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

January 1, 2022 - December 31, 2023

## **Greene County**

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#### 1. Administration

#### 1.1 Administrative Structure

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

Organizational chart is 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.

Greene County Department of Social Services Temporary Assistance Unit is responsible for the operation of the Welfare To Work (WTW) Program. The Temporary Assistance Unit is located within the Greene County Department of Social Services Agency. The total number of employees of the local Department of Social Services is 101. The Employment Unit consists of two employees, one Community Services Worker and one Principal Social Welfare Examiner who supervises the unit. The Community Services Worker works with the participant to determine exemption status, complete the Employment Assessment, complete the Employment Plan, and provide case management services to those participants who are employable, non-exempt, or wish to participate voluntarily. Participants are provided with information about job services, job search assistance, job leads, and/or referrals to other local organizations who provide assistance with supportive service needs, job development, training and educational programs, and/or work experience (Community Work Experience Program or CWEP). A participant may be referred to Workforce Development at Columbia-Greene Community College for a workshop on resume development or referred to Questar III BOCES for High School Equivalency completion.

# 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.

Provider	Total Contract Cost/Year	Funding Source(s)	Categories of Clients Served	Programs, Services or Activities Provided
		FFFS SNAP E&T Local Other	FA SNA Family SNA Individual SNAP TANF 200%	

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.

Provider	Funding Source(s)	Categories of Clients Served	Programs, Services or Activities Provided
Questar III	Others: Unknown	□ FA     □ SNA Family     □ SNA Individual     □ SNAP     □ TANF 200%	Literacy Testing/Training
ACCES VR	Others: Unknown	□ FA     □ SNA Family     □ SNA Individual     □ SNAP     □ TANF 200%	Aid to people with disabilities in securing employment thru trainings and job development
Columbia Greene Workforce New York	Others: Unknown	<ul><li></li></ul>	Provides resume assistance, training for certificate programs, job readiness, on the job training and job search/job fairs.
PROS @ Firehouse	Others: Unknown	<ul><li></li></ul>	Provides aide to people with disabilities/mental health in securing employment through training and job development programs.

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:

### 1.3 OTDA Jobs Staff Agreement

	OTDA Jobs Program Services - Target Groups. Check all services and target groups that apply:
	Services:  Assessment/Employment Plan  Supervised Job Search  Job Readiness Training  Job Club  Job Placement Services  Grant Diversion  Job Development (employer outreach)  WOTC pre-certifications
	Target Groups:  Applicants  FA & SNA with children  SNA without children  SNAP  TANF 200%
b.	Described below are the additional services/duties Jobs staff will be requested to perform (e.g. WTWCMS data entry, case conferencing, job fairs).
1.4	4 Access to Services at New York State Career Centers
	Access to Services at New York State Career Centers  Described below is how the district provides access to its programs and services with Career Center partners (select all that apply):  ☐ The district has employee(s) physically present at a Career Center  ☐ The district has contract staff physically present at a Career Center  ☐ The district makes available direct access to its program staff via phone or technology at a Career Center  ☐ The district makes available copies of the LDSS-2921 (Common Application) at a Career Center  ☐ Other:
a.	Described below is how the district provides access to its programs and services with Career Center partners (select all that apply):  ☐ The district has employee(s) physically present at a Career Center  ☐ The district has contract staff physically present at a Career Center  ☐ The district makes available direct access to its program staff via phone or technology at a Career Center  ☐ The district makes available copies of the LDSS-2921 (Common Application) at a Career Center

#### 2. Orientation, Assessment and Employment Plan

#### 2.1 Orientation (Reference 18 NYCRR 385.5)

a.	Check one of the following:
	☐ The district provides orientation in accordance with 18 NYCRR 385.5 and no additional
	information is provided at orientation.
	☑ In addition to the requirements outlined in 18 NYCRR 385.5 of the regulations, the
	district's orientation provides the following:

There is an explanation of the benefits of work participation in the work assignment and consequences if the client fails to comply with work activities. In addition, an explanation of the Child Care in lieu of Temporary Assistance Policy is discussed.

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

The required orientation is done either in a group setting or individually. It is discussed during the eligibility interview by the Social Welfare Examiner and completed within two weeks of the eligibility interview.

#### 2.2 Temporary Assistance (TA) Employment Assessment

a.	The district conducts assessments as required by 18 NYCRR 385.6(a) and 385.7(a). Check one of the following:
	☐ The district enters assessments directly into WTWCMS
	information into WTWCMS.
	☐ The district conducts assessments using a local equivalent tool, and later enters
	information into WTWCMS. Please attach the local equivalent tool. If the local equivalent contains additional elements beyond what is required, list them below:
	contains additional cicinistic beyond what is required, list them below.

b. Described below is the district procedure for the completion of an employment assessment:

The client is given the NYS Assessment (LDSS-4980) with the NYS Application (LDSS-2921) and completes it before the Community Service Worker meets with them. The Community Services Worker reviews the New York State Assessment with the clients at the initial employment interview and at recertification as well as when any change occur.

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

Greene County Department of Social Services - The Community Services Worker and the Social Welfare Examiner conducts the assessments and reports directly to the Principal Social Welfare Examiner.

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)):
	Community Service Worker minimum qualifications are one year of experience in a non-professional position relating to the delivery of human services program in public or private agencies. Minimum qualifications for a Social Welfare Examiner is graduation from high school or possession of a high school equivalency diploma and a 2 year associate degree from a regionally accredited junior/community college, business school, college or university registered by New York State in an acceptable academic degree program, such as business, education or human services.
е	<ul> <li>Are applicants in households with dependent children required to participate in completion of an employment assessment?</li> <li>☑ Yes</li> <li>☐ No</li> </ul>
f.	Are applicants in households without dependent children required to participate in completion of an employment assessment?  ☑ Yes ☐ No
g	<ul> <li>Are exempt adults in households without dependent children required to participate in completion of an employment assessment?</li> <li>☐ Yes</li> <li>☒ No</li> </ul>
h	. How often and under what circumstances is the employment assessment updated?
	The assessment is completed with the client at opening interview. The assessment is updated at every recertification and if a change occurs in the household that is related to employment, but no less than annually.
2.	3 TA Employment Planning (Reference 18 NYCRR 385.6 and 385.7)
а	<ul> <li>The district develops individual employment plans as required by 18 NYCRR 385.6(a) and 385.7(a). Check one of the following:  ☐ The district enters employment plans directly into WTWCMS.</li> <li>☐ The district uses the LDSS-4978 (New York State Employment Plan) and later enters information into WTWCMS.</li> <li>☐ The district develops individual employment plans using a local equivalent tool and later</li> </ul>
	enters information into WTWCMS. Attached is the local equivalent tool. If the local equivalent contains additional elements beyond what is required, list them below:
b	<ul> <li>Check one of the following:</li> <li>☑ The same administrative unit or contractor that conducts employment assessments also develops employment plans.</li> <li>☐ A different district administrative unit or contractor develops employment plans, and their qualifications include:</li> </ul>

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

The Employment plan is done with the client upon the completion of the assessment. It is a verbal discussion and documented answers.

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

The employment plan is updated at every recertification and at any changes in the client's circumstances.

#### 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:

## 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:

The agency utilizes all available state forms along with other language specific forms. We have trained all workers on the Language Line and utilize this resource 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:

At orientation, the Agency will explain the benefits of full participation in assigned work activities and continues the encouragement of participation throughout the work assignment. The employment worker also goes over any available resources, as in childcare and transportation with the client. The worker discusses issues and also monitors attendance to alleviate any unnecessary absences.

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

a. Select all that apply:

	Described below are the strategies the district uses to attempt to engage sanctioned participants as soon as they are sanctioned:
	Described below are the strategies the district uses to attempt to engage sanctioned participants when the durational period of the sanction is completed:
$\boxtimes$	Described below are the strategies the district uses to attempt to engage sanctioned

participants during different times in the sanction period:

Our staff attempts to educate our sanctioned participants about the importance and

advantages of compliance and becoming self-sufficient at every contact we have with sanctioned individuals.

#### 3.5 Strategies for Reducing the Need for TA

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

Greene County has a Community Resource Unit that meets with all clients requesting an application for Temporary Assistance. A Community Services Worker meets with clients to provide information on community resources and ensure that all options available to the individual have been explored. Information is also provided to individuals concerning job search services and employment requirements for non-exempt individuals. The child care program is discussed with the client and a referral is made if appropriate.

#### 4. Work Activities

#### 4.1 Allowable Work Activities

a. Please select all the 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.

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

Coop Time	Activity and Definition
Case Type	Activity and Definition
☐ FA☐ SNA FAM☐ SNA Ind☐ SNAP	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.
□ FA     □ SNA FAM     □ SNA Ind     □ SNAP	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.
⊠ FA ⊠ SNA FAM ⊠ SNA Ind ⊠ SNAP	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.
☐ FA ☐ SNA FAM ☐ SNA Ind ☐ SNAP	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 equivalence (HSE) diploma, in the case of a recipient who has not completed secondary school or received a certificate of general equivalence. Secondary school participation may include general adult basic education or ESL if it is linked to attending secondary school or leading to a HSE diploma as determined necessary by the educational institution. Secondary School or HSE programs that routinely include ESL, career training, alternative school, tutoring, dropout prevention, teen pregnancy or parenting programs as a requirement of program participation as determined by the educational institution will also be permitted.
☐ FA☐ SNA FAM☐ SNA Ind☐ SNAP	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.
⊠ FA ⊠ SNA FAM ⊠ SNA Ind ⊠ SNAP	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, 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.

Case Type	Activity and Definition
□ FA     □ SNA FAM     □ SNA Ind     □ SNAP	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.
☐ FA ☐ SNA FAM ☐ SNA Ind ☐ SNAP	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.
	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.
☐ FA☐ SNA FAM☐ SNA Ind☐ SNAP	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.
☐ FA ☐ SNA FAM ☐ SNA Ind ☐ SNAP	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.
	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.  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.  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
SNA FAM SNA Ind SNAP	activities constitutes participation that is not countable toward federal and State participation rates.

#### 4.2 Job Development

a.	Does the district conduct or access job development services to expand job opportunities for
	TA and SNAP participants?
	⊠Yes
	□ No

If Yes, select how the district participates in job development activities.

District staff contacts employers to solicit jobs for TA and SNAP Participants. Describe below how this is done, including number of staff, frequency of contacts, etc.

Employment Community Services Worker will mail out job listings to TA & SNAP participants and there is a listing in our lobby for TA & SNAP participants and the public to see.

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

Greene County does not have contracts with outside employment agencies to assist TA & SNAP participants with job leads. The Community Services Worker refers participants to Columbia Greene College when there are Job Fairs available.

## 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, 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:
  - All applicants/recipients are referred to Questar III BOCES, 341 Rt 217, Philmont, NY. This is our only provider for individuals 21 and over.
- 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:

All recipients referred for training as a result of their individualized Employment Plan are referred to Columbia-Greene Workforce Career Center located at Columbia-Greene Community College to enroll in an approved vocational education and/or job skills program. This is Greene County's only training provider and this provider works very well with our recipients and has had successful outcomes.

c. Described below are the 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:

All applicants for Temporary Assistance need to complete an English-Proficiency Assessment in order to identify the applicant's literacy and/or English language learning needs. Individuals whose reading level falls below 8.9 on the TABE, or do not have a high school diploma, will be offered the opportunity to enroll and may be required to participate in Adult Basic Education, High School Equivalency and/or English Language instruction as needed.

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:

Once a client has been tested and it is determined that they are in need of an educational activity, they are given the opportunity to enroll in an educational program. The education program may be mandated when appropriate. We would not deny an educational activity if the client has shown an ability to participate and has not failed at prior attempts of the same activity.

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:

Once the recipient does their Assessment with the Columbia- Greene Workforce investment Office One Stop Center and they are evaluated, they may be given an opportunity to participate in a job skill training or vocational education activity based on the Workforce Investment Office's recommendation. The district will include the activity in the individuals employability plan if the individual is interested in participating and has shown and ability to attend an activity

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

They are evaluated by their successful outcomes and how well they work with our clients

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

The Employment Worker discusses options on a one-on-one basis with clients.

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

Individuals are notified by their employment worker verbally; it is also explained to them what the reporting requirements are for being enrolled in an approved training. The individual will receive a written assignment letter when enrolled.

- i. Described below is how the district will monitor the high school attendance for 16-18 yearolds in order for them to retain their TA exempt status:
  - LDSS-3708 School Attendance Verification is sent to the School to verify attendance of all 16-18 year old students at application and at every recertification.
- j. Described below is the district's procedure for ensuring that an individual's health related limitations are accommodated when assigning the individual to a work activity:

The district provides written documentation indicating any work limitations or necessary accommodations to the work activity supervisor.

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

- a. Described below is the highest level of post-secondary level education that the district will approve as a work activity, up to a four-year college program:
  - The agency will approve up to 12 months of post-secondary level education as an acceptable activity.
- b. Described below is how the district will ensure that enrollments in post-secondary education beyond the 12-month lifetime limit are combined with a weekly average of at least 20 hours in paid employment activities which may include work study, work experience or community service:
  - The agency will not approve anything over 12 months of post-secondary level education as an acceptable activity.
- c. In accordance with 18 NYCRR 385.9(b), regardless of whether the college program is approved for the participant as an employment work activity, the district will approve as a work activity a work-study, internship, externship or other work placement that is part of a non-graduate student's curriculum unless one or more of the following conditions applies as checked below (Select all that apply):
  - ☑ It has been determined that the student voluntarily quit their job or reduced earnings to qualify for initial or increased TA.
  - ☑ A job or on-the-job training position that is comparable to the work-study, internship, externship or other work placement cannot reasonably be expected to exist in the private, public or not-for-profit sector.
  - □ The student is not maintaining a cumulative C average (or the equivalent). The district may disregard this provision if the student documents an undue hardship.
  - □ The institution or student fails to monitor and report information regarding the student's attendance and performance as required.
  - ☑ The student fails to progress toward the completion of a course of study without good cause, as determined by the district.
  - ☑ The student has previously enrolled in work-study, internship, or other work placement and failed to complete the work placement without good cause as determined by the district.
  - ☐ Additional reasons as stated below:

#### 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. Include in this description 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).

Greene County conducts a group orientation and job search meeting every Wednesday. At that time all non-exempt individuals, including individuals whose status has changed from exempt to non-exempt, are enrolled in job search and referrals are made for enrollment in additional activities including work experience as appropriate. This ensures that all nonexempt clients can be enrolled within seven days. Single parents with a child under six are required to participate up to forty (40) hours per week, Single Parents with all children over six are required to participate up to forty (40)hours per week. Each adult with no children may be required to participate up to forty (40) hours per week in assigned activities and/or a combination of work activities to achieve the districts weekly standard participation rate. Individuals will be dually enrolled in Job Search as well as Work Experience if there is a worksite available. Due to the COVID-19 Pandemic the agency continues to conduct Employment appointments over the telephone and sends all paperwork and job search handbooks by mail to each client. If the client requests they can come and pick up their job search handbook weekly along with job leads. The client is directed to submit their handbooks every week. With each mailing there are job leads attached and a self addressed stamp envelope enclosed.

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

Household Type	Number Served
Households with Dependent Children Average Monthly	15
Households without Dependent Children Average Monthly	20

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

We examine the Cognos reports weekly to monitor progress and update employment activities to ensure that all applicants and recipients are fulfilling their required engagements in Community Work Experience Programs, Job Search, and any other approvable activity.

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

The district assigns	TA applicants to Job Search
⊠Yes	
□ No	

Applicant	Min.	Min.	Additional Information
Job Search	Contacts	Hours	
TANF and SNA MOE	35		TA applicants are required to do a minimum of 35 Job Search hours a week in addition to other assigned activities, but no more than 40 hours of combined activities per week. This includes time spent on research, resume preparation, interview and follow up. Applicants are provided a Job Search Handbook (LDSS 3696) which they are required to bring with them when they meet with their Employment Worker on a weekly basis. During COVID-19 clients are encouraged to mail or drop off their Job Search Handbooks weekly and the employment worker will call them with any questions they may have. The Employment Worker will monitor by running a report from WTWCMS "Missing Schedule Report" every Friday. All clients with outstanding schedules are contacted via telephone and a conciliation is sent. If client reaches out to the worker and claims good cause we will give the client 10 days to comply. A case manager will be available at any time an individual requests assistance.
SNA Individuals	35		TA applicants are required to do a minimum of 35 Job Search hours a week in addition to other assigned activities, but no more than 40 hours of combined activities per week. This includes time spent on research, resume preparation, interview and follow up. Applicants are provided a Job Search Handbook (LDSS 3696) which they are required to bring with them when they meet with their Employment Worker on a weekly basis. During COVID 19 clients are encouraged to mail or drop off their Job Search Handbooks weekly and the employment worker will call them with any questions they may have. The Employment Worker will monitor by running a report from WTWCMS "Missing Schedule Report" every Friday. All clients with outstanding schedules are contacted via telephone and a conciliation is sent. If client reaches out to the worker and claims good cause we will give the client 10 days to comply. A

Applicant	Min.	Min.	Additional Information
Job Search	Contacts	Hours	
			case manager will be available at any time an individual requests assistance.

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

Th	e district assigns	TA recipients t	o Job Search.
$\boxtimes$	Yes	·	
$\Box$	No		

Recipient Job Search	Min. Contacts	Min. Hours	Additional Information
TANF and SNA MOE		35	TA recipients are required to do a minimum of 35 Job Search hours a week in addition to other assigned activities, but no more than 40 hours of combined activities per week. This includes time spent on research, resume preparation, interview and follow up. Recipients are provided a Job Search Handbook (LDSS 3696) which they are required to bring with them when they meet with their Employment Worker on a weekly basis. Case manager will be available any time the Participant requests assistance.
SNA Individuals		35	TA recipients are required to do a minimum of 35 Job Search hours a week in addition to other assigned activities, but no more than 40 hours of combined activities per week. This includes time spent on research, resume preparation, interview and follow up. Recipients are provided a Job Search Handbook (LDSS 3696) which they are required to bring with them when they meet with their Employment Worker on a weekly basis. Case manager will be available any time the Participant requests assistance.

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.

The self-employment must lead to self-sufficiency and the number of hours of work for a self-employed individual will be determined by dividing the gross income (after subtracting certain allowable business expenses) by the federal minimum wage. Additional activities will be assigned accordingly to achieve a 40 hour a week standard. Additional time will be given to transition from self-employment to a traditional work activity.

#### **5.2 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):
  - Greene County does not mandate Non-Temporary Assistance SNAP applicants and recipients to participate in SNAP E & T work activities, but does offer individuals assistance with job search activities at each contact. If requested, the applicant or recipient is referred to the employment unit who will meet with the individual on a weekly basis and also will provide case management services.
- b. If the district is offering Supervised Job Search as an E&T activity component, describe below how the job search activity will be supervised and tracked, including the frequency of monitoring the participant's job search efforts.
- 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):
  - Greene County does not mandate Non-Temporary Assistance SNAP applicants and recipients to participate in SNAP E & T work activities, but does verbally offer individuals assistance with job search activities at each contact.

#### 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 <u>AQI.WV.SelfAudits@otda.ny.gov</u> for State review including specific information on each of the errors identified. In addition, when monitoring reveals substantial problems, the district must describe the corrective action it will take.

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

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

d. Below is the number of random sample cases in which a case member is reported as an 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 cases

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

#### 6.2 Use of Outside Providers/Vendors

a.	Does the district utilize outside providers/vendors to collect documentation and enter data directly into WTWCMS?  ☐ Yes ☐ 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?  Yes No
c.	If No, describe below the process used:

## 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 selfsufficiency:

Supportive Services will be provided to work activity participants Car repairs Up to \$500 or value of the car, whichever is less Car insurance Up to \$500 or six months, whichever is less Clothing/tools Any reasonable need --not to exceed \$550

Transportation Mileage reimbursement

If the client does not have internet access they are referred to their local library, community action and work force. If necessary we would provide transportation. The agency offers the Assurance Phone which is free to the client and provides 250 monthly minutes.

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. (Select all that apply)   ☐ Bus pass/token ☐ Gas card/voucher ☐ Mileage reimbursement at IRS Business rate (effective 1/1/21 is 56 cents/mi) ☐ Mileage reimbursement at IRS Medical/Moving rate (effective 1/1/21 is 16 cents/mi)
	☐ Other mileage rate (please explain methodology used to establish reimbursement rate):

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 maximum distance a client would be expected to walk to a work assignment is 2 miles. However, special consideration would be given to recipients with young children that need to go to daycare and recipients with physical limitations.

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:

Supportive Services available:

Car repairs Up to \$500 or value of the car, whichever is less Car insurance Up to \$500 or six months, whichever is less Clothing/tools Any reasonable need --not to exceed \$550 Transportation Mileage reimbursement

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

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

If eligible, we provide daycare, SNAP, temporary transportation (until first pay received), car insurance and repairs, and work-related expenses ie; clothing, boots.

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

Transitional Medicaid, Transitional Daycare, and Transitional SNAP provided the household is eligible for the transitional benefits

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:

If eligible, we provide daycare, SNAP, temporary transportation (until first pay received), car insurance and repairs, and work-related expenses ie; clothing, boots.

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

Transitional Medicaid, Transitional Daycare, and Transitional SNAP provided the household is eligible for the transitional benefits

#### 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.):

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

Referrals to Enhanced Drug & Alcohol and Healthy Homes

#### 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.
	(Select all that apply and describe the procedure below).
	⊠ In person

By phone

By mail

All Temporary Assistance recipients and applicants who are conciliated are sent a DSS-4230, Conciliation Notification (through the WTWCMS system). Individuals must respond within 10 days from the date of the conciliation notice. Individuals are given the opportunity to explain their reasons for non-compliance. A determination is made by the Employment supervisor in consultation with the Director of Eligibility (if needed) and willfulness and good cause are taken into consideration.

b.	Who makes the TA good cause/willfulness determination? (Select all that apply)
	□ A supervisor in the district
	☐ A separate entity (describe below):

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. (Select all that apply and describe the procedure below)  ☑ In person ☑ By phone ☑ By mail
	The individual is sent a conciliation notice and has 10 days to contact the agency to explain the reasons for non-compliance, including whether the noncompliance was willful, and if there was good cause.  The districts conciliation process for SNAP recipients is in accordance with 18 NYCRR 385.11
d.	Who makes the SNAP E&T good cause/willfulness determination? (Select all that apply)  ☐ The client's employment worker ☐ A supervisor in the district

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

The individual is sent a conciliation notice and has 10 days to contact the agency. When the client contacts the agency, they are given an appointment to come to the agency and are given a job search handbook. They will need to complete 10 job search hours within 10 days.

#### 8.2 Sanction

☐ A separate entity (describe below):

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

The client is assigned to a work assignment and must attend and participate for 10 days. Once they successfully maintain the 10 day work assignment, 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). If after the durational sanction period has ended, the clients claims to be work exempt, the client will be given the opportunity to submit medical documentation to verify the exemption from work requirements and will be added back to the case, provided that the individual has complied with efforts to document the exemption, in the same time frame as a non-exempt individual who has complied with temporary assistance benefits restored retroactive to the date the individual indicated a willingness to comply.

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

The recipient writes a statement that they are willing to comply with employment; they are then assigned to a work assignment and must attend and participate for 10 days.

#### 8.3 Dispute Resolution

documentation-exempt).

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.  ☐ An independent entity which has an agreement with the district ☐ Supervisory staff who are trained in mediation and who have no direct responsibility for	
	the individual's case  Designated supervisory staff who have no direct responsibility for the individual's case and who are not trained in mediation	
	Disability Determinations, Documentation and equirements 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. (Select all that apply, and describe the process)  ☑ District participates in the OTDA managed contract for independent medical evaluations. ☐ District contracts directly with a physician to provide independent medical evaluations. ☑ District accepts physician's statement provided by participant. ☑ District accepts physician's statement provided by participant but refers for an independent evaluation when deemed necessary ☐ Other process	
b.	<ul> <li>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. (Select all that apply)</li> <li>□ District directs the contracted physician or individual's physician to determine status.</li> <li>□ District review team reviews and determines status (described below).</li> <li>□ Specialized disability/medical staff or unit reviews and determines status (described below).</li> <li>□ Other</li> </ul>	
	1.Upon the individual claiming a medical exemption, the examiner will assign the individual	

code in WMS to an employment code 70( exemption claimed pending medical

- The Social Welfare Examiner will send a documentation requirement form to the client with a medical to be completed by their health care practitioner. Upon receipt of the medical documentation, the examiner will make a copy of the original medical documentation, keep the original medical documentation in the case record, and pass the copy of the medical documentation to designated clerical staff.
- 3. The clerical staff will remove the client's name (blacks out) from the medical documentation, to assure confidentiality during the review process.
- 4. The clerical staff assigns a review team/process number to each case that will be reviewed. They log the client's name and assigned number for reference. They then forward the numbered medical documentation to the Employment Supervisor.
- 5. The Employment Supervisor collects and organizes all medical documentation, then calls a semi-monthly meeting to review all medical documentation with the review team.
- 6. The review team (which consists of Employment Supervisor and the Aid to Disabled Medical Services Specialist) objectively reviews all presented cases and makes a determination.
- 7. The Employment Supervisor sends all the clients their notifications of Disability Review Findings and Their Right to Contest (via CNS system) and changes the client's employment code to their correct code based on their medical review. She enters case comments and puts in the appropriate AFA codes.
- 8. The Examiner will get a referral form from the Employment Supervisor stating if the examiner needs to do any other referrals for the client (File for SSI, need employment

	No other staff member may make a determination on the employment determination.	
9.2 Mental Health Screening and Assessment		
a.	In addition to screening for a disability as part of the application or disability determination process, does the district administer a screening tool for TA participants to help determine whether a referral for a mental health evaluation is warranted?  ☐ Yes ☐ No	
b.	Describe the district's policy for determining when a program participant is offered a mental health screen:	
C.	What screening tools does the district use? (Select all that apply)  ☐ LDSS 5009 - Mental Health Screening Tool  ☐ The computer assisted version of the Modified Mini Screening tool (MMS)  ☐ Other Screening tool (describe below)	
d.	If using the MMS, indicate below the district's cutoff score (7, 8 or 9) for referral to a mental health evaluation.	
e.	Describe below the procedure the district uses if the screening tool warrants a mental health evaluation referral	

## 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.).

Our local medical review team makes the determinations based on the individuals medicals.

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

The medical review team reviews the individuals medical and treatment plan and refers the client appropriately.

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.

Our Employment worker tracks the participants compliance in treatment. Our CASAC worker tracks the drug and alcohol clients. Our employment worker does semi-monthly COGNOS audits and works hand in hand with the Examiners to determine compliance with their medical/physical treatment plans. Our treatment plans are updated as individuals circumstances change and at recertification.

#### 10. District Certification

#### 10.1 Certification

As a condition of the receipt of federal and State funds the Local District Commissioner of Greene 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, 2022 through December 31, 2023. 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.

1/06/2021 Kira Pospesel Commissioner