

National Skills Coalition Comments on Supplemental Nutrition Assistance Program: Employment and Training Program Monitoring, Oversight and Reporting Measures Interim Rule

May 2016

National Skills Coalition — a broad-based coalition of business leaders, union affiliates, education and training providers, community-based organizations, and public workforce agencies advocating for policies that invest in the skills of U.S. workers — is pleased to submit comments regarding the Supplemental Nutrition Assistance Program: Employment and Training Program Monitoring, Oversight and Reporting Measures Interim Rule (FNS-2011-0026).

National Skills Coalition has long supported skills-based SNAP E&T programs that provide opportunities for participants to enhance their skills, credentials, careers, and families' financial well-being. Although each state must have a SNAP E&T program, the size and scope of programs can vary. As the interim rule explains, states can choose to provide one or more E&T component to participants, including job search, job search training, workfare, work experience, work training, basic education, self-employment training, job retention services, and other programs as approved by the Secretary. While states can use SNAP E&T to expand low-income people's access to education and training that leads to family-supporting work, too few have done so.

National Skills Coalition applauds Food and Nutrition Services' (FNS) emphasis on helping SNAP participants build the skills needed to achieve economic security, and we appreciate the agency's effort to better understand what types of programs yield such results. National reporting measures can provide FNS, state leaders, advocates, and others with a better understanding of what works. The interim rule provides an important opportunity to identify how the national reporting requirements should be structured to provide information on who is



being served by SNAP E&T programs, their outcomes, and areas for improvement and alignment with other workforce development programs.

Accordingly, our comments offer the following recommendations:

1. Adjust reporting measure definitions so they are consistent with Workforce Innovation and Opportunity Act (WIOA) measures
2. Measure all individuals assigned to SNAP E&T
3. Require the national reporting measures for each E&T component
4. Report outcome measures for each subpopulation

1. Adjust reporting measure definitions so they are consistent with WIOA

We appreciate Food and Nutrition Services' efforts to establish national reporting measures that are consistent with the common performance indicators in WIOA. By using common measures across programs, states can better identify opportunities to coordinate SNAP E&T with WIOA education and training activities. The interim rule defines the following reporting measures:

- 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 in E&T; and
- The number and percentage of participants that completed a training, educational, work experience, or on-the-job training component.

To be consistent with WIOA, employment and earnings outcomes described in the measures above should be pegged to E&T program exit rather than completion. For example, the first measure should read, "The number and percentage of individuals assigned to E&T who are in unsubsidized employment during the second quarter after exit." The same change in wording should be made in the other measures of employment and earnings. Without this modification, the E&T data will not be comparable to WIOA reported outcomes, and providers that serve both E&T and any of the six core WIOA programs will have additional reporting burdens. To be consistent with WIOA, "exit" should be defined as the time from which an individual receives no services for 90 days except for retention services.



The national reporting measures should also include a credential attainment measure consistent with the WIOA primary indicator on credential attainment, such as the number and percentage of individuals assigned to E&T who obtain a recognized postsecondary credential, or a secondary school diploma or its recognized equivalent during participation in or within 1 year after exit from the program. Measuring the number and percentage of people who receive a credential is an important part of measuring skill-building outcomes.

2. Measure all individuals assigned to SNAP E&T

Under federal law, states can choose to have mandatory programs, which require certain individuals to participate in E&T in order to receive benefits, or voluntary programs which allow SNAP participants to choose whether they want to participate in E&T. National Skills Coalition supports an all-voluntary E&T policy as a best practice because it allows states to focus E&T resources on education and training activities for those who choose to build their skills rather than on program compliance.

As written, the interim rule only reports on individuals who have participated in an E&T activity, instead of additionally reporting on those who are assigned to E&T but do not participate in an E&T activity. This does not provide a complete picture of who is (and is not) receiving services in mandatory E&T programs, nor does it provide full information on the labor market outcomes of those assigned to E&T in mandatory programs.

Individuals assigned but not participating in E&T should be treated as a subpopulation for reporting purposes (as are voluntary or mandatory participants, participants achieving or not achieving a high school degree or its equivalent, and participants who are or were ABAWDs).

States should also be required to report the percentage and number of individuals assigned to E&T who do not comply with employment and training requirements and as a consequence are ineligible to receive benefits. This also is valuable information for policymakers as they consider the design and effectiveness of the program.

3. Require the national reporting measures for each E&T component

Under the interim rule, states must report the national reporting measures for their overall SNAP E&T program. The rule, however, does not require states to apply these same reporting measures to individual E&T components, which can range from job search to education and training.

We recommend that the rule be changed to require the national reporting measures for each E&T component with over 100 participants. This information will be critical for assessing the



effectiveness of different services. Without consistent measures, it will not be possible to compare component outcomes across states nor will it be possible to have national information on component outcomes. The additional reporting burden would be minimal since states are already collecting the national measures for their programs as a whole.

4. Report outcome measures for each subpopulation

Reporting employment, earnings, and credential attainment outcomes for subpopulations will provide valuable information on the effectiveness of different SNAP E&T strategies. The interim rule explains that national reporting measures will be disaggregated based on the following three characteristics:

- Individuals who are or were voluntary vs mandatory participants
- Participants having achieved a high school degree (or GED) prior to being provided with E&T services
- Participants who are or were ABAWDs

As described previously, we recommend that individuals who are assigned to but do not participate in E&T should be treated as a subpopulation, such that reporting measures are reported separately for assigned but not participating individuals, and for participating individuals.

FNS should also clarify its intention to report these measures for each subpopulation. For example, the number and percentage of all voluntary participants in unsubsidized employment during Q2 after exit from E&T should be reported. The same should be reported for all mandatory participants. The example provided in the interim rule suggests that voluntary vs mandatory status would be reported only for those in unsubsidized employment – showing the composition of those in unsubsidized employment instead of the employment rates for voluntary and mandatory participants.

We appreciate the opportunity to share our comments. Please do not hesitate to contact us should you have any questions.



