Model Comments from CLASP

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Re: Interim Rule, SNAP Employment and Training Program Monitoring, Oversight and Reporting Measures (RIN 0584-AE33).

Thank you for the opportunity to comment on the interim rule on SNAP (Supplemental Nutrition Assistance Program) Employment and Training (E&T) reporting measures, as published in the Federal Register on March 24, 2016 (81 FR 15613).

Add description of organization. As practitioners and advocates in the workforce development arena (change as needed), we recognize the importance of SNAP E&T as a flexible resource for employment and training services for individuals who face food insecurity.

In general, we support of the effort of the interim rule to add reporting measures in order to improve the understanding of outcomes of individuals in SNAP E&T programs. In the workforce development world, we have been reporting common outcome measures for years. We support the alignment of these measures with the common performance measures identified in the Workforce Innovation and Opportunity Act (WIOA). Below, we offer recommendations for additional measures that are critical to understanding the full effects of E&T programs, and of the different components that states may offer, as well as technical comments on the measures included in the interim rule.

**Additional measures are needed to understand the effects of SNAP E&T mandates.**

States may operate voluntary or mandatory SNAP E&T programs (or a combination of both). Under a mandatory program, individuals who are assigned to E&T but do not participate, can be sanctioned and lose their SNAP benefits. Mandatory programs are often seen as punitive for this reason.

For voluntary SNAP E&T programs, it is sensible that only a SNAP applicant or recipient who is placed in *and begins* an E&T component is considered a “participant” for reporting purposes. However, for mandatory programs, the outcomes of assigning a SNAP applicant or recipient to SNAP E&T are not reflected in the proposed reporting requirements because in states with large mandatory programs, many individuals lose their SNAP benefits before ever participating in an E&T component. To understand these important outcomes, the sanction rate and the employment rate for all recipients assigned to mandatory SNAP E&T should be reported.

**States should be required to report the four national measures for any component that is expected to include 100 or more participants, in addition to any optional state measures.**

Under the interim rule, the four national reporting measures are as follows:

* The number and percentage of E&T participants and former participants who are in unsubsidized employment during the second quarter after completion of participation in E&T;
* The number and percentage of E&T participants and former participants who are in unsubsidized employment during the fourth quarter after completion of participation in E&T.
* The median quarterly earnings of all the E&T participants and former participants who are in unsubsidized employment during the second quarter after completion of participation in E&T; and
* The number and percentage of participants that completed a training, educational, work experience or an on-the-job training component.

However, when reporting outcomes for the individual components, states may identify their own reporting measures for components that are expected to serve at least 100 participants per year. We strongly recommend that all states be required to report the four common national measures for each component that meets this threshold. As workforce development practitioners and advocates (change as needed), we know the value of common measures across multiple programs.

Component-specific reporting measures that are uniform across the states will allow comparison across the components within their E&T programs. It will also allow evaluation of the cost effectiveness of E&T programs and the components states have implemented. Since states will already be collected and reporting the national measures, the burden will be minimal compared to the added value. Furthermore, if a participant completes multiple components, states should count these outcomes toward each of the components completed.

**Clarifications are needed to the national measures in the interim rule.**

In general, since the proposed report requirements adopt some variations of the WIOA measures, we recommend that FNS adopt WIOA measurement calculation instructions that yield comparable result to the WIOA common measures, to the extent possible.

1. “Completion of participation” not “exit”

The required national reporting measures refer to the outcomes of "E&T participants and former participants" during a period "after completion of participation in E&T." The phrase "completion of participation" is not further defined in the interim rule. Based on our experience with WIA and WIOA, we know it is critical to clearly define when measurement begins, which defines who counts in the measure. WIOA refers to a period “after exit from the program.” The proposed WIOA definition of "exit" (at proposed 20 CFR 677.150(c)) defines exit as the last date of service received, determined after a lapse of 90 days without services. We recommend that FNS use the same concept and language as under WIOA.

1. “Using the most recent data available”

Under the interim rule, each measure will be reported “using the most recent data available during the reporting period for each measure.” Based on our experience in reporting quarterly Unemployment Insurance (UI) wage record data, FNS should clarify that different measures will be reported for individuals in different time periods, as there are different lags for the different measures (e.g., by definition, it takes six months longer to get fourth quarter post-program data than it takes to get second quarter post-program data).

1. Key disaggregated groups

FNS should clarify that the proposed regulations require reporting of the outcomes, not just counts, for the members of key disaggregate groups identified in the interim rule. The groups are as follows:

* Are voluntary vs. mandatory;
* Have achieved a high school degree (or GED) prior to being provided with E&T services;
* Are ABAWDS (Able-bodied adults without dependents);
* Speak English as a second language;
* Are male vs. female;
* And belong to the following age ranges: 16-17, 18-35, 36-49, 50-59, 60 or older.

Under WIOA, we will be reporting outcomes for disaggregate groups referred to in WIOA as “individuals with barriers to employment.” Individuals with barriers include, but are not limited to the following: low-income individuals, individuals with disabilities, ex-offenders, homeless individuals, individuals who have low levels of literacy, and single parents (including single pregnant women). By reporting outcomes for these individual groups, our programs can track these participants and learn how to better serve them. SNAP E&T would similarly benefit from reporting outcomes for the key disaggregate groups.

Thank you again for the opportunity to provide comments on the interim final rule.

Sincerely,

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