

UNITED STATE DEPARTMENT OF AGRICULTURE
FOOD AND NUTRITION SERVICE
SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM

April 2016

Employment and Training Plan Handbook



***A HANDBOOK TO
HELP STATES PREPARE
AND SUBMIT ANNUAL
E&T STATE PLANS***

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I. Introduction

This document provides guidance to State agencies administering and operating the Supplemental Nutrition Assistance Program (SNAP) Employment and Training (E&T) program on how to prepare and submit their annual plan to the Food and Nutrition Service (FNS) for approval. Section 6 of the Food and Nutrition Act of 2008, as amended, (the Act) provides that each State shall implement an employment and training program for the purpose of assisting members of SNAP households in gaining skills, training, work or experience that will increase their ability to obtain regular employment.

SNAP E&T programs include one or more training components such as: job search, job search training, workfare, actual work experience or training, educational programs or activities, self-employment activities, job retention, and other appropriate programs, projects, or pilots as approved by FNS. SNAP E&T components are designed to help participants move into unsubsidized employment.

This document supersedes the 2003 E&T Handbook and provides a new suggested format based on the Federal regulations at 7 CFR 273.7(c) and Federal policy guidance. The new format provides more information on key financial and organizational aspects of E&T programs that will facilitate an easier and more efficient plan review and approval process. Lack of information in any aspect of an E&T plan will result in FNS requesting additional information or clarification from the State agency, which could delay plan approval. State agencies may contact their FNS Regional Office for further information on SNAP E&T policies and Federal financial management policies.

State agencies should also refer to the E&T Toolkit, which contains policy guidance and useful program tools. The E&T Toolkit can be found on the SNAP Employment & Training webpage, under E&T Policy and Guidance at: <http://www.fns.usda.gov/ET-policy-guidance>.



II: Program Design

II. Program design

A growing body of evidence points to the importance of an individual's skills as a driver of economic security. Two-thirds of the jobs created over the next decade are expected to require at least some education or training beyond high school. Today's employers are seeking a more qualified, higher skilled workforce. Without access to workers with the right skills, employers will struggle to grow their businesses, which can limit State economic growth. One of the strongest efforts States can make to boost their economic growth is to ensure workers have access to education and skills training. Moreover, slow projected growth in the labor force means that most of tomorrow's workforce is already in the labor market today. Investment needs to be made in the current workforce, not just the future workforce, in order to meet current and future economic and employment needs.

Expanding access to education and training for SNAP participants is a critical part of this response and can help participants transition to self-sufficiency while investing in the State's economy. SNAP E&T has the potential to improve the job prospects for thousands of low-income and low-skilled workers across the country with more effective and robust training programs.

State agencies have a great deal of flexibility in the design of their SNAP E&T programs. They may design E&T programs to meet the range of needs of SNAP participants as well as employer needs; to help those who are work-ready find good paying jobs or help those who need additional skills enroll in education or training programs that lead to in-demand careers; and assist participants as they transition to employment through the use of retention services. State agencies have an opportunity to expand the reach of their SNAP E&T program by forging partnerships with State and local agencies, community-based organizations, private for-profit and non-profits, foundations, and employers to more fully utilize and leverage available Federal funding.

Contact your FNS Regional Office E&T analyst for information on how FNS can support your State's efforts to grow a more skilled workforce through SNAP E&T.

Considerations prior to plan submission

The following ideas should be considered when deciding and planning the next step in the evolution of each States' E&T program.

- **A comprehensive client initial assessment and ongoing case management are keys to an effective E&T program.**

A strong comprehensive initial assessment collects general information about demographics, educational attainment, basic skills, literacy, work experience, and public benefits. It also assesses objective and subjective barriers to work, such as disabilities, criminal background, family composition, housing circumstances, childcare needs, and transportation needs.

Comprehensive case management services may help individuals navigate identified barriers and challenges that they face in obtaining and retaining employment. E&T case managers, sometimes called career specialists or employment counselors within the workforce system, plays a critical role in helping participants successfully obtain and retain employment. In an effective case management model, the case manager guides, motivates and supports job seekers by continually assessing their needs and barriers, identifying resources, and advising on career and training opportunities.

- **Assessment of State Resources and Needs.**

During the E&T Planning process State agencies should continuously evaluate their SNAP E&T program by conducting an assessment of State resources and needs. Some of the elements that might be included in this assessment may include assessment of other workforce development programs and review of collaborations with other entities in the State in the delivery of E&T services, such as Workforce agencies, community colleges and community based organizations.

- **Incorporating Job-Driven Elements into SNAP E&T Programs**

Today's labor markets require workers to have higher levels of skills and education than ever before. To achieve economic self-sufficiency and reduce their need for food assistance, SNAP recipients must have opportunities to increase their skills and gain work experience through job-driven SNAP E&T programs. Incorporating job-driven elements into your State's E&T program and plan requires thoughtful planning with your State's workforce and education systems. You can consider the following in developing a plan that will help participants gain the skills they need:

- **Make training programs responsive to the needs of local industries/employers and job opportunities in the local labor market.**

State agencies should engage with employers and local industries when designing SNAP E&T programs and components. Inviting businesses to the table to help design curricula and provide work experience can help ensure that participants are learning the necessary skills they will need to compete for available jobs in their community. State agencies should also partner with local workforce boards, which can identify and describe high-demand sectors.

- **Create opportunities for individuals to earn postsecondary credentials that employers value, including certificates and degrees, industry-recognized credentials, and licensures.**

Economists predict that by 2020, almost two-thirds of jobs will require some education beyond high school. The opportunity to earn credentials that are portable and widely recognized by employers will best position a SNAP E&T participant to

compete for a good-paying job that reduces or eliminates their need for food assistance.

- **Encourage flexible and innovative instructional models that accelerate learning and transitions to employment.**

A growing body of evidence shows that individuals with low foundational skills are more likely to succeed in programs that offer flexible scheduling, contextualized and accelerated instruction and wraparound supportive services. These models have been proven to be more successful than traditional, sequential approaches, e.g. a stand-alone high school equivalency preparation course.

For individuals with very low skills, State agencies may fund the initial steps of an individual's career pathway through SNAP E&T where other education and workforce programs leave gaps, such as helping college-ready adults without a high school diploma access to post-secondary education. State agencies may also use braided funding approach to deliver a continuum of services and supports using multiple sources of federal, state, and local funds.

- **Promote work-based education and training to help individuals earn while they learn.**

State agencies can design components that allow E&T participants to gain valuable work experience in their chosen career, improving their likelihood of landing a job in their field upon completion of an E&T program. Such work experience or work-based learning can include internships, pre-apprenticeships, Registered Apprenticeships, or other on-the-job training.

- **Provide robust and embedded support services to address barriers to success.**

Unlike most other workforce programs, State agencies are required to provide payments or reimbursements for expenses directly related to participation in an E&T component, such as transportation, books, course fees, and dependent care. States should take full advantage of this flexibility to include robust supportive services for SNAP E&T participants, who often have multiple or very serious barriers to employment. For participants with significant barriers to employment, such as poor health or lack of affordable child care, State agencies should offer participant reimbursements that enable clients to participate in longer-term training that offers a better chance at long-term self-sufficiency.

- **Make connections with other education and training systems, partner organizations, and institutions, such as community colleges and community-based organizations.**

SNAP recipients may interact with or benefit from a multitude of services provided by community organizations, such as food banks, private charities, and faith-based organizations, or other State agencies/programs, such as American Job Centers, Temporary Assistance for Needy Families (TANF) agencies, adult education providers, and community colleges. Developing partnerships with these other organizations can streamline the experience for SNAP E&T participants and can help State agencies use scarce resources more efficiently.

III: Plan Requirements

III. Plan Requirements

Receipt of a Federal grant for the SNAP E&T Program is contingent upon approval of the State E&T plan by FNS. This handbook covers all of the items that must be included in the State E&T plan.

E&T Plan Format

- **Cover Page and Authorized Signatures.** Contains basic contact information and required signatures from the State SNAP agency director (or Commissioner) and fiscal representative. Number the cover page as page 1.
- **Assurances.** This documents that an authorized official has acknowledged key obligations of the E&T plan (including consultation with Indian Tribal Organizations (ITOs) as appropriate.)
- **State E&T Program, Operations and Policy.** Provides a summary of the State E&T Program and outlines relevant State policy information.
- **Pledge State Declaration and Summary.** Outlines pledge State commitment and pledge services (if applicable.)
- **E&T Component Details.** Lists program components with a description of each component offered.
- **Estimated Participant Levels.** Lists participant levels in each component.
- **Operating Budget.** Gives a budgetary overview of the entire State E&T program. The rows are for the categories of expenditures that the State agency administering and operating SNAP E&T will incur during implementation of the E&T plan, such as salary and benefits, copying/printing, telephone, equipment, supplies, space, travel, and contracts. This budget should include both Federal and State funds contributed to the SNAP E&T program.
- **Budget Narrative.** Provides a budget narrative to accompany the Operating Budget. The budget narrative describes how the figures in the line item budget were calculated in simple terms and provides a justification as to why each is needed. The budget narrative should be detailed enough to provide justification for all items on the line item budget.
- **Summary of Contracts.** Lists all State and county contracts and sub-recipients down to the final receiving agencies. Additional detail on contracts receiving more than 10 percent of the

overall State SNAP E&T budget should be included in the Contractor Detail Addendum. See below.

- **Contractor Detail Addendum.** Each contract receiving more than 10 percent of the overall State SNAP E&T budget should be described in detail; description should include what services are provided and a brief explanation that justifies the need for the contract. Include with other attachments.
- **Planned Federal FY Costs of the State E&T Program by Category of Funding.** Provides the total Federal and State funding planned under each category of SNAP E&T funding (100 percent grant, ABAWD grant, 50/50 administrative reimbursements and 50/50 participant reimbursements).
- **Additional Attachments:** Include the indirect cost rate agreement, and Contract Detail Addendum(s).

IV: Plan Submission

IV. Plan Submission

Schedule

Plans for the upcoming Federal FY must be submitted by August 15. If nothing has changed in the foundation of the program (such as sanctions, integration with the workforce development system or reimbursements), State agencies may submit a cover memo stating no significant program changes have occurred along with updates to part A through J. However, comprehensive State E&T plans must be submitted at least every other year.

Once approved, SNAP E&T plans are effective October 1, which is the start of the Federal FY. FNS cannot reimburse State agencies for E&T expenditures until an approved SNAP E&T plan is in effect. State agencies choosing to start activities without FNS approval risk not receiving reimbursement for those activities. FNS will consider retroactive reimbursements of E&T activities to the plan submission date or October 1, whichever is later, if plans are subsequently approved. For more information on retroactive reimbursements see Policy memo issued May 30, 2012 entitled “Approval of SNAP E&T Plans”. This memo may be accessed on the SNAP E&T Webpage at: <http://www.fns.usda.gov/ET-policy-guidance>

Plan Submission

On or before August 15, State agencies must send an electronic copy of their annual E&T plan to their FNS Regional Office. Earlier submission is encouraged to allow time for any issues, and facilitate earlier approval of the plan.

WIOA Combined State Plan and Submission

The Workforce Innovation and Opportunity Act (WIOA) was designed to help job seekers access employment, education, training and support services to succeed in the labor market and to match employers with the skilled workers they need to compete in the global economy. Under WIOA, States must outline a four-year strategy for the State’s workforce development system by developing a Unified State Plan that includes operational plans for the WIOA’s core programs. States have the option to submit a Combined State Plan that includes the core programs as well as other Federal employment and training programs, including SNAP E&T and Work programs authorized under section 6(o) of the Food and Nutrition Act. For more information on SNAP E&T Plan requirements and submission process when States opt to submit E&T plan components as part of the WIOA Combined State Plan see Memo issued March 14, 2016 entitled “Supplemental Nutrition Assistance Program Employment and Training, WIOA Unified and Combined State Plans”. This memo may be accessed on the SNAP E&T Policy webpage at: <http://www.fns.usda.gov/ET-policy-guidance>

Plan Modifications

If a State agency wishes to make significant changes to its approved E&T program it must submit a formal plan modification to its FNS Regional Office for review at least *30 days before*

the planned implementation. The modification must be approved before it is implemented. The State agency may be liable for costs associated with implementation prior to approval by FNS. The following are examples of changes that require a formal modification of the State E&T plan:

- ✓ Major changes in components (e.g., adding, deleting, or modifying a component);
- ✓ Significant changes in State policy (e.g. major changes to State E&T exemptions);
- ✓ Requests for additional 100 percent Federal E&T grant funds, over and above the State agency's annual grant allocation;
- ✓ Changes in the amount of expenditures expected to exceed the 100 percent E&T grant level for which the State agency will request 50 percent Federal reimbursement;
- ✓ Change in the method of paying participant reimbursements;
- ✓ Change in funding sources, such as new third-party funding that accounts for more than 10 percent of the State's SNAP E&T budget.
- ✓ Adding a contractor that will account for more than 10 percent of the State's SNAP E&T budget.

The plan modification should include a cover letter that explains the proposed change(s). The modified plan should be attached in final copy. Tables included in the plan must be updated, if affected.

Changes that do not affect the participation levels or component cost do not need prior approval, including:

- Substitution of one contractor for another that does not affect the scope or operation of a component;
- Change in the targeted population of a component (for example, shifting the focus of a GED preparation component from illiterate adults to high school dropouts between 18 and 20 years old).

Although FNS approval is not required for these changes, all changes to the State E&T plan should be reported to FNS no less than 30 days of the change. A revised plan should be submitted electronically with page changes noted in a cover letter.

Requests for Additional Funds

FNS allocates a \$90 million grant to State agencies, annually, for the purpose of administering and operating their E&T programs. These funds are often referred to as "100 percent funds" because no State match is required to spend these funds. Depending upon States' requests, FNS will reallocate the unobligated, unexpended portion of the \$90 million grant to other State

agencies during the year on a first come, first serve basis. These funds are available for FNS to reallocate for 24 months after the start of the Federal FY so FNS encourages State agencies to quickly assess their funding needs and let their Regional Office know of those needs as soon as possible.

State agencies may request additional 100 percent funds at any time during the Federal FY provided that the State agency can amend its plan and obligate additional funds before the end of the Federal FY. States should be aware that in order to maximize their opportunity for consideration of additional funds States should submit their request as soon as possible in the beginning of the Federal FY. Interested State agencies must submit their request for additional funds in writing to their FNS Regional Office, the Regional Office will then forward to National Office (NO). If the requests are determined reasonable and necessary, FNS will allocate funds to meet some or all of the State agencies' request, as it considers appropriate and equitable and based upon availability of funds.

In reviewing requests, FNS will consider the completeness of the State's request to support, expand upon, or enhance its existing E&T program. Requests must provide detail on the following:

- the specific amount of additional funds requested;
- the detailed plan for the use of additional funds including: new or existing services or initiatives the additional funds will support, costs of these services, partners involved, and any other details useful to explain the proposed plan;
- the location (county, city, parish, etc.) the services will be provided;
- the targeted population to receive the services supported by additional funds;
- an estimated number of participants to be serviced in each service component;
- how the proposed plan enhances existing services or builds new opportunities for participants to gain access to employment and training services.

FNS will consider the participation rate and spending history of the State when deciding if the amount requested is appropriate. FNS will be reviewing funds utilization on a quarterly basis and this analysis will be used to assess the State's funding request.

V: State Agency Responsibilities

V. State Agency Responsibilities

General for SNAP

Under SNAP regulations at 7 CFR 272.2(c), the State agency must submit to FNS for approval a Budget Projection Statement (Form 366-A OMB No. 0584-0083) which provides projections of the total costs for major areas of program operations. The Budget Projection Statement (BPS) is submitted annually by August 15. With the BPS, the State agency also submits a narrative justification documenting and explaining the assumptions used to arrive at the projections. Under 272.2 (e), the State agency shall submit to FNS for approval, a plan for activities requiring prior approval, which includes the SNAP E&T plan. FNS has 30 days to approve, deny, or request additional information. If additional information is requested, the State agency shall provide this as soon as possible, and FNS shall approve or deny the plan within 30 days after receiving the information. FNS notifies the State agency of the plan approval (or denial) and the authorized allocation amount. Funds are then put in the FNS Letter of Credit for the State agency to draw down to pay administrative costs.

Specific for SNAP E&T

The State agency is accountable for implementation of their plan once it is approved. It is responsible for making allowable cost determinations and monitoring to ensure that SNAP E&T operators spend funds appropriately. The State agency is fully liable for repayment of Federal funds should those costs later be determined unallowable. FNS Regional Office financial management and program staff are available to provide technical assistance to State agencies in developing SNAP E&T plans. The State agency is responsible for providing clear direction and, as necessary, technical assistance to any sub-grantees to ensure that all projects support the State's SNAP E&T goals/objectives and to clarify which expenses are eligible for reimbursement through SNAP. For more information on allowable costs, please see the E&T Toolkit.



VI: Reporting Measures

VI. Reporting measures

Information Included in State E&T Plans

State agencies are required to prepare and submit annual reports to FNS with outcome data for the State's E&T program as a whole as well as for individual components. The following section details what information must be included in the State E&T plan regarding these measures and provides guidance on data sources and sampling plans.

States agencies are required to collect data on the National Reporting Measures identified in 273.7(c) and must include in their E&T plans a clear description of how information for each E&T reporting measure will be collected, including the data source and the methodology used to obtain data for the annual report. The E&T reporting measures are similar to the performance indicators for the core programs in Workforce Innovation and Opportunity Act (WIOA) and data collection could be coordinated with the State's labor agency.

Additionally, State agencies must identify in their annual E&T plans appropriate reporting measures for each proposed component that is designed to serve at least 100 participants during the year. In designing their E&T component reporting measures, State agencies may consider the following measures:

- The percentage and number of program participants who received E&T services and are in unsubsidized employment subsequent to the receipt of those services;
- The percentage and number of participants who obtain a recognized credential, including a registered apprenticeship, or a regular secondary school diploma or its recognized equivalent, while participating in, or within 1 year after receiving, E&T services;
- The percentage and number of participants who are in an education or training program that is intended to lead to a recognized credential, including a registered apprenticeship or on-the-job training program, a regular secondary school diploma or its recognized equivalent, or unsubsidized employment;

Measures developed by each State agency to assess the skills acquisition of employment and training program participants that reflect the goals of the specific employment and training program components of the State agency, which may include:

- The percentage and number of participants who are meeting program requirements in each component of the education and training program of the State agency;
- The percentage and number of participants who are gaining skills likely to lead to employment as measured through testing, quantitative or qualitative assessment, or other method; and

- The percentage and number of participants who do not comply with employment and training requirements and who are ineligible under section 6(b).

Data Sources

Each State agency will determine the data source and the collection methodology it will use to gather data for the reporting measures, and include this information in its E&T plan. There are many data sources that States should consider using, including the following.

- Quarterly wage record (QWR) information for the three national measures if access to this data is allowed by State law. QWR information are the intrastate and interstate wages paid to an individual, the social security number (or numbers, if more than one) of the individual and the name, address, State, and the Federal employer identification number of the employer paying the wages to the individual.
- The National Directory of New Hires (NDNH). The NDNH is a database established pursuant to the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 to assist state child support agencies in locating parents and enforcing child support orders. States may also use NDNH for the purpose of administering SNAP. NDNH includes data on New Hires, Quarterly Wage Information and Unemployment Insurance.
- Manually follow up with SNAP E&T participants and former participants.
- Automated eligibility systems. Many State agencies already have systems in place to track E&T participants who enter into employment.
- E&T tracking tools. State agencies could adapt workforce investment technology to track this activity. Or, State agencies may develop new automated tools to gather the required data.
- Survey a sample of participants. For some reporting measures, a random sample of E&T participants and former participants may be used to obtain estimates of the required information. State agencies electing use of a sample will be required to obtain approval through the E&T plan approval process.

Sampling

State agencies may use a random sampling methodology to gather the outcome data. If a State uses a random sample rather than tracking all E&T participants, the following sample sizes must be met.

Universe Size of E&T Participants for Reporting Measure	Reporting Measure Random Sample Size to be Completed
5000 and over	500
300 to 4,999	300
Under 300	All participants

State agencies using a random sample must include its sampling plans in its E&T plan. All sampling procedures used by the State agency must be described, including:

- **Sample Design.** All sampling plans must conform to principles of probability sampling. A systematic sample designs for samples should be used because of its relative ease to administer and its validity, and because it yields a sample proportional to variations in the caseload over the course of the year. (To obtain a systematic sample, a State agency would select every “kth” case after a random start between 1 and k. The value of “k” is dependent upon the estimated size of the universe and the sample size.) The plan must specify the method of sample selection.
- **Sample Universe and Frames.** The State agency must select from a sample frame. The State agency must ensure that sample frames accurately reflect their sample universes. The frame for active cases must list all households that participated in E&T in the fiscal year. The description of the sample frames must include: source, availability, accuracy, completeness, components, location, form, frequency of updates, and structure.
- **Sample Size.** The above chart contains the required sample size. This is the minimum number of cases which must be selected each year to for any reporting measure based upon the number of cases or individuals in the sample universe. The sample sizes assume that State agencies will use a systematic or simple random sample design.
- **Sample Selection.** The description of the methods of sample selection must include procedures for: estimating caseload size, computation of sampling intervals and random starts, as appropriate. A time schedule for each step in the sampling procedures must be included.

Annual Outcome Data Reports

State agencies must report SNAP E&T outcome data to FNS in an annual report, which is due January 1 each year. The annual report must contain the following information for the Federal fiscal year ending the preceding September 30.

State Level Totals

- The number and percentage of E&T participants and former participants who are in unsubsidized employment during the second quarter after completion of participation in E&T;
- The number and percentage of E&T participants and former participants who are in unsubsidized employment during the fourth quarter after completion of participation in E&T;
- The median quarterly earnings of all the E&T participants and former participants who are in unsubsidized employment during the second quarter after completion of participation in E&T; and
- The number and percentage of participants that completed a training, educational, work experience or an on-the-job training component.
- The number of all E&T participants who:
 - a. Are voluntary vs. mandatory participants;
 - b. Have received a high school degree (or GED) prior to being provided with E&T services;
 - c. Are Able Bodied Adults Without Dependents (ABAWDs);
 - d. Speak English as a second language;
 - e. Are male or female;
 - f. Are within each of the following age ranges: 16-17, 18-35, 36-49, 50-59, 60 or older.
- Of the number and percentage of E&T participants to be reported in the first four measures above, a disaggregation of the number and percentage of those participants by the characteristics listed in a, b, and c. A participant may have more than one characteristic.

Individual Component Data

State agencies must also report outcome data for individual components that are projected to have 100 or more participants throughout the Federal fiscal year.. The individual component data must correspond with measures included in the State's E&T plan. See information below for guidance on these measures.

Pledge States

State agencies that have committed to offering all at-risk ABAWDs participation in a qualifying activity and have received an additional allocation of funds must also provide information concerning ABAWDs in the annual report.

VII: Templates

VII. Templates

The following templates should be used for all State SNAP E&T plans. These templates supersede the templates provided in the 2003 E&T Handbook. The E&T templates are also available on the FNS website in a spreadsheet format and can be submitted as a Microsoft Word document to the appropriate FNS Regional Office. Please keep in mind that a State E&T plan is a public document and must be made available to the public upon request, so the State E&T plan should be submitted in its final format without track changes or comments.

While the use of these templates is optional, using a different format may delay plan approval if all of the required and requested information is not covered. It is to the State agency's advantage to use the recommended templates in this handbook.

E&T plans should be in standard 12-point font with at least one-inch margins. State Agency Name and the Federal FY of the plan should be included in headers and/or footers. It is highly recommended that the pages of the E&T plan be numbered consecutively, including the attachments. Please check your plan for spelling and grammar errors and submit the document in a final format.

Part A: Cover Page and Authorized Signatures

State: *Enter the name of your State*

State Agency: *Enter the name of your State SNAP E&T agency*

Federal FY: *Enter the Federal FY.*

Primary Contacts: *Complete the table with the name, title, phone and email address for those State agency personnel who should be contacted with questions about the E&T plan. Add additional rows if needed.*

Name	Title	Phone	Email
<i>Insert more rows as needed.</i>			

Certified By:

<Signature of Authorized Person>

State Agency Director (or Commissioner)

Date

Certified By:

<Signature of Authorized Person>

State Agency Fiscal Reviewer

Date

Part B: Assurances

Assurance Statement	
<i>Check box at right to indicate you have read and understand each statement.</i>	
1. The State agency is accountable for the content of the State E&T plan and will provide oversight of any sub-grantees.	<input type="checkbox"/>
2. The State agency is fiscally responsible for E&T activities funded under the plan and is liable for repayment of unallowable costs.	<input type="checkbox"/>
3. State education costs will not be supplanted with Federal E&T funds.	<input type="checkbox"/>
4. Cash or in-kind donations from other non-Federal sources have not been claimed or used as a match or reimbursement under any other Federal program.	<input type="checkbox"/>
5. If in-kind goods and services are part of the budget, only public in-kind services are included. No private in-kind goods or services are claimed.	<input type="checkbox"/>
6. Documentation of State agency costs, payments, and donations for approved E&T activities are maintained by the State agency and available for USDA review and audit.	<input type="checkbox"/>
7. Contracts are procured through competitive bid procedures governed by State procurement regulations.	<input type="checkbox"/>
8. Program activities are conducted in compliance with all applicable Federal laws, rules, and regulations including Civil Rights and OMB regulations governing cost issues.	<input type="checkbox"/>
9. E&T education activities directly enhance the employability of the participants; there is a direct link between the education activities and job-readiness.	<input type="checkbox"/>
10. Program activities and expenses are reasonable and necessary to accomplish the goals and objectives of SNAP E&T.	<input type="checkbox"/>
11. The E&T Program is implemented in a manner that is responsive to the special needs of American Indians on Reservations. State shall: consult on an ongoing basis about portions of State Plan which affect them; submit for comment all portions of the State Plan that affect the ITO; if appropriate and the extent practicable, include ITO suggestions in State plan. (For States with Indian Reservations only)	<input type="checkbox"/>

By signing on the cover page of this document, the State agency Director (or Commissioner) and financial representative certify that the above assurances are met.

Part C: State E&T Program, Operations and Policy

Instructions:

Complete the fields in the table using the following guidance.

1. Short Summary of the SNAP E&T Program – Include State agency mission, program scope and list services offered, including references to State’s E&T policy, such as handbooks or State administrative code. For E&T programs that are county-administered, include an explanation about how E&T is administered, how the program varies among counties and what leeway Counties have in developing their own programs. This should be a succinct overview with details incorporated in the appropriate plan sections.

2. Program Changes – Summarize changes for the upcoming Federal FY only.

3. Workforce Development System – Describe the statewide workforce development system and identify the E&T components that will be delivered through this system. If a particular component is not available locally through the system, identify and explain the source(s) the State agency will use to provide it. Include information about target or emerging industries in the state, career pathways and/or credentials that will be made available to participants.

4. Other Employment Programs – Describe other employment and training programs that serve WIOA/TANF/General Assistance recipients and how the SNAP E&T program will interface with them. Specifically detail the coordination between the TANF work program (under title IV-A) and the SNAP E&T program, including administrative consolidations and shared components. FNS requests this information to ensure SNAP E&T funds are not spent on SNAP recipients who also receive title IV-A assistance. FNS also requests this information to ensure proper lines of communication are in order to support dual disqualification.

5. State Options in E&T Participants – State agencies have the option to refer SNAP applicants to E&T programs prior to eligibility determination. Specify whether applicants will be referred to E&T programs. State agencies may also serve categorically eligible, zero benefit households. Specify whether the State agency refers either of these two populations to the SNAP E&T program.

6. Screening process - Describe the process for screening work registrants for referral to E&T.

7. Conciliation process – State agencies have the option to offer a conciliation period to non-compliant E&T participants. The conciliation period provides mandatory E&T participants with an opportunity to comply before good cause is determined and a notice of adverse action is sent. If a conciliation process is planned, describe the procedures that will be used when an individual

fails to comply with an E&T program requirement. Specify the length of the conciliation period and include a reference to State policy or directives.

8. Disqualification policy – A nonexempt individual who refuses or fails to comply without good cause, as defined at 7 CFR 273.7(f)(i)(2) and (i)(3) with SNAP work requirements will be disqualified and subject to State disqualification periods. Note that the State disqualification plan applies to noncompliance with SNAP work requirements and not just E&T requirements. Please detail the length of disqualification for each occurrence of noncompliance (first, second, third and subsequent) and include a reference to State policy or directives.

9. Participant Reimbursements – Provide a comprehensive list of all allowable participant reimbursements. This list must be specific as to the types of participant reimbursements and the reimbursement cap (if one exists). Explain whether participant are treated as a reimbursement or an allowance and provide details on how the reimbursement or allowance is allowed to the participant as well as the monitoring and oversight of these reimbursements. Also provide the directives issued to local E&T offices or contractors governing the limitations on what costs are allowable and can and cannot be reimbursed.

10. Work Registrant Data – Describe the method the State agency uses to count all work registrants (defined as SNAP participants not otherwise exempted by 7 CFR 273.7(b)(1)). Describe measures taken to prevent duplicate counting.

11. Outcome Reporting Measures – The State agency must include a clear description of how information for each E&T reporting measure will be collected, including the data source and the methodology used to obtain data for the annual report. If the State is using a sampling method, all sampling procedures used by the State must be described, including the sample design, its universe and frames, the sample size, and the sample selection.

Table 1: State E&T Program, Operations and Policy

State E&T Program, Operations and Policy Overview	
Summary of the SNAP E&T Program	
Program Changes	
Workforce Development System	
Other Employment Programs	
Special Populations	
Screening Process	
Conciliation Process (<i>if applicable</i>)	
Disqualification Policy	
Participant Reimbursements	
Work Registrant Data	
Outcome Reporting Data Source and Methodology	

**Part D: Pledge to Serve All At-Risk ABAWDs
(if applicable)**

The Food and Nutrition Act of 2008 provides for an additional allocation of \$20 million each Federal FY to be used to reimburse eligible State agencies for costs incurred in serving ABAWDs. Eligible State agencies (those with at-risk ABAWDs they are prepared to serve on October 1) are ones that commit to offer a qualifying education, training, or workfare opportunity to every at-risk ABAWD applicant or recipient (not waived or exempted) who is in the last month of the 3-month period of eligibility and to provide such an opportunity to those at-risk ABAWDs who accept the offer.

ABAWD and Pledge Information	
<i>State agencies wishing to receive pledge funds should identify a desire to pledge and provide the following information:</i>	
Is the State agency pledging to offer qualifying activities to all at-risk ABAWDs?	
Information about the size & needs of ABAWD population	
The counties/areas where pledge services will be offered	
Estimated cost to fulfill pledge	
Description of State agency capacity to serve at-risk ABAWDs	
Management controls in place to meet pledge requirements	
Description of education, training and workfare components State agency will offer to meet ABAWD work requirements	

Part E: E&T Component Detail

Instructions:

Complete a table for each category of components included in the State E&T program. Refer to the component categories below to determine which tables should be completed. Each component should be described and education activities must also be justified. Along with a description of the component, identify the counties or geographic area in which the component will be offered, and the target audience (if specific). For each component, include the unduplicated count of monthly participants and the total anticipated monthly cost of the component (administrative costs only, do not include participant reimbursements). Finally, specify whether the component will be offered by the State SNAP agency, a contractor, or both.

Component categories are as follows:

Non-Education, Non-Work Components

- Assessment (included as a component if assessment includes some form of employment search, career exploration, or training)
- Job Retention Services
- Job Search
- Job Search Training
- Workforce Innovation and Opportunity Act (Programs under the Workforce Innovation and Opportunity Act (WIOA) of 2014)

- *Education Components***

- Basic Education
- English as a Second Language
- High School Equivalence Program
- Institute of Higher Education (education programs in business, technical training, a specific trade, and post-secondary)
- Pre-apprenticeships
- Vocational Training

Work Components

- Self-Employment Program
- Registered Apprenticeships
- On-the-job Training
- Workfare
- Work Experience/Training

* WIOA programs may fall under multiple categories. Please specify the activities included.

*** The Food and Nutrition Act of 2008 prohibits State agencies from supplanting State education costs with Federal E&T funds. Please clarify whether education activities will be charged to the E&T program and justify these expenses. State agencies must explain the basis for any educational expenses charged to the Federal government. This explanation must include a discussion of why such costs are attributed to the E&T program and cannot be met through other existing education programs. Address whether the services being provided are available to persons other than E&T participants and if so, what the cost is for those persons. For more information on allowable educational activities see the E&T Toolkit.*



Table 2: E&T Component Detail

Non-Education, Non-Work Components							
Component	Description	Geographic Area	Target Audience (e.g., Homeless, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated Monthly cost*	Provider (Contracted, SNAP agency, or both)	Reporting Measure(s) – if > 100 participants
<i>Job Search (EXAMPLE)</i>	<i>Independent job search</i>	<i>Newtown county</i>	<i>ABAWDs</i>	<i>50</i>	<i>\$1000</i>	<i>In-house</i>	<i>% of participants that obtained employment</i>
<i>Job Search Training</i>							
<i>Job Retention Services</i>							
<i>Insert more rows as needed.</i>							

* Limit anticipated monthly cost to administrative costs only. Do not include participant reimbursements.

Education Components (Education expenses must be justified)							
Component	Description & justification	Geographic Area	Target Audience (e.g., Homeless, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost*	Provider (Contracted, SNAP agency, or both)	Reporting Measure(s) – if > 100 participants
<i>Basic Education (EXAMPLE)</i>	<i>ABE, GED, ESL To increase employability of participants.</i>	<i>Austin County</i>	<i>ABAWDs</i>	<i>57</i>	<i>\$1000</i>	<i>Contracted</i>	<i>% successfully completed</i>
<i>Vocational Training</i>							
<i>Insert more rows as needed.</i>							

* Limit anticipated monthly cost to administrative costs only. Do not include participant reimbursements.

Work Components							
Component	Description	Geographic Area	Target Audience (e.g., Homeless, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost*	Provider (Contracted, SNAP agency, or both)	Reporting Measure(s) – if > 100 participants
<i>Workfare (EXAMPLE)</i>	<i>A work component in which non-exempt ABAWDS are required to perform work in a public service or private nonprofit capacity as a condition of eligibility for SNAP benefits.</i>	<i>Travis county</i>	<i>ABAWDS</i>	<i>100</i>	<i>\$100.</i>	<i>Contracted</i>	<i>% successfully complete</i>
<i>Work Experience</i>							
<i>Insert more rows as needed.</i>							

* Limit anticipated monthly cost to administrative costs only. Do not include participant reimbursements.

Part F: Estimated Participation Levels

Instructions:

It is important to be as accurate as possible in developing these estimates and, as appropriate, projections should be based upon actual figures from the current Federal FY.

Line A. Anticipated Number of Work Registrants. Estimate the number of unduplicated work registrants during the Federal FY by adding the two following numbers:

- The number of work registrants expected to be in the State on October 1 of the Federal FY.
- The anticipated number of new work registrants to be added between October 1 and September 30, of the Federal FY.

NOTE: Work registrants include the number of SNAP household members not excluded by SNAP regulations at 7 CFR 273.7(b)(1). Federal exemptions from work registration include:

- (i) A person younger than 16 years old or a person 60 years of age or older. A person age 16 or 17 who is not the head of a household or who is attending school, or enrolled in an employment training program, is also exempt.
- (ii) A person physically or mentally unfit for employment, as defined by the State agency for the purpose of work requirements.
- (iii) A person subject to and complying with any work requirement under title IV of the Social Security Act.
- (iv) A parent or other household member responsible for the care of a child under 6 or an incapacitated person.
- (v) A person receiving unemployment compensation, including those who have applied but are not yet receiving if they are complying with the work requirements of that program.
- (vi) A participant in a drug addiction or alcoholic treatment and rehabilitation program.
- (vii) An employed or self-employed person working a minimum of 30 hours weekly or earning weekly wages at least equal to the Federal minimum wage multiplied by 30 hours.
- (viii) A student enrolled at least half-time in any recognized school, training program, or institution of higher education.

This is the Federal criteria only and does not include additional criteria or exemptions that States may identify in determining which work registrants must participate in SNAP E&T. Persons exempt from E&T participation through State agency exemptions **should be included** in the reported number of work registrants. For more information on Federal and State exemptions, please see 7 CFR 273.7, paragraphs (b), (c) and (e) and the E&T Toolkit.

Line B. List specific State exemptions, specifying who among the work registrant population will not be required to participate in E&T. Per Federal Regulations at 7 CFR 273.7(c)(6)(iii), State agencies may exempt from E&T participation categories of work registrants or individual work registrants. These exemptions allow the State agency to narrow down the number of work registrants it plans to serve in its E&T program. If the State agency plans to exempt all work registrants and conduct an all-volunteer E&T program, please indicate that all work registrants are exempt.

Line C. Calculate the percent of all work registrants exempt from E&T mandatory participation (line B total divided by line A).

Line D. Provide the number of all E&T mandatory participants (line A minus the total of line B)

Line E. Identify the number of E&T voluntary participants the State agency plans to serve through its E&T program.

Lines F to I. ABAWD Information

Estimate the number of ABAWDs expected to be in the State during the Federal FY (line F); this is the total number of SNAP clients who do not meet an exception at 7 CFR 273.24(c) and includes ABAWDs in waived counties.

Line G asks for the number of ABAWDs in waived areas of the State during the Federal FY and line H requests the number of ABAWDs exempted under the State's 15 percent exemption allowance. Add line G and line H for the total number of ABAWDs exempted. This number is then subtracted from line F to provide the total number of potential at-risk ABAWDs (line I).

Table 3: Estimated Participant Levels

A.	Anticipated number of work registrants in the State during the Federal FY (unduplicated count):	
B.	Total number of planned State option exemptions from E&T Participation:	
	List below planned State option exemption categories and the number of work registrants expected to be included in each during the Federal FY. 1. 2. 3. 4. 5. 6. 7. 8. 9. 10.	
C.	Percent of all work registrants exempt from E&T (B/A)	%
D.	Anticipated number of E&T mandatory participants (A-B)	
E.	Anticipated number of voluntary E&T participants	
F.	Anticipated number of ABAWDs in the State during the Federal FY.	
G.	Anticipated number of ABAWDs in waived areas of the State during the Federal FY.	
H.	Anticipated number of ABAWDs to be exempted under the State’s 15 percent ABAWD exemption allowance during the Federal FY	
I.	Number of potential at-risk ABAWDs expected in the State during the Federal FY (F-(G+H))	

Part G: Partnerships/Contracts

Instructions:

List each partner/contract providing SNAP E&T services. This list should include State agencies, other than the State SNAP agency, as well as county-level providers. Summarize the total cost of each contract and calculate the percentage of that cost of the E&T operating budget. See example below.

Table 4: Partnerships/Contracts

Name of Partner/Contract	Cost	% of E&T Operating Budget
<i>DC Community College</i>	\$1,000	12%
<i>DC Job Trust</i>	\$200	5%
<i>Insert more rows as needed</i>		

For each partner/contractor that receives more than 10% of the E&T operating budget, complete and attach a Contractor Detail Addendum.

Part H: Contractor Detail Addendum

Instructions:

Complete this section for each partner or contract that receives more than 10% of the E&T operating budget as specified in Part I. (The suggested length is not more than 2 pages for each project and if the information is identical for multiple contractors, a single addendum can be submitted, so long as this is explained and the included contractors (identified). Attach this addendum at the end of the State E&T plan.

Partner/Contract Name	<i>Name of partner or contractor</i>			
Monitoring and communication with contractor (s)	<i>Describe the State’s ongoing oversight and communication procedures that will be in place to monitor contractors’ performance and communicate policy changes.</i>			
Role of Contractor	<i>Briefly describe the role of the contractor. What responsibilities are included in the contract? Example: Assessment, placement, E&T service delivery, participation tracking, etc.</i>			
Timeline	Start	<i>Month and year, quarter, or annual/ongoing.</i>	End	<i>Month and year, quarter, or annual/ongoing.</i>
Description of Activities/Services	<i>Provide a detailed description of the services provided.</i>			
Funding	<i>Describe the funding structure of the contract. Is the contract funded with 100% E&T grant money or 50% reimbursements? Will the contractor provide the State agency’s share of E&T expenditures?</i>			
Evaluation	<i>Explain how the contract will be evaluated and monitored.</i>			

Part I: Operating Budget and Budget Narrative

Instructions:

Complete the operating budget table, providing line item detail and the program total. If there are contracts, enter the total contract amount. Cost categories outside of contracts apply only to the State SNAP agency (or county agency) expenses. Additional detail on contracts should be provided in Part G and the Contractor Detail Addendum.

See the *Part J: Budget Narrative and Justification* instructions for guidance on budget categories.

Table 5: Operating Budget

<u>Attach an approval letter from the cognizant agency identifying the indirect cost rate used.</u>	State cost	Federal cost	Total
I. Direct Costs:			
a) Salary/Wages			
b) Fringe Benefits* Approved Fringe Benefit Rate Used _____%			
c) Contractual Costs			
d) Non-capital Equipment and Supplies			
e) Materials			
f) Travel			
g) Building/Space			
h) Equipment & Other Capital Expenditures			
Total Direct Costs			
II. Indirect Costs:			
Indirect Costs*Approved Indirect Cost Rate Used: _____%			
Total Indirect Costs			
III. In-kind Contribution			
State in-kind contribution			
IV. Participant Reimbursement (State plus Federal):			

a) Dependent Care			
b) Transportation & Other Costs			
c) State Agency Cost for Dependent Care Services			
<u>V. Total Costs</u>			

*** Attach an approval letter from the cognizant agency identifying the indirect cost rate being used.**

Part J: Budget Narrative and Justification Instructions

Provide a budget narrative that explains and justifies each cost and clearly explains how the amount for each line item in operating budget was determined.

I. Direct Costs: Explain all direct costs to the program

a) Salary/Wages

Staff position should be described in FTE and time spent on the project.

Example:

E&T Program Manager

$\$60,000 \times .50 = \$30,000$

5 E&T Counselors

$\$25,000 \times 1.00 \times 5 = \$125,000$

b) Fringe Benefits

If charging fringe and benefits to the E&T program, provide the approved fringe rate.

c) Contractual Costs

Give the total cost of contractual services and briefly summarize what services will be provided.

d) Non-capital Equipment and Supplies

Describe non-capital equipment and supplies to be purchased with E&T funds.

e) Materials

Describe materials to be purchased with E&T funds.

f) Travel & Staff Training

Describe the purpose and frequency of staff travel charged to the E&T program. This line item should not include E&T participant reimbursements for transportation. Include planned staff training, including registration costs for training that will be charged to the E&T grant.

g) Building/Space

If charging building space to the E&T program, describe the method used to calculate space value.

h) Equipment & Other Capital Expenditures

Describe equipment and other capital expenditures over \$5,000 per item that will be charged to the E&T grant.

II. Indirect Costs:

Indirect costs (also called overhead costs) are the expense of allowable activities that support the E&T program but are charged directly to the State agency. If using an indirect cost rate approved by the cognizant agency, include the approval letter as an attachment to the E&T plan.

III. State In-kind Contribution

FNS defines in-kind contributions as non-cash contributions, usually the value of volunteer time or donated space. Per SNAP rules, only governmental entities may receive reimbursements for in-kinds. If claiming expenses in this line, please be specific about the valuation of in-kind contributions.

IV. Participant Reimbursement (State plus 50 percent Federal match):

a) Dependent Care

Specify payment rates for child care reimbursements, established in accordance with the Child Care and Development Block Grant and based on local market rate surveys. If alternative dependent care is provided by the State agency in lieu of reimbursement, describe arrangements.

b) Transportation & Other Costs

Total budget for transportation and other participant reimbursements identified in part C.

c) State Agency Cost for Dependent Care Services

If the State Agency plans to reimburse clients beyond allowable rates under SNAP regulations, specify what additional funding will be put toward this expense.

Table 6: Budget Narrative and Justification Table

Item	Narrative
I. Direct Costs:	
a) Salary/Wages	
b) Fringe Benefits* Approved Fringe Benefit Rate Used _____%	
c) Contractual Costs	
d) Non-capital Equipment and Supplies	
e) Materials	
f) Travel	
g) Building/Space	
h) Equipment & Other Capital Expenditures	
II. Indirect Costs:	
III. State In-kind Contribution	
IV. Participant Reimbursements	
a) Dependent Care	
b) Transportation & Other Costs	
c) State Agency Cost for Dependent Care Services	

Part K: Summary of Federal FY Costs

Table 7: Summary of Federal FY Costs

Funding Category	Approved Prior FY Budget *	Upcoming FY Budget
1. 100 Percent Federal E&T Grant:		
2. Share of \$20 Million ABAWD Grant (<u>if applicable</u>)		
3. Additional E&T Administrative Expenditures		
a. 50% Federal		
b. 50% State		
4. Participant Expenses:		
a. Transportation/Other		
50% Federal		
50% State		
b. Dependent Care		
50% Federal		
50% State		
5. Total E&T Program Costs (= 1+2+3a+3b+4a+4b)		
6. 100% State Agency Cost for Dependent Care Services		
7. Total Planned Federal FY Costs (Must agree with Part H—Operating Budget)		

***Include immediately preceding Federal FY’s final approved budget figures for each spending category**

VIII: County Administered Programs

VIII. County Administered Programs

Some State agencies have county-administered E&T programs. In a county-administered E&T program, the State agency delegates planning, implementing and operating E&T programs to its county SNAP agencies. Each county may design its own E&T program, determining its own E&T activities, participant reimbursements and contractors.

However, the State SNAP agency is ultimately responsible for the actions of individual counties and must ensure counties are operating within SNAP rules and regulations. FNS understands the challenges in consolidating all of the E&T plans for individual counties. Therefore, the following section offers tools and optional templates for States with county-run E&T programs.

Additionally for States operating their E&T programs through the Workforce Investment Board system they may provide this information by Local Workforce Investment Boards (LWIB) rather than by county.

Budget Summary:

The State agency should complete parts I (operating budget) and J (budget narrative) of the plan for its own operations and expenses. The following chart can be used to summarize the activities of individual counties in addition to the State agency's budget. Each county should still have its own budget and budget narrative that conform to the guidance in the Handbook and make these items available to FNS upon request. Separate plans are not required from counties.

Example of a county budget summary:

County Name	County Administration	Contractors	Number of Contracts	Participant Reimbursements	Total Budget
<i>Jefferson</i>	<i>\$50,000</i>	<i>\$0</i>	<i>0</i>	<i>\$1,250</i>	<i>\$51,250</i>
<i>Lincoln</i>	<i>\$75,000</i>	<i>\$20,000</i>	<i>1</i>	<i>\$2,000</i>	<i>\$97,000</i>
<i>Washington</i>	<i>\$25,000</i>	<i>\$60,000</i>	<i>2</i>	<i>\$3,000</i>	<i>\$88,000</i>

County Activities:

Part E of the E&T plan may be omitted for States with county-administered programs at the State's option. However, the following table must be substituted in its place. Each county must be prepared to provide a breakdown of E&T activities, anticipated participation and cost upon request. FNS suggests that each county complete its own template for part E of the E&T plan in case such information is requested.

Part E: Substitute for County-run E&T Programs

Components Offered per County															
County Name	Assessment	Job Retention Services	Job Search	Job Search Training	WIOA	Basic Adult Education	English as a Second	High School Equivalency	Institute of Higher Education	Vocational Training	Self-Employment Program	On-the-Job Training	Workfare	Work Experience	Unique Component
<i>County A</i>															
<i>County B</i>															
<i>County C</i>															
Total number of counties offering component															
Reporting Measure(s) – if > 100 participants															

Glossary

Glossary

ABAWD. This is an able-bodied adult without dependents whose eligibility for SNAP is limited to any 3 months in a 36-month period (the 3-month time limit) unless the individual meets an ABAWD work requirement (see definition below). This limitation **does not apply** to individuals who are: 1) under 18 or over 50 years of age; 2) medically certified as physically or mentally unfit for employment; 3) parents or other members of households with responsibility for a dependent child; 4) federally exempt from general SNAP work requirements; or 5) pregnant. ABAWDs may be voluntary or mandatory E&T participants, depending on State policy.

ABAWD Exemptions. A State agency may exempt up to 15 percent of its ABAWD population from the 3-month time limit. See 7 CFR 273.24(g).

ABAWD Waivers. A State agency may request that FNS waive the 3-month time limit for ABAWDs residing in areas of the State which have an unemployment rate of over 10 percent or which do not have sufficient jobs to provide employment for the ABAWDs. See 7 CFR 273.24(f).

ABAWD Work Requirement. An ABAWD is not eligible to receive SNAP for more than 3 months in a 36-month period during which the ABAWD does not work 20 or more hours a week, averaged monthly; participate in and comply with the requirements of a work program (see definition below) for 20 or more hours a week; or participate in and comply with the requirements of a workfare program under section 20 of the Act or a comparable program established by a State or a political subdivision of a State (see also “Qualifying ABAWD Activity” below). The ABAWD work requirement does not apply to ABAWDs who reside in areas of a State granted a waiver of the 3-month time limit by FNS, or to ABAWDs who are included in a State agency’s 15 percent exemption allowance. All remaining ABAWDs are subject to work requirements in order to maintain eligibility for SNAP beyond 3 months. For more information on services to ABAWDs see SNAP web page <http://www.fns.usda.gov/snap/able-bodied-adults-without-dependents-abawds>

At-risk ABAWD. An ABAWD applicant or recipient who is:

1. In the last month of the 3-month time limit;
2. Does not live in an area covered by a waiver of the time limit; and
3. Is not part of a State agency’s 15 percent ABAWD exemption allowance.

Applicant. An individual, a member of a household or a representative of a household who applies for SNAP benefits.

Assessment. A basic evaluation of an individual’s needs and barriers prior to placement in an activity. A strong comprehensive assessment collects general information about demographics, educational attainment, basic skills, literacy, work experience and public benefits. It also assess’ objective and subjective barriers to work, such as disabilities, criminal background, family composition, housing circumstances, child care needs and

transportation needs. This in-depth evaluation of employability skills may often be coupled with counseling on how and where to search for employment. If combined with work experience, some form of employment search or training, a strong comprehensive assessment of this nature could constitute part of an approvable employment and training component.

Career Pathway. Well-connected and transparent education, training, credential and supportive services offerings within specific occupations that have multiple entry points and multiple exit points at successively higher levels of family supporting employment that aligns with subsequent entry point.

Categorically eligible, zero benefit households. State agencies may refer members of categorically eligible households with a SNAP benefit amount of zero dollars to a SNAP E&T Program or component, if appropriate. Under 7 CFR 273.10(e)(2)(iii)(7), States have the option to suspend a zero benefit household as opposed to denying it. Under this rule, the State agency may delay the work registration of a household member until the household is determined entitled to benefits. The State agency may also choose to work register non-exempt household members. Additionally, the State agency may choose to serve exempt members of zero benefit households that volunteer for SNAP E&T component.

Commencing a Component. When an E&T participant formally begins participation in a component by performing the first act required by the component, e.g., attending the first Job Club session or making the first job contact.

Component. As described in 7 CFR 273.7(e), a service, activity, or program designed to help SNAP recipients gain skills, training, or work experience that will increase their ability to obtain regular employment and achieve self-sufficiency. Components are designated either as “work” or “non-work.” Work components provide an actual job in the workplace. Workfare, on-the-job training (OJT), and work experience components are work components. Households containing E&T work component participants are limited to working the number of hours in a month determined by dividing the household’s monthly SNAP allotment by the higher of the applicable Federal or State minimum wage. Depending on the amount of the monthly SNAP allotment, individual work component participants can be required to work up to 30 hours per week and the individual’s total hours of participation in both work and non-work components is limited to 120 hours per month. E&T participants may volunteer for more than 120 hours of E&T activities in a give month but must not be required to do so.

An E&T program may contain one or more of the following components:

- 1. Job Search** — A component that requires participants to make a pre-determined number of inquiries to prospective employers over a specified period of time. The component may be designed so that the participant conducts his/her job search

independently or within a group setting. Job search components should entail approximately 12 contacts with employers per month for two months.

- 2. Job Search Training** — A component that strives to enhance the job readiness of participants by providing instruction in job seeking techniques and increasing motivation and self-confidence. The component may consist of job skills assessments, job finding clubs, job placement services, or other direct training or support activities. The job search training component may combine job search activities with other training and support activities.
- 3. Workfare** — A work component in which SNAP recipients perform work in a public service capacity as a condition of eligibility. In lieu of wages, workfare participants receive compensation in the form of their household's monthly coupon allotment. The primary goal of workfare is to improve employability and encourage individuals to move into regular employment while returning something of value to the community. A State agency may operate a workfare program as a component of its E&T program, or it may choose to operate a workfare program independent of the E&T program. Workfare assignments cannot replace or prevent the employment of regular employees and assignments must provide the same benefits and working conditions provided to regular employees performing comparable work for comparable hours. The maximum number of hours of work required of a household each month is determined by dividing the household's SNAP benefit allotment by the Federal or State minimum wage, whichever is higher.
- 4. Self-Initiated Workfare** — A work component, comparable to regular workfare, designed to assist ABAWDs in fulfilling their work requirement. In self-initiated programs, ABAWDs voluntarily participate and find their own workfare job assignments. They are responsible for arranging to have their participation reported to their caseworkers and for verifying their workfare hours. State agencies may use a range of SNAP allotments and corresponding fixed participation hours in lieu of requiring each participant to work the number of hours equal to the monthly household allotment divided by the higher of the applicable Federal or State minimum wage.
- 5. Work Experience** — A work component designed to improve the employability of participants through actual work experience and/or training and to enable them to move into regular employment. Work experience assignments may not replace the employment of a regularly employed individual, and they must provide the same benefits and working conditions provided to regularly employed individuals performing comparable work for comparable hours. It is permissible to place E&T participants in work experience positions with private sector entities. However, households that include work experience participants must not be

required to work more hours monthly than the total obtained by dividing the household's monthly SNAP allotment by the higher of the applicable Federal or State minimum wage. Depending on the amount of the household's monthly SNAP allotment, individual work component participants can be required to work up to 30 hours per week, and the individual's total hours of participation in both work and non-work components is limited to 120 hours per month.

- 6. Vocational Training** — A component that improves the employability of participants by providing training in a skill or trade allowing the participant to move directly into employment.
- 7. Education** — A component that provides educational programs or activities to improve basic skills or otherwise improve employability. Such programs include Adult Basic Education (ABE), basic literacy, English as a Second Language (ESL), high school equivalency (GED), and post-secondary education. A post secondary education component is one whose purpose is academic and whose curriculum is designed primarily for students who are beyond the compulsory age for high school. Only educational components that establish a direct link to job-readiness will be approved. Federal E&T funds cannot take the place of nonfederal (i.e., State, local) funds for existing educational services. Federal financial participation for operating education components may be authorized only for costs that exceed the normal cost of services provided to persons not participating in E&T.
- 8. Self-Employment Training** — A component that improves the employability of participants by providing training in setting up and operating a small business or other self-employment venture.
- 9. WIOA** — Job-training services developed, managed, and administered by State and local governments and the business community under the Workforce Innovation and Opportunity Act (WIOA). Activities may include basic skills training (GED, literacy), occupational skills training, on-the-job training, work experience, job search assistance, and basic readjustment services.
- 10. Job Retention** – The Food, Conservation and Energy Act of 2008 (Pub.L. 110-246) amended Section 6(d)(4) by adding job retention services as a new component that States may include in their E&T program. Under proposed rules published May 4, 2011 7 CFR §273.7(e)(1) would be amended to define job retention as services provided to individuals who have secured employment to help achieve satisfactory performance, keep the job, and to increase earnings over time. Such services and reimbursable participant costs may include but are not limited to:
 - Counseling;
 - Coaching;

- Support services;
- Life skill classes;
- Referrals to other services:
- Clothing required for the job;
- Equipment or tools required for the job;
- Test fees;
- Union dues; and
- Licensing and bonding fees.

Job retention services may be provided to individuals who have secured employment for up to 90 days even if the individual is no longer participating in SNAP. Only individuals who have received other employment/training services under the E&T program are eligible for job retention services.

Employment and Training Program. A program administered by each State SNAP agency consisting of one or more work, training, education, or job search components.

Employment and Training Mandatory Participant. A SNAP applicant or participant required to work register under 7 CFR 273.7(a) and not exempted by the State agency from participation in an employment and training program.

Exempted. This term refers to a work registered person or persons excused by the State agency from mandatory participation in the E&T Program. **Note:** Individuals who are exempted from mandatory participation can still participate as volunteers, but are not subject to sanction for failure to comply with program requirements. See definition of “volunteer” below.

Newly Work Registered. SNAP participants work registered at the point of application or those registered for the first time in their current period of participation.

Pre-apprenticeship programs – Equips participants with the basic knowledge, soft skills and technical requirements to qualify for a Registered Apprenticeship. Pre-apprenticeship programs should also meet the definition and quality framework established by the Department of Labor’s Employment and Training Administration (ETA). ETA identifies quality pre-apprenticeship programs as ones that include the following elements:

1. Approved training and curriculum
2. Strategies for long-term success
3. Access to appropriate support services
4. Promotes greater use of Registered Apprenticeships to increase future opportunities
5. Meaningful hands-on training that does not displace paid employees
6. Facilitated entry and/or articulation

Qualifying ABAWD Activity. In order to remain eligible beyond the 3–month time limit, at–risk ABAWDs—those subject to the ABAWD work requirement and in the last month of the

3-month time limit—must participate at least 20 hours a week in education and training activities or participate in a workfare position—either as part of an optional workfare program under section 20 of the Food and Nutrition Act of 2008 or as part of an E&T workfare component, including a comparable program established by a State or a political subdivision of a State. E&T job search or job search training components are not qualifying activities for ABAWDs. However, job search or job search training activities, when offered as part of other E&T components, are acceptable as long as those activities comprise less than half of the total required time spent in the components. In addition, State agencies may establish a job search period of up to 30 days following initial SNAP certification prior to making a workfare assignment. Participants are considered to be participating in and complying with workfare requirements, thereby meeting the ABAWD work requirement.

Registered Apprenticeships. Programs registered by the National Apprenticeship Act of August 16, 1937 by individual businesses, employer associations or labor-management organizations that provide paid employment, on-the-job training and industry recognized credentials to participants.

Screening. An evaluation by the eligibility worker as to whether a person should or should not be referred for participation in an E&T program. This activity is not an approvable E&T component.

SNAP Work Requirements. Every able-bodied SNAP applicant and recipient between the ages of 16 and 60—unless exempted by law—must: 1) register for work or be registered by the State agency; 2) participate in the E&T Program if assigned by the State agency; 3) participate in a workfare program if assigned by the State agency; 4) provide sufficient information to determine employment status or availability for work; 5) report to an employer when referred by the State agency or its designee; 6) accept a bona fide offer of suitable employment; and 7) must not voluntarily quit a job of 30 or more hours a week or reduce work hours to less than 30 hours a week without good cause.

Volunteer. A SNAP recipient who is: 1) statutorily exempt from work registration requirements; 2) exempted by the State agency from E&T participation; or 3) not exempted and has complied with, or is complying with, program requirements. State agencies may, to the extent they choose, permit volunteers to participate in an E&T component. Volunteers are not subject to sanction for failure to comply with E&T requirements. Volunteers are not limited by the number of hours spent in an E&T program each month and may participate more than 120 hours, whereas mandatory participants may not be required to participate more than 120 hours. **Note:** Except for the specified amounts in Colorado, Utah, Vermont, and Wisconsin, Federal funds must not be used to provide E&T services to recipients of assistance under title IV–A of the Social Security Act (see 7 CFR 273.7(d)(1)(ii)(D)).

Workforce Development System. An interconnected strategy for providing comprehensive labor market and occupational information to job seekers, employers, providers of one-stop delivery of core services, providers of other workforce employment activities, and providers of workforce education activities. Each component of a State agency's E&T program must be delivered through its workforce development system. If a component, activity, or service that the State agency would like to provide is not available locally through such a system, the State agency may use another source.

Work Program (as related to ABAWD work requirements). A program under the Workforce Innovation and Opportunity Act of 2014; a program under section 236 of the Trade Act of 1974; or a program of employment and training, including the SNAP E&T Program, operated or supervised by a State or a political subdivision of a State that meets standards approved by the Governor of the State, other than a job search or job search training program. To qualify for Federal financial participation, a work program must be included in the State E&T plan and it must adhere to statutory limitations on hours of work and/or participation for E&T participants.

Work Registrant. A SNAP applicant or participant subject to the provisions of section 6(d)(1) of the Act and 7 CFR 273.7 (a).