Supplemental Nutrition Assistance Program Employment and Training

Overview: Supplemental Nutritional Assistance Program Employment and Training (SNAP E&T; formerly known as Food Stamps Employment and Training, or FSET) funds can be used to support a variety of education, training, employment, and related services for SNAP recipients. Federal administration of the SNAP E&T program is housed within the Food and Nutrition Service of the U.S. Department of Agriculture.

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

Under the first type of funding, each state receives a capped allotment of 100 percent federal funds to provide SNAP E&T services (other than participant reimbursements). This allotment is very low compared to the total number of potentially eligible SNAP recipients. In many states, it is entirely consumed by job search activities and referrals to education and training that are also funded from other sources. States can also qualify for additional 100 percent federal funds, known as Able Bodied Adults Without Dependents (ABAWD), who would otherwise be at risk of losing SNAP benefits due to a time limit that restricts them to three months of SNAP in a three-year time span if they are not working or participating in a work activity.

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 must approve the plan.

Eligibility and Targeting: Participants must be recipients of SNAP benefits and not Temporary Assistance for Needy Families recipients. In general, SNAP recipients must have gross monthly incomes under 130 percent of the federal poverty level and have assets under defined limits. In some states, services further target "ablebodied adults without dependents" who are at risk of losing SNAP eligibility if they are not participating in a work-related activity. Some states impose additional criteria, such as targeting certain regions.

Services/Program Support: SNAP E&T funds can support operating costs of education and training programs, support services for participants, and job retention services for up to 90 days.

Non-federal Funds: States receive a limited allotment of 100 percent federal funds and must provide a match to receive the 50 percent federal reimbursement funds. Third-party (non-governmental) expenditures may be claimed as state spending for this purpose, contingent upon approval by the Food and Nutrition Service.

HOW PROGRAM CAN SUPPORT CAREER PATHWAYS

SNAP E&T supports education and training activities for SNAP (Food Stamp) recipients and is quite flexible with respect to eligible programs. SNAP E&T can pay for the costs of operating education and training programs, including basic skills instruction, as long as the program or service is not available to the participant at no cost through another government program or private source. The federal government will share half the cost of reimbursing recipients for a wide 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. In a provision added by the Food, Conservation, and Energy Act of 2008 (P.L. 110 - 234), SNAP E&T funds can also be used to provide job retention services for up to 90 days after an individual who received employment and training services under SNAP E&T gains employment.

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.

Since 2005, Washington has operated a third-party match SNAP E&T program called Basic Food Employment and Training (BFET). The program includes partnerships between community colleges and communitybased organizations (CBOs) that provide participants with support services. The non-federal funds spent on support services for SNAP E&T students by CBOs are allowable expenses to claim for the federal 50 percent reimbursement. Expenses claimed by community colleges for the SNAP E&T 50 percent reimbursement can include 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. The Food and Nutrition Service does not allow reimbursement for expenses above and beyond what the general public or other grants pay (e.g., state funding to community colleges for instruction is not an allowable reimbursement expense).

In Fresno, California, the Fresno Bridge Academy, a program of the nonprofit Reading and Beyond, accesses SNAP E&T resources to help eligible unemployed and underemployed adults become job ready and undertake job searches. In the 18-month program, individuals work one on one with a case manager who helps develop individual goals; offers workshops on soft skills, such as resume writing and interviewing; and provides wraparound services to meet needs that affect workforce success (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, administrative, manufacturing) to receive their certifications in a period of 8 to 18 months, after which case managers help place them in jobs.

PROGRAM LIMITATIONS

- Historically, many SNAP E&T programs have not been robust education and training offerings. They have largely been designed to provide an activity for participants who are unemployed and mandated to participate in a SNAP E&T program to maintain food stamp benefits.
- Participants must be assessed for appropriateness and enrolled in SNAP E&T programs to receive services and 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.
- 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. Student tuition, mandatory student fees, case management, course books, transportation, and child care are generally considered allowable expenses. It is not allowable to claim the amount of funding a state provides to an institution.

• There is no statutory or regulatory limit on how long a SNAP E&T component may last, but it is clear that the Department of Agriculture thinks of the program as providing short-term skills training for unemployed individuals. However, P.L. 110-234 clarified that individuals may volunteer to participate for more than 30 hours a week. This flexibility allows SNAP E&T funds to be used for more robust education and training activities for individuals who are employed in low-wage jobs.

OPPORTUNITIES FOR STATES

- The 50 percent reimbursement stream can be a significant, flexible source of federal funding. States are reevaluating the types of supports they would like to provide under these programs, and a few are offering more robust education and training offerings. Some states, such as Washington and Minnesota, have implemented innovative SNAP E&T programs where community and philanthropic stakeholders are essential partners for providing funding and services for E&T participants. In areas where E&T programs can be strengthened, states can look to best practices to inform development of more robust offerings.
- Because SNAP E&T dollars can be used to serve low-income individuals who do not have children, SNAP E&T is a valuable complement to TANF, which only funds services for low-income families with children.
- When Congress reauthorized the SNAP program in 2014, it included \$200 million to create and evaluate three-year pilot projects testing innovative SNAP E&T programs in up to 10 states. These programs are designed to help SNAP recipients enter the workforce, increase their earnings, and ultimately reduce their SNAP participation. These pilots will

be influential in informing future policymaking on SNAP E&T programs. FNS will announce the ten pilot projects in February 2015. States should closely follow the progress and lessons of these pilots and assess whether any (or a combination) of the strategies may be effective in their states.