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Introduction and Background

This handbook provides a standard set of procedures and guidelines for providers of employment and training services who partner with the South Carolina Department of Social Services (DSS) in the SNAP2Work program. The handbook is not intended to cover every situation a program partner may encounter in managing their service delivery. DSS has contracted with Winthrop and Clemson Universities to provide face-to-face training, on-going guidance and answer specific questions that may arise. As public and non-profit organizations express interest in partnering with DSS in the program, a program contact will be assigned to provide this direct, hands-on technical assistance. After reviewing this handbook, please contact the SNAP2Work Program Director to receive hands-on guidance:

Larry G. Young  
SNAP E&T Program Director  
South Carolina Department of Social Services  
Phone: (803) 898-7396 Fax: (803) 898-7296  
Email: larry.young@dss.sc.gov

Additional informational materials and formed mentioned in this document can be found online at the SCDSS SNAP2Work website: https://dss.sc.gov/snap2work.

What is the SNAP2Work Program?

The SNAP2Work Program is an initiative of South Carolina’s Department of Social Services (DSS) designed to expand the State’s skilled workforce while increasing employment and enabling better jobs for participants in the Supplemental Nutrition Assistance Program (SNAP), formerly known as the Food Stamp program. Work is better than welfare and the SNAP2Work Program provides training and employment opportunities to low-income, working-age families to increase their income and achieve self-sufficiency.

The SNAP2Work Program provides Federal funding to providers of employment and training services to SNAP participants through a “third-party reimbursement” model, where the other State agencies, non-profit organizations, foundations and others put up funding for the necessary and reasonable costs of an employment and training component, and DSS uses that funding to leverage 50% Federal reimbursement to help pay for partner services.

The recent recession has resulted in a large number of newly unemployed or underemployed individuals and families who may need help with job search training, improved skills and education or vocational training that will enhance their opportunities to find a job, retain employment, and advance in the workforce. At the same time, many employers are searching for employees with the necessary skills and abilities to perform the workforce needs of the 21st century. The SNAP2Work Program is designed to address both the needs of employers for qualified staff and the needs of low-income participants to find meaningful work.
Who Should Participate in the SNAP2Work Program?

We believe that any public or non-profit provider of employment, training, education and support services will benefit by becoming a partner with DSS in this third-party reimbursement program. This includes Technical Colleges, Adult Education Programs, Workforce Investment Act (WIA) providers and Community or Faith-Based Organizations (CBOs/FBOs). Many of these community agencies are already providing education or employment and training services to SNAP participants.

Through the SNAP2Work Program, providers can qualify for reimbursement of nearly half of their spending on services to qualified participants with Federal funds. [SNAP families that also receive cash assistance through the Temporary Assistance for Needy Families (TANF) program are not eligible, because they receive employment and training services through TANF.] But first, you must become an approved provider through DSS. This handbook provides a standard set of procedures and guidance so that service providers can qualify for, offer, and deliver efficient and effective services under the SNAP2Work Program.

What is the SNAP Program?

The purpose of the 40 year-old Supplemental Nutrition Assistance Program SNAP (formerly the Food Stamp) program is to alleviate hunger and improve nutrition by increasing the food purchasing power of the 47.8 million low-income households currently receiving benefits. The program is available to nearly anyone with little income and few resources using nationwide standards for eligibility and benefits. Generally, SNAP households must have monthly incomes below 130 percent of the Federal poverty guidelines. The chart below shows the maximum income levels for Fiscal Year 2013.

<table>
<thead>
<tr>
<th>Household size</th>
<th>Gross monthly income (130 percent of poverty)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>$1,211</td>
</tr>
<tr>
<td>2</td>
<td>1,640</td>
</tr>
<tr>
<td>3</td>
<td>2,069</td>
</tr>
<tr>
<td>4</td>
<td>2,498</td>
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<td>5</td>
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<tr>
<td>6</td>
<td>3,356</td>
</tr>
<tr>
<td>7</td>
<td>3,785</td>
</tr>
<tr>
<td>8</td>
<td>4,214</td>
</tr>
<tr>
<td>Each additional member</td>
<td>+429</td>
</tr>
</tbody>
</table>

Benefit amounts or allotments vary by household size, with a maximum allotment for a family of four of $668 per month, provided in the form of electronic debit cards. Income received by a household is used to reduce the benefit amount, but SNAP permits several deductions from income to provide a better measure of disposable income available to purchase food and also to encourage work.

SNAP is a state-operated, but Federally supervised program. SNAP benefits to participants are 100 percent Federally funded, whereas administrative costs are shared equally between States.
and the Federal government. The Food and Nutrition Service (FNS) in the U.S. Department of Agriculture (USDA) oversees SNAP which is administered by the South Carolina Department of Social Services (DSS). All SNAP Federal funding goes to or funnels through DSS.

The material below provides information that will help you determine who can be served, what services may be provided and how best you can participate in the SNAP2Work Program. However, because SNAP is complex and includes a variety of technical terms and acronyms, we suggest you should also review the SNAP Definitions in Appendix A as you begin to participate in the SNAP2Work Program.

**What is the SNAP Employment and Training Program?**

For low-income individuals, work is the primary path to independence and self-sufficiency. In 1987, Congress established the Food Stamp Employment and Training (E&T) Program to assist able-bodied Food Stamp recipients in improving their ability to obtain employment and reduce their dependency on public assistance. From its inception, the E&T Program has been designed to help SNAP households gain skills, training, work, or experience that will increase self-sufficiency.

The recent economic recession has resulted in a vast number of newly unemployed individuals. While some SNAP clients need assistance with job search training and basic skills, other clients would benefit more from vocational training that would enhance their ability to obtain regular employment. This manual will help adult education providers, technical colleges and CBOs in working with the Department of Social Services (DSS) to develop E&T programs to meet this wide range of needs.

SNAP rules require adult participants, unless exempt, to register for work, accept an offer of employment, and provide sufficient information to allow staff to determine their employment status and job availability. SNAP Eligibility staff determine which members of the household must comply with mandatory work requirements at the time of their eligibility interview or at recertification.

Although SNAP recipients may volunteer to participate in the SNAP E&T program, the following types of participants are Federally exempt from mandatory participation in E&T requirements:

- Under age 16 or over age 59;
- Physically or mentally incapacitated;
- Subject to and complying with work requirements of other programs (e.g. Temporary Assistance for Needy Families or TANF);
- Caretaker for a dependent child under age six or an incapacitated individual;
- Receiving unemployment compensation benefits;
- Participating in a drug or alcohol treatment and rehabilitation program;
- Employed at least 30 hours a week; and
- A student enrolled at least half time.
Failure to comply with E&T requirements can result in disqualification from the SNAP program. Quitting a job voluntarily without good cause or reducing work hours to less than 30 hours per week also can result in a SNAP disqualification.

Under South Carolina’s SNAP2Work program, fifty (50) percent reimbursement is available for all qualified administrative costs, including the costs of service providers for the planning and operation of the E&T program, and for participant reimbursements. State agencies are required to reimburse E&T participants, including volunteers, for all reasonable expenses directly related to participation in an E&T component, for example the costs of child care, transportation, books and uniforms.


**SNAP2Work – Getting Started**

**Why should my agency or organization become a SNAP2Work partner with DSS?**

The mission, goals and objectives of adult education providers, Technical Colleges, and many community-based non-profit organizations are designed to promote the education and training of clients, foster career development, improve employability and enhance their skills, abilities and life opportunities. Providers of these services to SNAP participants can expand their funding and offer additional services by becoming a SNAP2Work partner. As an approved partner, once you determine that clients are eligible SNAP participants, you then simply provide qualified services for them and submit quarterly invoices of costs. DSS will combine these invoices and submit them to FNS to obtain 50% reimbursement of allowable costs. DSS will retain 5% of the Federal funding received to pay for administrative, training, technical assistance, monitoring and quality assurance activities and pass 95% of these Federal revenues (or 47.5% of total costs) back to partner agencies for reinvestment in services.

It is also important to be realistic in understanding the expectations and requirements that partners must meet. Partners are expected to assess and track participants, to fund over half of their program costs and to track and invoice these costs to a Federal program. It is critical that a partner have non-Federal sources of funding and have the cash-flow to handle delays between outlays and Federal reimbursement. Partners also need to properly allocate costs among programs and to certify the source of matching funds.

**What services and activities are eligible for funding under the SNAP2Work program?**

Within broad guidelines, States have the flexibility to set the size, scope, and type of employment and training activities they wish to offer to SNAP participants. Some States have opted to operate all-volunteer E&T programs, where all SNAP recipients required to register for work are exempt from mandatory participation in E&T activities. South Carolina has opted for a
mandatory program for certain Able-Bodied Adults without Dependents (ABAWDs) receiving SNAP benefits in certain counties, while at the same time offering E&T services and activities to any SNAP client who volunteers to engage in employment and training activities on a State-wide basis. DSS intends to provide the E&T services through partnership reimbursement agreements with services providers under the SNAP2Work Program. Because the mandatory program has required timeframes, and additional tracking and record-keeping, DSS will refer mandatory participants only to those service providers willing to take on these additional responsibilities.

All public or non-profit providers offering approved employment and training services to SNAP participants using non-Federal funding are eligible to partner with DSS in this program. The SNAP2Work Program intends to direct its funding toward helping participants find paid employment.

In South Carolina, E&T providers or partners must include at least one of the following services:

- **Outreach and Marketing** – In addition to State staff explaining the services available to clients, service providers can receive reimbursement for the costs of advertising and marketing their program to potential SNAP clients. Enticing SNAP clients to volunteer to participate in a SNAP E&T program can be challenging, due to the prior negative image associated with mandatory work programs. The key to success is for respected community agencies to convince clients of the increased chance of finding a good job after participating in an E&T program and then providing education and training that is linked to the local labor market. Also, it may be important to emphasize that volunteers are not disqualified from SNAP for failure to complete training or educational components. SNAP E&T can offer a “second chance” for them to come back and succeed.

- **Assessment, employability plan development, placement and case management** – After a referral from DSS or a signed voluntary enrollment, a service provider should conduct an initial interview and assessment to determine the participant’s knowledge, skills, abilities, interests, work history and potential barriers to employment. Based on the information gathered, a training and employment plan should be developed, consistent with the participant’s interests and abilities that specify the necessary activities, training or education that will be undertaken to achieve employment. After assessment and plan development, the participant should be placed in the appropriate training/employment component. The plan may also include services not provided by the agency to which the participant may be referred. Participation and execution of the plan should be monitored to ensure effective and consistent progress on the path to employment and self-sufficiency.

- **Job Search** – The job search component 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 for mandatory participants entails approximately 20 contacts with employers per month for two months. E&T programs have historically placed a heavy emphasis on job search to connect work-ready participants to jobs. During a weak economy, additional training may be needed to help the work-ready obtain regular employment.
• **Job Search Training** – Job search training is a component that enhances the job readiness of participants by teaching them job-seeking techniques, increasing job search motivation, and boosting self-confidence. Job search training would be conducted locally based on available resources and should be designed to meet the needs of job seekers and employers. Providers may deliver training in group sessions and workshops or on an individual basis. These job search training activities may include, but are not limited to:

- Employability skills;
- Interpersonal skills;
- Basic job search skills;
- Job retention skills;
- Interviewing
- Appropriate dress;
- Resume development;
- Career assessments; and
- Guidance and motivation to develop positive work behavior.

• **Education**—Acceptable education components include a wide range of activities designed to improve basic skills and the employability of SNAP recipients. Such programs include Adult Basic Education (ABE), basic literacy, English as a Second Language (ESL), high school equivalency (GED), and occasionally post-secondary education. Educational programs must have a direct link to job-readiness. E&T funds can be used to pay for tuition and mandatory school fees charged to the general public. E&T funds cannot be used to pay for State or local education entitlements for which the general public does not ordinarily pay.

• **Vocational Training**—This component provides training, knowledge and skills development in a specific occupational area. In South Carolina, the focus will be on programs like the Quick Jobs With A Future Program and other certificate and non-certificate programs which allow adults to quickly obtain skills matching the needs of local business and industry.

Many states offer vocational training courses as part of the E&T education component. These training programs improve the employability of participants by providing training in a skill or trade, thereby allowing the participant to move directly and promptly into employment. Acceptable vocational training programs should have a direct link to the local job market.

• **WIA** – This component includes job training services that are developed, managed, and administered by the State Department of Employment and Workforce (DEW) and other State agencies, local governments, and the business community under the Workforce Investment Act (WIA). Activities include basic skills training (GED and literacy), occupational skills training, on-the-job training, work experience, and job search assistance. WIA establishes three levels of employment and training services for adults and dislocated workers: core, intensive, and training. A WIA eligibility determination is required when a job seeker needs staff-assisted services to obtain or retain employment. All job seekers are eligible to receive core services. Intensive services are available to unemployed job seekers who have been unable to find work through core services and to employed individuals who need additional services to reach self-sufficiency. Training
services are available for those job seekers who have been unable to find employment through intensive services. Federally funded WIA services are not eligible to receive SNAP2Work funding.

- **Job Retention** – The job retention component is meant to provide support services for up to 90 days to individuals who have secured employment. Only individuals who have received other employment/training services under the E&T program are eligible for job retention services. Job retention services must be reasonable and necessary and can include clothing required for the job, equipment or tools required for a job, relocation expenses, transportation, and child care.

- **Child care, transportation and other support services** – Supportive services such as child care, and transportation often make a critical difference in the ability of a participant to engage in training, education and work. Supportive service payments are available to reimburse participants for expenses necessary to complete the training or work activity. The need for the expenditure must be directly related to the approved activity. Funds for reimbursements may be paid directly to the provider or to the client.

**What does an interested agency need to do to partner with DSS in this initiative?**

As either a public or non-profit provider of employment and training services, it’s easy to become a qualified partner so that your agency or organization can receive Federal reimbursement for the services you provide to SNAP participants. We suggest that you just pursue the following steps:

1. Learn more about the program and talk to other community SNAP2Work partners;
2. Understand the roles and responsibilities of the partnership, which are specified in the required written agreements. (Note: while these agreements have been standardized for ease of use, changes can be considered to meet the needs of partner agencies.) If you are a public agency, review the standard Memorandum of Understanding (MOU) at: [https://dss.sc.gov/content/customers/food/snap2wk/files/SCPublicEntityModelMOU.pdf](https://dss.sc.gov/content/customers/food/snap2wk/files/SCPublicEntityModelMOU.pdf)
   If you are a non-profit organization, review the Grant Agreement at: [https://dss.sc.gov/content/customers/food/snap2wk/files/SNAPETGrantModelAgreement7-16-12.pdf](https://dss.sc.gov/content/customers/food/snap2wk/files/SNAPETGrantModelAgreement7-16-12.pdf)
3. Coordinate with DSS to determine how many potential SNAP participants live in the geographic area your agency provides services, and the number of SNAP participants your agency already serves;
4. Assess your services and activities to ensure they qualify for Federal funding, and identify potential sources and amounts of non-Federal funding;
5. Develop an outreach, intake, client flow and monitoring plan and develop a short description of the proposed program of services (Scope of Work) and a budget that reflects the number of proposed clients and available funding; and
6. Meet with DSS to discuss and agree on planned activities, responsibilities and sign the Grant Agreement or the Memorandum of Understanding.
How do we learn more about the program, explore options and discuss the feasibility of becoming a partner?

To ensure that adequate resources are available to help you completely understand the program and your responsibilities, DSS has contracted with Winthrop University and Clemson University to provide technical assistance staff who will visit you on-site at your convenience, provide you and your staff with an overview of the SNAP2Work program, describe other community-based agencies and organizations that have partnered with DSS, answer your questions, and review your program’s services and activities to make sure that they qualify for Federal reimbursement. They are also available to help guide you through the partnership process, including assistance with developing and submitting an agreement to DSS. To make arrangements for an on-site visit, simply call or e-mail the Program Director:

Larry G. Young
SNAP E&T Program Director
South Carolina Department of Social Services
Phone: (803) 898-7396 Fax: (803) 898-7296
Email: larry.young@dss.sc.gov

Note: For adult education and GED providers who are normally funded through the Department of Education, Office of Adult Education, a Statewide MOU has been signed between the two Departments so that all services and funding will be coordinated through the Office of Adult Education. Adult education providers should coordinate their plans and activities with:

David B. Stout, Jr., Ed.D.
Director, Office of Adult Education & State GED Administrator
908-A Rutledge Building
1401 Senate Street
Columbia, SC 29201
803-734-8348 Telephone
803-734-3643 Fax
www.ed.sc.gov

What criteria are available to help us decide whether to initiate a SNAP2Work program?

If your organization already provides employment and training services that may be eligible for Federal reimbursement, we believe the critical question is whether the SNAP2Work program will benefit your organization, the clients to be served and the community. Answers to the following questions may help you decide whether to participate:

- Are there enough SNAP participants that need our services to create and maintain a program?
- How will we market the services and attract enrollees into the program?
- Does our organization have a source of non-Federal funding which can be used to start the program? If not, could we attract foundations and other community sources to help provide funding or resources for the program?
• Would services or funding benefit from a collaborative approach with other community organizations?
• Does my organization have the necessary staff and administrative infrastructure to perform client enrollment, tracking, billing, and cost allocation?

Are there data for our area that show the potential SNAP population that might be served?

DSS has created a report that provides an overview of the total number of SNAP participants by county, and then breaks the total down into Non-TANF SNAP recipients, the work-eligible pool (excluding children and the elderly), the number of work registrants and the number of the work registrants that are ABAWDs. This will provide interested providers with a broad idea of the potential number of participants that could be encouraged to volunteer for their services. You can obtain a copy of the report from any technical assistance consultant or obtain a copy at: https://dss.sc.gov/content/customers/food/snap2wk/index.aspx

To help providers further evaluate whether program participation would be beneficial to them as well as to aid those providers who agree to operate a program verify that they serve eligible clients, DSS will electronically match the provider’s clients served to the SNAP benefit recipients. (Although individuals may move on and off of SNAP periodically, Federal reimbursement may only be claimed on behalf of participants who are eligible for SNAP during a month within which they are eligible and are not also receiving cash assistance under the Temporary Assistance for Needy Families (TANF) program.)

To conduct the match, providers will need to submit an electronic database to DSS. If the provider agrees to ongoing participation, this electronic database will need to be submitted either monthly or quarterly, to ensure costs are not claimed for months of ineligibility. To facilitate and automate this process to the extent possible, DSS has developed an electronic “Excel” template which is included. Examples have been provided on that template. (Please note that this template may be updated on occasion to facilitate faster and easier linkages.) If the Excel template does not work for your organization, please contact DSS directly using the contact information to discuss alternative methods.

DSS requests the following data fields:

1. Organization FEIN number. This is a standardized 9-digit text field: xx-xxxxxxxx (the dash is included)
2. Organization Name. The length of this field should be less than 50 characters
3. Month of Service Received. This should be a text field: MMYYYY. For example, if the client was served in January 2013, the field would be coded as “012013”.

There should be a separate Excel file/database per month of service. Participation / Services received should be submitted to DSS monthly.

Examples of coding the month of service include:
If the client was served in October 2012, the month of service should be coded as 102012.
If the client was served in January 2013, the month of service should be coded as 012013.
4. First Name (as complete as possible)
5. Middle Name (as complete as possible)
6. Last Name (as complete as possible)
7. Date of Birth. This field should be text in the format of MMDDYYYY. For example, if the client was born on February 14 1979, the date of birth should be coded as 02141979.
8. SSN. This field should be 9 digits with no hyphens. For example if the client’s SSN is 123-45-6789, it should be coded as 123456789. Please note that DSS recognizes the sensitivity around the use of SSNs. However to facilitate as many matches as possible, as many identifiers that can be supplied is encouraged.

The actual Excel template can be located at: https://dss.sc.gov/content/customers/food/snap2wk/index.aspx

**How do we decide whether to serve only volunteers or both volunteers and mandatory ABAWD participants?**

Partners may provide services to two potential types of participants: 1) volunteers who request the education or training service from DSS or the partner in response to an organization’s outreach; and 2) if a partner agrees to serve them, mandatory ABAWD participants who are required to participate in employment and training activities as a condition of eligibility.

As mentioned above, the mandatory program of participation for ABAWDs who are 18 to 34 years of age is already operating under separate contracts in the following counties: Anderson, Beaufort, Berkeley, Charleston, Cherokee, Darlington, Dorchester, Georgetown, Greenville, Greenwood, Lancaster, Lexington, Orangeburg, Richland, and Sumter. However, DSS would like to expand the program Statewide, as soon as service providers and services are available in additional counties. Once the partnership agreements have been signed and an organization is willing to offer services and track ABAWD participation, DSS Eligibility Staff will directly refer these mandatory ABAWDs to providers to serve them and monitor their participation. These participants will already have been enrolled in the program and eligibility confirmed.

Below, we outline the key differences between the mandatory ABAWD requirements and those for voluntary participants. A more detailed explanation may be found in the DSS SNAP manual that may be located at: https://dss.sc.gov/content/library/manuals/snap.pdf  There is also a separate Procedural Guide for the mandatory program which may be requested from the Technical Assistance consultants or Larry Young (contact information noted above).

**Mandatory Participants**

Mandatory participants must meet specific E&T requirements within specified timeframes. Failure to meet these responsibilities can result in the individual’s disqualification from the program. Mandatory participants must:

- Attend an initial E&T Program orientation/assessment and follow-up interviews;
- Contact 20 different prospective employers during each 30 day period of the 60-day job search period;
- Participate in 20 hours of E&T component activities weekly;
- Report to an employer to whom referred by the provider;
- Accept an offer of suitable employment from an employer to whom referred by the E&T program; and
- Continue suitable employment obtained through referral from the E&T program (quitting any job voluntarily without good cause, or reducing work hours to less than 30 hours per week also can result in a SNAP disqualification).

Failure of a mandatory participant to appear for scheduled meetings or meet the requirements noted above without “good cause” is non-compliant. Such participants will be provided written notification of non-compliance on the day of non-compliance and given an opportunity by the provider to establish good cause because of personal circumstances such as illness, no available transportation or a crisis situation. If good cause is not established within 10 days of the notice of non-compliance, the provider will notify designated eligibility staff who will initiate a 10-day notice of adverse action.

Providers of mandatory participants must ensure that monitoring of the SNAP E&T requirements, track and report participation hours, non-compliance, support services expenditures, and identify participants who are successful in obtaining employment.

**Volunteers**

SNAP participants who are exempt from mandatory participation may volunteer to participate in the SNAP2Work Program at the time of application or anytime while receiving SNAP benefits. Volunteers are not subject to penalties for non-compliance. As a result, the provider monitoring and reporting responsibilities described below are less than those for mandatory participants.

**SNAP2Work – Ongoing Responsibilities**

**What happens after an organization becomes a SNAP2Work partner?**

Once the partnership agreement has been signed by both parties, the program contact will arrange an Implementation Meeting with the partner agency to discuss how the program will operate, referrals and voluntary enrollments, mutual responsibilities, computer matching to verify SNAP eligibility, record-keeping, invoicing, and reporting requirements. These program contacts will be available on an ongoing basis to help your organization decide whether to participate in the program. In addition, DSS is tracking the typical kinds of questions that have been raised by potential partners. These questions and their answers may be located at: [https://dss.sc.gov/content/customers/food/snap2wk/files/SNAPETQsAs.pdf](https://dss.sc.gov/content/customers/food/snap2wk/files/SNAPETQsAs.pdf)

**How does a SNAP2Work partner enroll a SNAP participant in the program?**

Federal reimbursement is only available for costs incurred on behalf of eligible SNAP participants who are receiving SNAP benefits and enrolled in the SNAP2Work employment and training program. Greater education and training benefits and employment outcomes will be achieved by increased program participation. DSS intends to market and explain the program
and potential benefits to non-mandatory SNAP participants at intake and each recertification. When a participant requests program services, DSS will refer these individuals to the appropriate provider nearest to or most convenient to the client. For these clients, DSS will already have enrolled the clients and verified program eligibility.

We also expect our partner agencies to promote and market their services to potential SNAP participants, describing the program and the expected employment results. A simple participant explanation of the program and the advantages of participation is available at: https://dss.sc.gov/content/customers/food/snap2wk/files/SNAP2Workinforecipient.pdf

When an individual requests to receive services, the provider should enroll the participant and verify SNAP entitlement, either through documentation provided by the client, or through the computer matching program outlined above. DSS has developed a simple Voluntary Participation Agreement for this purpose which may be found at: https://dss.sc.gov/content/customers/food/snap2wk/files/SNAP2WorkVoluntaryParticipationAgreementWeb.pdf This Voluntary Participation Agreement also serves as the client’s acknowledgement that they are participating in a SNAP funded E&T program which is important and is required of each non-mandatory participant in the program. Low-income residents who are not receiving SNAP benefits may also be encouraged to apply for these benefits.

What reporting requirements will SNAP2Work providers need to meet?

SNAP2Work partners are expected to monitor client attendance and progress and verify SNAP eligibility on a monthly basis. As noted above, for ABAWDs, changes in participation may affect SNAP eligibility and non-participation should be reported as soon as it is known.

In order to draw down SNAP E&T Federal funding, FNS requires certain information on the number of clients receiving services by type of activity. In order to meet these Federal reporting requirements, DSS has designed a simple, monthly participation Excel report that should be reported by the 10th day of the month following the report month. Each provider is expected to report the number of new clients that began participation in the report month, as well as the number of continuing participants by whether the client is engaged in job search, vocational training, job search training or education. Providers are also expected to report the number of clients that found employment during the report month. The Third-Party Reimbursement Program Monthly Participation Report may be found under “Forms” at: https://dss.sc.gov/content/customers/food/snap2wk/index.aspx

What are the SNAP2Work record-keeping requirements?

SNAP2Work providers must maintain a paper or electronic file for all clients served, organized according to the provider’s standards. The files should include the following types of information:

- Intake and assessment – Copies of the Voluntary Participation Agreement or referral (if applicable) and evidence of how the need for selected program services were determined;
- Eligibility verification – Evidence of the client’s eligibility for SNAP benefits and that the participant is not a TANF recipient was checked for the months of services claimed;
• Services and expenditures – The types and costs of services provided; and
• Support services expenditures – If provided, all support service expenditures must be tracked.

SNAP2Work program records must be maintained for a period of three years and be made available to DSS or Federal program staff for review upon request. Documentation of SNAP2Work activities is important to verify and monitor the progress and success of the program in moving SNAP participants to employment. Program files should serve the following purposes:
• Identify the services provided;
• Track participation;
• Justify and support expenditures; and
• Allow DSS to gather and report statistical data required by the Federal government.

SNAP2Work providers shall safeguard the use and disclosure of information concerning applicants for and recipients of services in accordance with applicable Federal and state laws and shall restrict access to, and the use and disclosure of such information in compliance with said laws and regulations.

**How will DSS monitor and audit program partners?**

To ensure that services and claimed expenditures comply with Federal requirements, DSS plans to conduct monitoring site visits during the period of performance of the SNAP2Work program. We will also use these visits to evaluate performance, ensure required record-keeping and to provide technical assistance.

It is also possible that the U.S. Department of Agriculture (USDA) or a single State auditor conducting an audit of DSS programs may include a SNAP2Work partner in an annual, Federally-required OMB Circular a-133 audit of program performance and expenditures. The purpose of these audits is to ensure that grantees:

*Maintain internal control over Federal programs that provides reasonable assurance that the auditee is managing Federal awards in compliance with laws, regulations, and the provisions of contracts or grant agreements.*

As a result, at any time during normal business hours, service providers shall make all program records and service sites open to these organizations to perform program reviews or audits. Staff of these organizations shall have the right to examine and make copies of records, interview staff as needed, and to contact participants for documentation.
Budget and Invoicing Guidance

What needs to be included in the program budget?

As part of the Grant Award Agreement (for non-profit agencies) and the Memorandum of Understanding (for public agencies), Federal rules require a proposed budget that outlines the amount of Federal reimbursement anticipated, and the amount and source of non-Federal funds to be expended by the grantee. Allowable sources of the non-Federal funding include general tax funds, local tax levies, and donations from private firms, non-profit organizations or foundations, provided these funds are not used as match for any other Federal program.

Budgets should be prepared using an organization’s format that includes the following standard budget activities or line items:

- Direct Services – The necessary and reasonable costs of services provided directly to or on behalf of participants.
- Administration – The necessary and reasonable costs for the proper administration of the SNAP2Work program.
- Allocable costs
- Participant reimbursement – The allowable costs for support that participants may need to engage in SNAP2Work activities.

How does my organization get reimbursed for the costs of providing employment and training services?

DSS will make payments on a quarterly basis to SNAP2Work partners for allowable expenditures reasonably and necessarily incurred in the course of providing services. To facilitate and standardize the billing/invoicing process, DSS has developed a SNAP2Work Third Party Reimbursement Program Invoice, an Excel spreadsheet which is available at: https://dss.sc.gov/content/customers/food/snap2wk/index.aspx

In addition to providing necessary organizational information, partners are expected to complete the invoice by type or category of costs into two primary categories:

- Direct Charges – Eligible costs (both direct and indirect) related solely to the SNAP2Work Program and/or serving only individuals who are eligible non-TANF SNAP recipients; and
- Allocable costs – Eligible costs that include expenditures benefiting all clients served by the provider in addition to individuals who are eligible non-TANF SNAP clients. The claimable share of these costs is automatically calculated by reporting the total number of clients served and the number of eligible SNAP2Work clients served.

The invoice automatically combines the total direct charges and claimable allocable costs into total non-Federal expenditures, calculates the 50% Federal reimbursement, less the five percent DSS monitoring fee for the total reimbursement requested. To ensure a timely reimbursement and cash-flow, partners are encouraged to submit the quarterly invoice as soon as possible and no later than the 15th day of the month following the end of the quarter for which reimbursement is requested.
Each SNAP2Work partner must maintain an accounting system with necessary supporting fiscal records to assure that claims for funds meet all State and Federal requirements. Such financial and program records and supporting documentation must be maintained for a period of three years after the expiration of the written agreement with DSS.

**What are allowable costs that may be claimed under SNAP2Work?**

A SNAP2Work partner may claim all the costs that are “necessary and reasonable” for the proper and efficient administration of the program. Necessary costs are those needed to carry out the program and without which the program would be adversely affected. A cost is reasonable if, in its nature and amount, it does not exceed what a prudent person would pay in the same circumstances. Partners must maintain books and records, with source documentation, that reflects the source of funds and all costs expended for program purposes. All claimed expenditures must be documented in your financial records which reflect accurate, current and complete records of program costs.

The following list includes examples of SNAP2Work expenses that are allowable expenditures:

- Administrative costs, including
  - Salaries and fringe benefits of personnel involved in providing SNAP2Work services;
  - Office equipment, supplies, postage and duplication costs;
  - Development and production of SNAP2Work materials;
  - Lease or rental costs;
  - Necessary travel costs in accordance with State/local rules;
  - Maintenance expenses;
  - Other indirect costs; and
  - For public agencies only, in-kind costs, such as volunteer time or donated space.
- Program marketing, assessment and case management costs;
- Cost of tuition and fees provided; and
- Participant support costs, if provided, including: transportation, child care, books, uniforms and tools.

The cost of any items purchased that will not be used exclusively for SNAP2Work must be allocated among other funding sources. Also, Federal rules require that employees whose time is spent on multiple activities or accounts must maintain time and effort documentation to reflect the amount of time spent on the SNAP2Work program, and the total time worked on the job. If an employee is paid 100% by the SNAP2Work costs claimed for Federal reimbursement and this is the only activity claimed, then time and effort documentation is not required.

What types of costs are not allowable under SNAP2Work?

SNAP2Work cannot pay for services that are already available to the participant through a State entitlement program. For example, services appropriate to high school aged children are likely available through the State school system or public programs, and therefore not eligible for Federal reimbursement. The following costs are examples of expenditures that are unallowable under Federal rules:

- Cost of construction or purchase of facilities or buildings;
- Lobbying costs;
- Contingency or emergency funds;
- Entertainment costs that are primarily for amusement or social activities;
- Student activity costs;
- Bad debt expenses;
- Promotional memorabilia;
- Sectarian worship, instruction, or proselytization;

Federal SNAP2Work funds must **supplement and not supplant** State or local public funds. Federal funds may not result in a decrease in State or local funding that would have been available to conduct the activity had Federal funds not been received. In other words, Federal funds may not free up State or local dollars for other purposes, but should create or augment programs to an extent not possible without Federal funds. Consistent with this mandate, the agreements with DSS require that the grantee reinvest the Federal funding received to expand the services provided to eligible recipients.

A partner agency must charge the Federal government consistent with how other entities are charged. If a service is offered at no cost to non-SNAP2Work participants, and it is not charged to any other grant, these costs cannot be charged to the Federal government for reimbursement. Also, SNAP2Work cannot be charged for the difference between the actual costs of instruction and the tuition and fees that are charged to the general public. If a subsidy is available to all students but is made a separate charge for SNAP recipients, SNAP2Work participants are being treated differently than other students, and in doing so, State funds are being supplanted and the expenditure is unallowable.

If an organization provides services that are funded through a State or local entitlement, the SNAP2Work program cannot be charged for these services. For example, if all adults are entitled to free GED classes, then an organization cannot claim reimbursement for these costs from the Federal government.
Appendix A

Definitions

**ABAWDs (Able-Bodied Adults Without Dependents)**—SNAP household members who are determined to be mandatory work registrants and are:

- Classified as an able-bodied adult;
- At least 18 but less than 50 years of age; and
- Without dependents.

**ABAWDs meeting work requirements**—SNAP household members who are determined to be mandatory work registrants and are:

- Classified as able-bodied adults;
- At least 18 but less than 50 years of age; and
- Without dependents.
- Employed at least 20 hours per week, or participating in employment and training activities other than those funded under SNAP E&T (i.e., self-initiated WIA or TAA) at the time of the initial SNAP certification or recertification.

**ABAWDs not meeting work requirements**—SNAP ABAWDs who are not employed at least 20 hours per week, and prior to certification for SNAP benefits are not participating in any self-initiated employment and training activities, such as those funded by:

- The Workforce Investment Act (WIA); or

*Note: Only ABAWDs residing in designated counties not meeting work requirements at the time of SNAP certification and recertification will be required to participate in SNAP E&T activities.*

**Assessment**—an in-depth evaluation of employability, educational history, vocational and educational skills, work experience, family circumstances, and support service needs.

**CFR (Code of Federal Regulations)**—CFR is the compilation of general and permanent rules published in the Federal Register. Each CFR volume is divided into numbered titles. Title 7, issued for USDA, contains the SNAP E&T regulations.

**Dependent**—An individual under 18 years of age who is not the head of household.

**Exempt recipient**—a SNAP recipient who is not required to participate in SNAP E&T services, and must not be sanctioned for failure to cooperate with SNAP E&T requirements.

**Good cause**—a determination made by E&T Program staff that a mandatory work registrant’s lack of participation is warranted by illness, court appearance, no available transportation, etc.

**Noncooperation**—A lack of response to outreach notices or a failure to participate in SNAP E&T activities in accordance with the employment plan.

**Orientation**—a meeting conducted one-on-one or in a group setting, that provides E&T participants with an introduction to SNAP E&T services and activities.

**Outreach**—the process of informing mandatory ABAWD work registrants of a scheduled appointment to
begin SNAP E&T services or of encouraging non-mandatory participants to volunteer for SNAP E&T services.

**Participant**—a SNAP recipient participating in SNAP E&T.

**Recertification**—

**Sanction**—the loss of SNAP benefits for a mandatory E&T Program participant who fails to respond to outreach or fails to cooperate with SNAP E&T requirements without good cause.

**SNAP E&T activities**—allowable Supplemental Nutrition Assistance Program Employment and Training work activities which include the following:

- Job Search
- WIA Activities
- Vocational Training

**Work Registration Exemptions**—SNAP recipients are exempt from work registration requirements if they meet one of the following Federal exemptions:

**Age limits:**
- A person younger than 16 years of age;
- A person 60 years of age or older; or
- A person age 16 or 17 who is not the head of a household or who is attending school, or is enrolled in an employment training program, on at least a half-time basis. If the person turns 16 (or 18 under the preceding sentence) during a certification period, the Agency must register the person as part of the next scheduled recertification process, unless the person qualifies for another exemption.

**Caretakers:** A parent or other household member responsible for the care of a dependent child under 6 or an incapacitated person.

*Note: If the child has his or her 6th birthday during a certification period, DSS must work register the individual responsible for the care of the child as part of the next scheduled recertification process, unless the individual qualifies for another exemption.*

**Drug Addiction and Alcohol Treatment Program Participants:** A regular participant in a drug addiction or alcohol treatment and rehabilitation program.

**Employed:** An employed or self-employed person who is working a minimum of 30 hours per week or earning wages equal to the Federal minimum wage multiplied by 30 hours. This includes migrant and seasonal farm workers under contract or similar agreement with an employer or crew chief to begin employment within 30 days (although this will not prevent individuals from seeking additional services from the State employment services agency).

**FI/TANF Recipients:** Family Independence (FI)/Temporary Assistance for Needy Families (TANF) recipients who are subject to and complying with FI/TANF work activity requirements.

**Incapacitated:** Recipients of SSI and persons who are physically or mentally incapable of engaging in gainful employment are incapacitated. If a claim of permanent or temporary disability is questionable, verification must be provided.

**Students:** A student enrolled at least half-time (as defined by the school, program, or institution) in any recognized school, training program, or institution of higher education. Students enrolled at least half-time
in an institution of higher education must meet the student eligibility requirements. A student will remain exempt during normal periods of class attendance, vacation, and recess. If the student graduates, enrolls less than half-time, is suspended or expelled, drops out, or does not intend to register for the next normal school term (excluding summer), the Agency must work register the individual, unless the individual qualifies for another exemption.

**Unemployment Compensation Recipients:** A person receiving unemployment compensation. A person who has applied for, but is not yet receiving, unemployment compensation is also exempt if that person is complying with work requirements that are part of the unemployment compensation application process.