



SNAP E&T

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Overview: Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T) funds can be used to support a variety of education, training, employment, and related services for SNAP recipients. The Food and Nutrition Service of the U.S. Department of Agriculture makes grants to state agencies that operate the SNAP program.

Eligibility and Targeting: Participants must be recipients of SNAP benefits and not Temporary Assistance for Needy Families (TANF). In general, SNAP recipients must have gross monthly incomes under 130 percent of the federal poverty level and have assets under defined limits, but states may modify these rules. States may operate voluntary or mandatory SNAP E&T programs, and may limit eligibility to only certain types of SNAP recipients or to those who live in certain areas. SNAP participants unable to work are generally exempt.

Services/Program Support: SNAP E&T funds can support operating costs of job search, work experience, education and training programs, support services for participants, and job retention services for up to 90 days. Additional activities may be allowed under new pilot projects authorized under the Farm Bill.

SNAP E&T is a funding source that allows states to provide employment and training and related supportive services to individuals receiving Supplemental Nutrition Assistance Program (SNAP, formerly known as food stamps) benefits. These services are intended to assist recipients in gaining skills, training, work, or experience that will increase their employment and earnings and reduce their need for SNAP. In an average month in FY 2013, more than 47 million individuals received SNAP benefits, making a large share of workers in low-income families potentially eligible for SNAP E&T services; however, in 2012, the most recent year for which data are available, only 15.3 percent of non-elderly adult SNAP recipients participated in SNAP E&T activities.¹

Participants must be recipients of SNAP benefits in every month that they receive E&T services and may not be Temporary Assistance for Needy Families (TANF) recipients. Children, parents of young children, seniors, people with disabilities and those already working are exempt from E&T, though youth (ages 16 to 18) may participate in employment and training services if they are members of a SNAP household. As discussed below, states may operate mandatory programs (under which non-exempt recipients can be sanctioned by losing their food benefits), or voluntary programs, or a mix.

SNAP E&T supports a range of employment and training activities for SNAP recipients. Such activities can include job search, job search training, work experience or workfare, and education and training including basic skills instruction. SNAP E&T can pay for such services

as long as the program is not available to the participant at no cost through another government program or private source. Employability assessments and case management services can be part of a component but cannot be stand-alone activities. SNAP E&T can reimburse recipients for a range of expenses related to participation in a SNAP E&T component, such as the costs of dependent care, transportation, uniforms, books, safety equipment, interview clothing, test fees, and supplies. SNAP E&T can also be used to provide job retention services for up to 90 days after an individual who received other services under SNAP E&T gains employment.

SNAP and College Students

SNAP has certain eligibility rules that apply to college students. Students enrolled in an institution of higher education who are between ages 18 and 50, are not disabled and do not have parenting responsibilities must generally be employed at least 20 hours per week, receiving work-study funds, or enrolled in school as part of an employment-related program. An employment-related program can include one assigned by TANF or the Workforce Investment Act, as well as SNAP E&T components. SNAP E&T components are subject to certain restrictions added by the recent 2014 Farm Bill. For more information, see: [*SNAP Policy Brief: College Student Eligibility*](#).

SNAP E&T Funding

The SNAP E&T program includes two main types of funding: 100 percent federal funds and 50 percent federal reimbursement funds.

Each state receives a capped allotment of 100 percent federal funds to provide SNAP E&T

services (other than participant reimbursements) each year. Each state receives a share of the total funds appropriated (\$79 million in FY 2014), based on a formula that takes into account the number of SNAP recipients who could potentially participate in E&T services.² This allotment is very low compared to the total number of potentially eligible SNAP recipients. In many states, the allotment is entirely consumed by job search activities and referrals to education and training that are funded from other sources. States can also qualify for additional 100 percent federal funds if they commit to serving all unemployed childless adults who would otherwise be at risk of losing SNAP benefits due to the time limit.³

Under the second type of funding, states can claim 50 percent reimbursement for non-federal spending on SNAP E&T activities. This is not capped. To draw down these funds, states must include a description of these activities and a proposed budget in a SNAP E&T plan. The Food and Nutrition Service (FNS) must approve the plan. Payments to clients for participation-related expenses are only eligible for the 50 percent federal reimbursement, not for 100 percent federal funding.

In the past, states mostly claimed reimbursement for direct state and local expenditures under the 50 percent reimbursement funding stream. In recent years, a number of states have developed processes to claim expenses incurred by community colleges and other not-for-profit organizations under contract to the state agency operating SNAP E&T. These are sometimes referred to as “third-party match” programs. The funds used to leverage additional federal support can be state or locally appropriated funds, or funds provided by foundations or other private entities, but cannot come from other federal grant programs.

Examples

Washington 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. The non-federal funds spent on support services for SNAP E&T participants by CBOs are allowable expenses to claim the federal 50 percent reimbursement. Expenses claimed by community colleges for the SNAP E&T 50 percent reimbursement can include grants to cover tuition, mandatory student fees, books, and specific administrative costs associated with running BFET, as long as these charges are consistently applied to other grants or charged to the general public.

In *Fresno, California*, the Fresno Bridge Academy, a program of the nonprofit Reading and Beyond, uses SNAP E&T resources to help eligible unemployed and underemployed adults become job-ready and assists them with job searches. Individuals work one on one with a case manager in an 18-month program that supports them through developing individual goals, workshops on soft skills such as resume writing and interviewing, and providing wraparound services that assist with needs that affect their success in the workforce (e.g., transportation). Foundation funding supplements services that are not funded by SNAP E&T resources. The Bridge Academy partners with local schools to provide vocational training for participants. Bridge Academy participants can enroll in various training programs (e.g., medical assistance, HVAC, administrative, manufacturing) to receive their certifications in a period of 8-18 months, after which case managers help to find placement in a mix of temporary and permanent jobs.

SNAP Participation Requirements

The majority of SNAP recipients are either working -- but earning so little that they still qualify for benefits -- or are not expected to be employed, mostly due to age or disability. Working-age SNAP recipients who are not employed and do not qualify for an exemption must meet certain requirements by: registering as looking for work (typically with the state SNAP agency or employment services), accepting a suitable job if offered one, and complying with job search, training, or work experience requirements imposed by the state. Individuals are exempt if they are:

- Under 16 or over 60 years old;
- “Unfit for employment” due to a mental or physical disability
- Receiving unemployment insurance or TANF benefits, and complying with the job search or work requirements of that programs
- Parents with dependents six years old or younger;
- Participating in a drug or alcoholic treatment program;
- Employed or self-employed for at least 30 hours a week; or
- Enrolled at least half time in school, training, or another institution of higher education

Work registrants

Individuals who do not qualify for any of these criteria are often referred to as “work registrants.” States may sanction work registrants assigned to an E&T activity with a loss of some or all of their SNAP benefits for not complying with participation requirements, but are also permitted to operate SNAP E&T programs that serve recipients on a voluntary basis. SNAP recipients

who are exempt from work registration may volunteer to participate in an E&T component, but may not be sanctioned for failure to do so.

Able Bodied Adults without Dependents (ABAWDs)

A smaller group of recipients who are between 18 and 50 years old, not living in a household with a minor child (or pregnant), and are mentally and physically able to work are sometimes referred to as “able-bodied adults without dependents” or ABAWDs. These recipients are subject to an additional provision that generally limits them to receiving SNAP for no more than three months in a 36-month period unless they are working or participating in a SNAP E&T activity for at least 20 hours per week. . Clients who lose benefits due to the time limit may regain eligibility after they have worked for 30 days.

States have the option of waiving this limitation in areas of high unemployment, or statewide when unemployment rates are high enough. In recent years, nearly all states have qualified for statewide waivers. However, as unemployment rates are starting to come down, the ABAWD time limits are starting to come back into effect in some states, and more states will face them in the future.⁴ In addition to these waivers due to unemployment, states may exempt up to 15 percent of those who are ineligible due to the ABAWD provision from the time limit, and may also choose to make SNAP E&T activities available to unemployed workers who would otherwise be disqualified due to the ABAWD time limit.⁵

As noted above, states that pledge to provide work activities to all recipients facing disqualification due to the time limit can qualify for a share of additional SNAP E&T funding. However, even with this funding, SNAP E&T funding is

SNAP Pilots

The recently enacted 2014 Farm Bill authorizes FNS to select up to 10 states to operate pilots of employment and training services, lasting up to three years, aimed at increasing the number of work registrants who obtain unsubsidized employment, increase their earned income and reduce their use of public assistance. In addition to the current SNAP E&T activities, these pilots may also include other activities modeled after the TANF work activities, including subsidized and unsubsidized employment, and job readiness activities such as mental health services and substance abuse treatment.

The Farm Bill provides \$200 million to support the costs of these pilots, including both operational and evaluation costs. The Congressional report accompanying the bill indicates that these funds are intended to pay for all costs of the projects, which suggests that the full costs of participant reimbursements for support services like child care and transportation may also be covered.

FNS is required to issue a solicitation of applications by August 2014, and is directed to support a mix of projects both mandatory and voluntary in diverse geographic areas, serving diverse populations (e.g. ABAWDs, low-wage workers, individuals with barriers to employment). In addition, FNS is charged with testing a range of strategies including those that emphasize education and training, rehabilitative services for individuals with barriers to employment, rapid attachment to employment, and mixed strategies.

extremely limited compared to the number of SNAP recipients who could potentially be eligible for services. States that have committed to serving all ABAWDs facing the time limit have typically provided low-intensity services in order to be able to offer a slot to all recipients facing the time limit.

Program Limitations

Participants must be assessed for appropriateness and enrolled in SNAP E&T programs to receive services that can be counted toward the reimbursement. They cannot be assumed to be eligible for services based on SNAP receipt. SNAP E&T funds cannot be used to provide services to individuals receiving TANF cash assistance. Participants must be SNAP recipients in every month during which they receive SNAP E&T services. It is not sufficient to simply establish SNAP receipt at the start of the program; states must develop a process for checking SNAP status on an ongoing basis and allocating costs correspondingly.

Federal grant programs, including the SNAP E&T program, cannot be charged more for services than the general public pays. Therefore, when states are considering which expenses to claim for the 50 percent reimbursement, they must ensure that these claimed expenses are consistent with what the public pays or what is charged to other federal, state, or local grants. It is not allowable to claim the amount of funding a state provides to an institution if it is above what individuals are charged, even if allocated on a per-student basis, or student-paid tuition.⁶

FNS also monitors states to ensure that SNAP E&T funds do not supplant existing funding for education and training activities. States are more likely to receive approval to use SNAP E&T funds for a new program, or when a state can demonstrate that an existing program does not

have the capacity to serve all eligible participants and that the SNAP E&T funds will allow additional SNAP recipients to be served. In such cases, FNS may approve SNAP E&T funding for newly enrolled participants only.

¹ Caseload data accessed at: “Supplemental Nutrition Assistance Program FY2011 - FY2014 Participation Rates, Benefit Costs, and Average Monthly Benefit,” United States Department of Agriculture, Food and Nutrition Service, March 7, 2014, <http://www.fns.usda.gov/pd/34SNAPmonthly.htm> and *Characteristics of Supplemental Nutrition Assistance Program Households: Fiscal Year 2012*, Report No. SNAP-14-CHAR, United States Department of Agriculture, Food and Nutrition Service, February 2014, <http://www.fns.usda.gov/sites/default/files/2012Characteristics.pdf>.

² Specifically, the formula is based on the number of work registrants and the number of ABAWDs in the state. See discussion on pages 3 and 4.

³ An additional \$20 million is available to be divided among these so-called “pledge” states. In 2012, five states made the pledge: – CO, DE, NY, SD and TX. See: *The Return of the ABAWD*, Presentation to the American Association of SNAP Directors, September 24, 2013, <http://www.aphsa.org/content/dam/AASD/PDF%20DOC/ABAWD%20SNAP%20directors%20presentation%2010-13.pptx>.

⁴ A current list of ABAWD waiver status is available at: FY 2014 Status of State Able-bodied Adult without Dependents (ABAWD) Waivers, United States Department of Agriculture, Food and Nutrition Service, 2014, http://www.fns.usda.gov/sites/default/files/FY_2014_ABAWD_Waiver_Status.pdf. See also, *The Return of the ABAWD*, op cit.

⁵ *Guide to Serving ABAWDs Subject to Time-limited Participation*, United States Department of Agriculture, Food and Nutrition Service, 2013, http://www.fns.usda.gov/sites/default/files/Guide_to_Serving_ABAWDs_Subject_to_Time_Limit.pdf.

⁶ Moira Johnston, “SNAP Employment and Training (E&T),” PowerPoint, United States Department of Agriculture, Food and Nutrition Service, accessed March 2014, <http://www.winthrop.edu/uploadedFiles/cas/socialwork/cswra/USD AFNSpresentation.pdf>.