

# SNAP 2Work

## SNAPshot

A quick-start guide to developing  
50% federally matched  
SNAP E&T programs in SC

Does your proposed program qualify for 50/50 funding?

- ✓ Does it serve SC SNAP clients?
- ✓ Does it offer one of the allowable E&T components?
- ✓ Does your organization have a source of non-federal dollars to fund the program?

If you answered yes to all the above questions, please take a look at the information in this packet to give you an overview of developing a 50% federally reimbursable SNAP E&T program.

**DSS**

*Serving Children and Families*

## PURPOSE

The purpose of this SNAPshot is to provide Technical Colleges, Adult Education Programs, and Community Based Organizations (CBOs) in South Carolina with the information and resources to partner with the Department of Social Services (DSS) so that you may develop and implement employment and training services for individuals participating in a Supplemental Nutrition Assistance Program (SNAP) Employment and Training (E&T) program.

First, here's a brief overview of the 40-year old SNAP (formerly the Food Stamp) program. SNAP alleviates hunger and improves nutrition by increasing the food purchasing power of 40 million low-income households. The program is available to nearly everyone with little income and few resources using nationwide standards for eligibility and benefits. Generally, SNAP households must have gross monthly incomes below 130 percent of the Federal poverty level (\$2,498 for a family of four in FY 2013). 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. To encourage work and recognize the actual, disposable income available to purchase food, SNAP permits several deductions from income. Then, allotments are reduced by 30 percent of a household's net income. SNAP is a state-operated, but federally supervised program. Benefits 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 oversees SNAP. In South Carolina, SNAP is administered by the Department of Social Services (DSS). All SNAP Federal funding goes to and funnels through DSS.

## INTRODUCTION TO SNAP E&T

In 1987, Congress established the Food Stamp Employment and Training Program to assist able-bodied Food Stamp recipients in obtaining employment. From its inception, the purpose of the E&T Program has been 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 SNAPshot will assist technical colleges, adult education providers and CBOs interested in working with DSS to develop E&T programs to meet this wide range of needs.

A State should tailor its E&T program to meet the needs of its participants and the local economy, thereby increasing the likelihood of recipients gaining self-sufficiency. South Carolina's State E&T program includes the following allowable components:

- A job search program
- A job search training program
- State, local or Workforce Investment Act (WIA) work programs
- Education programs such as Basic Adult Education, GED preparation, and English as a Second Language classes

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 run all-volunteer E&T programs, where all SNAP recipients required to register for work are exempt from mandatory participation in E&T activities. However, South Carolina has opted for a mandatory program for Able-Bodied Adults without Dependents (ABAWDs) receiving SNAP benefits in some counties, while offering E&T services and activities to anyone who volunteers to participate on a Statewide basis.

## **CHARACTERISTICS OF A SNAP E&T PROGRAM**

An E&T program is a package of services, which includes recruitment, assessment, component activities, participant reimbursements and follow-up.

### Recruitment and Assessment

E&T administrative funds can be used to market the program to potential SNAP volunteers. In order to entice SNAP clients to volunteer, it is important to convey the positive aspects of the E&T program and how it will increase the likelihood of employment after participation.

After recruitment, a SNAP client must be assessed to evaluate their employability skills prior to placement in an E&T component. The assessment should determine the client's skill level, aptitude, interests, and supportive service needs to determine what will be the most effective E&T component leading to work. Using a variety of assessment tools, it may determine the literacy level, communication skills, education, employment history, employment-related skills, and employment barriers and steps needed to overcome these barriers. Before placement in a component, there must be a mechanism to ensure that the participant is not a TANF recipient, because E&T funds cannot be used to serve TANF participants.

### Placement and Tracking

After the assessment, the E&T participant is placed in an appropriate component. E&T participation must be tracked and reported to DSS.

### Participant Reimbursements

SNAP E&T participants must be reimbursed for reasonable and necessary expenses directly related to participation in the component. Support services, such as dependent care, transportation, uniforms, books and other reimbursements can provide a strong incentive for volunteers. While DSS will cover some participant reimbursements, E&T providers need to work closely with DSS to ensure that these client needs are met.

## **SOUTH CAROLINA'S E&T COMPONENTS**

### Job Search

In the job search component, participants 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. The job search component entails at least 12 contacts with employers per month. 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. This component may consist of job skills assessments, job finding clubs, job placement services, or other direct training or support activities.

Job search training requires a greater amount of resources than job search because of the administrative effort required to run job clubs, job placement services and training activities.

## Education

The education component includes a wide range of activities that improve basic skills and the employability of SNAP recipients.

Acceptable E&T educational activities are programs that 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 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.

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. DSS is particularly interested in the development of short-term vocational training programs that have a direct link to the local job market.

## WIA

This component includes job training services that are developed, managed, and administered by State agencies, local governments, and the business community under the Workforce Investment Act (WIA). Activities include basic skills training (GED, literacy), occupational skills training, on-the-job training, work experience, and job search assistance.

## **PARTNERSHIPS & FUNDING**

DSS can partner with local agencies to provide E&T services through written Memorandums of Understanding (public agencies) or contracts. The term "partner" implies shared responsibilities in terms of the program's operation and with program financing. South Carolina is adopting a model where the E&T partner puts up full funding for the necessary and reasonable costs of an E&T component and the State uses that funding to leverage 50 percent federal reimbursement funds to help pay for partner services. DSS will retain five (5) percent of the federal reimbursement to administer the program and forward 95 percent to the local agency service provider to reinvest in SNAP E&T services. These arrangements are often referred to as third-party reimbursement models.

## Partnerships

State agencies may establish partnerships and third-party reimbursement models with institutions of higher learning, adult education providers, and CBOs. Each type of provider can provide a variety of short-term education or training programs with a direct link to employment, making them a popular partner for the SNAP E&T program.

New programs designed solely for E&T participants or expansions of existing programs to accommodate newly recruited SNAP E&T participants are eligible for 50/50 funding.

## Supplementing vs. Supplanting

By law, Federal funds for educational programs shall not be used to supplant non-Federal funds used for existing services and activities. A partner agency must charge the Federal government consistently with how other participants, local, State or Federal grants are charged. If a service is offered at no cost to non-E&T participants and it is not allocated to any other grant, a partner agency cannot charge the E&T program for this service.

Therefore, SNAP cannot be charged for the difference between the actual costs of instruction and the tuition and fees that are charged to the general public. For example, if a subsidy is available to all students at no cost but charged to the E&T program, E&T participants are being treated differently than other students and in so doing State funds are *supplanted*.

Federal E&T reimbursements can be used to *supplement* rather than supplant State or local funding for existing education services or activities. Supplementing means to go above and beyond the educational services provided at no cost to non-E&T participants.

DSS may use E&T funds to pay for educational activities at community-based organizations. For example, a CBO offers adult basic education and relies on charitable donations or grants to fund these activities. DSS may use E&T funds to pay for E&T participants that receive these services. However, the CBO would need to figure out the per student cost of its educational activity and allocate costs to the E&T program accordingly.

If the CBO provides services that are funded through a State or local entitlement, E&T cannot be charged for these services. For example, if all adults in the State are entitled to free GED classes and the State provides funds to CBOs that offer these services; the CBO in this example cannot bill SNAP E&T for GED classes.

## Allowable Expenses for Education Components

- Non-governmental partner administrative costs, including:
  - Salaries and benefits of personnel involved in E&T specific work;
  - Office equipment, supplies, postage and duplication costs;
  - Development and production of SNAP E&T materials;
  - Lease or rental costs;
  - Maintenance expenses; and
  - For governmental agencies only, in-kind costs.
- Case Management
- Tuition/Fees

- Transportation (Participant Reimbursement)
- Child Care (Participant Reimbursement)
- Eye Care/Dental Care (Participant Reimbursement)
- Books (Participant Reimbursement)
- Uniforms, Tools, Equipment (Participant Reimbursement)

## QUESTIONS FOR PROSPECTIVE PARTNER AGENCIES

*Do you offer appropriate and allowable E&T activities or will you have to create new activities for SNAP E&T clients?*

Review the E&T components described above to determine if the services you currently provide meet the requirements.

*Can you verify that a participant is receiving SNAP benefits and not receiving cash assistance from a Temporary Assistance for Needy Families (TANF) program?*

A verification process can be developed with DSS. For example, a partner agency could provide a list of participants on a monthly basis so the State can verify that the participant is receiving SNAP benefits and not receiving TANF cash assistance.

*If interested in providing assessment services, do you have the ability to assess and place E&T participants in appropriate E&T activities?*

Check with DSS to determine if your current assessment process can be used.

*What support services can you provide?*

Support services can include case management, early intervention, career counseling, participant reimbursements for work-related expenses, referrals to additional programs and services.

*Can you monitor and report on the participation of SNAP E&T clients?*

Check with DSS to learn more about reporting requirements.

*Do you have the financial capacity to operate E&T services?*

- Will you be able to handle delays between outlays and reimbursements?
- Will you be able to track federal funds and guarantee that the source of non-Federal funds is allowable?
- Do you have the ability to allocate costs among other Federal, State or local grants? Has the cost allocation plan been approved?
- Do you have the capacity to track and invoice for staff time spent on the E&T program
- Can you retain and store records for State audits and reviews?

In this SNAPshot, we have provided only enough information for a quick-start guide to the SNAP E&T program. The Federal government provides a more detailed and complete explanation of requirements in an E&T Toolkit that can be found online. A link to the Federal E&T Toolkit has been placed on the website: <https://dss.sc.gov/snap2work>.