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Director, Office of Employment and Training,
SNAP, Food and Nutrition Service, USDA
3101 Park Center Drive, Room 806
Alexandria VA 223012

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

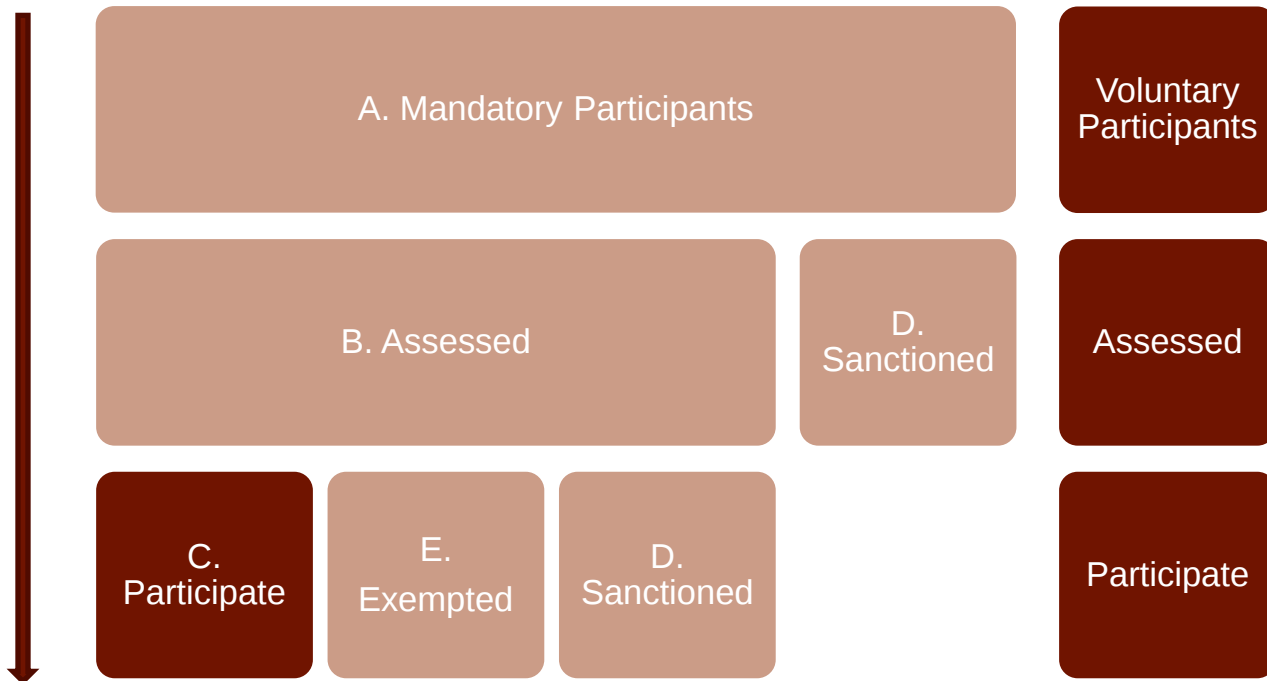
Thank you for the opportunity to comment on the interim rule on SNAP Employment and Training (E&T) reporting measures, as published in the Federal Register on March 24, 2016 (81 FR 15613). CLASP advocates for public policies that reduce poverty, improve the lives of poor people, and create ladders to economic security for all, regardless of race, gender or geography. We have extensive experience working on both income and work support programs, including SNAP, and workforce programs, at both the federal and state levels.

In general, we support of the effort to add reporting measures in order to improve our understanding of the outcomes of individuals who are assigned to (or who volunteer for) SNAP E&T programs, and to align these measures as much as possible to the common measures used under the Workforce Innovation and Opportunity Act (WIOA). Currently, we know very little about the employment outcomes of individuals who participate in SNAP E&T programs. 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.

In the preamble to the interim rule (page 15617), FNS clarifies that only a SNAP applicant or recipient who is placed in and begins an E&T component is considered a “participant” for reporting purposes. This is sensible for understanding the outcomes of voluntary E&T programs. However, for mandatory programs, it completely misses any outcomes of *assigning* a SNAP applicant or recipient to SNAP E&T.

In practice, we know that in states operating large-scale mandatory SNAP E&T programs, many people are sanctioned and lose their SNAP benefits without participating in an E&T component. Supporters of mandatory programs suggest that some of these individuals are motivated to find employment by the participation mandate, but there is not sufficient information to make that claim. Therefore, both the sanction rate and the employment rate for the full universe of those assigned to mandatory SNAP E&T should also be collected in order to present a complete account of the impact of mandatory programs.



Specifically, states should be required to report on the number of SNAP recipients who are mandated to report for assessment (A), the number of mandatory participants who receive a SNAP E&T assessment (B), the number of mandatory participants who participate in a SNAP E&T activity (C), the number who are sanctioned for non-compliance (D), and the number of those mandated to participate who are later found to be exempt (E). In addition, states should report on the employment rates in the second quarter and the fourth quarter after SNAP recipients are mandated to participate (A).

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 national measures apply to each state’s overall SNAP E&T program. In their plans, states are required to list the reporting measures they will collect for each component that is expected to include 100 or more participants. We strongly recommend that all states be required to report the four national measures for each component that meets this threshold.

E&T components vary greatly in their intensity and cost, and it is expected that they will similarly vary in the employment outcomes for their participants. Most states will offer more than one component within their E&T programs. Without component-specific information it will be impossible to compare components within a state (e.g. job search vs. vocational education) or to compare similar components across states (e.g. job search in one state vs. job search in another state). In the preamble (page 15616) FNS says that “outcome data will help the Department

identify E&T programs and components that produce a higher number and percentage of participants that obtain unsubsidized employment... [and] to evaluate the cost effectiveness of E&T programs and the components States have implemented.” These goals will not be possible to achieve unless information is reported by component, not just for overall E&T programs.

Once states are collecting the national performance measures for their programs as a whole, the additional burden for breaking out the data by component is minimal compared to the added value. If an individual participates in multiple components, states should count their outcomes towards all of the components.

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

In general, since the proposed reporting requirement adopts some of the WIOA measures, we recommend that FNS adopt measurement calculation instructions that yield comparable results to the WIOA common measures as much as is possible.

1) "Completion of participation"

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. We know from experience with WIOA that 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. If a different concept is intended, this should be clarified and carefully defined.

Two particular issues arise within SNAP E&T because of differences from WIOA. One question, for individuals who receive retention services under SNAP E&T, is whether completion (or exit) is dated from the start or end of retention services. We recommend that the regulations clarify that when someone obtains employment and transitions to retention services, this be considered an exit from SNAP E&T. Another issue is whether individuals who have stopped receiving SNAP benefits (and are therefore no longer E&T participants) but are continuing in the same education or training program (e.g., under WIOA) should be considered to have exited or completed participation. This is an issue for WIOA as well, as participants may transition between title II (adult education) and Title I (workforce development) services. If states have integrated data systems and are able to track participation across programs, we recommend that the regulations allow them to consider someone not to have exited until they ultimately complete the program, often known as a “common exit.” However, if this is not possible, people should be considered to have exited when they are no longer E&T participants.

2) All references to “high school degree (or GED)” should be replaced with “high school diploma or equivalency.” The GED is a trademarked name and is only one of several types of high school equivalency exams now being used.

3) Under the interim rule, each measure will be reported “using the most recent data available during the reporting period for each measure.” It should be clarified 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). Moreover, if states are expected to use Unemployment Insurance (UI) wage record data to report the employment measures, this will introduce additional lag. For example, the UI wage record data for the quarter ending September 30 usually is not available until early February. It is worth accepting this delay, because UI wage records are the best source of quality data at low cost (because they are already being collected), but it should be accounted for in the rule. See table below:

Completion, Measurement, and UI Data Availability				
“Completion” quarter:	Second Quarter Employment Rate/Median Earnings Measurement Quarter:	Second Quarter UI Data Available:	Fourth Quarter Employment Rate Measurement Quarter:	Fourth Quarter UI Data Available:
FY 2016 Q1	FY 2016 Q3	FY 2017 Q1	FY 2017 Q1	FY 2017 Q3
FY 2016 Q2	FY 2016 Q4	FY 2017 Q2	FY 2017 Q2	FY 2017 Q4
FY 2016 Q3	FY 2017 Q1	FY 2017 Q3	FY 2017 Q3	FY 2018 Q1
FY 2016 Q4	FY 2017 Q2	FY 2017 Q4	FY 2017 Q4	FY 2018 Q2

In addition, FNS should clarify that the proposed regulations at 273.7(c)(17)(vi) require reporting of the outcomes for the members of the key disaggregated groups, not simply of the composition of the group that is used to determine these outcomes.

Overall, it may be helpful to provide states with a grid showing the specific information to report, along these lines:

FY 2017 SNAP E&T Reporting

Measure	Timeframe (assuming the two quarter lag needed for UI data, reports due January 1 for prior fiscal year)	Disaggregated Report
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	Measured with respect to individuals who "completed" in Q2, Q3 and Q4 of FY 2016, and Q1 of FY 2017	Report separately for these subgroups: voluntary and mandatory participants, those who have achieved a HS diploma prior to being provided with E&T services, and those who have not, ABAWDs and not. Also report how many in each group.
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	Measured with respect to individuals who "completed" in Q4 of FY 2015, Q1, Q2 and Q3 of FY 2016	Report separately for these subgroups: voluntary and mandatory participants, those who have achieved a HS diploma prior to being provided with E&T services, and those who have not, ABAWDs and not. Also report how many in each group.
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;	Measured with respect to individuals who "completed" in Q2, Q3 and Q4 of FY 2016, and Q1 of FY 2017	Report separately for these subgroups: voluntary and mandatory participants, those who have achieved a HS diploma prior to being provided with E&T services, and those who have not, ABAWDs and not. Also report how many in each group.
The number and percentage of participants that completed a training, educational, work experience or an on-the-job training component.	Measured with respect to individuals who "completed" in FY 2017	Report separately for these subgroups: voluntary and mandatory participants, those who have achieved a HS diploma prior to being provided with E&T services, and those who have not, ABAWDs and not. Also report how many in each group.
Characteristics: • Voluntary vs. mandatory participants; • Have received a high school diploma (or equivalency) prior to being provided with E&T services; • Are able-bodied adults without dependents (ABAWDs); • Speak English as a second language; • male or female; • within each of the following age ranges: 16-17, 18-35, 36-49, 50-59, 60 or older.	Measured with respect to those who participated in FY 2017 (including those who may still be receiving services)	

Thank you again for the opportunity to provide comments on the interim final rule. We would be happy to discuss these comments in more detail.

Sincerely,

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