

SNAP Employment and Training Program

The Supplemental Nutritional Assistance Program (SNAP, formerly known as Food Stamps) is a critical component of America's safety net for unemployed and underemployed workers, providing assistance for an estimated 47.6 million individuals as of June 2014.¹ Unfortunately, many of these individuals lack the skills and credentials necessary to succeed in today's economy.

With two-thirds of jobs created over the next decade expected to require at least some form of postsecondary education,² expanding access to education and training for SNAP recipients is critical to ensure that individuals can transition into family-supporting employment. The SNAP Employment and Training program (SNAP E&T) is one key resource available to help states and localities address the needs of these individuals.

Background

Although SNAP has included various employment and training requirements for adult recipients to maintain eligibility since the 1970s, SNAP E&T was established as part of the Food Security Act of 1985 and largely shifted to focus on able-bodied adults without dependents (ABAWDs) as part of the 1996 welfare reform legislation. The purpose of the program is to help recipients meet work requirements, and to gain the skills, training, or experience to increase their ability to obtain regular employment. The program is administered on the federal level by the U.S. Department of Agriculture's Food and Nutrition Service (FNS).

SNAP E&T has historically been underutilized as a resource for workforce development activities, but innovative efforts on the state and local level—coupled with recent statutory and regulatory improvements—have put new focus on the potential for SNAP E&T to respond to the skill needs of SNAP recipients. There is considerable new opportunity at both the state and federal level to integrate SNAP E&T as a key component of the workforce development system, and ensure that SNAP recipients have access to critical employment and training services—including supportive services such as child care and transportation assistance—to help them obtain stable, family-sustaining employment and, ultimately, move off of SNAP.

Current Legislative Status

SNAP E&T was originally authorized under the Food Stamp Act of 1977, and most recently amended by the Agriculture Act of 2014, or the "Farm Bill."³ The program is authorized by the nutrition title of the Farm Bill, which is not up for reauthorization until 2019.

SNAP E&T At-A-Glance

Statute. The Food Stamp Act of 1977, as most recently amended by the Agriculture Act of 2014 (P.L. 113-79).

Administration. U.S. Department of Agriculture, Food and Nutrition Service (FNS).

Reauthorization. Authorized through Fiscal Year (FY) 2019.

Federal funding. Overall federal and state funding was \$393.3 million in FY 2013, of which the federal share was \$287 million.⁴

Type of program. Combination of formula grants and reimbursements to states for qualifying expenses.

Institutions providing services. Can include a variety of local organizations such as community colleges, community-based organizations, and American Job Centers (one-stop career centers) authorized under the Workforce Innovation and Opportunity Act (WIOA).

Participants served. In FY 2012, approximately 3.3 million individuals participated in SNAP E&T.

Policy recommendations.

As part of implementation of the Farm Bill, the Administration should:

- ▶ Encourage states to increase the number and percentage of SNAP recipients enrolled in postsecondary education and training, as well as the number of participants earning degrees, certificates, and other credentials with value in the labor market.
- ▶ Provide guidance and technical assistance for state SNAP agencies to help integrate SNAP E&T into the state workforce development system through partnerships with third-party organizations that have an expertise in providing training services.
- ▶ Incentivize states to engage employers and utilize labor market data in developing training programs for SNAP E&T participants.

Funded Activities

Each state is required by law to operate a SNAP E&T program, though they are given substantial flexibility in the design and scope of their programs. States must submit annual state E&T plans identifying, among other things: the E&T components the state agency plans to offer; the categories and types of individuals the state agency intends to exempt from E&T participation; characteristics of the population the state agency intends to place in E&T; and the geographic areas covered and not covered by the E&T plan, along with the type of services to be offered in those areas.⁵

Services funded under the program must include one or more of the following components:

- ▶ Job search activities;
- ▶ Job search training, including skills assessments, job finding clubs, training in employability techniques, and job placement services;
- ▶ Workfare programs;
- ▶ Programs designed to improve the employability of eligible individuals through actual work experience, training, or both;
- ▶ Educational programs to improve basic skills and literacy;
- ▶ Programs designed to increase an individual's self-sufficiency through self-employment;
- ▶ Programs to provide job retention service for up to 90 days following employment; or
- ▶ Other employment, educational, or training programs approved by the Secretary of Agriculture or the state.

In FY 2012:

- ▶ 14 states included a workfare component in their E&T program;
- ▶ 18 states offered a work experience component;
- ▶ 35 states offered education components, including adult education, vocational training, and postsecondary education;
- ▶ 19 states offered job retention services; and
- ▶ 12 states offered training services administered under the federal Workforce Investment Act (WIA).⁶

Eligibility

There are two categories of SNAP E&T participants, mandatory participants and voluntary participants. States have significant discretion in determining who may be served through E&T programs, including whether or not to make E&T participation mandatory for any participants, and how many participants may be served through the program.

Mandatory SNAP E&T Participants

Mandatory SNAP E&T participants are SNAP recipients who do not qualify for a federal work registration exemption or a state E&T exemption, and who are required by the state to participate in an E&T program as a condition of receiving benefits. There is no federal requirement that any SNAP participant be made a mandatory E&T participant—it is at the state’s discretion—and states can run entirely voluntary SNAP E&T programs. Mandatory participants are subject to sanctions for failure to comply with E&T participation requirements, including loss of SNAP eligibility.

All SNAP recipients between the ages of 16-59 are subject to federal work registration requirements, meaning they must register for work at an appropriate employment office, participate in an employment and training program if assigned by a state agency, and accept an offer of suitable employment. Failure to comply with work requirements can result in the loss of SNAP eligibility. Statutory exemptions exist for individuals who are:

- ▶ Physically or mentally unfit for employment;
- ▶ Complying with a work requirement under the Temporary Assistance for Needy Families (TANF) program;
- ▶ Responsible for the care of a child under six or an incapacitated person;
- ▶ Receiving unemployment benefits;
- ▶ Participating in an alcohol or drug treatment rehabilitation program;
- ▶ Enrolled at least half time in any recognized school, training program, or institution of higher education;⁷ or
- ▶ Already working at least 30 hours per week.

Overall, relatively few SNAP recipients are subject to work requirements; of the 46 million participants in SNAP programs in FY 2012, 7 million (15 percent) were required to register for work.⁸

Individuals who are exempt from work registration requirements are also exempt from any SNAP E&T requirements. However, it is not the case that individuals who are not exempt from the work registration requirements are automatically mandatory SNAP E&T participants. **States are not required to assign any participants for mandatory E&T.** However, earlier versions of the program included performance measures that were intended to focus state efforts on this population,⁹ and mandatory participants still make up around 90 percent of total E&T participants nationally. Workforce and nutrition advocates have long expressed concerns about the use of mandatory E&T because of the high risks participants face for sanctions or eligibility restrictions in the event of non-compliance.

Voluntary SNAP E&T Participants

Voluntary SNAP E&T participants are SNAP recipients who qualify for a federal or state exemption, but choose anyway to participate in an E&T component. Voluntary E&T participants may not be sanctioned for failure to participate in an E&T component.

Some states have begun utilizing their authority under the law to exempt all SNAP recipients from participation in E&T, and operate their programs on an all-volunteer basis. This approach allows states to focus investments on participants who may have greater motivation to succeed in education and training, while eliminating concerns about sanctions for non-compliance and reducing administrative burdens for state and local providers. At least 23 states were offering all-volunteer programs as of FY 2011.¹⁰

Federal statute used to limit voluntary SNAP E&T participants to 120 hours per month of combined training and employment activities.¹¹ This provision meant that individuals working 30 hours per week or more were effectively prohibited from participating in E&T activities, limiting the ability of low-wage SNAP recipients to obtain training or education to improve their employment and career prospects. However, this restriction was lifted as part of the 2008 Farm Bill, and states no longer face this limitation on their ability to serve voluntary SANP E&T participants.

SNAP E&T Funding

States may receive three types of federal funding for SNAP E&T programs: E&T Program Grants (“100 percent funds”), ABAWD or “pledge state” grants, and 50 percent reimbursement grants (“50-50 funds”).

E&T Program Grants

Every year, each state is allocated a program grant—a set dollar amount determined by formula—to fund its SNAP E&T program.¹² This money, often referred to as “100 percent funds,” must be used to pay for E&T programs and for the planning, implementation and operation of a state E&T program. Costs covered by this grant include administrative expenses, such as SNAP agency staff working with employment and training providers to develop SNAP E&T components, performing assessments, placing participants in E&T components, and case management. One hundred percent funds can also be used to provide direct services, such as operating training programs, whether spent directly by the administering agency or through a contract. These services may be provided by the SNAP administering agency, by contract with employment and training providers such as community-based organizations (CBOs) or community colleges, or by purchasing services at market rate in the same way an individual would purchase the service. One hundred percent funds cannot be used to pay for the reimbursement of participant expenses. However, they can be used to purchase necessary supplies or services for participants, even if those items might ordinarily be provided through a reimbursement. Every year some states do not obligate or expend their full 100 percent allocation. FNS may reallocate these funds to other states that request additional 100 percent funds, although reallocated money may not always become available.

One hundred percent funds have been capped at \$90 million since 2004, and in FY 2012, were reduced to \$79 million. The 2014 Farm Bill restores the 100 percent funds back to \$90 million.

Able-Bodied Adults without Dependents

Under the 1996 Personal Responsibility and Work Opportunity Reconciliation Act (welfare reform), Congress established additional work registration requirements and time limits for individuals identified as able-bodied adults without dependents (ABAWDs). ABAWDs between the ages of 18 and 49 may not receive SNAP benefits for more than three months in any 36 month period unless they do one of the following:

- ▶ Work at least 20 hours a week;
- ▶ Participate in a qualified work program (which may include a SNAP E&T program) for 20 hours per week;
- ▶ Engage in any combination of work and participation in a work program for 20 hours per week; or
- ▶ Participate in a “workfare” program.

Months in which individuals subject to this provision do not comply with their work requirement count toward their three months of eligibility. After three months of participation without meeting these requirements, participants cannot receive additional SNAP benefits unless they are in compliance with the work requirements, or until after the 36 month period expires.

By statute, states may request waivers of up to two years for ABAWDs in local areas with an unemployment rate above 10 percent or for areas with insufficient jobs. States also have the flexibility to exempt a limited number of unemployed ABAWDs from the three-month time limit. FNS determines the number of yearly exemptions for each state by formula; states may carry over unused exemptions from any given year into the following year. The American Recovery and Reinvestment Act (Recovery Act)¹³ temporarily suspended restrictions on ABAWD participation in SNAP between April 1, 2009 and September 30, 2010, except in states that continue to offer qualifying work opportunities.

As with other work-registered participants, states are not required to assign ABAWDs to SNAP E&T as a mandatory participant. States may serve ABAWDs as voluntary E&T participants to help such individuals to meet their work requirements. Some activities allowable under SNAP E&T—such as job search activities—do not satisfy the ABAWD work requirements.

ABAWD Grants

ABAWD, or “pledge state”, grants are available for states that pledge to offer and provide a qualifying work or training opportunity—including education, training, or workfare opportunities—for ABAWDs entering their third and final month of SNAP eligibility. Total grants are capped at \$20 million per year, and are allocated to states on a formula that takes into account the relative share of ABAWDs in a state compared to all other “pledge” states.

Fifty Percent Reimbursement Grants

In addition to the formula grants, the federal government will provide reimbursements to states of up to 50 percent of actual expenses for:

- ▶ Administrative costs that exceed the state’s funding under the E&T formula grant; and
- ▶ E&T participant expenses directly related to participation in the program such as dependent care costs, transportation, safety equipment, and supplies and books.

This funding is commonly referred to as “50-50 funds,” since the federal government will reimburse 50 percent of the costs of such activities. Annual federal funding for 50-50 funds is not capped, although states may set their own participant reimbursement caps. States may partner with third-party organizations—including community colleges and CBOs—to offer E&T components, and may use either 100 percent administrative funds or 50 percent reimbursement funds, as appropriate, to cover third-party expenses.

Pilot Projects to Test Innovative Strategies

The 2014 Farm Bill established a new pilot program for SNAP E&T that will award competitive grants to up to ten states to test E&T strategies designed to enable more SNAP participants to obtain unsubsidized employment, raise participants’ earnings, and reduce their reliance on public assistance. States receiving pilot funds may offer any E&T components and services, as well as work and education and training services allowed under TANF. The pilot projects will operate within the structure of SNAP E&T rules (except that some additional TANF-authorized activities will be permitted), including rules regarding which SNAP participants would be exempt from requirements and states’ options to sanction participants for noncompliance.

Current Funding Levels

In FY 2013, combined federal and state funding for SNAP E&T totaled \$393.3 million, with the federal share (including both 100 percent formula funds and 50 percent reimbursements) at \$287 million.¹⁴ Combined state and federal funding for program administration was approximately \$425.9 million, while combined funding for participant reimbursements was approximately \$102.9 million. The 2014 Farm Bill restores 100 percent funds to \$90 million, and makes an additional \$200 million available for the pilot projects.

Populations Served Through SNAP E&T

In FY 2012, nearly 3.3 million individuals participated in SNAP E&T programs, of which about 90 percent (3.1 million) were mandatory participants.¹⁵

Institutions Providing SNAP E&T-Funded Services

A variety of local organizations, including community colleges, CBOs and one-stop centers under the Workforce Innovation and Opportunity Act (WIOA), may deliver SNAP E&T-funded services.

In part because of dwindling resources for other federal education and training programs, there has been increase state interest in using E&T funds to help individuals participate in education and training at institutions of higher education. In May 2009, FNS issued a memo regarding the appropriate use of SNAP E&T funds to support educational costs, identifying four key points:¹⁶

- ▶ The education component must be described in the state's E&T plan of operations and reviewed and approved by FNS;
- ▶ A participant—whether mandatory or voluntary—must be assigned to or placed in the approved education component by the state agency as part of the participant's overall self-sufficiency plan. Self-initiated placements during the period of enrollment in E&T are acceptable provided that the E&T program has a suitable, approved education component and the state agency accepts the placement;
- ▶ Federal funds—whether 100 percent grant or 50 percent reimbursement—made available to operate an education component must not be used to supplant non-federal funds being used for existing services and activities. The state agency may use federal funds to operate its approved education component to the extent that E&T component costs exceed the normal cost of services provided to students not participating in E&T; and
- ▶ A SNAP recipient who is an eligible student already attending an institution (without benefit of E&T participation) is exempt from SNAP work requirements, including E&T participation. The student may volunteer to participate in another E&T activity, but because their current education costs are already being met it is inappropriate to use E&T funds to cover those expenses.

FNS issued further guidance in March 2010 indicating that SNAP E&T cannot be charged for services at a higher cost than would be charged to the general public. Federal funds can be used to pay for education and supportive services offered by educational institutions, as long as those services are above and beyond those offered to non-E&T students or are offered at cost, and the services are outlined in the state E&T plan.¹⁷

In guidance issued in August 2010, FNS clarified that students enrolled at least half-time in an institution of higher education through a SNAP E&T or equivalent state or local program may qualify for SNAP benefits if they are enrolled in the educational activity prior to applying for benefits and otherwise meet eligibility requirements.¹⁸

Relationship to Other Programs

The law requires that SNAP E&T services be available through the state workforce development system. However, the Workforce Innovation and Opportunity Act (WIOA) does not list SNAP E&T as a mandatory partner in the one-stop system (it is listed as an optional partner). As a result, there is no requirement that SNAP E&T be represented on state and local workforce investment boards (WIBs), nor is SNAP E&T required to provide financial support to the one-stop infrastructure or enter into memoranda of understanding regarding services to be offered through the one-stops.

In general, SNAP E&T funds may not be used to support individuals who are receiving TANF benefits. Providers are expected to explore other sources of education funding, including federal Pell Grants, before using E&T funds for tuition expenses.¹⁹

SNAP recipients may participate in non-SNAP employment and training programs. In FY 2012, approximately 3.67 million recipients participated in non-SNAP E&T employment and training programs (including TANF-funded programs) compared to 3.3 million SNAP E&T participants.²⁰

Performance Accountability

Until recently, there were no federally defined performance or accountability measures for SNAP E&T (although some states developed their own state-level reporting requirements). However, the 2014 Farm Bill requires that USDA, in collaboration with the Department of Labor, develop reporting measures for states to help identify which programs improve participants' skills, employments and earnings. Importantly, the Farm Bill requires USDA to establish reporting requirements rather than performance measures (i.e. there is no fiscal penalty for states that fail to meet requirements). The measures must be based on common measures of performance for federal workforce training programs and take into consideration the challenges SNAP participants face. State agencies are also now required to submit annual reports on the state E&T program, and USDA is required to conduct periodic evaluations of states' employment and training programs. Should USDA determine that a state is not meeting adequate outcomes for its SNAP E&T program, USDA may require the state to modify its SNAP E&T plan to improve outcomes.

Policy Recommendations

As part of its implementation of the 2014 Farm Bill, the Administration should:

Increase Participation in Postsecondary Education and Training

Many SNAP E&T recipients face barriers to employment because they lack the skills necessary to get and keep well-paying jobs. Despite this, just seven percent of SNAP E&T participants enroll in education or training programs.²¹ FNS should encourage states to increase the number and percentage of SNAP recipients enrolled in postsecondary education and training, as well as the number of participants earning degrees, certificates, and other credentials with value in the labor market.

Increase the Number of Robust, Skills-Based SNAP E&T Programs

The central focus of SNAP E&T programs should be to provide participants with the skills necessary to gain meaningful employment, and eventually, move off of SNAP. The new pilot program authorized by the 2014 Farm Bill provides an opportunity to increase the number of states that are running high-quality, skills-based SNAP E&T programs. FNS should, through guidance and technical assistance, assist states receiving pilot grants in developing and sustaining quality programs, and should, using information gathered from the pilots, develop and disseminate best practices to other states as well.

Align SNAP E&T Programs with Existing Workforce Infrastructure

While SNAP E&T is often administered by the state SNAP agency, the state agency should not be developing or operating siloed, stand-alone E&T training programs. Instead, state SNAP agencies should work to integrate SNAP E&T into the state workforce development system, by partnering with third-party organizations, including other state agencies, community colleges, and community based organizations that have an expertise in providing training services. The training provided through these partnerships should take into account the unique needs of the population being served. Because this type of collaboration requires a high degree of cooperation across agencies and partners, FNS should provide guidance and technical assistance for state agencies developing these types of partnerships.

Tie SNAP E&T Programs to Local Labor Market Demand

Employer engagement is a key part of improving employment and earnings outcomes for SNAP E&T participants. E&T providers should utilize labor market data to ensure that E&T training programs are designed to equip participants with the skills that are in-demand by local and regional employers. FNS should encourage states to use labor market data to develop programs that are relevant to employers, and work with the Department of Labor to develop guidance for states to connect SNAP E&T programs to existing sector partnerships on the local and regional level, or to develop partnerships in collaboration with the public workforce system.



To download the complete version of National Skills Coalition's Training Policy in Brief, visit www.nationalskillscoalition.org/in-brief.

Appendix: Comparison of SNAP Work Requirements and Time Limits

	Regular Work Program Requirements	Three Month Time Limit
Who is Subject to Requirement	All participants between the ages of 16 and 60 unless exempt. Requirements may vary among participants.	All participants over 18 and under 50 who are not disabled and do not live with a child.
Who is Exempt	<ul style="list-style-type: none"> • Person under 16 or 60 or older • 16 or 17 year old if not head of household • Students in recognized programs • Person physically or mentally unfit for employment (state agency defines physical and mental fitness) • Person complying with TANF work requirement • Household member caring for a child under 6 or an incapacitated person • Person receiving unemployment compensation • Regular participant in a drug addiction or alcoholic treatment and rehabilitation program • Person working 30 hours (or earning federal minimum wage x 30) per week 	<ul style="list-style-type: none"> • Person exempt from work requirements • Person under 18 or 50 years of age or older • Person who is “medically certified as physically or mentally unfit for employment” • Person who lives in a household with a child • Person working at least 20 hours per week • Pregnant woman
Definition of Physically or Mentally Unfit for Employment	<ul style="list-style-type: none"> • State agency defines physical and mental fitness • Cannot be less restrictive than a comparable used by the state’s TANF program 	<ul style="list-style-type: none"> • Receiving disability benefits (temporary or permanent, government or private source); • Medically certified as physically or mentally unfit for employment; or • If the unfitness is not obvious, provides a statement from a physician, physician’s assistant, nurse, nurse practitioner, representative of the physician’s office, psychologist, social worker, or other appropriate medical personnel, that he or she is unfit for employment.
Definition of Compliance	Participant must engage in activities assigned. Participant is excused for “good cause.” If no activity assigned or is voluntary, participant has no responsibility.	Participant must find, participate in, and provide documentation of participation in an acceptable work activity. State agency does not have to provide an activity.
Number of Hours Required*	For mandatory participants, up to the number of hours equal to the value of the FS allotment divided by minimum wage or 120 hours per month (whichever is less).* No limit for volunteers.	80 hours per month
What Activities can Fulfill the Requirement	<ul style="list-style-type: none"> • Job search program • Job search training program • Workfare program • Actual work experience or training • Supported work program, WIOA, or state or local E&T program • Educational programs or activities that directly enhance employability (GED, literacy training, ESL) • A self-employment program • Paid employment 	<p>Same activities, except that job search or job search training programs do not count.</p> <p>(Exception: people participating in Section 20 workfare can count job search for one month.)</p>
Penalty for Noncompliance	If mandatory placement and no good cause, disqualified until complies, but not less than: <ul style="list-style-type: none"> • 1st offense: 1-3 months • 2nd offense: 3 to 6 months • 3rd offense: 6 months or longer, or permanently 	Can receive food stamps for only 3 months in 36 during which participant does not document 80 hours of acceptable work activity. Under limited circumstances participant can earn a second period of eligibility of three consecutive months.

* The total time spent by all mandatory household members collectively each month in an E&T work program, combined with any hours worked that month in a workfare program must not exceed the number of hours equal to the household’s allotment for that month divided by the applicable minimum wage. The total hours of participation in an E&T component plus hours worked by any individual household member in any month must not exceed 120.

References

- 1 <http://www.fns.usda.gov/sites/default/files/pd/SNAPsummary.pdf>
- 2 <http://www9.georgetown.edu/grad/gppi/hpi/cew/pdfs/ExecutiveSummary-web.pdf>.
- 3 P.L. 113-79.
- 4 Data provided by FNS staff 7/9/2014.
- 5 See 7 CFR 273.7(c)(6) for full list of state plan requirements; the SNAP E&T Handbook may be found at <http://www.fns.usda.gov/snap/rules/Memo/Support/pdfs/handbook-2003.pdf>.
- 6 http://www.fns.usda.gov/sites/default/files/ET_Toolkit_2013.pdf.
- 7 Generally, students enrolled at least half time in an institution of higher education are ineligible to receive SNAP benefits unless they meet one of eight specified exemptions under 7 U.S.C. 2015(e). Among other things, exemptions to this rule are available for individuals under age 18 or over age 50; individuals who are not physically or mentally fit; and individuals assigned to or placed in the institution of higher education through or in compliance with the Workforce Innovation and Opportunity Act (WIOA), a SNAP E&T program, the Trade Adjustment Assistance (TAA) program; or another employment or training program operated by a state or local government.
- 8 <http://www.fns.usda.gov/sites/default/files/2012Characteristics.pdf>, Table A-25.
- 9 <http://www.fns.usda.gov/snap/rules/Memo/2009/040809.pdf>.
- 10 http://www.nationalskillscoalition.org/federal-policies/snap/snap-documents/usda_snap_toolkit_2011.pdf, p. 27.
- 11 Mandatory SNAP E&T participants are still limited to no more than 120 hours per month of combined training and employment activities.
- 12 This amount is calculated in accordance with to a formula set out in 7 C.F.R. §273.7(d)(1)(i).
- 13 P.L. 111-05.
- 14 Data provided by FNS staff 7/9/2014.
- 15 <http://www.fns.usda.gov/sites/default/files/2012Characteristics.pdf>, Table A.25.
- 16 <http://www.fns.usda.gov/snap/rules/Memo/2009/052709.pdf>.
- 17 <http://www.fns.usda.gov/snap/rules/Memo/2010/031810.pdf>.
- 18 <http://www.fns.usda.gov/snap/rules/Memo/2010/081910.pdf>.
- 19 http://www.nationalskillscoalition.org/federal-policies/snap/snap-documents/usda_snap_toolkit_2011.pdf.
- 20 <http://www.fns.usda.gov/sites/default/files/2012Characteristics.pdf>, Table A.25.
- 21 <http://www.nationalskillscoalition.org/resources/webinars/sign-up-now>.