Introduction

The Supplemental Nutrition Assistance Program (SNAP) is part of the Nutrition Title of the Farm Bill. The SNAP Employment & Training (SNAP E&T) program, administered by the Food and Nutrition Service (FNS) at the U.S. Department of Agriculture, was created in 1985 to help families exit SNAP by becoming self-sufficient through work. Skills are a critical component of family economic security particularly in today's economy—two in three jobs created in the next decade will require at least some postsecondary education or training. Yet in fiscal year (FY) 2010, four out of five SNAP households did not include anyone with education beyond high school; an estimated one-third did not include a high school graduate. A Government Accountability Office (GAO) report found that limited education and work histories make it hard for SNAP E&T participants to obtain employment.

Although SNAP E&T has the potential to provide extremely robust services and supports to a population that is often difficult to serve through other workforce development programs, historically the program has been significantly underutilized by most states. Recently, though, there has been growing interest in SNAP E&T at both the state and federal levels as policymakers acknowledge the importance of job training in helping SNAP recipients move into stable employment and, ultimately, off of SNAP. In addition, changes to SNAP E&T made under the recent Farm Bill, including new funding for pilot programs, create a tremendous opportunity to develop significant new, long-term sustainable education and training programs designed to help very low-income and low-skilled SNAP recipients gain the skills they need to move into stable, family-supporting employment.

National Skills Coalition and Seattle Jobs Initiative have summarized the following best practices for states interested in developing more robust SNAP E&T programs. These best practices are based on Washington State’s highly successful SNAP E&T program, Basic Food Employment and Training (BFET). Since its inception in 2005, the program has become an important part of the state’s comprehensive workforce development system as over 40,000 individuals have received employment, training and support services. Outcome data for people who began BFET services in 2009, tracked for 2 years, show that 71 percent became employed with a median hourly wage over $11.00 per hour. The program has generated over $33M for local nonprofits and Community & Technical Colleges to deliver program specific services.
Recommendations and Best Practices from Washington State’s SNAP E&T Program

BEST PRACTICES

The Value of SNAP E&T’s Flexibility

One of the most indispensable features of SNAP E&T is the flexibility it provides states in designing and implementing employment and training services that best meet the needs of their SNAP populations and that are integrated into their distinctive infrastructures and workforce system objectives. Accordingly, there is no single “best” SNAP E&T model for every state. In general, states making minimal use of SNAP E&T should give strong consideration to building more robust and effective programs that can undoubtedly help fill an urgent need among their under-served and low-skilled SNAP populations for the skills required to advance to living-wage employment. To build effective SNAP E&T programs, states should take advantage of the flexibility of SNAP E&T to incorporate best practices, many of which may be learned from Washington State’s BFET program.

Place Skills at the Center

Washington State operated a small SNAP E&T program prior to BFET that did little to move people to self-sufficiency. BFET did more than simply expand the state’s SNAP E&T services, it made a major shift from workfare to skills-building intended to lead to meaningful employment gains for participants; from a vehicle for mandatory SNAP populations to meet their participation requirements to a voluntary program serving individuals who are prepared and motivated to improve their skills and job prospects; and from a stand-alone, compliance-based program to a true employment and training program connected to the state’s workforce system.

SNAP E&T’s flexibility presents states with important and inter-related choices in program scope and design, including which populations to target for participation, the balance to strike between social service supports and purely employment and training services, and whether to focus on moving participants immediately to any available jobs or on building their skills for living-wage employment. BFET has resolved these questions by placing skills at the center. Its goal is to achieve positive long-term employment and wage gains for participants, and it holds contractors accountable for these metrics. As such, BFET targets participants that are prepared to succeed in employment and training programs, even if they require fairly robust support services. It is not designed to serve individuals who are not ready for unsupported employment simply to give them an activity to do to remain on Basic Food (SNAP) or punish them if they fail to participate.

Tie to Local Labor Market Demand

SNAP E&T programs should focus on providing participants skills and credentials that are in demand in local labor markets. Washington’s BFET program relies primarily on the effectiveness and nimbleness of individual third-party contractors in offering training that is connected to their labor markets. BFET community colleges and community-based organizations utilize labor market data along with formal and informal partnerships with employers to ensure that they are aligned with broader labor market opportunities and that their training programs are designed to provide participants the specific skills that local employers want. The third-party SNAP E&T match model can be very effective in this way because it connects participants to localized labor market openings with which

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contractors have greater familiarity than the state. Within the third-party model, a state can still play a valuable role by evaluating prospective contractors based on how well their employment and training programs tie to labor market demand; by providing centralized resources and training (as in BFET) on the labor market to contractors; and by ensuring its SNAP E&T program as a whole is an integral part of the state’s workforce development priorities related to meeting the needs of focal industry sectors. Because SNAP E&T participants are typically low-skilled, SNAP E&T program should focus particularly on middle-skill occupations that also offer ample opportunities for living-wages. Middle-skill jobs are those that require some education and training beyond high school but less than a B.A., and are thus more accessible to the SNAP population with some additional training.

Complement, Don’t Duplicate Other Workforce/Related Programs

Though states may think to utilize SNAP E&T to support services similar to those provided by TANF or WIA, SNAP E&T might best be deployed (as with BFET) to complement these programs by offering what they typically do not. Unlike TANF, SNAP E&T can focus on skills and education that will allow SNAP recipients to compete for jobs that will help them advance to self-sufficiency; unlike WIA, it can provide a more robust, flexible set of training and support services for a population with multiple barriers to employment. In the case of BFET, as demonstrated by an in-depth analysis of participant data, the population served by the program is one that is distinct from and not well served (in terms of supported employment and training services) by either TANF or WIA.

While SNAP E&T’s flexibility affords states a great opportunity to fill critical gaps within their workforce development systems, an effective program should not stand apart from but ought to be connected to other key parts of a state’s workforce development system. SNAP E&T, as is true of BFET, can be utilized as a bridge from TANF (or to help keep people from going on TANF in the first place). It can link to WIA as well. In Washington, WIA one-stop centers are well aware of BFET and can connect appropriate individuals who would be better served by BFET than by WIA to BFET providers. Overall, SNAP E&T can be part of career pathway development – the first rung on a skills continuum or providing post-employment wage and skill progression for low-income workers. BFET has also demonstrated the value of integrating SNAP E&T specifically with states’ community college systems. Student debt is a huge issue, and SNAP E&T can help alleviate this by serving as bridge funding for students while they qualify for other sources of financial aid, and by providing student supports for those students who may not be Pell eligible.

The Value of Third-Party Match Models

States should strongly consider adopting third-party match SNAP E&T models. This model allows states to build on the efforts of employment and training providers – community colleges and community-based organizations – already operating in their states and expert at providing services to low-income/low-skilled populations with barriers to post-secondary and employment success. It allows states to leverage investments being made in these organizations to serve as match for federal reimbursement, and build on their own investments. In utilizing a third-party match model, SNAP E&T can serve as a vehicle to better align the goals and services of providers with one another (and with the state) to offer participants a more seamless continuum of services.
Consider Starting With Focused Pilot Programs

As was true of BFET, the complexity of administering a SNAP E&T program may mean states are better off starting with limited programs focusing on specific populations of SNAP recipients, specific geographies (BFET), and/or specific groups of providers (e.g., community colleges). Starting small minimizes risk. In Washington, this approach allowed BFET to work out many of the kinks in program operations, and eliminated the need for new administrative staffing until the program proved a worthwhile endeavor. It also afforded time for BFET to begin to demonstrate success as the program went to scale. Starting small in Washington allowed time to build up sound policies and procedures, as well as develop expertise among key state-level and contracted agencies who were subsequently able to provide technical and political support to help grow the program. For these reasons, and because the program created its own momentum through peer-to-peer networks, starting small actually ended up facilitating faster growth of the program. States that start off with ample SNAP E&T resources – such as may be the case for those receiving pilot grants – may “start small” by initially investing in strategic planning, developing administrative infrastructures, policies and procedures, and building partnerships, prior to commencing program services. Taking the time for such a concerted effort may have a similar effect of minimizing problems for states after they launch their expanded SNAP E&T programs.
Build on the Strength of Local Partnerships: Collaborative, Not Directive Approach

One key factor underlying BFET’s successful development is that it was “locally grown.” This means that the state government did not design a SNAP E&T program in isolation and then ask prospective service providers to apply (e.g., via an RFP process) to provide a proscribed set of services. Nor has it operated BFET in an isolated, directive fashion. Just as a critical benefit of SNAP E&T is the flexibility FNS provides states to design their SNAP E&T programs, so states’ programs benefit greatly from designing and implementing their program models in collaboration with existing local partnerships. BFET, for example, was built on a strong partnership, already well-established, involving a local office of the state agency that administers Basic Food/BFET (DSHS), local community-based organizations and community colleges, and the funding community. These experts had already been working on concerted strategies to advance low-income individuals out of poverty through skills and better employment opportunities, and were given an equal voice at the table when the opportunity arose to design an innovative and expanded SNAP E&T program for the state.

BFET’s success since that time has been largely attributable to its development as an equal partnership between the state and the community colleges and community-based organizations that deliver program services. State and providers have worked in tandem to initially set and subsequently revisit and refine clear and mutually-agreeable goals for the program and its participants. The willingness of the state to listen and respond to contractors both in building the program and administering it has resulted in BFET’s continuous improvement and has led new colleges and community-based organizations to want to join the program.

Foundational Elements: Strategic Plan, Fiscal Expertise, Technical Assistance and Tools

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In Washington State, BFET was driven from the outset by a business plan that included a set of agreed-upon program objectives and a plan for meeting them. This was followed up a few years later by a five-year strategic plan that refined the program’s strategic priorities. Both plans have been invaluable in the growth and success of BFET. In addition, Washington quickly learned with BFET that SNAP E&T programs in general – and third-party match programs in particular – can be quite complex from a fiscal and contracting standpoint for both the state administrating agency and for contractors. Fiscal expertise should be brought in early and often, whether at the state level in developing its SNAP E&T program procedures, or at the provider level in determining whether and how to participate as a SNAP E&T program contractor. In particular, community colleges participating or planning to participate in SNAP E&T should ensure coordination between their workforce education departments and their business offices, financial aid offices, and student services offices. What has worked well in Washington is peer-to-peer (college-to-college, community agency-to-community agency) and state-to-contractor fiscal support for new providers to help them quickly get the financial systems in place necessary to participate. In a similar vein, technical assistance and tools for current and especially new providers have been key to BFET’s growth and success. DSHS, for example, has created tools for new providers to determine their capacity to participate in BFET, as

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well as a detailed program manual that covers all aspects of participation. These tools are supported by regular convening of providers by DSHS to discuss challenges, successes and potential improvements to BFET.

Integrate Support Services into SNAP E&T

States should consider how to match up state-supported social services with their SNAP E&T programs in order to provide more comprehensive and seamless services to SNAP E&T participants. In Washington, aligning BFET with the state-run childcare program has been critical for BFET providers, even though childcare is eligible for SNAP E&T 50 percent reimbursement. In general, allowing support services that specifically support SNAP E&T participants’ ability to enter and complete training programs and secure and retain employment is imperative for the SNAP population. States’ concerns about costs for childcare, transportation and other support services are legitimate, but can be controlled, as in BFET, through capping of these costs.

Build Upon Existing State Administrative Structures/Capacity

In building SNAP E&T programs, states should consider how they might build upon systems already in place rather than recreating/duplicating what exists. Inherent in a third-party match model is the utilization of existing community college and community-based organization infrastructures and programs. Beyond this, states may utilize the systems they have in place to administer public benefit programs such as TANF and SNAP for SNAP E&T, such as systems for tracking participants. Washington’s adaptation of its shared case management database for TANF – e-JAS – was critical to the success of BFET. Similarly, states should consider how to creatively deploy current staffing (fiscal, contract, program and policy) to develop and administer their SNAP E&T programs. Again, this is one reason to start small. Once programs are ready to expand, additional administrative capacity can be added utilizing SNAP E&T 100 percent funds.
Consider All-Voluntary Programs

When Washington moved to an all-volunteer model with BFET it made a substantial improvement in the quality of the program and gave more flexibility to contracted partners. SNAP E&T rosters actually increased, not decreased as might have been anticipated. Moreover, participants enrolling in programs were individuals who truly wanted to be there to improve their skills and opportunities for good jobs – they had not been forced. As a result, the quality of programs offered by BFET program providers has not been diminished by the inclusion of individuals who really do not want to be present. Further, mandatory participants in SNAP E&T programs remain subject to the 120-hour rule, limiting the types of employment and training programs in which they can enroll as well as their ability to work and simultaneously receive training. Mandatory participants also trigger a significant level of tracking to ensure that they are meeting participation requirements, placing a heavy burden on third-party providers.

Encourage Community College/Community-Based Organization Collaboration

Central to BFET’s success is the ability for participants to benefit from both the training and education services provided by community colleges (e.g., vocational education, basic skills) with the wrap around supports (case management, coaching, support services) and connections to employers and employment opportunities provided by community-based organizations. Co-enrollment of BFET participants by colleges and community-based organizations has afforded individuals with multiple barriers the best opportunity to complete their training pathways and transition successfully to employment. In
Washington, the emergence of BFET has actually encouraged colleges and community-based organizations to work together, forming partnerships and even co-locating services at the college campuses.

**Streamline Eligibility and Billing Systems**

In Washington, one of the major challenges of BFET has been developing procedures to determine whether participants are eligible for BFET services - and whether providers may thus seek reimbursement for providing these services – that are as streamlined yet as accurate as possible. The fact is that, for a variety of reasons, many SNAP participants will go on and off the program, changing their eligibility status for SNAP E&T services. This increases the challenge for states and SNAP E&T contractors to track participant eligibility during the often extended periods in which participants may be receiving services. Giving providers access to a shared case management system – e-JAS in the case of Washington State – makes this ongoing process more efficient for both providers and state administrators. The more automated and “real-time” this process can be made the better for all parties in administrating the program.

**Include Outcome Measures, Data Collection and Reporting**

BFET has made rigorously-tracked outcome measures a central feature, and so should other SNAP E&T programs. For BFET, metrics, data collection and reporting have been keys to continuous improvement of the program, and also to show evidence of impact to support program growth and continuance. States should be sure that, at minimum, the level of outcome reporting that is integrated into their SNAP E&T programs meets federal regulations. However, with the trend toward requiring higher levels of accountability in public programs, states should consider how they might include an even higher level of measurement within their SNAP E&T programs. For BFET, this opportunity is afforded by the use of a shared case management system (e-JAS), enhanced by linkages to Unemployment Insurance (UI) wage match data and community college data from the state’s Employment Security Department and the State Board for Community and Technical Colleges, respectively. These linkages allow a more comprehensive look at long-term employment and wage data, as well as student achievement milestones (e.g., basic skills, credit and credential attainment) met by BFET participants at the community colleges.

**No Wrong Door (Honest Broker Approach)**

States’ SNAP E&T programs should institute an honest broker approach in which service providers cross-refer participants to other providers offering programs that are a better match for participants’ employment and training needs and objectives. This system has worked well in Washington State with the BFET program. There are various ways to institute an honest broker model. A typical scenario: a provider conducts an initial assessment of a prospective participant to gain a picture of his or her education/training and career goals, current level of educational attainment and work experience, timeline, financial and family situation, barriers, and need for support services, and then assists with the development of an individualized employment and training plan. Based on this assessment and plan, the provider determines which SNAP E&T provider(s) offer the best programs to meet the participant’s needs and helps the participant make the appropriate contacts. The goal is for the participant to move as seamlessly as possible to the right set of services.
A state’s SNAP E&T administrative agency should play a prominent role in facilitating the honest broker model. This is true even if the state, like Washington, has a decentralized third-party match model in which contractors are primarily controlling the client flow (e.g., intake, referral of SNAP E&T participants). With the BFET program, for example, DSHS provides a website and other materials listing all BFET providers and their specific services. It trains its frontline staff working with low-income residents—as well as staff within the WIA one-stop system—on the BFET program, its contractors and their menu of services so that these staff can refer individuals on or qualified for SNAP to appropriate providers. Beyond its benefit to participants, an honest broker approach helps facilitate closer collaboration between employment and training providers.

**Partnership with FNS**

States should ensure that they are communicating openly and regularly with their FNS regional offices in developing and operating their SNAP E&T programs. This assists states in ensuring that they—and their contracted service providers—are not incurring and seeking reimbursement for disallowable costs. Because SNAP E&T is still a developing program with the benefit of fairly flexible guidelines, it may be the case, as it was with Washington State and the FNS Western Region, that states and their FNS regions are learning in tandem about the parameters of the SNAP E&T program and how they apply to states’ distinct models. Regular and open communication helps ensure that questions are answered and issues resolved before significant problems arise. A sense of partnership between FNS and states helps bring the goals of these two entities for the SNAP E&T program into alignment.
Utilize 100 Percent Funds to Build Program Infrastructure

SNAP E&T 100 percent funds (including pilot grant funds) can be effectively deployed by states to support the building of program infrastructure for their SNAP E&T programs, including: strategic planning and program development, initial staffing, the development of systems such as a shared case management database, building a data collection and program evaluation system, and creating resources for service providers such as tools and technical assistance, and so forth. These funds should be allocated within a limited timeframe, after which states should begin to utilize primarily 50 percent reimbursement funds to build up their program services in a sustainable manner.

Utilize 100 Percent Funds to Seed Growth of New Providers

The growth of BFET in Washington State was greatly facilitated by the state’s strategic use of 100 percent SNAP E&T funds to seed the measured addition of new service providers to the program. Due to the complexity of administering SNAP E&T programs, it typically requires a significant investment of time and effort among service providers to get their programs up and running. In Washington State, in addition to providing new BFET contractors technical assistance and peer-to-peer support to flatten the learning curve, the state directed a limited amount of 100 percent BFET dollars to these organizations as “start-up” funds to support initial program planning and implementation. This has helped remove what is perhaps the chief disincentive to BFET participation among prospective contractors. It has also provided a bridge for these contractors, allowing them to get their BFET programs up and running while they get their 50 percent reimbursement funds in order.

Building 50-50 SNAP E&T Funding Models

Ultimately, the longevity and success of SNAP E&T programs are contingent on building 50-50 funding models. States that are using exclusively or primarily 100 percent SNAP E&T funding (including those receiving pilot grant funds) should have in place well-considered plans dictating how they will transition in fairly short order to programs driven mainly by the presence of robust 50 percent reimbursement funds. This is obviously necessary as 100 percent funds, including those awarded through SNAP E&T pilot grants, are limited, so a transition to 50-50 funding models will be necessary to sustain programs. Beyond this, a key benefit of the 50-50 funding model – and a factor that has made BFET such an effective and cohesive program with strong advocates – is that it naturally creates a program in which there are multiple players with “skin in the game”: the federal government (FNS), state government, community colleges, community-based organizations, and philanthropic organizations (including corporate donors) are all investors in the program and have a stake in its success.

A first step for states in planning to transition to SNAP E&T programs driven by 50-50 funding is to map out the existing (non-federal) resources already being invested in employment and training services for their low-income population. States themselves, as well as entities like community colleges (which may be using state-based, college foundation-based or other non-federal dollars for tuition and support services at the college), community-based organizations, local governments, United Ways and other philanthropies, are likely investors in many states. These investments are an initial source of ready match and thus these entities are those to target for third-party match if they are providing appropriate services. SNAP E&T 50-50 funds can reimburse for these expenditures and allow entities to expand their services to new SNAP participants.
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SEATTLE JOBS INITIATIVE

Seattle Jobs Initiative (SJI) creates opportunities for students, workers, and businesses to succeed by helping education and job training programs meet the demands of a new economy. We find and apply solutions for people to gain the skills they need for good jobs that create prosperity for all in today’s marketplace.

As a workforce intermediary, SJI combines direct program services with efforts to improve the workforce system serving low-income adults. Our innovation, research and policy arm is currently focused on significantly increasing the number of low-income/low-skill adults who access and persist in community college programs that lead to middle-wage job opportunities within local labor markets. SJI is leading efforts to develop and share knowledge, tools and best practices on the labor market value of postsecondary education, college/career navigation, and meeting obstacles to college completion. SJI also focuses increasing funding for education and training for low-income adults, as well as on labor market research aimed at ensuring workforce systems are meeting the needs of local employers while providing individuals with skills leading to middle-wage jobs.

NATIONAL SKILLS COALITION

National Skills Coalition is a broad-based coalition working toward a vision of an America that grows its economy by investing in its people so that every worker and every industry has the skills to compete and prosper. We engage in organizing, advocacy, and communications to advance state and federal policies that support these goals—policies that are based on the on-the-ground expertise of our members.

National Skills Coalition was founded in 1998 as The Workforce Alliance in response to a series of federal policies that signaled the end of national investments in the skills of America’s workers at a time when skill gaps were growing in key U.S. industries. Since then, we’ve demonstrated that investments in skills work. We’ve shown that diverse stakeholders can find agreement around specific reforms that will improve a variety of workforce education and training policies. And we have documented that the American public is strongly supportive of a deeper investment in the skills of America’s workers. We continue to mobilize support for a new national skills agenda that cuts across public policies, and simultaneously serves a wide range of U.S. workers and industries.

National Skills Coalition is governed by a Board of Directors and advised by a national Leadership Council drawn from the ranks of business, labor, community colleges, community-based organizations, and the public workforce system.

Seattle Jobs Initiative
830 4th Avenue South, Suite 206
Seattle, WA 98134
www.seattlejobsinitiative.com

National Skills Coalition
1730 Rhode Island Avenue NW, Suite 712
Washington DC 20036
www.nationalskillscoalition.org