Federal SNAP E&T
States are required by law to operate a SNAP Employment and Training (SNAP E&T) program, but have flexibility in program scope and design. States are required to submit annual SNAP E&T plans for FNS approval, which include:
- Services the state plans to offer
- Categories and types of individuals the state intends to exempt from SNAP E&T
- Characteristics of the population the state intends to serve
- Geographic areas covered by the program
- Financial information.

Services offered by the state must include one or more of the following components.
- Job search activities
  - Participation in Job Search, Job Club and Job Seeking Skills are not countable activities unless participation hours constitute less than 50 percent of the required 80 hours per month.
- Job search training
  - Including skills assessments, job search 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
- Education programs to improve basic skills and literacy
- Programs designed to increase an individual's self-sufficiency through self-employment
- Job retention services for up to 90 days following employment
- Other employment, education or training programs approved by the Secretary of Agriculture of the state.

Participants
There are two categories of SNAP Employment & Training (SNAP E&T) participants.

Mandatory SNAP E&T participants
Recipients who do not qualify for an exemption, and who are required by the state to participate in a SNAP E&T program as a condition of receiving SNAP benefits. These are Able Bodied Adults without Dependents (ABAWDs). There is no federal requirement that any SNAP
participant be made a mandatory SNAP 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 participation requirements, including loss of SNAP eligibility. Minnesota currently operates a mandatory program.

**Voluntary SNAP E&T participants**
Recipients who qualify for a federal or state exemption, and choose to participate in a SNAP 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, allowing states to focus investment 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 states and local providers.

**Funding**
States can receive three types of federal funding (Minnesota leverage the 100 percent and 50-50 funds to fund SNAP E&T).

**SNAP E&T Program Grants (100 Percent Funds)**
Annually, states are allocated a program grant — a set dollar amount — to fund SNAP E&T programs. Referred to as 100 Percent Funds, this grant must be used to pay for SNAP E&T programs, including the planning, implementation and operation of the programs. Costs covered by this grant include administrative expenses and case management. 100 Percent Funds can also be used to provide direct services, including operating training programs. SNAP E&T Program Grants are capped at $90 million per year. If states do not spend the entirety of their funds, Food and Nutrition Services may reallocate these funds to other states requesting additional funds.

**Pledge State (ABAWD) Funds**
Pledge State Funds 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. Funds are capped at $20 million per year, and are allocated to state on a formula that takes into account the relative share of ABAWDs in one state compared to all other pledged states.

**Fifty Percent Reimbursement Funds (50-50 Funds)**
The federal government will provide reimbursements to states of up to 50 percent of actual expenses for Administrative costs that exceed the state’s 100 percent funds; and participant expenses directly related to the participation in the program, such as dependent care costs, transportation, safety equipment, supplies and books. This funding is commonly referred to as 50-50 Funds.
Annual funding for 50-50 Funds is not capped, but states may set their own participant reimbursement caps. States may partners with third-party organizations to offer SNAP E&T services and supports, and may use 100 percent administrative funds, or 50 percent reimbursement funds to cover these costs. Minnesota does not use this federal funding type.

**Service providers**

A variety of local organizations — community colleges, community based organizations and Workforce Innovation and Opportunity Act centers — may deliver SNAP E&T funded services. Food and Nutrition Services has provided guidance regarding the appropriate use of SNAP E&T funds to support education costs, including:

- The education component must be describes in the state’s SNAP E&T plan of operations, and reviewed and approved by Food and Nutrition Services
- A participant — whether mandatory or voluntary — must be assigned to, or placed in, the approved education component by the state as part of the participant’s overall individual SNAP E&T plan
- Federal funds — whether a SNAP E&T Program Grant or Fifty Percent Reimbursement Funds — made available to operate an education component must not be used to supplant nonfederal funds being used for existing services and activities
- A recipient who is an eligible student already attending an institution — without benefit of SNAP E&T participation — is exempt from SNAP work requirements, including Employment and Training participation. Students may volunteer to participant in another Employment and Training activity, but because their current education costs are already being met, it is inappropriate to use funds to cover these expenses.

SNAP E&T cannot be charged for services at a higher costs 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 by non-SNAP E&T students, offered at cost and are outlined in the state SNAP E&T plan.

**Relationship to other programs**

Recipients may participate in non-SNAP E&T programs. The law requires that SNAP E&T services be available through the state workforce development system, however, the Workface Innovation and Opportunity Act does not list SNAP E&T as a mandatory partner in the one-stop system, only as an optional partner.

There is no requirement that SNAP E&T be represented on state and local workface investment boards, or required to provide financial support to the one-stop infrastructure to 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 Temporary Assistance to Needy Families benefits. Providers are expected to explore other sources of education funding, including federal Pell Grants, before using program funds for tuition expanses.
Able-bodied adults without dependents

Under the 1996 Personal Responsivity and Work Opportunity Reconciliation Act, congress established additional work registration requirements and time limits for individual identified as Able-Bodied Adults without Dependents (ABAWDs)—participants between 18 and 49 years old, not receiving SNAP benefits for more than three months in a 36 month period, unless they do one of the following:

- Work at least 20 hours per week
- Participate in a qualified work program for 20 hours per week
- Engage in any combination of work and participation in a work program for 20 hours per week
- Participate in a workface program.

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.

Reporting outcomes of SNAP E&T programs

States are required to track key earning and employment outcomes for SNAP E&T participants to help identify effective training programs and those in need of improvement. In March 2016, the USDA required states to report on earning and employment outcomes for participants in the SNAP E&T program, beginning with fiscal year 2017 activities. In order to foster and streamline partnerships across federal training programs, reporting requirements are closely aligned with Workforce Innovation and Opportunity Act measures, which govern the nation’s federal training programs.

Collaboration to build job-driven SNAP E&T

In March 2016, the Departments of Agriculture and Labor issued a joint letter encouraging collaboration at the regional and local levels to identify ways to provide effective job-driven education and training opportunities to SNAP participants, particularly ABAWDs, through the workforce system, and connect participants to employment and training opportunities through American Job Centers.

SNAP to Skills

A top priority includes working with states to build SNAP E&T programs that can provide SNAP recipients the skills and experienced needed to find better jobs and reduce their need for assistance. In late 2015, the federal government introduced SNAP to Skills (S2S), a technical assistance project operated in partnership with Seattle Jobs Initiative, providing states with tools and resources needed to develop job-driven SNAP E&T programs that help participants find work and move toward self-sufficiency.

Minnesota was chosen as one of 10 states under the SNAP to Skills (S2S) project, working directly with Seattle Jobs Initiative to jumpstart efforts to build a robust and effective SNAP Employment and Training (SNAP E&T) program, providing a combination of hands-on technical assistance and tools, resources and networking opportunities.
Opportunities for SNAP E&T under SNAP to Skills

SNAP E&T is an essential part of Minnesota’s education and training toolbox, filling the gap left by many traditional workforce programs. Employment and Training programs reach a population of workers with low skills who often aren’t well served by other development programs, helping them gain the middle-skills employers are currently seeking. As participants gain skills, they can move into stable, gainful employment that pays a family support wage and reduce their dependence on public assistance.

SNAP to Skills (S2S) works with Minnesota to identify areas of growth in SNAP E&T programs, including expansion with federal support, which will match funding on a 50-50 basis. With S2S, Minnesota can help more participants work toward economic self-sufficiency. In collaboration with Food and Nutrition Services, S2S will support, guide and empower Minnesota to build a better, stronger employment and training program.