



SNAP E&T Pilots

May 2014

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SNAP Employment and Training Pilots Offer Opportunity for Innovation

In February 2014, Congress reauthorized the Supplemental Nutrition Assistance Program (SNAP, also known as food stamps) as part of the Agricultural Act of 2014 (the Farm Bill). This legislation included \$200 million for the creation and evaluation of pilot projects in up to 10 states for 3 years to test innovative SNAP Employment & Training (E&T) strategies that help SNAP recipients get into the workforce, increase their earnings, and ultimately reduce their SNAP participation. Lawmakers and advocates will look to the pilots to inform future policymaking about SNAP work requirements and services at both the federal and state levels.

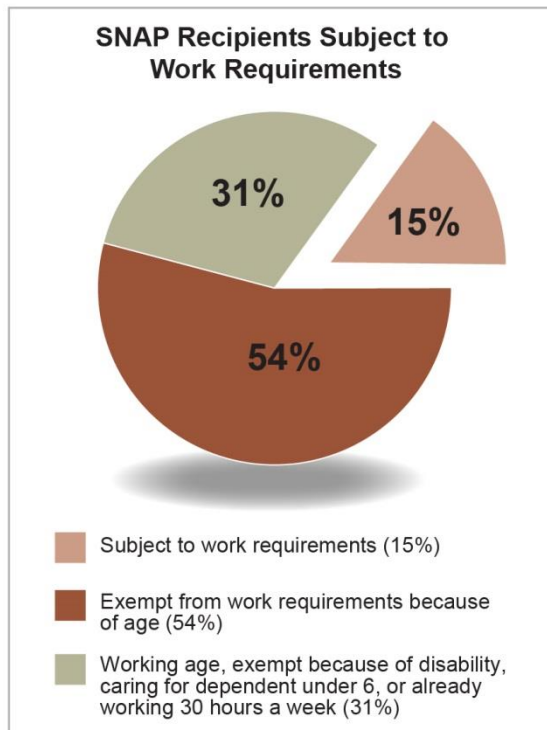
For states, this is also an opportunity to obtain significant new funding to develop and test innovative strategies that will help SNAP participants succeed in the workforce. These pilots have the potential to encourage state SNAP E&T and other workforce programs to collaborate with each other and local community-based organizations on a shared mission to get individuals into jobs that support the needs of their families. By bringing together the most promising workforce programs with a funding stream that is focused on low-income people—and that brings with it supportive services such as transportation and child care—an opportunity exists to make a real difference in the lives of vulnerable individuals and their families. The lessons from these pilots may also help influence TANF

program design, as they will allow states to experiment with what work-focused services are most effective in helping low-income individuals succeed in employment without having to worry about whether participants' activities are countable toward TANF work participation rates.

E&T Programs Provide Employment Services to SNAP Recipients

Most SNAP recipients are either already employed or not expected to work based on their age or disability. The majority of SNAP recipients (68 percent) are not expected to work because they are children, elderly, disabled, or are caring for a disabled family member. Among households with at least one working-age, non-disabled adult, more than half (58 percent) work while receiving SNAP.ⁱ

As a condition of SNAP eligibility, those who are neither working nor otherwise exempt are subject to work requirements that include registering for work, participating in a SNAP E&T or workfare program if mandated by the state, providing information on employment status, reporting to an employer if referred by the state agency, accepting an employment offer, and not voluntarily quitting a job.ⁱⁱ As shown on the chart below, only 15 percent of SNAP recipients are in this category. Those subject to work requirements include “able-bodied adults without dependents” (often referred to as ABAWDs), who may only receive SNAP for 3 months in a 36-month period unless employed or participating in SNAP E&T.ⁱⁱⁱ



Source: *Employment and Training Toolkit, A Toolkit to Help States Create, Implement and Manage Dynamic E&T Programs*, Supplemental Nutrition Assistance Program, Food and Nutrition Service, United States Department of Agriculture, 2013, http://www.fns.usda.gov/sites/default/files/ET_Toolkit_2013.pdf.

Congress created the SNAP E&T program to encourage states to offer employment-related services to SNAP recipients. While SNAP recipients may also be eligible under other workforce development programs, few of these focus on low-income workers, who often face significant barriers to employment. Moreover, general workforce programs only have funding to serve a small fraction of those who could benefit from training.^{iv}

At the federal level, SNAP E&T is administered by the Food and Nutrition Services (FNS) at the U.S. Department of Agriculture (USDA). At the state level, SNAP E&T funding flows to SNAP agencies, who may contract with state or local workforce agencies and adult education providers,

community colleges, community based organizations, or others to provide services.

Existing E&T Programs Vary in Intensity of Services

States are required to run SNAP E&T programs, but have the flexibility to spend funds on any number of activities related to job search; job search training; work experiences or workfare; and education and training, including basic skills instruction. States may operate mandatory programs, under which work registrants may be sanctioned for non-participation, or offer services to SNAP recipients on a voluntary basis. States are required to provide participants with supportive services, such as child care and transportation, needed to participate in E&T.

States may receive a share of additional funding if they commit to offering a SNAP E&T component to all ABAWDs at risk of losing eligibility due to the time limit, but are otherwise subject to no requirements regarding the number of SNAP recipients served in E&T. States are not currently required to collect and report data on SNAP E&T employment outcomes, but the Farm Bill requires FNS to develop such performance measures for E&T programs.

Each state receives a capped allotment of 100 percent federal funds with which to operate E&T programs. If a state does not use its full allotment, these funds are reallocated to other states. States may also draw down additional funds by spending non-federal money on SNAP E&T activities and receiving a 50-50 match on such expenditures.^v Total federal E&T funding was nearly \$287 million in FY 2013.^{vi}

Many states currently provide low-intensity services under SNAP E&T, primarily focused on

job search and on activities needed to ensure that individuals subject to the ABAWD time limit are offered an opportunity to participate in an activity. Supportive services for E&T participants cannot be funded with 100 percent federal funds—only with the 50 percent reimbursement funds. Given high unemployment rates and the many demands on state services during the recent recession, some states operated E&T programs only in portions of their states or restricted them to individuals who did not need child care to participate.

At the same time, some states have leveraged the funds available under E&T to provide more intensive services to participants. These are often designed to wrap around and leverage existing investments in employment and training programs. In these cases, SNAP E&T can provide a key funding stream for case management, academic supports, and supportive services to ensure that SNAP recipients succeed. These programs have typically been voluntary, in order to target limited resources toward recipients who are motivated to participate.

For example, Washington state has operated a third-party match SNAP E&T program called Basic Food Employment and Training (BFET) since 2005. The program includes partnerships between community colleges and community-based organizations (CBOs) that provide participants with support services.^{vii} Minnesota is now exploring using SNAP E&T funding to provide wrap around supportive services to SNAP recipients enrolled in FastTRAC, its Career Pathways program.

Farm Bill Provisions

FNS is charged with developing and publishing a process for soliciting prospective pilot projects no later than 180 days from the enactment of the Farm Bill (August 6, 2014). In addition to current SNAP

E&T activities, these pilots may also include those modeled after TANF work activities, including subsidized and unsubsidized employment and job readiness activities such as mental health services and substance abuse treatment.

By statute, USDA is required to select projects based on the following criteria:

- Degree to which the pilot project would enhance existing E&T programs in the state;
- Degree to which the pilot project would enhance employment earnings of participants;
- Whether there is evidence that the project could be replicated; and
- Whether the state agency has demonstrated capacity to operate high-quality E&T programs.

The pilots are to include a broad range of strategies, such as those:

- Targeting individuals with low skills or limited work experience;
- Pilots from different geographic areas;
- Emphasizing education and training, rehabilitative services for individuals with barriers to employment, and mixed approaches; and
- Pilots that include both mandatory and voluntary SNAP E&T participation.

Further details will be available in the Request for Applications (RFA), which will likely be released close to the August deadline. The application period is expected to last 90 days. FNS is required to select pilot projects no later than 180 days from the date on which the RFA is issued.

An independent evaluation will be conducted to measure the pilots' impact; it will assess the ability of participants to find and retain employment that increases income and reduces reliance on SNAP and other programs. The evaluation must include a comparison between those receiving services through the pilot and those not subject to the E&T programs and services under the pilot.

Maximizing Effectiveness of the E&T Pilots

The pilots provide an opportunity to develop innovative partnerships between SNAP and workforce programs, and for stakeholders to learn about innovative and effective local strategies that help eligible SNAP participants get jobs and increase their earnings. These partnerships could also potentially be replicated in other areas. Over the next three years, lawmakers, program administrators, and advocates will look to the pilots, including implementation and evaluation data, to inform future program design and policymaking at both the federal and state levels on work requirements. Based on CLASP's knowledge of both income support and workforce programs, we offer the below recommendations for maximizing the effectiveness of these pilots.

The pilots offer multiple opportunities to strengthen SNAP E&T. The new funding and the flexibility under the pilots both allow states to try new approaches to SNAP E&T. The increased interest in SNAP E&T also creates opportunities to improve programs through technical assistance and shared learning that bring together SNAP E&T program operators and their peers in welfare and workforce programs, community colleges, and community-based organizations. And ultimately the evaluation findings will help shape the next generation of programs. By selecting pilots that are

implemented in a diverse range of states and settings, FNS can maximize the extent to which findings are relevant to programs elsewhere.

The pilots should fund and test innovations that are promising based on what we know now. This means they should reflect a thoughtful use of experience and evidence and should be intensive enough that it is plausible that they will meaningfully impact clients' employment outcomes. They should not be limited to a few pre-selected models, because we simply do not know enough about what works to narrow the possibilities in this way. Few SNAP recipients are currently offered SNAP E&T services, little data is currently collected on participant outcomes, and even the most promising programs have not been evaluated.

With few exceptions, this implies that the pilots should not simply be a test of what states are currently doing under their SNAP E&T programs. Most SNAP recipients who could potentially benefit from E&T services are not currently offered the opportunity to participate. Only a handful of states have determined how to combine SNAP E&T funding with other resources to support programs that reflect the cutting edge of workforce training. There is no reason to spend limited demonstration and research funding on rigorous evaluations of programs that cannot reasonably be expected to have substantial impacts on participants' employment outcomes. Promising opportunities will likely arise if pilots represent collaborations between SNAP E&T programs and others with experience in intensive, well-designed programs for low-income and low-skilled individuals. The selection process should ask applicants to reflect on lessons from previous employment and training efforts and explain how they will address

challenges that previous programs have encountered.

Learning and future improvement will be greatest if the pilots have the best possible chance to succeed. Given the current starting point, states will have to move quickly to identify the types of programs they want to run and develop needed partnerships accordingly. Moreover, even thoughtful, well-intentioned pilots are likely to encounter design and implementation problems. Overcoming these challenges to generate successful pilots (or at least pilots that are grounded in promising ideas and implemented successfully) will require federal agencies—including the Departments of Labor, Education, Health and Human Service, and Agriculture—to undertake active outreach to ensure that a range of quality proposals are submitted and to provide ongoing technical assistance and implementation support after sites are selected

Assuming that many of the pilots will be new implementations, random assignment should not begin immediately; states should have a chance to get their programs up and running. While recognizing the tight statutory timeline, no one will benefit if effective programs are found wanting because they were studied during an early start-up phase. Similarly, the evaluation design should not get in the way of providing the best services possible to recipients.

Given the diversity of SNAP recipients, it is important to include models that reach a variety of needy groups within SNAP. Not every pilot needs to include services that are appropriate for every kind of recipient, but those that include a single type of intervention should propose a thoughtful way to target services so that they are provided to the recipients who can

most benefit while ensuring others are not hurt by any changes. Moreover, the set of pilots as a whole should utilize a range of approaches. To that end, at least some pilots should offer a mix of services that can be tailored to participants' needs and interests. The evaluation should capture a range of outcomes and subgroups to assess whether the effect of programs varies across populations.

The pilots—and any lessons drawn from them—should not have the effect of undermining the critical statutory protections that ensure SNAP provides nutritional and income support to needy individuals and families. From the TANF experience, we know that mandatory programs can serve as significant barriers to receipt of benefits by many families who would choose to participate if they could but who face personal, family, and logistical barriers. This is a particular problem when state programs fail to assess participants for such barriers, fail to provide adequate support services to address these barriers, include excessively complex or difficult-to-follow procedures, and/or fail to provide actual work or training opportunities in a labor market without private sector alternatives. FNS should be clear about the protections that apply to participants and should require pilot applicants to explain how they will ensure that requirements do not become barriers to SNAP receipt for people who are willing but unable to participate. In addition, the evaluation should capture information about the ways in which participants might be adversely affected by mandatory programs (including entry effects), as well the ways in which they might benefit.

Next Steps

FNS will likely issue the RFA close to the August deadline. However, state human services and

workforce agencies, community colleges, and advocates should not wait until the RFA is published to being thinking about the types of programs and services that are needed to help SNAP succeed in the workforce. To compete for this funding opportunity—and to operate an effective program—it is important to begin thinking through and developing proposals for the pilots now. This is the time to consider what mixtures of programs and services are appropriate for different populations, how to identify target populations, and which interim and final outcome measures to track. States may wish to reach out to workforce and community service providers to gather ideas and best practices. Advocates may wish to reach out to states to learn what they are considering and to share their own ideas. A diverse pool of applications with well-thought out programs and ideas will be needed to ensure that the pilots provide results that advocates and decision makers can learn from.

program: Elizabeth Lower-Basch, *SNAP E&T*, Center for Law and Social Policy, March 2014, <http://www.clasp.org/resources-and-publications/publication-1/SNAP-ET-Overview.pdf>.

^{vi} In FY 2013, Federal Funding for SNAP E&T totaled nearly \$287 million which consisted of \$78.3 million allocated to all states as 100 percent funds, \$19.6 million in “pledge funds” to states that offered E&T services to all ABAWDs, \$150.8 million in 50% match to states for administrative costs, \$7.7 million for 50% match to states for dependent care, and \$30.4 million for 50% match to states for transportation and other SNAP E&T costs. These figures are unpublished data provided by FNS.

^{vii} Elizabeth Lower-Basch, *SNAP E&T*, Center for Law and Social Policy, March 2014, <http://www.clasp.org/resources-and-publications/publication-1/SNAP-ET-Overview.pdf>.

ⁱ Dottie Rosenbaum, *The Relationship Between SNAP and Work Among Low-Income Households*, Center on Budget and Policy Priorities, January 29, 2013, <http://www.cbpp.org/files/1-29-13fa.pdf>.

ⁱⁱ See the SNAP Employment and Training Toolkit for detailed information on who work requirements apply to, who is exempt from work requirements, and the difference between “work registrants” and “mandatory E&T participants”: *Employment and Training Toolkit, A Toolkit to Help States Create, Implement and Manage Dynamic E&T Programs*, Supplemental Nutrition Assistance Program, Food and Nutrition Service, United States Department of Agriculture, 2013, http://www.fns.usda.gov/sites/default/files/ET_Toolkit_2013.pdf.

ⁱⁱⁱ Guide to Serving ABAWDs Subject to Time-limited Participation, Food and Nutrition Service, United States Department of Agriculture, 2013, http://www.fns.usda.gov/sites/default/files/Guide_to_Serving_ABAWDs_Subject_to_Time_Limit.pdf.

^{iv} *A New Look at the GAO Report on Workforce Funding: Spending on Seven Largest Workforce Programs Cited in the Report Has Fallen By More Than 1/3 Since 2009*, Center for Postsecondary and Economic Success, Center for Law and Social Policy, November 7, 2013, <http://www.clasp.org/resources-and-publications/publication-1/A-New-Look-at-the-GAO-Report-on-Workforce-Funding.pdf>.

^v Technically, these funds are a reimbursement rather than a match. See CLASP’s SNAP E&T brief for more information about the