



# **SNAP Employment and Training Third-Party Reimbursement Program**

**Provider Handbook  
May 2019**



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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 (also referred to as the Third-Party Reimbursement Program, or TPRP). The handbook is not intended to cover situations a program partner may encounter in managing their service delivery. DSS will continue to provide onsite training, technical assistance and an annual training conference to address the training needs of partner agencies. As public and non-profit organizations express interest in partnering with DSS, a program contact will be assigned to provide direct, hands-on technical assistance. After reviewing this handbook, please contact the SNAP2Work Program Director if additional guidance is needed:

Deborah Reed-Cole  
SNAP E&T Program Director  
South Carolina Department of Social Services  
Phone: (803) 898-5137 Fax: (803) 898-7102  
Email: [Deborah.reed-cole@dss.sc.gov](mailto:Deborah.reed-cole@dss.sc.gov)

Additional informational materials and forms mentioned in this document can be found online at the DSS 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 training opportunities for participants in the Supplemental Nutrition Assistance Program (SNAP), formerly known as the Food Stamp program. The SNAP2Work Program provides training and employment opportunities to low-income, working-age families to increase their income that would lead to self-sufficiency.

The SNAP2Work Program provides federal funding to providers of employment and training services to SNAP participants through a “third-party reimbursement” model. Partner agencies, 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 percent federal reimbursement to help pay for partner services.

South Carolina has a large number of SNAP participants who are unemployed or underemployed who may need help with job search training, improved skills and education or vocational training that will enhance their opportunities to obtain employment, 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 needs of their workforce. 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?***

Any organization that provides employment, training, education, case management or support services will benefit by becoming a partner in the SNAP2Work third-party reimbursement program. This includes technical colleges, adult education programs, state agencies and community or faith-based organizations. 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 for 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 the TANF program. In order to qualify for the reimbursement, a provider must first become an approved provider through DSS.

## ***What is the SNAP Program?***

The purpose of the Supplemental Nutrition Assistance Program (SNAP) is to alleviate hunger and improve nutrition by increasing the food purchasing power of millions of low-income households currently receiving benefits. SNAP is available to those with little income and few resources using nationwide standards for eligibility and benefits. Generally, SNAP households must have monthly income below 130 percent of the federal poverty guidelines. The chart below shows the maximum income levels for Fiscal Year 2019.

<b>Household size</b>	<b>Gross monthly income (130 percent of poverty)</b>
<b>1</b>	\$1287
<b>2</b>	\$1736
<b>3</b>	\$2184
<b>4</b>	\$2633
<b>5</b>	\$3081
<b>6</b>	\$3530
<b>7</b>	\$3980
<b>8</b>	\$4430
<b>Each additional member</b>	\$451

Benefit amounts or allotments vary by household size and are provided in the form of electronic debit cards. Income received by a household is used to calculate 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. All SNAP federal funding goes to or funnels through DSS.

This handbook 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 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.

While some SNAP recipients need assistance with job search training and basic skills, others may benefit more from vocational training that would enhance their ability to obtain regular employment or obtaining a General Education Degree or High School Diploma. This manual will help adult education providers, technical colleges, community-based organizations, other partners and potential partners in working with DSS to develop E&T programs to meet this wide range of needs.

SNAP policies 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., 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.

Quitting a job voluntarily without good cause or reducing work hours to less than 30 hours per week can result in a SNAP disqualification.

Under South Carolina's SNAP2Work program, 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 monthly invoices of costs. DSS will process these invoices and submit 50 percent reimbursement of allowable costs. DSS will retain five percent of the federal funding received to pay for administrative, training, technical assistance, monitoring and quality assurance activities and pass 95 percent of these federal revenues (or 47.5 percent of total costs) back to partner agencies.

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 DSS. It is critical that a partner have non-federal sources of funding and have the cash-flow to handle delays between outlays and the 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. South Carolina has opted for a voluntary SNAP Employment and Training program. All SNAP only clients are eligible and can volunteer to participate in the program statewide. DSS provides E&T services through partnership reimbursement agreements with service providers under the SNAP2Work Program.

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:

- **Assessment, employability plan development, placement and case management.** After a referral from DSS or a signed voluntary participant agreement form, 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. 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
  - 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) and high school equivalency. 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 is on short-term 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.

All vocational training programs must be less than one year.

- **Job Retention.** The job retention component is meant to provide support services for up to 30 days to individuals who have secured employment after participating in another E&T component. 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, equipment or tools required for a job, transportation, child care and other needed support.
- **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.
- **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.

### ***What does an interested agency need to do to partner with DSS?***

As either a public or non-profit provider of employment and training services, it is 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 you 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.)
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 (also referred to as a scope of work) and a budget that reflects the number of proposed clients and available funding.
6. Meet with a DSS representative to discuss planned activities and responsibilities.

### ***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 will conduct an exploratory visit on-site at your convenience, to 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. DSS staff is 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, please e-mail the SNAP E&T Program Director at [deborah.reed-cole@dss.sc.gov](mailto:deborah.reed-cole@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 contract 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:

Director  
Office of Adult Education & State GED Administrator  
908-A Rutledge Building  
1401 Senate Street  
Columbia, SC 29201  
Telephone 803-734-8348  
Fax 803-734-3643  
[www.ed.sc.gov](http://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 potential 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, invoicing, and cost allocation?

### ***Is there data available to show the potential SNAP population that might be served in our area?***

DSS has a report that provides an overview of the total number of SNAP participants by county, and then breaks the total down into 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 by sending an email request to [SNAP2WORK@dss.sc.gov](mailto:SNAP2WORK@dss.sc.gov).

The South Carolina Comprehensive Employment and Training System (SCCETS) database provides client eligibility information in real time. SCCETS will help providers further evaluate whether program participation would be beneficial to them and aid providers in verifying that they serve eligible clients. Although individuals may move on and off SNAP periodically, federal reimbursements may only be claimed on behalf of participants who are eligible (those with an open SNAP case who are not receiving cash assistance under the TANF program).

To verify client eligibility, the provider will enter the participant's first name, last name and date of birth into the SCCETS database. The system will check against the DSS mainframe eligibility system to determine the client's eligibility to participate in the SNAP2WORK program. All clients must be entered into the system before a reimbursement can be processed.

### ***Who can we serve?***

South Carolina operates a statewide, voluntary Employment and Training program. All "SNAP only" (non-TANF) clients who are physically and mentally capable of working can participate in the program. Partner agencies may provide employment and training services to volunteers who are referred for education or training services from DSS or walk-in SNAP clients in response to an organization's outreach. Volunteer participants are not subject to a minimum number of participation hours, however, thirteen or more hours per week is recommended. These hours can be a combination of study and classroom time.

Clients who have been determined to be an Abled Bodied Adult Without Dependents (ABAWDs), however, must meet specific work requirements within a specified timeframe. Failure to meet these responsibilities can result in the individual's SNAP case closing. ABAWD's participating in the E&T program must:

- Participate in 20 hours of a qualifying E&T component activity weekly (80 hours monthly) in order to remain eligible for SNAP benefits.
- 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 can result in a SNAP disqualification).

Providers agencies are required to track and report participation hours, support services expenditures, and identify participants who are successful in obtaining certificates, certifications, and employment.

SNAP participants 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.

## **SNAP2Work - Ongoing Responsibilities**

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

Once the partnership agreement/contract has been signed by both parties, an implementation meeting will be scheduled with the partner agency to discuss how the program will operate, referrals and voluntary enrollments, mutual responsibilities, SCCETS training to determine SNAP eligibility, record-keeping, invoicing, and reporting requirements. Technical assistance is available on an ongoing basis.

### ***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. Enhanced 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 SNAP participants at intake and at recertification. When participants request program services, DSS Employment and Training Coordinators will refer them to the appropriate provider nearest to or most convenient to the participant. For these clients, DSS will have already 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 brief explanation of the program and the advantages of participation is also expected to be provided to the participant.

When an individual requests to receive services, the provider should verify that they are receiving SNAP benefits and then enroll the participant into the SNAP2WORK program. All clients enrolled in the SNAP2WORK program must sign the Voluntary Participation Agreement form. This agreement 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 participant in the program.

### ***What reporting requirements will SNAP2Work providers need to meet?***

SNAP2Work partners are expected to monitor client attendance and progress and verify SNAP during the initial contact. 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, all participation data must be entered into the SCCETS database by the last day of each month of the client's participation. 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 enter the number of clients that received certificates, certifications and obtained employment during the report month.

### ***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.
- Component participation information.
- Eligibility verification (SCCETS will be used to verify eligibility).
- 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 into 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 conducts monitoring site visits during the period of performance of the SNAP2Work program. We also use these visits to evaluate performance, ensure required record-keeping and provide technical assistance.

It is also possible that the U.S. Department of Agriculture (USDA) Food and Nutrition Services 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 controls over federal awards that provide reasonable assurance that the auditee is managing federal awards in compliance with laws, regulations, and the provisions of contracts or grant agreements*" (<https://www.eisneramper.com/auditee-omb-circular-a-133-0210/>).

Management Evaluation (ME) Reviews will be conducted once annually or every two years depending on the contract budget. However, all providers will receive ongoing technical assistance and training as requested.

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.

All corrective action plans accepted by the DSS E&T program for disallowed or undocumented charges must include a reimbursement process.

Once the corrective action plan is accepted DSS reviewers will conduct either a desk review or on-site follow-up review to ensure that the corrective actions have been implemented. The follow-up review will take place 90 days after the acceptance of the corrective action.

Local Match Certification forms must be completed by potential partner agencies to verify the non-federal funding source obligated for the SNAP E&T program.

## Budget and Invoicing Guidance

### *What needs to be included in the program budget?*

The South Carolina SNAP2Work program grant agreement requires 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 monthly reimbursements 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 Excel Invoice which is available at: <https://dss.sc.gov> (click on Assistance Programs, then click Work Programs, then click on SNAP Employment and Training).

In addition to providing necessary organizational information, partners are expected to complete the invoice by type 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.
- 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 (SNAP vs non-SNAP percentage) 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 percent 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 monthly invoice as soon as possible and no later than the 15th day of the month following the month for which the reimbursement is requested.

### ***Invoicing Process***

Before submitting an invoice for reimbursement:

- A client Assessment and Employment Plan must be completed in the South Carolina Comprehensive Employment and Training System (SCCETS). The SCCETS database will verify the eligibility of the client to participate in the SNAP2WORK program.
- The client must be enrolled in a qualifying E&T component.

The partner agency can then invoice DSS for the number of verified SNAP only clients. Supporting documentation for all invoiced costs must be submitted with the invoice (ex. time & effort sheets, receipts, etc.).

The budget line amounts must be strictly adhered to and any amendments must be requested in writing.

Match fund certifications must be sent with the monthly invoice.

Invoices must be submitted by the 15<sup>th</sup> day following the month of the client's participation.

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

DSS follows the policies and guidance of the USDA/FNS Employment and Training Toolkit to determine allowable costs. The toolkit can be found online at: [https://fns-prod.azureedge.net/sites/default/files/ET\\_Toolkit\\_2013.pdf](https://fns-prod.azureedge.net/sites/default/files/ET_Toolkit_2013.pdf)

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 (for SNAP only agencies).
- Necessary travel costs in accordance with state/local rules.

- Maintenance expenses.
- Other indirect costs.
- 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.
- 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.

In-state conferences related to education, employment and training must be approved prior to attending if a reimbursement is desired. Partner agencies must submit a copy of the conference agenda to [SNAP2WORK@dss.sc.gov](mailto:SNAP2WORK@dss.sc.gov) for approval. Out-of-state conferences will not be reimbursed.

An outline of SNAP E&T cost principles is included in Appendix C of the SNAP E&T Toolkit located at: [https://fns-prod.azureedge.net/sites/default/files/ET\\_Toolkit\\_2013.pdf](https://fns-prod.azureedge.net/sites/default/files/ET_Toolkit_2013.pdf). Appendix C provides specific examples of allowable and unallowable administrative costs, outlines the calculation of indirect cost rates, and allowable in-kind donations for public agencies.

FNS has also provided a detailed set of questions and answers on SNAP E&T financial issues at: <https://fns-prod.azureedge.net/sites/default/files/snap/employment-training-QA.pdf>.

For a detailed description of allowable federal costs, see OMB Circular A-21 (Cost Principles for Educational Institutions) at: [https://www.govinfo.gov/content/pkg/CFR-2012-title2-vol1-pdf/CFR-2012-title2-vol1-part220.pdf](https://www.govinfo.gov/content/pkg/CFR-2012-title2-vol1/pdf/CFR-2012-title2-vol1-part220.pdf)

### ***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.

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.

## Civil Rights and Non-Discrimination

In accordance with federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, religious creed, disability, age, political beliefs, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotape, American Sign Language, etc.), should contact the Agency (state or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, (AD-3027) found online at: [http://www.ascr.usda.gov/complaint\\_filing\\_cust.html](http://www.ascr.usda.gov/complaint_filing_cust.html), and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by: (1) mail: U.S. Department of Agriculture Office of the Assistant Secretary for Civil Rights 1400 Independence Avenue, SW Washington, D.C. 20250-9410; (2) fax: (202) 690-7442.

## **Appendix A – Definitions and Abbreviations**

**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 WIOA 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 Innovation and Opportunity Act (WIOA); or
- The Trade Act of 1974.

*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 a qualifying activity.*

**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 a work program, and must not be sanctioned for failure to cooperate with SNAP work requirements.

**FI/Family Independence** — the former name of South Carolina's TANF program

**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.

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

**Outreach** — the process of informing SNAP clients about the E&T program and encouraging them to volunteer for SNAP E&T services.

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

**Recertification** — the process to recertify for ongoing SNAP benefits; also referred to as a “recert”.

**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 or components** — allowable Supplemental Nutrition Assistance Program Employment and Training work activities which include the following:

- Job search
- Job Search Training
- Education
- Vocational Training
- Work Experience
- Welfare
- Job Retention Services

**TANF** — Temporary Assistance for Needy Families is a work program for specific recipients of cash assistance.

**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 halftime 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.

## Appendix B – SNAP E&T Coordinators

Counties Served	E&T Coordinator(s)	Phone Number	Email Address
Abbeville, Edgefield, Greenwood, Laurens, McCormick, Newberry, Saluda	Beverly Owens	(864) 227-7051	Beverly.Owens@dss.sc.gov
Aiken, Allendale, Bamberg, Barnwell, Calhoun, Orangeburg	Telly Haigler Vacant	(803) 813-1098	Telly.Hraigler@dss.sc.gov
Anderson, Oconee, Pickens	Ieashilyne Lewis	(864) 722-9271	Ieashilyne.Lewis@dss.sc.gov
Beaufort, Colleton, Hampton, Jasper	Maria Morris	(803) 636-7545	Maria.Morris@dss.sc.gov
Berkeley, Charleston, Dorchester	Charlene Boyd	(843) 636-6003	Charlene.Boyd@dss.sc.gov
Cherokee, Spartanburg, Union	Larry Snow	(864) 764-1967	Larry.Snow@dss.sc.gov
Chester, Lancaster, York, Fairfield	Kerrie Kail	(803) 313-7380	Kerrie.A.Kail@dss.sc.gov
Chesterfield, Darlington, Florence, Marlboro	Diana “Lynn” Barnhill	(843) 309-9814	Diana.Barnhill@dss.sc.gov
Clarendon, Kershaw, Lee, Sumter	Roleesha Montgomery	(803) 774-1302	Roleesha.S.Montgomery@dss.sc.gov
Lexington, Richland	Catherine Bamberg Vacant	(803) 898-0974	Catherine.Bamberg@dss.sc.gov
Georgetown, Horry, Williamsburg, Marion, Dillon	Deborah Matthews	(843) 436-6264	Deborah.Matthews@dss.sc.gov
Greenville	Tina Dent	(864) 467-7718	Tina.Dent@dss.sc.gov

**SOUTH CAROLINA DEPARTMENT OF SOCIAL SERVICES  
SNAP EMPLOYMENT AND TRAINING PROGRAM  
SNAP2WORK REGIONS**

