

SNAP Employment and Training (E&T) 101

Background

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

Although SNAP has included various employment and training requirements since the 1970s, SNAP E&T was established in 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 Activities

Each State is required by law to operate a SNAP E&T program, though they have lots of flexibility in the design and scope of their programs. States must submit annual State E&T plans identifying, among other things: the services the State plans to offer; the categories and types of individuals the State 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. Services offered 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.

SNAP E&T Participants

There are two categories of SNAP E&T participants, mandatory participants and voluntary participants.

Mandatory SNAP E&T Participants

Mandatory SNAP E&T participants are SNAP recipients who do not qualify for an exemption, and who are required by the State to participate in an E&T program as a condition of receiving SNAP 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.

Voluntary SNAP E&T Participants

Voluntary SNAP E&T participants are SNAP recipients who qualify for a federal or State exemption, but choose to participate in an E&T component. Voluntary participants may not be sanctioned under SNAP E&T. Recently, more States have begun to 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.

Federal SNAP E&T Funding

States can receive three types of federal funding for SNAP E&T: 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. This money, referred to as “100 percent funds,” must be used to pay for E&T programs and for the planning, implementation, and operation of an 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. 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 are capped at \$90 million, but every year some States do not spend all of their 100 percent funds. FNS may reallocate these funds to other States that request additional funds, although reallocated money may not always become available.

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 services and supports, and may use either 100 percent administrative funds or 50 percent reimbursement funds, as appropriate, to cover these costs.

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. FNS has provided guidance regarding the appropriate use of SNAP E&T funds to support educational costs, identifying four key points:

- 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;

- 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; 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.

SNAP E&T cannot be charged for services at a higher cost than would be charged to anyone else. 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.

Relationship to Other Programs

SNAP recipients may participate in non-SNAP employment and training programs. The law requires that SNAP E&T services be available through the State workforce development system. However, 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.

Able-Bodied Adults without Dependents (ABAWDs)

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.

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.

Pilot Projects to Test Innovative Strategies

The 2014 Farm Bill established a new pilot program for SNAP E&T that awarded about \$165 million in competitive grants to ten sites—California (Fresno), Delaware, Georgia, Illinois, Kansas, Kentucky, Mississippi, Vermont, Virginia, and Washington—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. Pilot sites are a good mix of urban, rural, and suburban; include three mandatory and seven voluntary programs; target services to ABAWDs, low-wage workers, homeless, ex-offenders, and other highly-barriered populations; include intensive case management; and focus on middle-skill jobs. Common strategies across the pilots include subsidized employment, career pathways, financial literacy, barrier remediation, and job retention services. The pilots will run through December 2018 and will be rigorously evaluated to help improve the effectiveness and efficiency of the SNAP E&T program.