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Supplemental Nutrition Assistance Program Employment & Training - Georgia Primer

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Summary

Georgia is poised to maximize its SNAP Employment & Training 100 percent and 50/50 program, which will help more SNAP recipients gain skills to obtain and maintain employment:

- New FNS guidance and approved models from other states can facilitate compliance.
- Georgia DHS is required to submit the FFY 2012 Georgia SNAP E&T Plan this summer.

Background

Congress established the Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T), formerly known as Food Stamps Employment and Training or FSET, in 1985 “to assist SNAP recipients in gaining skills, training, work or experience that will increase their ability to obtain regular employment.”¹

The Food and Nutrition Act of 2008 (Act) gave states flexibility in designing their E&T programs. States must submit an annual state SNAP E&T plan to the U.S. Department of Agriculture (USDA), Food and Nutrition Service (FNS) and may contract with other state or local agencies or private organizations to provide services to participants or to operate the entire program.

A state SNAP E&T program must include at least one of these components: 1) job search, 2) job search training, 3) workfare, 4) work experience or training, 5) education (e.g., literacy training, English as a Second Language, etc.), 6) self-employment training, 7) state, local or Workforce Investment Act work programs, or 8) job retention. SNAP E&T education activities must help SNAP participants move into employment. Job retention services may only be provided to a SNAP E&T participant who secured employment after receiving a SNAP E&T service.

Funding

Federal SNAP E&T funding is contingent upon FNS approval of the state SNAP E&T Plan and the availability of federal funds and includes:

1. **100 percent federal funds.** Each state is allocated 100 percent federal funds for planning, implementation and operation of its SNAP E&T program (excluding participant reimbursements such as transportation and child care). In Federal Fiscal Year 2010², FNS allocated \$90 million, including \$2.3 million for Georgia.³ In FFY 2010, Georgia planned to use 8 percent (\$180,239) of its \$2.3 million allocation, dropping to 3 percent (\$72,876) in FFY 2011.⁴ At the end of the federal fiscal year, FNS can reallocate a state’s unexpended or unobligated funds to other states that request additional funds.

States can also qualify for additional funds if they commit to serving all unemployed childless adults⁵ who would otherwise be at risk of losing SNAP benefits due to the time limit. In FFY 2010, FNS allocated \$20 million for this purpose. Georgia did not access these funds in FFY 2010 or FFY 2011.

2. **50 percent federal reimbursement funds (50/50 funds).** These funds *are not capped*. The federal government provides a 50 percent reimbursement for non-federal spending for:
 - a. **Additional Administrative Costs** for planning, implementing and operating a SNAP E&T program. The 50/50 funds can be used for the same purposes as the 100 percent federal funds. A state does not have to spend its 100 percent federal funds before using 50/50 funds.
 - b. **Participant Reimbursements** for SNAP E&T participant (and volunteer) expenses that are reasonable, necessary and directly relate to program participation (e.g., dependent care, transportation, uniforms, personal safety items, books and training manuals). A state's approved SNAP E&T plan must include a description of these costs and a proposed budget.

Note: The state can reimburse third-party providers of SNAP E&T administration and services with federal 100 percent or 50/50 funds.

Table 1 **Georgia E&T Budget**

Funding Category	FFY 2010 Budget	FFY 2011 Budget
1. 100 percent Federal E&T	\$180,239	\$72,876
2. Additional E&T Admin	\$86,000 federal \$86,000 state	\$86,000 federal \$86,000 state
3. Participant Reimbursement - Transportation	\$50,000 federal \$50,000 state	\$2,500 federal \$2,500 state
Total FFY Costs	\$452,239	\$249,876

Source: Georgia Food Stamp Employment and Training Program for FFY 2011.

Eligibility

A SNAP E&T participant must be a SNAP recipient but not a Temporary Assistance for Needy Families recipient. In general, SNAP recipients must have gross monthly income below 130 percent of the federal poverty level (e.g. \$24,089 for a family of three).⁶ Mandatory SNAP E&T participants are SNAP recipients who have not met any federal exemptions from SNAP work requirements⁷, are registered to work in the state, and are referred by the state agency to a SNAP E&T program.

Voluntary Programs

States have the option to operate an all-volunteer program, which can save administrative costs by eliminating the time and expense of sanctions. States may impose additional target criteria such as geographic regions. In FY 2011, Georgia operates a voluntary program in one county, Paulding County.⁸ In addition, Georgia limits participation to SNAP recipients with children age 12 or younger (or otherwise not in need of dependent care) who are not medically exempt, and individuals who are 18 years of age or older.⁹

From FFY 2010 to FFY 2011, Georgia decreased the counties served from three counties to one due to “state spending constraints for 50/50 client services” and “based on program participation for FFY 2010”.¹⁰ To increase participation in voluntary programs, states or third-party providers can:

- Use SNAP E&T administrative funds for outreach and marketing. Outreach partners such as food banks can help assess and refer potential participants.
- Show SNAP E&T participants that there is a direct link between SNAP E&T services and employment.
- Provide support services such as transportation and child care, which are often barriers to participation.

Partnerships and Third-Party Reimbursements

A state agency can partner with third-party organizations to administer the program and/or deliver SNAP E&T Services. In a third-party reimbursement model, the state uses 100 percent federal funds or 50 percent federal reimbursement funds to reimburse the partner for using non-federal funding for allowable costs of SNAP E&T services. Program responsibilities can be shared between the state and its partners as follows:

- **Restricted Model** – State agency is responsible for recruitment, assessment, placement and tracking. The partner provides a SNAP E&T service such as job search training.
- **Comprehensive Model** – The partner is responsible for recruitment, assessment, placement, tracking and providing SNAP E&T services.

New programs that only serve SNAP E&T participants are the easiest to administer and invoice; however, a partner may expand existing programs to include SNAP E&T participants.

Steps to Build a Partnership

1. Develop a partnership packet, including program purpose, program responsibilities and requirements, and services a partner could offer.
2. Compile a list of potential partners to receive the partnership packet.
3. Assess interested organizations for administrative capacity to provide a SNAP E&T service.
4. Draft a Memorandum of Understanding or contract.
5. Share contract with FNS. Ensure all proposed costs are allowable.
6. Revise the State SNAP E&T Plan and submit to FNS. Include new tables and cost estimates along with proposed changes.
7. Implement. Collect participation data from partners. Review invoices to ensure all information is correct.
8. Audit partner on a regular basis to ensure fiscal and program integrity.

- FNS Employment and Training Toolkit

Cost Policies for Partner

Partner SNAP E&T expenses must be directly related to approved SNAP E&T services, costs must be reasonable and necessary, and federal funds may not be used to supplant non-federal funds for existing educational activities. FNS may not be charged more than the general public (or what a non-SNAP E&T participant would pay) for an educational activity. For example, state funding to community colleges for instruction is not an allowable reimbursement expense.

Technical and Community College Partners

Though more complex than partnering with community-based organizations (CBOs), the state may partner with technical and community colleges. In general, a technical or community college partner can:

- Use either 100 percent grant or 50 percent reimbursement funds to pay for SNAP E&T-specific administrative support at the school.
- Cost allocate for allowable SNAP E&T expenses. For example, a technical or community college can claim expenses for SNAP E&T 50/50 funds for tuition, mandatory student fees, or case management as long as these charges are consistently applied to other grants or charged to the general public.

FNS does not allow reimbursement for expenses above and beyond what the general public or other grants pay.

SNAP E&T funds cannot be used by a community college for a government funded educational activity that is a state or local entitlement (e.g., adult basic education). However, SNAP E&T funds may be used to pay for CBO educational activities offered at no cost that are funded by donations or grants. The CBO would need to determine the per student cost of its educational activity and allocate costs to the SNAP E&T program accordingly.

- Charge for SNAP E&T specific services.

Approved State Models

Washington

Since 2005, the state of Washington has operated a third-party SNAP E&T 50/50 program known as Basic Food Employment and Training (BFET), which provides employment, education, training and support services. BFET partners include 14 community colleges and six CBOs, facilitating most SNAP E&T participants to receive educational services from the community colleges and support services from the CBOs. In some instances, the CBOs provide vocational education and training as well.

Since 2005, BFET has served more than 13,000 individuals and achieved a job placement rate of 53 percent with working participants earning an average wage of \$10.43 per hour. In FFY 2010, Washington spent more than \$18 million on BFET with \$8.4 million in federal reimbursement funds for its third-party partners.

The Washington third-party reimbursement model has shown that community colleges and CBOs can work together to design and commit resources to serve SNAP E&T recipients. BFET partners are able to serve clients they would not otherwise have been able to serve. For example, South Seattle Community College provides education and training services to those who lacked resources to pay for tuition, books and fees. It also has meant being able to provide services and supports that are key to their success. For CBOs, such as FareStart, which provides homeless men and women and those at risk of becoming homeless with culinary job training and placement, the state's BFET program has expanded their capacity to serve additional participants. Another key to this model has been ongoing and open communication between the state and FNS.

Rhode Island

In order to improve the state's SNAP E&T performance and implement a 50/50 program, the Rhode Island Department of Human Services (RI DHS) chose to contract out the entire SNAP E&T program.¹¹

After a competitive bidding process, RI DHS chose the Rhode Island Local Initiative Support Coalition (RILISC) to operate the 100 percent program and to launch the 50/50 program with five community-based organizations (CBOs). RILISC is responsible for choosing the CBOs based on financial and program integrity, ability to provide non-federal funding, and alignment with the intent of SNAP E&T. In addition, RILISC manages the 50/50 reimbursement process for the CBOs. Employment and training services run the range of activities, including adult literacy, skills training in a range of occupations, job readiness, job placement, and support services.

The program is being piloted during 2011 as RILISC, RI DHS, and FNS finalize approval of the 50/50 program.

Next Steps for Georgia

Georgia is poised to maximize its SNAP E&T 100 percent and 50/50 program, which will help more SNAP recipients gain skills to obtain and maintain employment:

- New FNS guidance and approved models from states like Rhode Island and Washington can facilitate compliance.
- Georgia DHS is required to submit the FFY 2012 Georgia SNAP E&T Plan this summer and can include the expansion of the 100 percent and 50/50 SNAP E&T program.

Endnotes

¹ Unless otherwise noted, “Employment and Training Toolkit”, United States Department of Agriculture Food Nutrition Service 2011.

² Federal Fiscal Year is October 1 through September 30.

³ SNAP E&T state allocations for FY 2010 and 2011 are available at: http://www.clasp.org/admin/site/documents/files/FY-2010_2011-allocations.xlsx.

⁴ Georgia Food Stamp Employment and Training Program for FFY 2011, Georgia DHS, August 2010.

⁵ Also known as able-bodied adults without dependents (ABAWDS).
<http://www.fns.usda.gov/snap/rules/Memo/PRWORA/abawds/ABAWDsPage.htm>

The Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA) limits the receipt of SNAP benefits to three months in a 3-year period for ABAWDS who are not working, participating in, and complying with the requirements of a work program for 20 hours or more each week, or a workfare program. States may request a waiver of this provision for people in areas with an unemployment rate above 10 percent or for those in an area with insufficient jobs. Georgia received a state-wide waiver through September 2011.

⁶ Author calculation using 2011 Federal Poverty Level data available at <http://aspe.hhs.gov/poverty/11poverty.shtml>.

⁷ Federal exemptions include SNAP recipients who are under age 16 or over age 59, physically or mentally unfit for employment, subject to and complying with work requirements for other programs (i.e. TANF), caretaker for a dependent child under age 6 or an incapacitated individual, receiving unemployment insurance compensation, participating in a drug or alcohol treatment and rehabilitation program, employed 30 hours a week, or a student enrolled at least part time.

⁸ Georgia Food Stamp Employment and Training Program for FFY 2011, Georgia DHS, August 2010. Note: there is currently a state-wide labor surplus waiver of able-bodied adults without dependents.

⁹ Ibid.

¹⁰ Ibid.

¹¹ Unless otherwise noted, RI LISC information from e-mail correspondence from Center for Law and Social Policy, May 10, 2011.