



# SNAP E&T 101

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# Agenda

- Work Requirements and SNAP E&T Eligibility
- Program Description and Policies
- Expanding Services Through E&T Partnerships
- SNAP E&T Funding

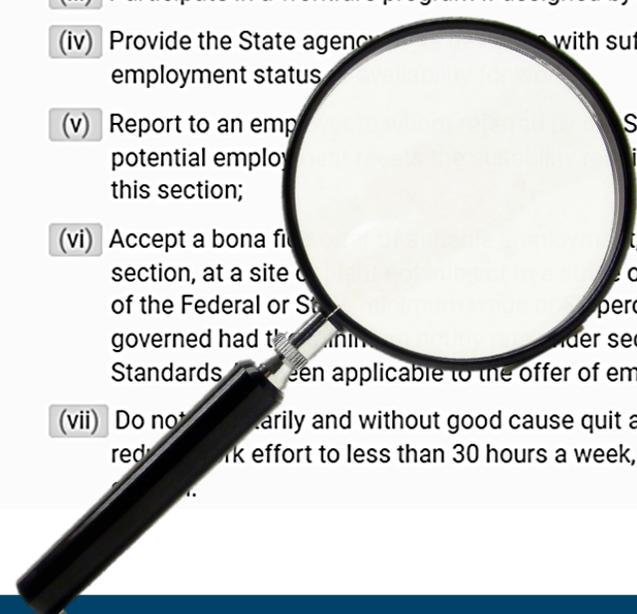
# Work Requirements

# SNAP E&T is a Work Requirement

## § 273.7 Work provisions.

### (a) Work requirements.

- (1) As a condition of eligibility for SNAP benefits, each household member not exempt under paragraph (b)(1) of this section must comply with the following SNAP work requirements:
  - (i) Register for work or be registered by the State agency at the time of application and every 12 months after initial registration. The member required to register need not complete the registration form.
  - (ii) Participate in a Food Stamp Employment and Training (E&T) program if assigned by the State agency, to the extent required by the State agency;
  - (iii) Participate in a workfare program if assigned by the State agency;
  - (iv) Provide the State agency with sufficient information regarding employment status;
  - (v) Report to an employer or the State agency or its designee if the potential employer has any requirements described in paragraph (h) of this section;
  - (vi) Accept a bona fide offer of employment, as defined in paragraph (h) of this section, at a site of operation or lockout, at a wage equal to the higher of the Federal or State minimum wage or 90 percent of the wage that would have governed had the minimum wage under section 6(a)(1) of the Fair Labor Standards Act been applicable to the offer of employment.
  - (vii) Do not voluntarily and without good cause quit a job of 30 or more hours a week or reduce work effort to less than 30 hours a week, in accordance with paragraph (j) of this section.



# What are Work Registrants?

- Work registrants are SNAP participants who are subject to the general work requirements.
- Work registrants are required to register for work or be registered by the State agency.
- Work registrants are mandatory E&T participants, unless they meet a State-specific exemption.



# Federal Exemptions from the Work Requirements

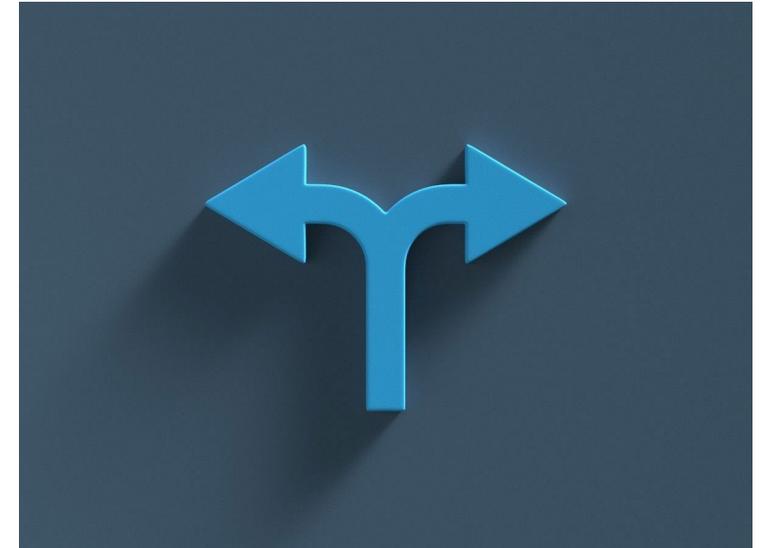
- SNAP participants are exempt from the general work requirements if they are...
  - Below the age of 16
  - Elderly (60+)
  - Mentally or physically unfit for work
  - Working or in another work program
  - Responsible for a child under 6 years old or an incapacitated person
  - In a drug/alcohol treatment program
  - Students enrolled at least half-time

# State Exemptions from SNAP E&T

- FNS regulations say that “work registrants not otherwise exempted by the State agency are subject to mandatory E&T”.
- State agencies have broad authority to exempt work registrants from the requirement to participate in E&T.
- Exemptions vary by State agency and can include:
  - All Work Registrants (this would be a Voluntary E&T Program)
  - Lack of an appropriate or available spot in E&T,
  - Geographic location,
  - Pregnancy,
  - Homelessness,
  - Low-English proficiency.

# Screening and Referral

- Screening for referral to E&T is an evaluation by the eligibility worker as to whether a person should be referred for participation in an E&T program or exempt.
- State agencies must screen all work registrants to determine whether it is appropriate, based on the State agency's criteria, to refer the individual to an E&T program.
- Screening and referral for E&T are part of the certification process to determine eligibility for SNAP.
- Screening and referral must be completed for both mandatory and voluntary participants
  
- Source: 7 CFR 271.2 and 7 CFR 273.7(c)(2)



# Mandatory vs. Voluntary Participants

Based on State policy decisions of who to exempt, States can operate a Mandatory or Voluntary E&T Program.

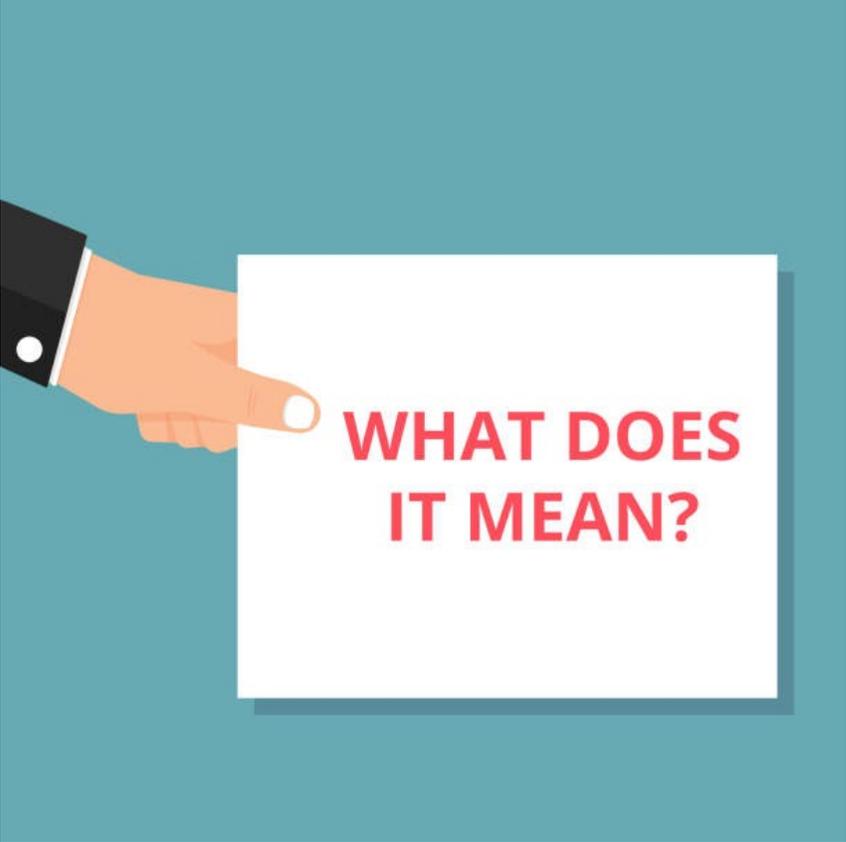
- **Mandatory**
  - Participants who do not qualify for Federal or State exemptions.
  - Are required by the State to participate in an E&T program as a condition of receiving SNAP.
  - Can be sanctioned for non-participation
- **Voluntary**
  - Participants who qualify for an exemption.
  - Choose to participate in an E&T program.
  - May qualify for an exemption.
  - Cannot be sanctioned for non-participation.

# Mandatory E&T

There are certain policies only applicable to States operating mandatory E&T programs:

- If an individual's allowable monthly expenses exceed the State agency cap, the State agency must exempt the participant from mandatory E&T.
- The State agency must disqualify mandatory E&T participants who fail to comply without good cause with E&T program requirements.
  - Good Cause is granted when circumstances beyond the participant's control prevent them from participating.
- The State agency must inform all mandatory participants of their rights and all pertinent information related to each of the applicable work requirements in the consolidated written notice and oral explanation.

# So what?



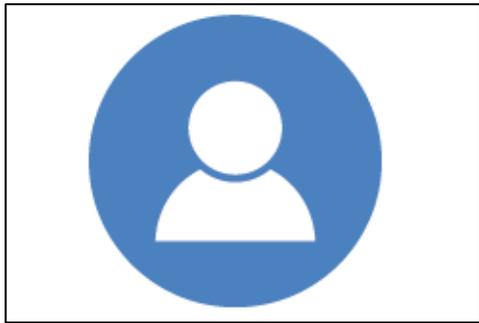
**WHAT DOES  
IT MEAN?**

State agencies need to develop and implement policies and processes that, among other things:

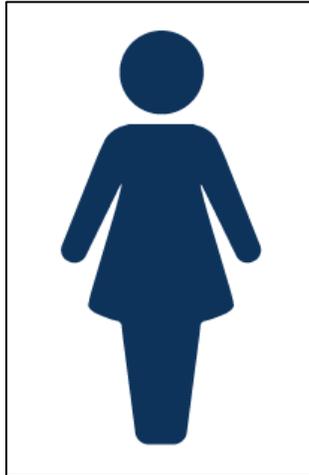
- Are informed by the E&T services available in the State and the characteristics of individuals the State intends to serve in E&T
- Ensure that individuals are referred to E&T only if appropriate
- Facilitate access to E&T services and supports for individuals who elect to participate
- Ensure individuals know what they are required to do, the consequences are for not doing them, their rights and responsibilities, etc.
- Do not result in individuals losing benefits through no fault of their own

# The Employment and Training Program

# Who are SNAP E&T Participants?



58% Voluntary Participants



51% Participants are Female



49% of Participants have a high school diploma

# What is SNAP E&T?

- An E&T program is a package of services:
  - Case Management + at least 1 component
  - Participant reimbursements (e.g. dependent care, transportation, books, supplies)
- All States are required to operate E&T programs.
- States have considerable flexibility in designing E&T programs that meet the needs of participants and employers.
- In FY22, FNS provided \$628.5 million annually to States to operate SNAP Employment and Training programs.



# Purpose of the E&T Program

- To assist members of SNAP households in gaining skills, training, work, or experience that will increase their ability to obtain regular employment.

Section 6(d)(4) of the Food and Nutrition Act



# Workforce Development Consultation and Coordination



- State agencies design E&T programs in **consultation** with the State workforce development board, or in consultation with private employers or employer organizations, if the State agency demonstrates that this would be more effective or efficient.
- State agencies are required to include in their E&T State Plan the extent to which they are **coordinating** with title I of the Workforce Innovation Opportunity Act (WIOA). This does not mean that programs should all be run through AJC's or WIOA.

# What Services are Provided through E&T?

- State agencies choose the activities (“components”) they will offer and articulate them in the annual E&T State plan.
  - Supervised Job search and job search training (work readiness)
  - Workfare;
  - Programs designed to improve the employability of individuals through actual work experience, training, or both;
  - Programs designed to increase an individual’s self-sufficiency through self-employment;
  - Education that improve basic skills or employability and have a direct link to employment;
  - Vocational training; and
  - Job retention for minimum 30 days and up to 90 days.

# E&T Best Practices



The Best Practices Report conducted in 2016 concluded:

- Strategies designed to support **longer term connections to stable employment** in growth fields can be effective for low income populations' employment and earnings.
- **Work-based learning strategies** demonstrate positive results in assisting low-income individuals to achieve employment and earnings.
- Research on **case management** demonstrates the importance of individualized assessment and support to training and employment outcomes.
- **Participant reimbursements**, are key elements to removing barriers to engagement, retention, and success in employment and training programs.

# Expanding Services through E&T Partnerships

# E&T Partnerships

- States rarely operate SNAP E&T programs fully in-house.
- Working with high-quality E&T providers (e.g. community colleges, community-based organizations) to deliver services can improve overall quality and depth of services, connections with employers.
- States can reduce their administrative burden by partnering with intermediaries who manage provider relationships.
- Providers can also use non-Federal funds to pay for services and get reimbursed 50% through a third-party partnership.

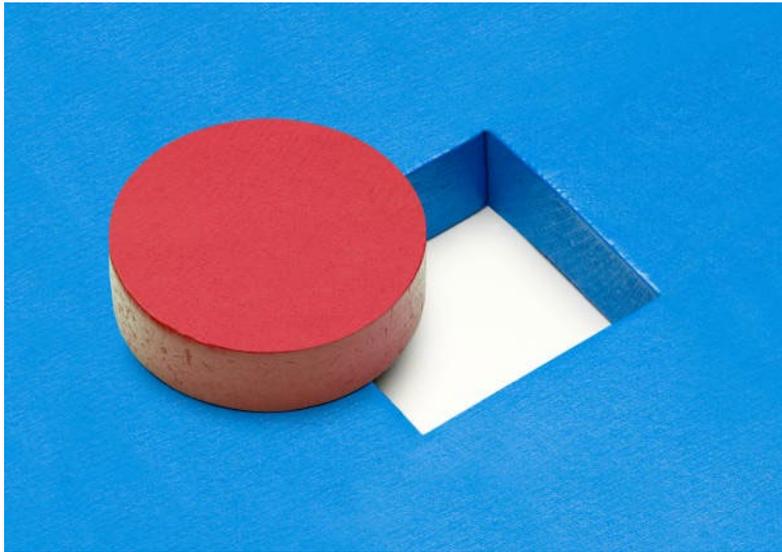


# What are the Responsibilities of an E&T Provider?

- E&T providers must be prepared to serve eligible SNAP participants, identify and track non-Federal expenditures eligible for reimbursement (as applicable), and collect and report participant data to the State agency.
- Depending on the agreement with the State agency, E&T providers may take on additional responsibilities, such as providing participant reimbursements and E&T case management services.
- E&T providers must notify the State agency within 10 days if a participant is not compliant with the work requirement.
- E&T providers have the right and responsibility to identify individuals who are not a good fit in an E&T component and notify the State agency of the provider determination.



# What is a Provider Determination?



- A provider determination is when the E&T provider determines the individual is not a good fit for the E&T component in which the individual is participating.
- Not only do E&T providers have the authority to make a provider determination, the E&T providers also have the responsibility to make this determination.
- The E&T provider then informs the State agency of the provider determination and the State agency must take one of four actions to identify a program or service that may be a better fit for the individual.

# Funding

# SNAP E&T Funding: A Snapshot

- Federal SNAP E&T Funding
  - 50-50 Funds
    - Participant Reimbursements
    - Administrative Reimbursements
  - Pledge State (ABAWD) Funds\*
  - 100 Percent Funds
- There are three major SNAP E&T funding streams
- 50-50 funds are flexible

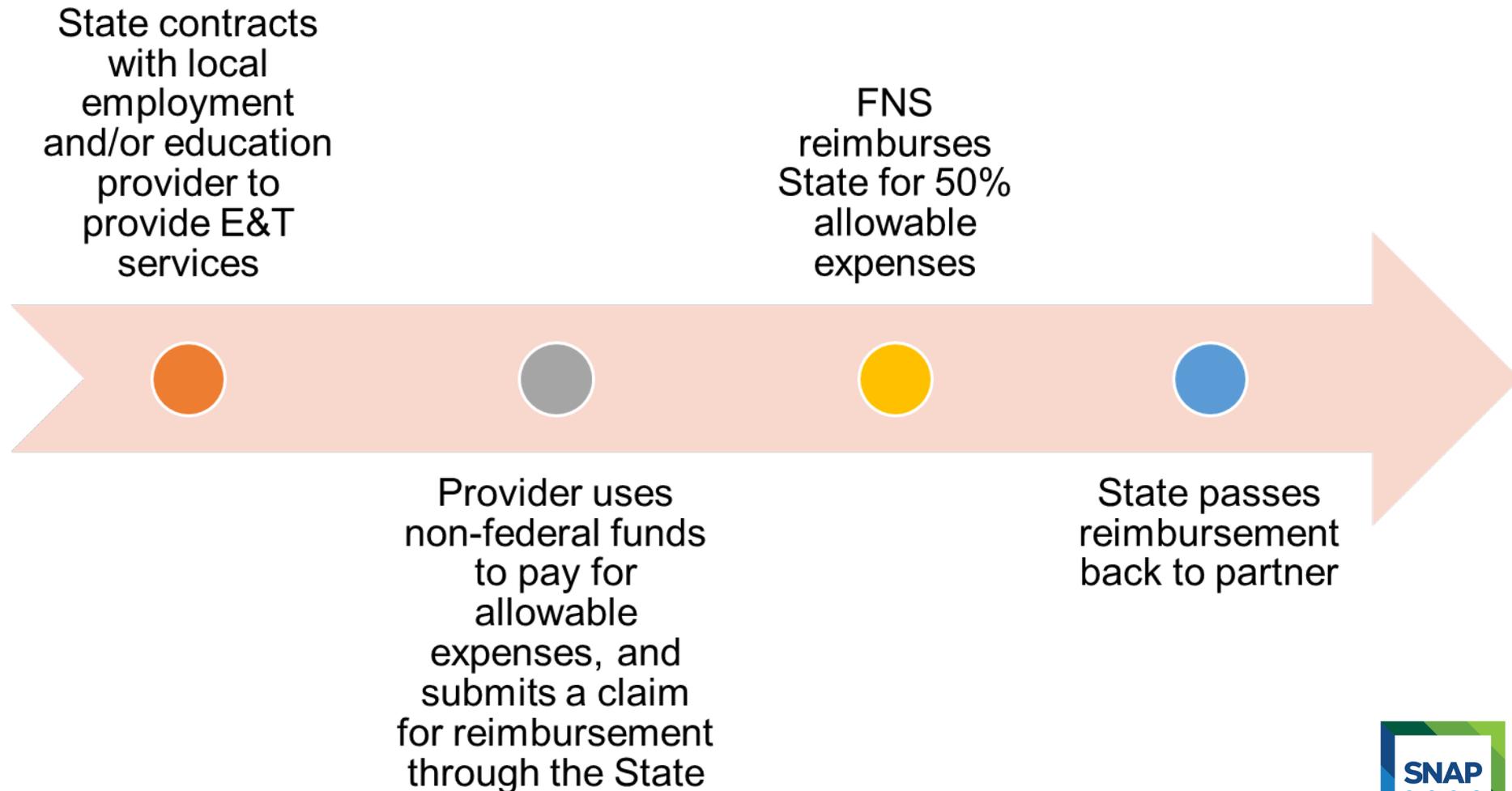
*\* States that agree to serve all childless adults in the state receive a proportionate share of \$20 million in addition to the 100 percent funds.*



# How are E&T Partners Funded?

- State agencies must enter into a formal agreement with an E&T provider to deliver services to E&T participants. State agencies may fund E&T partners with 100 percent funding.
- If they use State funds, or other non-Federal funds, FNS will provide them with 50 percent reimbursement for allowable expenses.

# Third-Party Reimbursement Models



# Participant Reimbursements

- State agencies are required to pay for or reimburse E&T applicants and participants for all expenses that are reasonably necessary and directly related to participation in an E&T program.

## Examples:

- Dependent care costs
- Transportation expenses
- Books or training manuals
- Uniforms
- Personal safety items required for participation

# Determining Reasonable and Necessary

## Reasonable costs:

- Provide a program benefit commensurate with the costs incurred;
- Are in proportion to other program costs for the function that the costs serve; and
- Are what a prudent person would incur in like circumstances.

## Necessary Costs

- Are incurred to carry out functions of E&T;
- Cannot be avoided without adversely affecting program operations;
- Do not duplicate existing efforts;

# In Conclusion...

- SNAP E&T exists because it is part of the SNAP general work requirements
- Policy regarding who is required to participate in E&T as an eligibility requirement should be based on what services are available through the E&T program and what populations they are serving.
- States have considerable flexibility in designing E&T programs that meet the needs of participants and employers.
- States can partner with organizations to improve overall quality and depth of services offered.
- SNAP E&T consists of 3 funding streams that can be leveraged to enhance the employability of SNAP participants.

**Want to learn more?**



# SNAP E&T Resources

- **SNAP E&T Program Toolkit**
  - E&T Policy
  - Information on partnerships
  - Information on allowable costs and participant reimbursements
  - FAQs
- **SNAP E&T Operations Handbook**
  - Information on third-party partnerships and options for structuring program partnerships

Visit [www.fns.usda.gov/snap-et](http://www.fns.usda.gov/snap-et)

