. In addition, utilizing other resources in the community are researched. We endeavor to assist participants in succeeding and not to "set them up for failure." In particular, given the limited availability of public transportation in Orleans County (Community Action's Transportation Services, CATS, is no longer available; RTS Orleans has limited routes and times, with some variances allowed; and we have no LYFT or UBER), we have partnered with a local private foundation which has generously donated gas cards that our counselors can provide at their discretion to clients as deemed necessary if no other resources are accessible and so they can participate in employment and/or work activities.

3.4 Strategies/Procedures for Engaging Sanctioned TA Participants

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

Strategies and Procedures for Engaging Sanctioned TA Participants

Yes or No:	Strategies and Procedures for Engaging Sanctioned TA Participants
No	Described here are the strategies the district uses to attempt to engage sanctioned participants as soon as they are sanctioned:
Yes	<p>Described below are the strategies the district uses to attempt to engage sanctioned participants when the durational period of the sanction is completed:</p> <p>When a sanctioned participant informs the TA worker of their willingness to comply, a referral is made to Job Development. Job Development staff then schedules the sanctioned participant for a 1:1 orientation and immediately engages the individual in an activity.</p>

Yes or No:	Strategies and Procedures for Engaging Sanctioned TA Participants
	TA eligibility workers will refer individuals sanctioned beyond duration to the Welfare Fraud Investigator and/or Employment & Training Counselor. Those sanctioned individuals will be required to meet monthly with the Welfare Fraud Investigator and/or Employment & Training Counselor to establish on-going eligibility for Temporary Assistance. At each appointment, the Welfare Fraud Investigator and/or Employment & Training Counselor will explore changes in case circumstances, household composition, medical condition, availability of resources, barriers to self-sufficiency, and household income/expenses. At each appointment, individuals will be required to present receipts or other acceptable verification of how previous month's bills were paid, such as for shelter, fuel, utilities, phone, food, etc. The Welfare Fraud Investigator and/or the Employment & Training Counselor will discuss the benefits of work with the sanctioned individual, including supportive and transitional services available to support employment. The Welfare Fraud Investigator and/or Employment & Training Counselor will continue to meet monthly with individuals sanctioned beyond duration.
No	Described below are the strategies the district uses to attempt to engage sanctioned participants during different times in the sanction period:

3.5 Strategies for Reducing the Need for TA

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

Orleans County provides supportive services to divert applicants from needing Temporary Assistance. These supportive services are provided on a case-by-case basis and are only approved for individuals who are either already employed or have a promise of employment. To be eligible for a diversion payment, an individual must have verifiable employment or the promise of employment.

4. Work Activities

4.1 Allowable Work Activities

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

Allowable Work Activities by Case Type

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

Activity and Definition	Case Type
<p>Work Experience – Unpaid work performed at a public or not-for-profit organization to enable a participant who has not obtained unsubsidized employment to improve his or her employability. Work experience provides participants with an opportunity to acquire training, knowledge, work habits, and work references necessary to obtain and retain employment. Participation in work experience includes training required for the participant to complete the work experience assignment. For example, an individual who is expected to provide clerical support in a government agency may be provided training to develop or refine filing and data entry skills as needed to perform the tasks required as part of the work activity assignment.</p>	<p>FA SNAFAM SNA</p>
<p>Job Search – The act of seeking or obtaining employment or preparing to seek or obtain employment and will include looking for suitable job openings in a group or individual setting; making contact with potential employers; learning appropriate workplace expectations and behaviors in preparation for submitting job applications and interviewing; preparing and applying for, and/or interviewing for jobs and related activities.</p>	<p>FA SNAFAM SNA SNAP</p>
<p>Vocational Education – Vocational education is defined as an organized educational program that directly relates to the preparation of individuals for current or emerging occupations that require training up to a four-year degree. Vocational education does not generally include basic or remedial education or English as a Second Language (ESL) but may include work focused general education and language instruction that is a regular or integral part of a vocational education program. Social services districts are responsible for ensuring that any such remedial education or ESL is a regular part of the program for participants with similar skill sets as the TANF/SNA MOE client, is determined necessary by the program provider, and is limited in hours to less than one half of program participation. Vocational education programs include the completion of activities that provide individuals the knowledge and skills to perform a specific trade, occupation, or vocation. Vocational education must be provided by an education or training organization.</p>	<p>FA SNAFAM SNA</p>
<p>Secondary School – Regular attendance in accordance with the requirements of the secondary school or a course of study at a secondary school or other State accredited institution leading to a high school equivalency (HSE) diploma, in the case of a recipient who has not completed secondary school or received a certificate of general equivalency. Secondary school participation may include general adult basic education or ESL if it is linked to attending secondary school or leading to a HSE diploma as determined necessary by the educational institution. Secondary School or HSE programs that routinely include ESL, career training, alternative school, tutoring, dropout prevention, teen pregnancy or parenting programs as a requirement of program participation as determined by the educational institution will also be permitted.</p>	<p>FA SNAFAM SNA</p>

Activity and Definition	Case Type
<p>Job Skills Training – Training or education in job skills to improve a participant’s employability, to ensure clients have the basic skills competencies required by employers to support job entry and/or to advance or adapt to the changing demands of the workplace. Where identified as needed, such training may include the development of basic workplace skills including professional workplace behaviors and decision-making skills. Job skills training may include customized or technical training designed to provide participants with additional workplace skills, post-secondary education courses leading to a bachelor’s or other advanced degree, or other training included under the definition of vocational education training. Job skills training may include literacy instruction, English language instruction, or other basic education for an individual who has already obtained a high school diploma or equivalency when determined from a client’s assessment that such instruction is needed to improve the participant’s employability.</p>	<p>FA SNAFAM SNA SNAP</p>
<p>Education Training – Education directly related to employment for a recipient who has not received a high school diploma or equivalency must be related to a specific occupation, job or job offer or otherwise determined based on a client assessment as necessary to improve the participant’s employability to support job entry, retention, or advancement. Education directly related to employment may include courses designed to provide the knowledge and skills for general or specific occupations or work settings to ensure clients have the basic skills competencies required by employers and may also include Adult Basic Education (ABE), ESL instruction and education leading to a high school equivalency diploma as determined as necessary to improve the participant’s job opportunities in potential occupations. Where identified as needed such training may include the development of basic workplace skills including professional workplace behaviors and decision-making skills.</p>	<p>FA SNAFAM SNA SNAP</p>
<p>Job Readiness Training (JRT) Activities – Participation in programs that include seeking and preparing for work. JRT includes two types of activities: (1) traditional activities of resume preparation, training in interviewing skills, and instruction in workplace expectations, training in effective job seeking, including life skills training; and (2) activities that improve an individual’s employability, such as substance abuse treatment, mental health treatment, or rehabilitation activities in which a qualified medical or mental health professional has certified that such treatment is necessary.</p>	<p>FA SNAFAM SNA SNAP</p>
<p>Subsidized Private Sector Employment – Employment in the private sector for which the employer receives a subsidy from TANF or other public funds (excluding tax credits) to offset some or all of the wages and costs of employing and training a recipient in accordance with New York State Social Services Law 336-f. Subsidized private sector employment will include positions subsidized through grant diversion/Transitional Employment Advancement Program (TEAP), supported employment programs, and paid college work study programs at private institutions. Individuals participating in subsidized private sector employment are paid wages and receive the same benefits as unsubsidized employees who perform similar work. An employment situation will be subsidized for up to the full amount of wages/benefits provided to the program participant and will be subsidized for the length of time as determined appropriate by the State or social services district.</p>	<p>FA SNAFAM SNA</p>

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

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
No	District staff contacts employers to solicit jobs for TA and/or SNAP participants. Describe how this is done, including number of staff, frequency of contact, etc.:
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>Job Development refers clients for recruitments and job fairs, both in person and virtual. In addition, Job Development coordinates Job Fair(s) in the community with local businesses and service providers; clients are referred to attend and learn about employment opportunities and community resources. Job Development staff also utilize local temporary employment agencies, communicate with businesses about their needs, and encourage employers to call when they need to fill positions. Identified candidates are referred to employers for interviews for job openings, when appropriate. Job Development also issues a weekly emailed newsletter, "Hot Jobs," listing current job openings and training opportunities. In addition, Job Development posts job openings, training opportunities, etc., on its web site and Facebook page, highlighting new opportunities every Tuesday at 11am with a Facebook Live session.</p>

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.

The district has an on-going relationship with educational providers in our area and the availability to immediately enroll clients in appropriate educational activities listed above. The district utilizes education services primarily available through Orleans/Niagara BOCES.

- 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.

The district has an on-going relationship with many educational and vocational training providers in our area. They are aware of our attendance and satisfactory progress requirements. In addition, all educational and vocational training providers must be certified by the State Education Department, Veterans Administration, or be included on the NYS DOL Employment & Training Provider List (ETPL). The district will track the successful completion rate of students from their programs, the number entering training related jobs and their degree of cooperation in obtaining attendance and satisfactory progress report.

- 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.

- Nonexempt individuals who possess less than a 9th grade literacy level are encouraged, and may be required, to enroll in educational activities. These activities may include basic literacy, high school equivalency, or other educational programs.

- Nonexempt individuals who have attained a basic literacy level but have not attained a high school diploma or the equivalent will be offered, and may be required, to enroll in educational programs designed to improve literacy level and/or prepare an individual to attain a high school diploma or the equivalent.

- Individuals with limited English proficiency, without a high school diploma obtained in the United States, will be offered the opportunity, and may be required to participate in educational activities. These activities may include adult basic education or preparation for a high school equivalency diploma. Individuals with limited English proficiency will be assessed to determine whether enrollment in ESL is necessary before the individual is enrolled in an Adult Basic Education or secondary education program.

- Nonexempt individuals who have an IEP and have not attained either a high school diploma or High School Equivalency will be offered, and may be required, to enroll in an educational program designed to improve literacy levels and/or prepare an individual to attain a high school diploma or the equivalent.

- All educational enrollments will be based on assessments and the district will also consider other pertinent factors when determining whether or not an assignment is appropriate, such as:

The extent to which the individual is capable of participating in and able to benefit from participation in an educational activity.

The individual's progress with the activity or progress achieved in similar prior activity assignments. When reviewing progress, districts will consider the time that has elapsed since prior participation, whether or not the prior enrollment was appropriate for the

individual, and factors known or presented by the individual which may have impacted his or her ability to make satisfactory progress.

The individual's attendance or prior compliance with past similar educational activity assignments. When reviewing program attendance or prior compliance, districts will consider the time that has elapsed since prior participation and factors known or presented by the individual which may have impacted his or her ability to satisfactorily attend.

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

- Individuals will be assigned to educational activities consistent with their individual assessment and employment plan.

- Staff will review progress of individuals with the activity or progress achieved in similar prior activity. When reviewing progress, district will consider the time that has elapsed since prior participation, whether or not the prior enrollment was appropriate for the individual, and factors known or presented by the individual which may have impacted his/her ability to make satisfactory progress.

- Individuals' attendance or prior compliance with past similar educational activity assignments will be reviewed. When reviewing program attendance or prior compliance, district will consider the time that has elapsed since prior participation and factors known or presented by the individual which may have impacted his/her ability to satisfactorily attend.

- Staff will determine if the individual is capable of participating in and able to benefit from an educational activity.

- Individuals requesting to participate in an educational activity may be denied if the Counselor determines it's an inappropriate work activity based on assessments, not an "in demand" occupation, and case review.

- 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.

The approval of an individual to participate in job skills or vocational education activities will be based upon (1) individual must show an active job search has been unsuccessful with the current skills and abilities and/or the individual cannot continue working in the same field due to limitations (2) the individual's current ability to reasonably compete for jobs in the chosen occupation without additional training, (3) attendance and satisfactory progress evaluations from previously assigned work activities, (4) prerequisite educational levels needed to be successful in the program, and (5) the client's readiness to seek employment after the training is completed. This readiness includes, but is not limited to, availability of transportation, childcare and access/ability to participate in online learning, if necessary to the program.

Prior approval is required to enroll a client in vocational or educational training. An approval procedure is currently in place. Approved programs are generally 52 weeks in length, must

be related to a viable career, and must provide sufficient skills enabling the trainee to move directly to employment.

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

The district has referred clients to many educational and training providers in our area in the past. The providers are made aware of our attendance and satisfactory progress requirements. All education and training providers must be certified by the State Education Department and/or be listed on the Department of Labor's Employment & Training Provider List (ETPL). Curriculum appropriateness is evaluated based on documented labor market demands and the employment needs in the area. The district tracks the successful completion rate of students from their programs, the number entering training related jobs, and their degree of cooperation in obtaining attendance and satisfactory progress reports.

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

The Agency has books, pamphlets and lists of web sites and other resources (online and other) available from training facilities for the recipient's use. Our Counselors will sometimes suggest a training facility that is currently running a specific program the recipient is interested in and suggest to the recipient to look into course offered. We also have compiled a list of online and in person training programs in the region that are pre-approved by NYSED and/or NYSDOL. We intend to make this available on our web site in the near future.

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

Recipients are notified via phone as well as via email, text, if available, and written notification by mail, unless undomiciled.

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

The attendance policy is monitored by the Temporary Assistance staff by requesting School Verification annually.

- 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.

Job Development staff will provide participants' medical restrictions or limitations in writing to the Supervisor at their work assignment. (Privacy laws prohibit disclosure of medical conditions).

4.4 Post-Secondary Education Approval and Enrollment Policies

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

The District approves post-secondary education as a work activity. Time sheets signed by provider are required and verified by the E&T Counselor. Post secondary education may be approved for up to a four-year college program.

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

Conditions For Disapproval of Work Activities For Individuals Enrolled in College

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

- The district plans to meet federal and state participation rate requirements by engaging individuals in activities immediately at opening. All non-exempt applicants are enrolled in a job search prior to case opening. Before the case opens the Job Development staff meet with applicants on a weekly basis to assess employability, skills, and to review job searches. Our goal is to have all nonexempt individuals assigned to start a work assignment on the day the case opens.

- When the status changes from exempt to nonexempt the TA Eligibility Worker refers the client to Job Development and the client is scheduled to participate in a 1:1 orientation and assessment again. Our goal is to have these clients engaged in activities immediately.

- Individuals are assigned to at least the minimum number of hours of participation for their case to count in the participation rate: true single parent families with a child under six to participate 20 hours weekly; single parent families with a child six or older to participate 30 hours weekly; Safety Net Non-MOE individuals are required to participate 35 hours weekly or the hours of work experience as allowed by the amount of the public assistance and SNAP benefits; two parent families in which one parent is disabled are required to participate 30 hours weekly; two parent families, in which neither parent is disabled, may be required to participate up to 40 hours. WEP hours are limited to the monthly PA grant plus the Supplemental Nutrition Assistance Program (SNAP) allotment divided by the State or federal minimum wage, whichever is higher.

- Households assigned to work experience will usually be assigned to the maximum number of hours that the TA grant and SNAP benefits will allow (not to exceed 40 hours per week). WEP hours are limited to the monthly PA grant plus the Supplemental Nutrition Assistance Program (SNAP) allotment divided by the State or federal minimum wage, whichever is higher.

- When assigning households to paid or unpaid work activities we strive to assign individuals fully, within any limitations, up to 40 hours per week in one or more countable work activities.

- 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	50
Households without Dependent Children Average Monthly	75

- 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:

Each employment counselor reviews the various Cognos reports regularly to manage their caseloads and determines which Cognos reports are helpful in managing their caseloads. The Director and/or Workforce Coordinator reviews the various reports and addresses any issues/concerns regarding individuals not participating/not counting in the participation rate.

- 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

Applicant Job Search	Min. Contacts	Min. Hours	Additional Information
TANF and SNA MOE	6	6	Non-exempt TANF applicants are assigned a job search at orientation and are required to make six or more employer contacts at the Counselor's discretion and to spend at least 6 hours per week looking for work. The Job Development Counselor attempts to contact applicants weekly - by phone and/or email - to review and monitor their job search until a case determination is made. Prior to the anticipated case opening date, the case is transferred to the assigned Job Development staff to contact the applicant so they can be enrolled in a work activity as soon as possible upon case opening. Contact is attempted by phone, email and by mail. We are in the process of making our job search forms fillable online to assist in this process. Access to the appropriate hardware and internet are reviewed and supportive services offered, as appropriate.

Applicant Job Search	Min. Contacts	Min. Hours	Additional Information
SNA Individuals	6	6	Non-exempt SN applicants are assigned to a job search at orientation and are required to make at least six employer contacts per week and spend at least 6 hours per week looking for work. SN applicants are assigned to an in-person job search class at the Orleans/Niagara BOCES in Medina or Albion, depending on where they reside. BOCES staff monitors their job search and administers the TABE test to each applicant. Thereafter, SN applicants who have their HS diploma/HSE attend two days per week, 3 hours per day. Those SN applicants without a HS diploma/HSE are assigned to attend 5 days per week, 3 hours per day. Applicants bring their job search books to class daily. Applicants are assisted with their job search, referrals are made to employers, and they attend various job fairs in the area, go on job interviews, and use computers provided to complete their job searches. Their job search books are reviewed by Job Development staff. If applicants fail to comply, the application is denied for failure to complete a job search assignment. This is the process until a case determination is made. Contact is attempted by phone, email and by mail. We are in the process of making our job search forms fillable online to assist in this process. Access to the appropriate hardware and internet are reviewed and supportive services offered, as appropriate.

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

Yes

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

TA Recipient Job Search

Recipient Job Search	Min. Contacts	Min. Hours	Additional Information
TANF and SNA MOE	6	6	Non-exempt TA recipients are assigned a job search at Orientation. The hourly requirement for assignment to ongoing job search will vary depending on whether or not the recipient is enrolled in other activities. When job search is combined with another work activity the minimum required weekly hours are determined by the Job Development staff. Non-exempt recipients participating in self-directed job search will be required to maintain and submit a log detailing the amount of time spent looking for work.

Recipient Job Search	Min. Contacts	Min. Hours	Additional Information
			<p>Contact is attempted between the Job Development Counselor and the recipient at least weekly to review job search efforts.</p> <p>Non-exempt TA recipients are assigned to job search on a continuous basis.</p> <p>Contact is attempted by phone, email and by mail. We are in the process of making our job search forms fillable online to assist in this process. Access to the appropriate hardware and internet are reviewed and supportive services offered, as appropriate.</p>
SNA Individuals	6	6	<p>Non-exempt SN recipients are assigned a job search at Orientation. The hourly requirement for assignment to ongoing job search will vary depending on whether or not the recipient is enrolled in other activities. When job search is combined with another work activity the minimum required weekly hours are determined by the Job Development staff.</p> <p>Non-exempt recipients participating in self-directed job search will be required to maintain and submit a log detailing the amount of time spent looking for work.</p> <p>Contact is attempted between the Job Development Counselor and the recipient at least weekly to review job search efforts. Contact is attempted by phone, email and by mail. We are in the process of making our job search forms fillable online to assist in this process. Access to the appropriate hardware and internet are reviewed and supportive services offered, as appropriate.</p>

- 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:

In most situations, if a client is self-employed, Job Development staff does approve participation in self-employment if a vocation and not avocation. Amount paid minus expenses then divide by minimum wage to get the hours to enter in WTCMS. If an individual who is self-employed receives less than the hourly minimum wage in payment, they will be allowed up to six months to increase their business income to become self-supporting / meet the minimum wage through self-employment before other work activity is considered. Additional time may be permitted as determined on a case-by-case basis.

5.2 Informing SNAP Applicants and Recipients of Work Requirements

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

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

Written Information Provided to SNAP Applicants and Recipients

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

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

The NTA examiners utilize a revised version of the SNAP interview guide to explain the employment requirements to the household. The TA SNAP examiners do a verbal explanation and document in the case record at opening using the opening checklist, and during the case, changes are documented in the case notes.

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

How the District Documents the Written Requirement in the Case Record

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

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

How the District Documents the Oral Requirement in the Case Record

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

Orleans County Department of Social Services does not require NTA SNAP recipients to participate in SNAP E&T work activity assignments.

- 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):

The district provides individuals with written information on how to access assistance with job search activities through the Orleans County Job Development Agency (aka Orleans County Career Center, an affiliate partner of the One-Stop System). Since the District doesn't require NTA SNAP recipients to participate in SNAP E&T work activities, Supervised Job Search is offered upon voluntary request by an NTA SNAP recipient. Upon request, the NTA SNAP recipient would be referred to Orleans/Niagara BOCES, which supervises and tracks the participant's job search efforts at least on a weekly basis, but more often daily and including, as needed: case management, career exploration, interview preparation, job application assistance and direct job referrals. O/N BOCES communicates daily with Job Development staff regarding participant's efforts.

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
N/A	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: QR code given to clients on paperwork for their orientation and next schedule date. QR code directs to Orleans County Job Development.
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.

Prior to referral to activity or program, the Employment and Training Counselor meets 1:1 with the client to complete the employment assessment including the skills and ability portion. Once completed, a discussion is held with the client of what activity is recommended to help the client become more self-sufficient. A referral is created in WTWCMS and a phone call and/or email is sent to the provider. If the client has limitations, a letter is sent to the provider explaining those to help ensure a good fit and smooth transition to the work activity. When possible, the Counselor will also meet the client at the provider's work site on the first day. After the client starts with the provider, timesheets and feedback are given on regular basis to the Employment & Training Counselor. If the provider determines that the client is not a good fit, the provider has ten (10) days to notify Job Development of this determination. If other types of issues arise, the provider and/or client will contact the Counselor, and the Counselor may do a site visit. Case notes and referrals are all stored in WTWCMS.

- 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.

If the individual is not a good fit for a particular activity or program, the provider will notify the E&T Counselor via email or phone, and the individual is asked not to go back to the provider's work site and instead to meet with the Counselor to re-assess the situation, skills and abilities to find a better fit. This takes place within ten (10) calendar days from the provider determination notification.

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

The E&T Counselors work with the site supervisors regularly to check in on clients via email, phone and/or site visits, if needed. Counselors follow up with the client to ensure they have not been treated unfairly or discriminated against.

6. Quality Assurance/Work Verification

6.1 Quality Assurance Process - Random Case Sampling

Consistent with New York State's approved Work Verification Plan (WVP), and in accordance with the requirements established by the United States Department of Health and Human Services, districts must develop a quality assurance plan to ensure that the data reported, from

which their work participation rates are derived, are accurate. The plan must include the district's procedure for monitoring reported scheduled and actual attendance in paid employment and unpaid work activities and the controls in place to ensure that reported exemption statuses resulting in federal exclusions from the work participation rate calculation are accurately made, work eligible individuals are correctly identified, hours of attendance reported are accurate and documented, data entry is accurate and that the district and its providers adhere to the approved work activity definitions and the determination of countable excused absences and holiday reporting within federal limits. Each district must maintain the documentation to verify what is being reported to NYS OTDA.

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

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

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

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

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

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

6

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

6

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

3

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

3

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

6.2 Use of Outside Providers/Vendors

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

No

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

N/A

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

N/A

7. Supportive Services

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

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

- Expenses related to child care such as registration, application or service fee to secure or hold a daycare slot.

- A clothing allowance up to a maximum amount will be provided to participants in need of clothing to participate in their work activity, job interview or other work-related need or to maintain employment. Documentation of the need must be provided. At the discretion of the Counselor based on job requirements not to exceed \$250.00.

- Fees and licenses necessary for employment not to exceed \$300.00. This may include driver's license/vehicle registration, or any other license required by the state, physicals, and PPDs, for instance.

- Up to \$200.00 for tools, equipment and miscellaneous items needed for an applicant or recipient in order to retain employment. Documentation of the need from the employer must be provided.

- Payment for car insurance and car repairs may be made, and the cost will not exceed \$600 for repairs, or the retail value, whichever is greater per year per individual and \$500 for insurance per year per individual. Clients must use authorized repair shops licensed by the State of New York and must provide at least two-three estimates, or per Counselor's discretion (per below).

In order for Orleans County to consider paying for repair to a client's vehicle, it is necessary for the following to be submitted:

- Proof of ownership of the vehicle being requested to repair is that of the individual participating in the required activities;

- Must be employed or have offer of employment; proof of employment, employment offer, or compliance in required activities of the individual requesting repairs and/or insurance is required (e.g. documentation of offer or verification of income);

- Proof of valid driver's license of the individual requesting repairs and/or insurance; Two-three separate written estimates from New York State approved vehicle repair shops listing all necessary repairs to the vehicle to put it in safe working order. This statement must include a valid DMV Repair Shop Identification Number.

- In the event that two-three written estimates cannot be obtained (e.g. the vehicle cannot be driven), the reason why must be documented prior to approval of any repair or towing cost.

- Upon receipt of the two-three written estimates, or documentation per above, Orleans County will review to determine if car repairs can be paid. Contact must be made to the

chosen repair shop to confirm only those repairs listed on the estimate are to be done. Once completed, the repair shop must submit a bill to Orleans County for payment directly to the repair shop.

- Hair Cut up to \$50.00 at the discretion of the Counselor. (Job interview, or employment)
- Bicycle and Helmet up to \$250 at the discretion of the Counselor. (Work activity, interview, education/training, or employment).

If client requests supportive services above the limits set here the Employment Counselor and Employment Coordinator will review and determine if there is a need to approve the higher amount on a case-by-case basis.

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

Transportation Services Provided to Clients

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

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

The district endeavors to assign participants to providers/work sites in close proximity to their residences. At the Counselor's discretion, a participant may be expected to walk up to one (1) mile to their assignment or to access public transportation. Reasonable accommodations are made based on an individual's work limitations, individual circumstances, and weather conditions.

- 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:

Please see 7.1. a.

7.2 Post-Employment/Transitional Supportive Services

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

- Expenses related to childcare such as registration, application of service fee to secure or hold a daycare slot.
- Vehicle repairs and car insurance - See Section 7.1. a.
- Fees and licenses necessary for employment not to exceed \$250.00. This may include driver's license/vehicle registration, or any other license required by the state, physicals, and PPDs, for instance.
- Hair Cut up to \$50.00 at the discretion of the Counselor. (Job interview or employment)
- Bicycle and Helmet up to \$250 at the discretion of the Counselor. (Work activity, interview, education/training, or employment).
- Clothing necessary to retain employment up to a maximum of \$250.00.
- Post employment services, counseling, case management

- 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:

- Expenses related to child care such as registration, application of service fee to secure or hold a daycare slot.
- Vehicle repairs and car insurance - See Section 7.1.a.
- Fees and licenses necessary for employment not to exceed \$250.00. This may include driver's license/vehicle registration, or any other license required by the state, physicals, and PPDs, for instance.
- Clothing necessary to retain employment up to a maximum of \$175.00.
- Hair Cut up to \$50.00 at the discretion of the Counselor. (Job interview or employment)
- Bicycle and Helmet up to \$250 at the discretion of the Counselor. (Work activity, interview, education/training, or employment).
- Post employment services, counseling, case management.
- Each case that is closed on Public Assistance due to employment will automatically be evaluated for Transitional Medicaid and SNAP.

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.):

Bus passes through Rochester Regional Transit Service Orleans.

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:

The district will issue a conciliation notice to individuals who have refused or failed to comply with employment requirements. The district uses the conciliation notice that is generated through the WTWCMS. The conciliation notice identifies the specific instance(s) of noncompliance with work requirements. All conciliations are maintained as part of the district records.

If the individual does not contact the Job Development Counselor within the period in the notice, which follows the requirement to allow ten (10) days for the client to respond, the Counselor will make the determination to refer for sanction based on all available information.

If the individual contacts the Job Development Counselor within the period in the notice, which follows the requirement to allow ten (10) days for the client to respond, the Counselor will determine if the failure to comply was willful and without good cause based on information and documentation gathered during the conciliation.

A DSS official conducts the grievance/dispute resolution if requested by individuals. If the individual's grievance is not resolved through conciliation, the individual shall be informed of the right to a fair hearing.

- 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

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

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

The district will issue a conciliation notice to SNAP recipients who have refused to comply with work requirements as assigned. The district uses the conciliation notice that is generated through the WTWCMS. The conciliation notice identifies the specific instance(s) of noncompliance with work requirements. All conciliations are maintained as part of the district records.

If the individual does not contact the Job Development Counselor within the period in the notice, which follows the requirement to allow ten (10) days for the client to respond, the Counselor will make the determination to refer for sanction based on all available information.

If the individual contacts the Job Development Counselor within the period in the notice, which follows the requirement to allow ten (10) days for the client to respond, the Counselor will determine if the failure to comply was willful and without good cause based on information and documentation gathered during the conciliation. If there is a disagreement, dispute or uncertainty, management/supervision will review to make a determination. A DSS official conducts the grievance/dispute resolution if requested by individuals. If the individual's grievance is not resolved through conciliation, the individual shall be informed of the right to a fair hearing.

Individuals who fail to comply and express an interest in avoiding a SNAP E&T related sanction are offered the opportunity to participate in a 1:1 orientation to available services

and then is assigned to a one week job search (minimum 6 employer contacts) to demonstrate compliance.

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

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

Yes or No:	Who makes the TA good cause/willfulness determination?
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:

Individuals who fail to comply and express an interest in avoiding a SNAP E&T related sanction are offered the opportunity to participate in a 1:1 orientation to available services and then is assigned to a one week job search (minimum 6 employer contacts) to demonstrate compliance.

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:

Sanctioned individuals may demonstrate their willingness to comply at the end of the sanction period by participating in an assigned work activity for a maximum of 10 business days, complete an employment assessment, or re- enrolled in treatment.

Temporary Assistance benefits are restored retroactive to the date the individual indicated a willingness to comply, but no earlier than the expiration of the minimum duration period.

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

Individuals who express a willingness to comply in order to end a SNAP E&T related sanction are offered the opportunity to participate in a 1:1 orientation to employment services and then is assigned to a one week job search (minimum 6 employer contacts) to demonstrate compliance. Individuals who are subject to a durational sanction period must serve the full durational period and demonstrate a willingness to comply or document that they have become exempt from SNAP work requirements in order to restore eligibility for SNAP benefits. The time period for demonstrating compliance to the satisfaction of the district is no more than ten business days.

8.3 Dispute Resolution

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

Grievance Mediation

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

9. Disability Determinations, Documentation and Requirements of Exempt Individuals

9.1 Disability Determination Process and Tools

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

Process for Determining Disabilities and/or Work Limitations

Yes or No:	How the district determines an individual’s disabilities and/or work limitation
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: Individuals claiming a temporary or permanent disability are given a medical (LDSS-4526) for their health provider to complete. Individuals have ten calendar days from the date of the request to provide documentation of a medical/mental impairment. Extensions may be given based on the availability of the provider to complete required information. DSS staff or the Job Development staff will evaluate the medical documentation. If there are any questions, they will contact the medical provider for clarifications.

Yes or No:	How the district determines an individual's disabilities and/or work limitation
	The district will notify the individual in writing of the disability determination using the LDSS-4005 or LDSS 4005(a). Orleans County reserves the right refer an individual to Industrial Medical Associates (IMA) to help clarify disability status.

- 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:

Department of Social Services mails the LDSS-4005/LDSS-4005(a) and retains a copy in the case record. If needed, client is provided a LDSS-4526 to take to their medical provider for determination. If this step occurs, the applicant or recipient is also provided a documentation request notifying them that they are required to return the completed medical within 10 days and/or reach out to the assigned examiner to request an extension.

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

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

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

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

Process for Reviewing Medical Documentation

Yes or No:	District's process for reviewing medical documentation
No	District directs the contracted physician or individual's physician to determine status.
No	District review team reviews and determines status (described here):
No	Specialized disability/medical staff or unit reviews and determines status (described here):
Yes	Other process: Temporary Assistance workers review medical documentation and determine employability status.

9.2 Mental Health Screening and Assessment

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

No

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

N/A

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

Screening Tools the District Uses

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

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

N/A

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

N/A

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

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

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

practitioner, district contracted provider, specialist evaluation obtained as result of district referral, etc.).

The LDSS will require the individual practitioner to complete a medical (LDSS-4526) to determine whether or not the individual can recover from a mental or physical impairment. The assigned Social Welfare Examiner will work with the A/R during intake, at recertification or when a change occurs that limits their ability to obtain or maintain employment. Any recommended treatment will be discussed with the A/R as appropriate and they will be verbally informed of the requirement to comply with the treatment as recommended by medical practitioner. DSS may make a referral to IMA for further evaluation. Information gathered is reviewed by DSS and the Job Development staff.

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

The recommendation of the physician/provider is followed.

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

The District reviews an individual's exemption status at recertification or sooner if there is a reason to believe the status has changed. The district tracks and monitors participant compliance with treatment plans on a regular basis. Job Development and TA staff monitor the exempt TANF population and schedule appointments to review their medicals, compliance with treatment recommendations, attendance, and if needed, gather further medical documentation. We endeavor to obtain monthly confirmation of attendance at rehabilitation or other factors to judge participation and progress. The district may refer individuals to IMA for further evaluations. TA and Job Development staff review the SN exempt population.

10. District Certification

10.1 Certification

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

1/9/2024

Holli Nenni
Commissioner