

SNAP E&T Questions

Q. What are the goals of this initiative?

A. The purpose of the SNAP E&T program is to help SNAP participants to gain skills, training, work, or experience that will increase self-sufficiency. The goal of Partners for Jobs Success is to enhance the planning, coordination and employment and training resources devoted to South Carolina's unemployed SNAP participants that will improve their employment prospects and reduce their reliance on SNAP benefits.

Q. What factors should an organization consider in deciding whether to initiate a SNAP E&T program?

A. Below are several questions a governmental agency or a non-profit organization should consider in developing a SNAP E&T program?

- Do I have a source of non-federal funding which can be used to start the program?
- Are there enough SNAP recipients to create a program?
- How will I market the services and attract enrollees into the program?
- Does my agency have the necessary staff and administrative infrastructure to perform client tracking, billing and cost allocation?

Q. What are the appropriate next steps to begin a SNAP E&T program?

A. Here are our suggested next steps to implement a SNAP E&T program:

- *Review the model MOU (public agencies) or the model Grant Agreement (community-based, non-profit organizations) and clear it with appropriate parties;*
- *Analyze current services/activities to determine whether they could qualify for Federal SNAP E&T funding and potential numbers of SNAP clients served. (DSS will conduct a computer run to identify numbers and individuals served);*
- *Determine current and potential amounts and source of non-Federal funding;*
- *Consider the feasibility of additional funding from foundations, cities, counties or potential partnerships, in light of additional 50% reimbursement;*
- *Develop short description of proposed employment and training services, costs and numbers of potential clients;*
- *Contact DSS to discuss and agree on planned activities;*
- *Sign MOU/Grant Agreement and submit brief Statement of Work and budget.*

Q. What kinds of services and activities can be funded under the SNAP E&T program?

A. Organizations have the option of creating new programs specifically for SNAP E&T participants, or of integrating SNAP E&T enrollees into their regular programs. The focus of SNAP E&T is on activities that lead directly to employment, not long-term education. The following types of services and activities are included in the approved State plan:

- *Assessment of participant's employment skills, such as literacy, communication skills, education, employment history, skills, abilities and interests, and employment barriers*
- *Case management and employment planning*
- *Job search of job readiness training*
- *Job search*

- *Education – Programs that will enhance basic skills and employability, including Adult Basic Education (ABE), ESL, high school equivalency (GED preparation), vocational education*
- *WIA*
- *Child care*
- *Transportation*

Q. How will a provider be able to ensure that the services are provided only to eligible SNAP E&T participants?

A. DSS intends to provide either a monthly listing of the eligible clients being served by an organization, or an exception list of clients who have lost eligibility for the month.

Q. Are there limitations on the source or types of funding an organization may use as the non-Federal expenditure?

A. A provider may use its own non-Federal funds (raised through donations, fund-raising, dues, or other sources) on eligible activities. There is a prohibition on using Federal funds, Federally matched funds or funds used to meet a maintenance-of-effort requirement of another Federal agency (such as TANF MOE).

Q. Are there additional requirements that providers should be aware of?

A. Consistent with its responsibilities as the Single State Agency responsible for the SNAP E&T program, DSS intends to monitor provider activities. Providers shall safeguard the use and disclosure of information concerning applicants and SNAP participants. Providers who expend \$500,000 or more in Federal funds from all sources in a fiscal year are required to obtain an annual audit, under the Single Audit Act (OMB Circular A-133). Organizations that receive more than \$75,000 in State funds are required to obtain an annual financial audit. At the request of DSS, the State Auditor, FNS, GAO or any other appropriate Federal agency, the provider must make records available for inspection. Providers must retain all financial, programmatic and statistical records for a period of three (3) years.

Q. What will we need to do to receive the Federal reimbursement?

A. DSS intends to make the reimbursement process as simple as possible. Providers will be expected to submit quarterly invoices approximately 15 days after the end of a quarter outlining their expenditures over the prior quarter. A brief statistical report on the numbers of clients served by type of activity will also be required. DSS anticipates payment on the invoices within 30 days. Providers will be required to maintain the documentation to support the expenses for three federal fiscal years after the end of year in which the claim was submitted. DSS will conduct regular reviews or audits to verify the expenditures claimed.

Q. How much reimbursement of expenses will providers receive?

A. Once DSS reaches agreement or contracts with an organization to provide SNAP E&T services, it will be able to pass back the 50% Federal reimbursement to the contractor, minus a 5% fee which DSS will retain to fund administrative, training, technical assistance and quality assurance activities. Thus the organization will actually receive 47.5% reimbursement. Grantee agrees to use (reinvest) the remaining 95% of Federal revenues to cover direct costs (and for governmental or public agencies indirect costs) related to the grant and to expand services to eligible SNAP E&T participants. The reasonableness of this

oversight fee will be reviewed annually and may be adjusted, with the approval of both parties. In the future, DSS intends to base a portion of grantee reimbursement payments on program performance.

Q. Will providers be expected to serve both volunteers and mandatory recipients of SNAP E&T?

A. Yes, but currently only able-bodied adults without dependents (ABAWDs) in 12 counties are required to participate in work activities, usually 60 days of structured job search. ABAWDs may select a provider's employment and training program to meet their work requirement and any adult SNAP participant ages 16-59 (except TANF recipients) may volunteer for E&T services that will improve their employability.

Q. Which SNAP participants are most likely to enroll in employment and training activities?

A. While any adult may volunteer for services, the following individuals, including ABAWDs, are federally exempt from required participation:

- Under age 16 or over age 59;*
- Physically or mentally unfit for employment;*
- Subject to and complying with work requirements for other programs (TANF);*
- Caretaker for dependent child under 6 or an incapacitated individual;*
- Receiving unemployment insurance compensation;*
- Participating in drug or alcohol treatment and rehabilitation;*
- Employed 30 hours a week; and*
- A student enrolled at least half time.*

Q. What types of youth employment and training programs may be funded?

A. A child younger than 16 is exempt from work registration. Exempt 16 or 17 year olds may volunteer for SNAP E&T; however, all activities must have a prompt path to employment and the participant must be old enough to work upon completion of the program. SNAP E&T cannot pay for services that are already available through a State entitlement program, for example services available through the State school system.

Q. What suggestions do you have for client recruitment?

A. To be considered an E&T participant, an individual must knowingly volunteer for the program. DSS will conduct a computer match of current program clients to identify those who are SNAP recipients. At that point, the organization may reach out to those individuals to make them aware of available services. In addition, DSS Program Coordinators and contractors (Goodwill/DEW) will notify ABAWDS and volunteers of the availability of funded programs. Providers may also reach out to community partners such as food banks, community centers and adult education and technical schools to reach potential volunteers. Since mandatory E&T programs suffer from negative stereotypes, it is important to portray a positive message that volunteering will increase opportunities for employment.

Q. What types of participant expenses can a program offer and claim?

A. SNAP rules require that State agencies reimburse E&T participants for expenses that are reasonable, necessary and directly related to participation. Examples include: child care, transportation, books,

uniforms, personal safety items. States may establish a cap on reimbursements, and DSS has capped transportation costs at \$50 per month.

Q. Can student-paid tuition be used as a match?

A. No

Q. Can in-kind costs or contributions be claimed as an expense?

A. Governmental entities may claim in-kind costs; however, in-kind contributions like volunteers or space, do not count as an expense for non-governmental agencies.

Q. Which types of E&T activities are the most successful?

A. Since the goal of funded activities is employment, it is critical that the training be based on local labor market analysis and available jobs. The training requirements should closely match the growth occupations and employer expectations.