Onondaga 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.*)

TA Employment teams and staff assignments are created and adjusted based on the overall district caseload and needs at any given time. See attached organizational chart.

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 Onondaga TA Employment program is housed within the County complex consisting of the Civic Center and connected County Office building in downtown Syracuse. Caseload units within the program consist of a Principal Employment Counselor (supervisor), an Employment Counselor II, and several Employment Counselor I positions. Two Employment and Vocational Specialists are supervised by the Associate Director of the Employment Program. At this time, units carry caseloads based on employability. Caseloads are mixed as far as case type, TANF, SN, SN-MOE. The exempt team assesses, and case manages cases from TA Intake that claim an exemption from work requirements. They receive open cases from other units when employability changes to exempt. They request and collect medical documentation to determine ongoing employability. They refer to, monitor and track attendance in required treatment. provide case management, and link clients to providers in the community. The exempt unit is the primary referral source for the Social Security Transition (SST) team. The SST team works with individuals to collect additional documentation and assist with the application for SSD/I. They provide support and navigate throughout the entire SSD/I process. SST is supported by contracts with Legal Aid and Volunteer Lawyers Project. Identified cases go through a referral and review process to determine if appropriate for the team to support the application. The SST team Employment Counselors work on the SSD/I side of the case while another Employment Counselor on the team manages the employment program/OTDA requirement side of the case. The ESOL unit works with individuals who may have naturalization, citizenship, immigration, or employment authorization needs. Clients may be new to the Country or increased needs because of being new are new to the area. The team has additional knowledge and communication with area resettlement agencies and English as a second language providers. We are in process of adding additional staff to our ESOL Unit. The mandatory/work experience unit works with clients who are non-exempt from work requirements. They assess and assign to appropriate work activity if clients are not employed. Staff performing work experience related duties are on this team. The mandatory/2Gen team also works with clients who are non-exempt from work requirements. They also assess and assign to appropriate work activity if not employed. One employment counselor on this team is assigned to the 2Gen pilot program. This Employment Counselor has a caseload of parenting Moms 30 years and under, who are actively receiving support from 2Gen Case Managers and dedicated Income Maintenance workers in TA. Mandatory unit Employment Counselors educate and link clients to community resources to address

individual needs. Employment and Vocational Specialists focus on connections with vocational providers. Their caseloads consist of individuals who are in additional need of support and case management. All workers may refer for conciliation. Employment Aides are assigned to clerical support and staffing of our reception desks. Capacity of all units varies depending on the caseload and staffing at any given time.

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%.

Provider	Total Contract Cost per Year	Funding Source(s)	Categories of Clients Served	Programs, Services or Activities Provided
Partners In Learning	\$25,000	Local	FA SNA Family SNA Individual SNAP	Vocational & employment skills for emergent bilinguals, conversational English classes, assistance obtaining working papers and translating credentials.
Crouse Health	\$296,658	Local	FA SNA Family SNA Individual	Provides independent physical, mental health, and substance abuse

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
				evaluations/assessments. Review of case records and medical documentation for SSI applications. Supportive case management services.
RISE-Refugee and Immigrant Self Empowerment	\$50,000	SNAP E & T Local	FA SNA Family SNA Individual	Provides ongoing case management, job readiness and placement and workforce oriented English language training for those with limited English proficiency.
Industrial Medicine Associates	\$50,000	Local	FA SNA Family SNA Individual	Provides independent medical, psychological and related evaluations.
Home Head Quarters, Financial Empowerment Center	\$270,000	Local	FA SNA Family SNA Individual SNAP	One-on-one financial education and counseling. Two staff on- site to assist clients.
Jubilee Homes	\$247,600	Local	FA SNA Family SNA Individual SNAP	Job search assistance, short term pre- employment training, job fairs, youth development and first-time home buyer education.
Syracuse Interpreter Circle, LLC	\$1,000	Local	FA SNA Family SNA Individual	Provides in person and phone interpretation for non-English speaking clients on an as needed basis. Cost varies depending on number and length of appointments per month.
Voiance	\$105,000	FFFS Local	FA SNA Family SNA Individual SNAP	Provides over the phone interpretation for non- English clients.
Child Care Solutions	\$82,173	FFFS	FA SNA Family	Provides childcare referrals and education. One staff on-site with TA Employment.

Provider	Total Contract Cost per Year	Funding Source(s)	Categories of Clients Served	Programs, Services or Activities Provided
Legal Aide Society of Mid- NY	\$260,000	Local	FA SNA Family SNA Individual	Reviews and represents cases the SST team is supporting through the SSI application process.
Volunteer Lawyers Project	\$100,000	Local	FA SNA Family SNA Individual	Assists disabled clients with the citizenship process which in return allows them to apply for SSI.

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%.

Provider	Funding Source(s)	Categories of Clients Served	Programs, Services or Activities Provided
Center for Community Alternatives	Others: N/A	FA SNA Family SNA Individual SNAP	Provides case management, housing support, and job training to participants impacted by the criminal justice system.
Rescue Mission	Others: N/A	FA SNA Family SNA Individual SNAP	Provides meals, supportive permanent housing. and employment resources including a food service readiness training.
PEACE, Inc.	Others: N/A	FA SNA Family SNA Individual SNAP	Offers Head Start, home visiting services, case management, free tax preparation, and energy and housing services.
Women's Opportunity Center	Others: N/A	FA SNA Family SNA Individual SNAP	Provides work-readiness programs including short-term training and employability skill classes for those facing barriers to gaining or retaining employment.
Spanish Action League	Others: N/A	FA SNA Family SNA Individual SNAP	Provides general information and referral to housing, linkage to emergency help with expenses and bills, crisis intervention including counseling, emergency relocation,

Agencies and Providers to whom the District Refers for Employment Services

Provider	Funding Source(s)	Categories of Clients Served	Programs, Services or Activities Provided
			information, and referrals for social, legal, and health services, confidential translation services in medical settings and document translation.
SUNY EOC	Others: N/A	FA SNA Family SNA Individual SNAP	Offers GED classes, ESOL classes, college prep, various medical field related trainings, telecommunications, construction, and manufacturing training. Provides access to their Attain lab which is a comprehensive computer lab offering an assortment of academic, occupational, and employability courses.
Catholic Charities	Others: N/A	FA SNA Family SNA Individual SNAP	Provide support for refugees when they arrive in Syracuse. Case managers connect refugees to education, housing, jobs, English language class, health care, and more. Provides subsidized housing and case management to individuals and families transitioning out of homelessness. Provides health home care management services. Assistance with prescription co-pays, clothing, utility payments, household storage, and a food pantry.
Acces-VR	Others: N/A	FA SNA Family SNA Individual SNAP	Provides vocational rehabilitation services including counseling and guidance to develop and reach employment goals.
Syracuse City School District	Others: N/A	FA SNA Family SNA Individual SNAP	Offers High School Equivalency and GED classes and testing, ESOL classes and career counseling.
YWCA Syracuse & Onondaga County	Others: N/A	FA SNA Family SNA Individual SNAP	Offers resources, training, and case management to develop the knowledge and skills they need to become confident, competent, productive members in today's working society.
OCM BOCES	Others: N/A	FA SNA Family SNA Individual SNAP	Offers full and part-time certification and continuing education programs including business and industry training, literacy and High School Equivalency.

Provider	Funding Source(s)	Categories of Clients Served	Programs, Services or Activities Provided
Access CNY	Others: N/A	FA SNA Family SNA Individual SNAP	Offers supported employment programs to help individuals with a developmental disability and/or a mental health diagnosis find and succeed in jobs they enjoy.
Onondaga Community College	Others: N/A	FA SNA Family SNA Individual SNAP	Provides short term career training up to Associate degree programs.
Healthy Start	Others: N/A	FA SNA Family SNA Individual SNAP	Provides support services to these families through case management and outreach, including home visiting services. Create opportunities for healthy pregnancy and birth while enhancing the physical and emotional relationships of parent and child and adults with each other.

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:

DSS-ES staff are in regular contact with contractors to ensure the expected services are being performed. Contact takes place in person, via phone and through an internal database where contractors submit back up documentation on a monthly basis. Information is shared with both the contractors and staff regarding client eligibility for the services provided by contractor. Providers are invited to on-site meetings where they are able to speak to Employment staff regarding offerings. Monthly attendance and referral processes are monitored by TA Employment staff. Each year the scope of service is reviewed and adjusted as necessary.

1.3 OTDA Jobs Staff Agreement

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

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

Services Provided by Jobs Staff

Yes or No:	Services Provided:
N/A	Grant diversion
N/A	Job development (employer outreach)
N/A	WOTC pre-certification

Jobs Staff Target Groups

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

 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).

Onondaga County does not have OTDA JOBS staff.

1.4 Access to Services at New York State Career Centers

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

Programs and Services Provided at Career Centers

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

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

TA Employment continues to partner with the local Career Center, CNY Works. TA Employment and CNY Works have identified liaisons to accept referrals and answer questions for one another. CNY Works staff provide on-site information sessions to TA Employment staff regarding Career Center offerings as needed. TA Employment staff are participating members at One-Stop operator collaborative meetings which also include other community agencies. Information is shared via email blasts, at meetings and via the internet.

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)?

Yes or No:	District Orientation:
No	The district provides orientation in accordance with 18 NYCRR 385.5 and no additional information is provided at orientation.
Yes	In addition to the requirements outlined in 18 NYCRR 385.5 of the regulations, the district's orientation provides the following: Additional Information Shared at Orientation beyond what's required: -Assistance with work-appropriate clothing, uniforms, or necessary tools -Assistance with making transportation plans -Childcare subsidies -Income disregards -Transitional services offered by the district -HEAP -Earned Income Tax Credits -DSS-ES contact info. for departments -OneStop Career Center -Community Centers -Diaper Bank -Food Pantries -Computer Access -Medical Answering Services -WIC -Outpatient Treatment Programs for MH and Substance Use -Domestic Violence -211 -Financial Literacy -Home Visiting services -Links to MyBenefits.ny.gov -Link to apply for healthcare coverage - Onondaga DSS-ES Mission Statement

District Orientation Procedures

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:

The district provides orientation in several manners. At certification, TA Intake workers review the district orientation brochure with applicants. Once the case is determined eligible for assistance, orientation information is reviewed with the client by TA Employment staff. At recertification, TA Undercare staff review the orientation brochure. All three of these situations may take place either in person or over the phone. If in person, the client is offered an orientation brochure. If the conversation is completed over the phone, the brochure is mailed. Notes are entered by the worker in the system they use which may be Status Tracking or CMS.

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)?

Yes or No:	How the district conducts assessments
No	The district enters assessments directly into WTWCMS.
No	The district uses the LDSS 4980 (New York State Assessment) and later enters information into WTWCMS.
Yes	The district conducts assessments using a local equivalent tool, and later enters information into WTWCMS. If applicable, the local equivalent contains additional elements beyond what is required: See attached documents. Local tools used include: -Employment profile A (394M) -Employment profile B (395M) -Activity requirements and transportation assistance statement of understanding (450) -Bus pass for medical needs (519) -Childcare Plan (195) and/or Childcare decline (534).

District Assessment Procedures

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:

Assessments are generally completed after the client has been determined eligible for assistance. A COGNOS report sorted by employment code alerts TA Employment staff of case openings. Assessment appointments are scheduled as soon as possible for all case types with an Employment Counselor I, Employment Counselor II, or an Employment & Vocational Specialist. If an applicant would like to engage with TA Employment prior to opening or is in need of support services, an assessment is completed. Most assessments are scheduled in person. Phone assessments are completed on an as needed basis. A phone assessment may be conducted when the assessment due date is in the very near future, upon client request related to a transportation, medical or childcare issue, or to

accommodate individual circumstances in which a phone assessment would result in greater likelihood of client engagement and compliance. This process includes assessments for sixteen and seventeen-year-olds who are not in school. If a student drops out of school, they are scheduled for an assessment. All assessments include a review of the individuals strengths and barriers in the context of employment.

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

TA Employment staff are responsible for conducting assessments.

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)):

A. Graduation from a regionally accredited or New York State registered college or university with a Baccalaureate Degree in sociology, psychology, social work, human resources, business or labor/industrial relations, or a closely related field, and one (1) year of professional level work experience, or its part time equivalent, providing direct service to educationally and/or economically disadvantaged individuals -or-B. Five (5) years of full time paraprofessional or professional level work experience, one (1) year of which must have been professional level work experience as defined in (A).

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

No

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

No

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?

Employment assessments are updated whenever there are changes to the individual's circumstance and at change in employability status (for example, from exempt to non-exempt). If these circumstances do not take place, at minimum, assessments are updated yearly.

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)?

Yes or No:	How the district develops employment plans
No	The district enters employment plans directly into WTWCMS.
No	The district uses the LDSS-4987 (New York State Employment Plan) and later enters information into WTWCMS.
Yes	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: See attached documents. Local tools used: -Employment Plan - 56 -Restoration to Self-Sufficiency - 279 Additional elements: -Types of jobs the client has identified interest in -Employers who have such jobs -Specific positions for which they will apply

District Employment Plan Procedures

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:

Employment plans are completed by TA Employment staff in collaboration with the client at time of assessment for all case types.

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

The employment plan is updated as the client reaches goals outlined in the plan, at time of change in assigned activity, change in client circumstances, change in support services, or if there is a change in employability status. Employment plans are updated with the client whenever possible. If there are changes and the client is not able to be in person or is not reachable via phone, the TA Employment worker will update the plan and mail a copy to the client. Correspondence to ensure understanding is included asking the client to contact the worker for explanation or in the event they have questions. Employment plans are updated at least yearly. Plans are scanned into IEDR and provided to the client.

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:

The district adheres to the Onondaga County LEP Title VI/ADA policy in order to provide an equal and meaningful opportunity to people with limited language skills to participate in programs and activities. Inserts offering translation are included in each outgoing mailing. The district pays for qualified, independent, contracted interpretive services. Posters alerting clients of translation services and to identify their language are posted throughout the agency. Clients who refuse interpretation services or indicate a preference to utilize their own competent and appropriate interpreting resource, are asked to sign a waiver at each contact indicating services have been offered but refused to take advantage of the language services available. The district retains the responsibility for ensuring that effective communication is in place. Given the nature and complexity of our procedures, we generally do not permit children under the age of 18 to serve as interpreters. The district has a contract with Voiance which provides immediate translation over the telephone. The district also contracts with Syracuse Interpreters Circle, LLC on a fee for service basis to provide interpretation with medical providers and individual appointments with workers. TA Employment has staff who speak several languages. TA Employment has a dedicated ESOL team. The district has partnered with several community partners to provide activities which can include job search, work experience, ESL, vocational training, and other activities as appropriate for those with limited English proficiency. The Spanish Action League and Partners In Learning work primarily with Spanish-speaking clients. The Refugee Assistance Program (RAP), Catholic Charities and RISE provide acclimation activities for newly arrived refugees. Attendance/progress is monitored for each individual. The Refugee Assistance Program, Catholic Charities, Interfaith Works, or other partners may provide translation or resettlement services for several months. Refugees classified RCA are assessed and assigned to activity after twelve months.

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:

Visits to subsidized employment sites and Work Experience sites are conducted regularly. Attendance/progress from work experience and other activity sites is submitted weekly, allowing workers to respond in a timely manner to attendance issues. All clients in need of childcare are required to have a childcare backup plan. Support service needs are addressed prior to activity assignment. At assessment, activity requirements are reviewed which describe attendance expectations. At orientation and worker contact, clients are told to contact their worker as soon as possible if their need for support services changes. Worker contact information is included on all correspondence. To the extent possible, appropriate activity options are presented to the client.

3.4 Strategies/Procedures for Engaging Sanctioned TA Participants

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

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	Described below are the strategies the district uses to attempt to engage sanctioned participants when the durational period of the sanction is completed: An Employment Counselor re-engages sanctioned individuals through a combination of invitation to 1:1 appointments, mailers, and phone calls. Sanctioned individuals who request re-engagement and have served the durational period are assigned to work activity to demonstrate compliance. Barriers to compliance such as childcare and transportation are addressed prior to assignment. Sanctioned individuals who claim medical limitations are able to participate in the disability review process. Sanctioned individuals who repeatedly refuse or fail at re-engagement may be interviewed by Employment staff at recertification. Staff explain why compliance is beneficial and the process to do so. Interviewers attempt to gain an understanding of why the participants continue to remain sanctioned and offer services as indicated. Job development assistance is also offered. District investigation staff conduct home visits to assess special needs or circumstances and to offer services, including a streamlined manner in which to initiate the compliance process.
No	Described below are the strategies the district uses to attempt to engage sanctioned participants during different times in the sanction period:

Strategies and Procedures for Engaging Sanctioned TA Participants

3.5 Strategies for Reducing the Need for TA

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

Recipients who are parenting and under the age of 25, may be offered the services of a dedicated team consisting of Case Managers, Income Maintenance Workers and an Employment Counselor. The 2GEN team is dedicated to reducing generational poverty through a whole family coaching approach. The district will include non-custodial parents in this wholistic approach. Financial Empowerment Counselors are available on-site to educate financial best practices including opening bank accounts, budgeting and debit relief. TA Employment has a dedicated Social Security Transition team which assists TA clients with documented chronic disabilities to apply for SSI or SSDI. The district provides referrals to many services in the community related to housing, employment, education and medical services. The benefits of employment are discussed at all opportunity including Work Pays visuals and explanation of the earned income disregard. Work activity is assigned after assessment with the intention of purposeful assignment leading towards a reduced need for TA.

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
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 SNAFAM SNA 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 SNAFAM SNA SNAP

Activity and Definition	Case Type
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 SNAFAM SNA 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 SNAFAM SNA 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 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 SNAFAM SNA 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 (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.	FA SNAFAM SNA SNAP

Activity and Definition	Case Type
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 SNAFAM SNA 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.	FA SNAFAM SNA SNAP
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 SNAFAM SNA 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 SNAFAM SNA 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.	N/A

Activity and Definition	Case Type
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.	N/A
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.	FA SNAFAM SNA SNAP
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.	FA SNAFAM SNA

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)?

Yes or No:	How the district participates in job development activities
Yes	District staff contacts employers to solicit jobs for TA and/or SNAP participants. Describe how this is done, including number of staff, frequency of contact, etc.: TA Employment has established relationships with many local employers and is in regular communication with them regarding job openings. Staff throughout the program contribute to job development duties. Job leads are posted internally for all staff to see and share with clients. Job Leads are available in our waiting rooms. Informative slideshow containing employment and training related events in the community play in waiting rooms on several floors of DSS. Employment staff host job fairs and on-site recruiting events with local employers. Workers use the internet to search job opportunities and appropriate employers for their clients. The local career center provides job leads and labor market information used to assist clients.
No	District contacts or has an agreement with another agency to contact employers and solicit jobs for TA and/or SNAP participants. Described here is how this is done, including number of staff, frequency of contacts, etc.: N/A

How the District Participates in Job Development Activities

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 is in close communication with educational providers in the community and ensures it has information about available offerings. If a client requests this type of education and the district is in agreement that it will increase the client's employability, the client will be assigned to the activity. The district supports educational agencies applications for State funding for additional programs as appropriate.

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 is in close communication with vocational education and training providers in the community to ensure it has information about available offerings. When funds are available, the district may also contract for training programs that meet the needs of its clients. Providers of vocational training and job skills training include Onondaga Community College, OCM BOCES, SUNY EOC, YWCA, Women's Opportunity Center, Center for Community Alternatives, Rescue Mission, and Jubilee Homes.

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.

Educational opportunities for clients who demonstrate low literacy levels and/or who do not have a high school diploma or equivalent are discussed during assessment as part of determining the appropriate activity based on individual needs, The topic is be revisited during case reviews and upon the request of the client. Staff have access to a list of available educational opportunities, schedules, and minimum entrance requirements. The assigned activity site may report TABE scores once tested and indicate if the participant is appropriate for their offerings. School records may be obtained for a better understanding of the individuals needs. The Syracuse Central School District holds testing on-site with the intent to then enroll students into their adult learning classes.

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.

Such requests are approved unless the worker determines the individual had recently engaged in such activity and did not maintain acceptable attendance or satisfactory progress or has repeatedly engaged in such activity with little or no progress. Workers can utilize online information including https://dol.ny.gov/why-go-school and NYS and local occupational and wage statistics provided by the One-Stop and DOL to guide conversations.

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.

Considerations related to approval of training include the status of previously enrolled or completed related training, physical, mental and cognitive ability of the client to complete training and work in the related occupational area, schedule and length of program, financial liability or funding availability to complete the program without taking loans or entering into debt, academic status of the client if currently, or previously, enrolled in educational or vocational training, previous disapproval of training for the same or similar training, if the individual quit a job to attend training, their demonstrated ability to attend and maintain satisfactory progress and attendance in assigned work activity, the ability to request and obtain monthly attendance/progress and grades for such activity, and review of labor market data related to subject of training.

Clients seeking vocational training should complete a Vocational Training Info Form which is reviewed by Employment staff. The district utilizes section 385.9 of the Employment Policy Manual to guide approval.

Individuals may request approval for up to a two-year post-secondary program if the training can be shown to assist the individual in obtaining a job in a field that is in demand. Regarding four-year post-secondary degree programs, potential exception of approval can be made when less than 2 years of attendance remains for the individual to graduate with the four-year degree. All above considerations must be review prior to approval. Approval is on a case-by case basis. Approval is granted on a semester basis, or other segment/module basis, if applicable to the activity. The Employment worker re-evaluates approval and the employment plan based on progress upon completion of the initially approved semester, segment, or module. The client must comply with all other eligibility and employment requirements if approved/assigned to participate in job skills or vocational education activity.

In all cases, approvals for post-secondary programs must be developed in collaboration between worker and client and be included in the employment plan. In the event a client is already enrolled in and attending, prior to being assessed, the training will be approved when the above conditions are met.

Exceptions to the considerations will be made for recipients who are part of the 2Gen pilot project. The district does not pay tuition.

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

1. History of providing education/training services or being part of a larger organization, which has done so. The WIOA Career Services Center list of approved providers and programs will be utilized 2. Training provides skills that are in demand for specific occupations locally (as determined by DOL economic analysts) 3. There is a written standard of satisfactory progress for each training course, including qualitative measures of progress (grades, competencies) and quantitative measures of progress (established amount of time to complete training) 4. Courses for which tuition is charged will not be approved if similar, free, programs are available.

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

Approved training options are discussed at the time of assessment. Flyers are posted in staff offices and waiting areas with information about approvable trainings. In the event a clients request a training that has not previously been considered for approval, the district will contact the provider to determine if approval can be given.

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

All recipients receive verbal and written verification of approval for training or enrollment in a work activity. The approved activity is documented on the employment plan. Clients are provided with an "Initial Activity Assignment and Verification form" with information regarding the assigned activity. See documents.

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.

Verification of school enrollment is requested by TA Intake and Undercare workers at application and recertification. If documentation is not received, or received and states the individual is no longer enrolled, the information is shared with TA Employment. TA Employment will recode and schedule an assessment and assist to re-establish school enrollment or assign to other work activity. A COGNOS report will be utilized to monitor those turning 19 and no longer exempt.

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.

All individuals are assessed to determine if there are limitations to work activity due to medical, mental health or cognitive impairment. Individuals are assigned to activity within the limitations provided by client's physician or the agency's independent medical examiner. All documented limitations that impact the ability to participate in the activity are shared in writing with the activity supervisor with a release of information from the client. All assignments are discussed in collaboration with the client in order to address expressed concerns. The client is able to enter the disability review process if they claim limitation after assignment.

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 highest level of approvable post-secondary level education is a two-year college degree. If enrolled in a four-year degree program, the client must have less than 2 years left to complete to be considered for approval. Approval is made on a case-by case basis related to considerations documented in e. above. Clients in the 2GEN program may be considered for additional approval if reviewed and supported by their Employment Counselor and 2GEN Case Manager. Providers of post-secondary education include OCM BOCES, Onondaga Community College, SUNY EOC, and Women's Opportunity Center.

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):

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

Conditions For Disapproval of Work Activities For Individuals Enrolled in College

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).

Non-exempt individuals will be enrolled in up to 35 hours of activity/week including, whenever possible, the requisite number of hours of countable activity as defined under federal and state legislation. When possible, clients who are employed less than 35 hours/week will be assigned to additional activity to total up to 35 hours/week. The district will take into consideration the time the client has to travel to and from work when determining if additional activity assignment is reasonable and will not negatively impact the ability to maintain employment. The district will also take into consideration other circumstances which may impact the ability to participate in full time activity such as housing issues, other agency involvement, needs of children, and current life circumstances. Nonexempt individuals with children under the age of six may be required to participate in less than 35 hours/week. The district will focus on assignment to activity that is thoughtful and expected to result in steady movement toward self-sufficiency first and foremost. The Federal minimum wage is used when determining whether non-exempt individuals can provide childcare for another parent per 21-ADM004. When possible, two weeks will be allowed to the recipient to give notice to the parents of the child(ren) receiving the care. Additional time may be permitted as determined by the district based on case circumstances. In most instances, an individual less than 20 years of age will be assigned to educational activities. Individuals between the ages of 16 and 18 may be excused from secondary school attendance if it is determined, through an assessment, that further attendance is not likely to result in attainment of a high school diploma or its equivalent, and the individual participates in non-traditional educational activity designed to lead to the attainment of a diploma or equivalent, or in job skills training. The district may require any nonexempt adult to participate in educational activities consistent with the individuals assessment and employment plan. Satisfactory attendance/progress is required in all assigned activities. Absences may be excused if they are documented due to emergency medical, dental, or mental health/social work appointments, illness, pre-approved nonemergency medical, dental, mental health/social work, or attorney appointments, court appearances, Temporary Assistance recertification or fair hearings, short-term childcare interruptions, death or serious illness in family, short-term transportation problems, job interviews, temporary site closings, other pre-approved absences for mandatory appointments with Children's Division, HEAP, WIC, Probation, etc., and adverse weather conditions. Recipients will participate in maximum work experience hours as determined by dividing the temporary assistance grant plus SNAP grant by the higher of federal or state minimum wage (unless medically limited) based on the availability of sites. Safety Net recipients also participate in other activities including job search, job readiness training, or secondary school for a total of up to 35 hours/week. The district will determine any good cause exceptions. Vocational training may be approved. Individuals in single-parent families in receipt of Safety Net Assistance due to having received 60 months of cash assistance may participate in the same work activities, subject to district approval, as single-parent

TANF families. All two-parent family adults (whether in receipt of TANF or Safety Net Assistance) should participate in full-time activity unless subject to medical limitations or due to individual case circumstance. If assigned to work experience, they will be assigned to up to the maximum number of allowed hours. Whenever possible, all non-exempt FA, SN, and SN Family individuals are scheduled for assessment once the case opens. Activity assignment should be made at initial assessment. When work status changes from exempt to non-exempt individuals are assigned to work activity as soon as possible after reassessment.

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	2100
Households without Dependent Children Average Monthly	2300

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:

An internal data base provides monthly reports including entered employments by team, case type, and staff person, average wage at placement and top placement sites. Our internal data is compared to the COGNOS reports to verify and correct programming errors. COGNOS reports track length of time a code 70, clients not counting, participation and engagement rates, assessment status and numbers and type of sanctioned individuals. Each supervisor is trained in COGNOS reporting and can create individual reports based on work or team assignment.

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:

No

Applicant Job Search

Applicant Job Search	Min. Contacts	Min. Hours	Additional Information
TANF and SNA MOE			
SNA Individuals			

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

Yes

TA Recipient Job Search

Recipient Job Search	Min. Contacts	Min. Hours	Additional Information
TANF and SNA MOE	10	10	Job Search is often assigned in combination with other activity. A maximum of 2 weeks of job search is assigned at a time. Clients are expected to reach the minimum contacts and minimum hours of assignment. Job search activity includes elements of the approved definition of job search including resume development, online applications, phone contacts, and job search group meetings. Clients who are employed or work limited may be assigned less job search to accommodate work hours or limitations. In all job search assignments, the district will adhere to HHS and State requirements in documenting that the number and type of contacts is reasonable for the amount of time assigned. Travel time between potential employers will be included in this determination. Current job leads matching work abilities and skills will be provided. Direct job leads may be assigned which are specific positions/employers that are actively hiring, and which the jobseeker meets minimum requirements.
SNA Individuals	10	10	Job Search is often assigned in combination with other activity. A maximum of 2 weeks of job search is assigned at a time. Clients are expected to reach the minimum contacts and minimum hours of assignment. Job search activity includes elements of the approved definition of job search including resume development, online applications, phone contacts, and job search group meetings. Clients who are employed or work limited may be assigned less job search to accommodate work hours or limitations. In all job search assignments, the district will adhere to HHS and State requirements in documenting that the number and type of contacts is reasonable for the amount of time assigned. Travel time between potential employers will be included in this determination. Current job leads matching work abilities and skills will be provided. Direct job leads may be assigned which are specific positions/employers that are actively hiring, and which the jobseeker meets minimum requirements.

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 selfemployment as part of an individual's required work activities, please note this policy below:

A recipient who provides childcare for another parent and who receives less than the State hourly minimum wage in payment will be required to participate in 35 hours of activity each week. However, two weeks will be allowed to the recipient to give notice to the parents of the child(ren) receiving the care; additional time may be permitted as determined by the district based on case circumstances. For all other self-employment, the district will approve self-employment as part of an individual's required work activities provided the self-employment income is documented and the hours of employment are documented. Self-employed individuals earning less than the Federal hourly minimum wage will be required to participate in activity up to 35 hours/week. For budgeting purposes, the number of hours for self-employment is determined by dividing the individual's self-employment income (gross income less documented business expenses) by the Federal minimum wage.

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).

Yes or No:	How written information is provided to SNAP applicants and recipients
Yes	Eligibility staff use the LDSS-5193 Important Information about SNAP Work Rules (General, Mandatory E&T, and ABAWD) and the LDSS-5193A Important Information about SNAP Work Rules (General and Mandatory E&T) 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.

Written Information Provided to SNAP Applicants and Recipients

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.

Onondaga County will conduct the comprehensive oral explanation with TA/SNAP and NTA/SNAP households over the phone and in person as able and appropriate. The explanation will take place at application, recertification and when a household member becomes non-exempt from SNAP work requirements.

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).

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.

How the District Documents the Written Requirement 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).

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

How the District Documents the Oral Requirement in the Case Record
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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):

The district does not require NTA SNAP recipients to participate in SNAP E&T Activities.

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

N/A

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

NTA SNAP work registrants are verbally informed of services available at application and recertification. Those who had applied for, and were denied TA receive the district's orientation brochure at application.

If a NTA SNAP recipient requests supervised job search, an Employment Counselor would be responsible to assign hours and number of applications. Direct job leads would be given matching the participants qualifications. Job Search would be reviewed no less than biweekly. Use of computers in our resource room is available M-F.

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):

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

Who the District Provides Employment and Training Services Information to

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

How the District Provides Employment and Training Services Information

Yes or No:	How the district provides employment and training services information
Yes	Materials and information provided in print form
No	Materials and information provided on a website. Described here is how individuals are made aware the information is available on the website:
No	Material and information provided via email.

5.5 Provider Determinations

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

Individuals are screened in advance of activity assignment/referral. TA Employment and providers communicate the ideal skillset or suggested education level to attend activities. Expected progress and requirements to continue in the activity are also communicated and share with assigning/referring staff. Effort is made in advance to assign to appropriate activity for the individual. After assignment, the provider is generally able to inform the district if the client is a good fit, or not, within 10 days from the date of provider determination. The provider will contact the assigning TA Employment worker of their decision via phone, email or written on attendance/progress forms. Upon notice from the provider the district agrees to reach out to the client within 1 week to discuss the provider determination. The client is informed verbally of the provider determination. The worker documents the determination and conversation with the client in CMS notes.

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.

During TA employment and provider communication, the provider is asked to share any concerns related to appropriateness of an individual's assignment. The provider is reminded of this as the district seeks consistent progress and feedback on referred clients.

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.

TA Employment staff review all provider determinations and ask for more information if a determination is unclear or does not seem to hold merit. If a determination does not fall in line with previously communicated requirements the provider has communicated, the determination is taken to a higher-level supervisor for review. At that time the district may ask for the determination to made in writing, if only verbally communicated.

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, the Self-Sufficiency, Employment, Assessment and Management System (SEAMS) or other automated systems used for reporting work activities is accurate, including actual hours, excused absences and holidays; and is based on documentation in the case record; and

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

24

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

24

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

12

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

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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:

Excluding tuition, the district will provide supportive service expenses deemed necessary for participation in approved training, other assigned activity, or employment including but not limited to work clothing, occupation related tools or equipment licensing, testing fees for approved training and study materials for approved vocational training. Costs associated to obtain a birth certificate may be covered for verified employment purposes or to obtain ID. All requests are evaluated on a case-by-case basis. Evaluation criteria includes alternative sources of funding, estimates from one or more providers of service or material, whether the requested item/service is required or optional and whether the amount of the request is commensurate with the need. Written documentation from the work site or employer of the need for the required items must be submitted. Payment will be based on the lowest cost estimate. When payment is issued to the EBT card, the client must submit proof that the funds were used to purchase the items authorized by an established due date. If the district determines that the supportive service payment was not used for the intended purpose, or a receipt is not provided, a referral to investigation staff will be made and may result in recoupment. Alternatively, payment may be sent directly to an approved vendor.

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).

Yes or No:	Transportation Assistance Provided
Yes	Bus pass/token
No	Gas card/voucher
No	Mileage reimbursement at the IRS Business rate (effective 1/1/2023 is 65 cents per mile)

Transportation Services Provided to Clients

Yes or No:	Transportation Assistance Provided
Yes	Mile reimbursement at the IRS Medical/Moving rate (effective 1/1/2023 is 22 cents per mile)
No	Other mileage rate (the methodology used to establish reimbursement rate is described here):

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

The district has established the maximum distance an individual would be required to walk to participate in a work activity assignment or to access public transportation is a maximum of one mile. Staff will consider factors such as medical limitations, the safety of the individual based on location and schedule of assignment, weather at any given time, personal circumstances and any concerns or barriers the worker or client identify when discussing the assignment. If location is barrier to activity or transportation, the individual will be linked to relocation information. A discussion will take place regarding how their location or lack of reasonable transportation impacts their self-sufficiency and reliance on TA.

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:

On a case-by-case basis, such services may include:

-Referral to childcare education and subsidy

-Work-related expenses such as career related equipment (tools, stethoscope), work appropriate clothing and uniforms, and licensing fees (skill-based or drivers)

-Transportation expenses such as car repairs, insurance, bus pass, Lyft rides, and 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:

Transportation assistance will be provided for as long as the individual remains employed with an open TA case. See 7.1 c. for additional considerations regarding transportation. Childcare subsidy may be provided and adjusted based on the needs of the employed individual. Financial literacy services through Financial Empowerment Center are offered and available on-site and throughout the community. Ongoing case management services are provided. OJT and TEAP may be utilized to increase employment opportunities. All support services are evaluated on a case-by-case basis.

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:

Assistance with the cost of car repairs and/or insurance for a vehicle owned by a client may be provided, if required for employment. Work-related expenses may be provided for employment, including but not limited to uniforms, work clothing and occupation related tools or equipment licensing. Lyft rides for employed clients who cannot be accommodated by the bus service, and do not have access to other means of transportation to and from work. All support services are evaluated on a case-by-case basis.

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.):

Childcare subsidy is provided for households determined eligible.

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).

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

The districts process for conduction TA conciliations is described below:

Employment workers have been provided with conciliation case prep/transfer guidance that is reviewed prior to processing a conciliation. The direct supervisor determines if their staff must also submit the case to them prior to conciliating. Conciliation notices are mailed to the address on file. The Conciliation notice instructs the client to respond in writing or by phone within 10 days of the notice. Contact information is provided if the client wishes to ask questions or respond verbally. Once the verbal or written response is received, the designated staff person with no involvement in the case reviews all the circumstances of the case including notes, attendance, pay stubs/other employment verification, doctor's notes and appointments/hospitalization/clinic records, other appointments, any documentation submitted, as well as the response given by the client, to determine whether the client willfully and without good cause refused or failed to comply with employment requirements. In situations when a client makes a specific claim but does not submit supporting documentation, the client may be given an additional ten days to provide such

documentation. In the event the client does not respond to conciliation the case is reviewed as is. The review may lead to conciliation withdrawal or a referral for sanction.

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?
No	The client's employment worker
No	A supervisor in the district
Yes	A separate entity (described here): A TA Employment worker at the level of Employment Counselor I or higher with no direct responsibility for the case.

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

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

Employment workers are provided with conciliation case prep/transfer guidance that is reviewed prior to processing a conciliation. The supervisor determines if staff must also submit the case to them prior to conciliating. Conciliation notices are mailed to the address on file. Conciliation notices instruct clients to respond by either providing in writing or by phone with the reasons they did not comply with the required SNAP work requirement and/or to avoid a SNAP sanction by demonstrating compliance through a job search assignment. A verbal or written response and/or the job search assignment must be submitted within 10 days. Once the response is received, the designated staff person with no direct responsibility for the case makes the willful and good cause determination. The designated staff person reviews all the circumstances of the case including case notes, attendance, pay stubs/other employment verification, doctor's notes and appointments/hospitalization/clinic records, other appointments, and any other documentation submitted, as well as the reasons offered by the client to determine if they willfully and without good cause refused or failed to comply with employment requirements. If the client submits a response that shows the client's actions were willful and without good cause, the client is given an additional 10 days to demonstrate compliance through a job search assignment.

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?
No	The client's employment worker
No	A supervisor in the district
Yes	A separate entity (described here): A TA Employment worker at the level of Employment Counselor I or higher with no direct responsibility for the case.

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:

SNAP recipients wishing to demonstrate compliance to avoid a SNAP sanction must complete ten job search contacts. Any combination of in person applications and online applications is sufficient. Documentation must be submitted within 10 days to be considered in compliance and having avoided a SNAP E&T sanction.

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:

The individual is assigned to comply with assigned activity for 10 days unless the individual has limitations which impact their ability to participate. If they comply with the activity with no unexcused absences the sanction will removed. A sanction may also end once it has reached its duration if the individual can demonstrate incapacity or obtains full-time (30 hours or more) employment. 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:

In most instances, SNAP recipients who wish to end their employment sanction will be assigned to complete ten job search contacts. Any combination of in person applications and online applications is sufficient. Documentation must be submitted within 10 days to be considered in compliance and end their employment sanction. TA Employment staff may assign to other activity. In such circumstances, the client must attend satisfactorily for 10 days to be considered in compliance and end their employment sanction. An individual may be eligible for SNAP benefits before the end of the durational period if the individual documents that they are exempt from SNAP work requirements and is otherwise eligible for SNAP benefits.

8.3 Dispute Resolution

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

Grievance Mediation

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

9. Disability Determinations, Documentation and Requirements of Exempt Individuals

9.1 Disability Determination Process and Tools

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

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.
Yes	District contracts directly with a physician to provide independent medical evaluations.
No	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: The employment worker reviews all documentation submitted by the client. Additional information may be requested from the client and/or the client may be referred for an independent evaluation through either the OTDA managed contract or a local contract with Crouse Hospital. Upon receipt of all available information, a decision is made by the worker regarding the individual's claim of disability.

Process for Determining Disabilities and/or Work Limitations

b. Described below is the district's procedure for notifying an individual of their exempt or nonexempt 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:

The Employment worker reviews the medical documentation and make a determination on whether the client is exempt, non-exempt, or work-limited. The LDSS4005, Notice of Disability Determination, 4005a (determined exempt) or LDSS 4005a (determined non-exempt) is mailed based on the determination.

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

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

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

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

Yes or No:	District's process for reviewing medical documentation
Yes	District directs the contracted physician or individual's physician to determine status.
Yes	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: See attached documents. TA Employment workers send an approved local equivalent, employability evaluation MH and Physical - 597 and 598 with a Request for Medical Documentation - 282, to be returned in as soon as 10 days. If the individual does not have a health provider, or the district is looking for a second opinion, the worker may refer the individual for an independent evaluation review with Industrial Medical Associates or Crouse.

Process for Reviewing Medical Documentation

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?

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 individual's treating practitioner, or the state or district contracted provider will make the determination if the individual has the potential through treatment or other rehabilitative activity to restore or improve employability.

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

See attached document. If the treating practitioner, or the contracted provider, indicates the individual would benefit from treatment, the Employment worker issues a "Treatment Referral Notice - 404". In addition, a restoration plan is completed in cooperation with the individual which outlines the required steps needed to improve the ability to work.

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.

Compliance with a treatment plan is tracked by the Employment worker responsible for the case. Treatment attendance/progress is verified on a monthly basis. If documentation received does not communicate satisfactory attendance/progress with treatment, the Employment worker is responsible for reaching out to the provider for clarification. A release of information is obtained. The provider updates the treatment plan as they see fit. The Restoration to Self-Sufficiency is updated at each change in treatment including level of treatment and provider.

10. District Certification

10.1 Certification

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

2/14/2024 Sarah Merrick Commissioner