



SNAP E&T

Opportunities for Alignment with WIOA

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OVERVIEW

Administered by the U.S. Department of Agriculture (USDA) Food and Nutrition Services (FNS), Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T) is a federal program that supports employment and training activities and related supportive services to help SNAP participants advance to self-sufficiency. While federal law requires each State to operate a SNAP E&T program, historically most States have not fully realized the program's potential, with many States returning unspent SNAP E&T program grant funds back to FNS on an annual basis. Yet in recent years, some States have begun to realize the enormous potential of SNAP E&T. SNAP E&T offers States broad flexibility to design programs that focus on a high-barrier population often not well-served by other public workforce programs, on job-driven strategies to build participants' skills to meet labor market demand, and on combining training with wrap around supports to increase participants' chances of success. Moreover, SNAP E&T's funding model can facilitate rapid expansion of resources and services through State-provider (third-party) partnerships, while at the same time spurring new collaborations between government, community colleges, community-based organizations and philanthropy supporting workforce development.

SNAP E&T has historically operated on the periphery of principal workforce development strategies and programs for a variety of reasons, including a lack of understanding of the program and its potential both on the part of States' human/social services agencies that typically administer SNAP E&T as well as labor/workforce agencies. With the passage the Workforce Investment Opportunity Act (WIOA) in July of 2014ⁱ, however, the opportunity arose for this to change. WIOA, administered by the U.S. Department of Labor (DOL) and the driving legislation of the public workforce system in the U.S., required States to develop comprehensive plans for their workforce systems that, among other things, strategically align various workforce development programs while placing an increased emphasis on serving vulnerable populations. SNAP E&T is one of the programs that States could include in these plans, integrating or aligning it within their workforce systems. Alignment of WIOA and SNAP E&T has also been encouraged by the White House, which, in its *Ready to Work* report, released at the same time as the passage of WIOA, cited the burgeoning partnership between DOL and USDA to identify opportunities to better align SNAP E&T with the broader public workforce system.ⁱⁱ

In 2015, as States commenced developing their workforce plans pursuant to WIOA, concern existed among many advocates of strong SNAP E&T programs about the impact of WIOA on SNAP E&T. While just a very few States, most notably Washington, had already capitalized on the unique, flexible program structure of SNAP E&T to develop robust programs, other States were only beginning to take steps to do the same. This effort was spurred by the passage of \$200 million in new funding for SNAP E&T pilot programs in ten Statesⁱⁱⁱ as well as an increased commitment of resources by FNS to build the program nationally. On the one hand, WIOA created an impetus for established and burgeoning SNAP E&T programs to partner with other public workforce system programs to create a more seamless set of employment and training services for low-skill individuals, while helping to transition SNAP E&T from a not-well-understood and disconnected program to an integral part of States' workforce systems. At the same time, especially where only limited SNAP E&T programs existed, WIOA might open the door for States, not understanding the true potential of SNAP E&T, to simply subsume the program into its regular workforce operations. In this case, SNAP E&T might be viewed as purely a funding source to support similar types of activities as the core programs supported by WIOA. The unique potential of SNAP E&T to serve individuals with high barriers, to focus on skill-building in combination with supportive services, and to build valuable collaborations and partnerships, might be thus inhibited.

In late 2015, Seattle Jobs Initiative (SJI) set about work to gain a better understanding of whether and how States were thinking about working toward the alignment of SNAP E&T and WIOA as they developed their State plans. The first component of this effort was identifying and providing SNAP E&T program development technical assistance to a State uniquely positioned to develop a robust, flexibly-designed SNAP E&T program that would also be successfully integrated into its WIOA-supported public workforce system. This could provide a model for other States to emulate. Tennessee was the State that was selected, as its SNAP E&T program was already administered by its Department of Labor and Workforce Development, which had demonstrated a commitment to growing a strong SNAP E&T program focused on skill-building for its most vulnerable residents through collaboration with college and community-based partners. The approach of Tennessee is one focus of this brief. In addition, the brief examines the extent to which other States have worked to align SNAP E&T within their State workforce plans under WIOA, looking at several examples. Finally, the brief discusses the policies relevant to the alignment of WIOA and SNAP E&T as well as opportunities for integrating these programs in a way that is beneficial to the expansion of job-driven SNAP E&T programs.

SNAP E&T AND ITS GROWING ROLE AS A WORKFORCE DEVELOPMENT STRATEGY

SNAP E&T is a program administered by the USDA/FNS to support job-driven employment and training activities for SNAP participants to help them augment their skills and careers to attain self-sufficiency. States are mandated under federal law to operate SNAP E&T programs, but they are given flexibility on the scale of their programs as well as on what employment and training activities they will offer. These activities include: job search and job search training; workfare; work experience, including apprenticeships; educational programs designed to improve basic skills and literacy connected to employment; vocational training, career/technical programs and postsecondary education; job retention services for up to 90 days post-employment; and supportive services that directly help participants succeed in employment and training components. States can choose to operate mandatory programs that require certain SNAP recipients to participate in SNAP E&T in order to receive benefits, or all-voluntary programs that permit SNAP recipients choose whether or not to participate in SNAP E&T.

In nearly all States, SNAP E&T has historically existed on the periphery of broader workforce development strategies. One key reason is that it is a USDA/FNS-funded program that is typically operated by States' human/social services agencies (those responsible for States' SNAP programs). SNAP E&T has thus operated outside of traditional federal workforce funding streams and the State structures that administer these funds. In addition, SNAP E&T has been a relatively small program in most States. SNAP E&T provides formula-based grants to all States ("100 percent funds") to administer their programs and provide program services. In Fiscal Year 2016 these grants totaled just \$90 million, and many States have regularly under-spent these allocations, annually returning funds to FNS.

Robust SNAP E&T programs require States to expand the use of the program's fifty percent reimbursement grants ("50-50 funds"), which reimburse 50 cents per dollar to States for SNAP E&T program costs exceeding those covered by program grants. Importantly, costs eligible for reimbursement do not need to be expended directly by the State, but can be non-federal funds expended by "third-party" partners – such as community colleges and community-based organizations – contracted by the State to provide SNAP E&T services. One example of this SNAP E&T model is Washington State's Basic Food Employment & Training (BFET) program, now a program with an annual budget exceeding \$30 million, involving all 34 community colleges and more than 60 community-based organization partners, and serving tens of thousands of participants each year.^{iv} Yet, most States are only just beginning to realize SNAP E&T's potential to provide skill-building opportunities for SNAP participants utilizing 50-50 funds and a third-party partnership model, thus far limiting the growth of SNAP E&T in most parts of the U.S.

The potential of SNAP E&T as an integral part of States' overall workforce strategies is considerable. Critically, SNAP E&T focuses on serving a population that has traditionally not been well-served by other federal workforce programs: low-income individuals with significant barriers to success. Many SNAP participants need much more education and training to succeed in advancing to middle-skill jobs compared to other jobseekers. A recent study, for example, found that only 20 percent of SNAP households included someone with education beyond high school.^v Despite the need for more skills, it can be difficult for SNAP participants to access and complete postsecondary education and training programs. The obstacles they face may include a lack of knowledge about training program options, lack of child care or transportation, and low basic skills (literacy/numeracy).^{vi}

Among federal workforce programs, SNAP E&T is fairly unique in the flexibility it provides States to design programs that combine employment and training, education and supportive services focused on serving low-income, high-barrier adults. This can be seen, for example, when comparing SNAP E&T to WIOA (and its predecessor, WIA) and Temporary Assistance for Needy Families (TANF). As stated in earlier research by National Skills Coalition and SJI,

WIOA [WIA] mostly supports workforce development activities. In Program Year 2014, only 7 percent of WIA Adult exiters received supportive services and only 20 percent of WIA Adult exiters who received intensive or training services also received supportive services. While TANF targets services to low-income families, a very small portion of TANF funds are invested in skill-building activities. Only 6.8 percent of federal and state TANF spending in FY 2014 was on work-related activities, and only a portion of work-related activities were related to education and training.^{vii}

In addition to supporting a flexible and robust set of employment and training and supportive services, SNAP E&T is unique because the 50-50 third-party partnership model it supports spurs collaboration between State and local governments, philanthropy, college and adult education systems, and community-based organizations as they co-invest with FNS in a broad array of skill-building activities. Through use of third-party partnerships, not only are new, shared investments being made in needed services, but States are able to leverage a variety of existing, effective employment and training programs and supportive services rather than seeking to create their own programs from scratch.

The potential of SNAP E&T to become an integral part of the public workforce system is now well-recognized by the relevant federal agencies. USDA/ FNS has plans to continue to expand the role of SNAP E&T within the portfolio of federal workforce programs. USDA's Undersecretary for Food, Nutrition and Consumer Services recently issued an official communication to State SNAP agencies urging them to make their SNAP E&T programs job-driven.^{viii} Further, FNS has bolstered the agency's expertise in workforce development by staffing up its own Office of Employment and Training (OET). Additionally, FNS launched the *SNAP to Skills Project* in the fall of 2015 to provide States tools, resources and direct technical assistance to expand job-driven SNAP E&T programs.^{ix} These actions by FNS demonstrate its commitment to ensuring that SNAP E&T continues transitioning from a peripheral part of the SNAP program to a robust program that meets a high standard in terms of integrating workforce development best practices and standards.



WIOA AND THE OPPORTUNITY FOR ALIGNMENT OF SNAP E&T

The passage of WIOA provided an opportunity for SNAP E&T to align or integrate with other federal workforce development programs to create a more seamless set of services for individuals seeking employment and training support, while bringing SNAP E&T more into the mainstream of the public workforce development system. WIOA was passed into law in July of 2014, superseding the Workforce Investment Act (WIA) of 1998, and representing the first legislative reform of the public workforce system in 15 years.^x Taking effect on July 1, 2015, WIOA is designed to strengthen the nation's workforce system through a variety of key reforms, including: 1) requiring States to strategically align workforce development programs; 2) promoting accountability and transparency within the workforce system, including through reporting on common performance indicators; 3) fostering regional collaboration between workforce and economic development strategies; 4) improving the American Job Center (AJC) system; 5) improving services to employers and promoting work-based training; 6) providing access to high-quality training leading to industry-recognized credentials; and 7) enhancing services to jobseekers, with an increased emphasis on providing services to vulnerable populations.^{xi}

Particularly relevant to SNAP E&T and SNAP participants are WIOA's reforms to require strategic alignment of workforce programs, and to emphasize services to vulnerable populations. With regard to the latter, WIA had long generated concerns that it was structured to place greater focus on serving individuals "nearest the goal line", or those with a more limited need for skills development, greater readiness for employment and fewer barriers to success. WIA required funds to be prioritized for vulnerable populations only when such funds were limited, and left the determination of prioritization to local workforce boards.^{xii} Moreover, measurement of performance under WIA did not take into account the extent to which hard-to-serve populations were being served by States or their AJCs, which could incentivize them to serve fewer of these individuals.

Recognizing this, WIOA made specific changes to increase access to the workforce system for low-income individuals with limited skills and work experience as well as other barriers. WIOA's mandate to serve vulnerable populations included a priority of service requirement for these individuals – specifically including those receiving public assistance, such as SNAP – regardless of available funding. Further, WIOA requires that AJCs report on the number of individuals they are serving who have barriers to employment.^{xiii} WIOA also will set local and State performance targets utilizing a statistical measure that adjusts for participant characteristics so that States and AJCs will not be penalized for serving those with greater barriers to success. In addition to these measures, WIOA requires State and local workforce plans (including State Unified or Combined Plans, described below), to account for the specific needs of individuals with barriers and describe how access to services for these individuals will be expanded.^{xiv}

Importantly, the passage of WIOA coincided with the White House's release of its *Ready to Work* report, previously cited. The report, as mentioned, called for all federal training programs to be more job-driven – that is, responsive to employer demand so that they place ready-to-work participants in good, available jobs or provide skills training and credentials participants require to obtain these jobs. The report further pointed to the joint responsibility of federal and State governments to better integrate the funds from different federal programs to align job training systems and achieve a unified set of workforce development goals. It stated that federal agencies “are working at an unprecedented level to align resources, activities and strategies to bust silos and develop a job-driven workforce system across federal programs.”^{xv} And that this work included partnership between the Departments of Labor and Agriculture to “identify promising collaborations between the Supplemental Nutrition Assistance Program (SNAP) Employment & Training program and the broader workforce system that can be disseminated widely.”^{xvi}

WIOA's requirement that States work to align federal workforce development programs provided an early opportunity to carry out the mandate of the *Ready to Work* report. Pursuant to WIOA's goal to “ensure that employment and training services provided by [its] core programs are coordinated and complementary,” the legislation required all States to develop and submit to the Department of Labor a “four-year strategy – in the form of a single ‘Unified’ strategic plan for WIOA's core programs – for preparing an educated and skilled workforce and meeting the workforce needs of employers.”^{xvii} Unified Plans would include operational plans for what are known as the six “core programs” under WIOA: the Adult Program, the Dislocated Worker Program and the Youth Program (Title I); the Adult Education and Family Literacy Act Program (Title II), the Wagner-Peyser Act Program (Wagner-Peyser Act, as amended by Title III), and the Vocational Rehabilitation Program (Title I of the Rehabilitation Act of 1973, as amended by Title IV). In addition, WIOA allowed States to submit a “Combined” strategic plan that also included “other key partners in their plans such as Temporary Assistance for Needy Families (TANF) and Perkins career and technical education programs” along with SNAP E&T.^{xviii} These Combined or Unified Plans were due to the Department of Labor in April 2016.

For those States opting to include SNAP E&T in a Combined Plan, detailed guidance was provided by FNS in a memorandum issued March 14, 2016 and directed to Regional SNAP Directors.^{xix} The memorandum first urged Regional SNAP directors to use the opportunity of WIOA planning to “advocate for the unique needs of SNAP clients in their State's workforce development system.”^{xx} States including SNAP E&T in their Combined State Plans were not required to submit separate plans to FNS; rather, they were asked to submit the same information about their SNAP E&T programs for the Combined Plans [pursuant to the Information Collection Request (ICR) *Workforce Innovation and Opportunity Act (WIOA) Unified and Combined State Plan Requirements*, published under Office of Management and Budget (OMB) control number 1205-0522] as for their annual SNAP E&T Plans submitted to FNS [under 7 C.F.R. SS273.7(c)(i) through 273.7(d)(vi) and SS273.7(m)].^{xxi}

One of the challenges of including SNAP E&T within a Combined Plan (as noted by FNS in its March 14, 2016 memorandum) is the incongruous time periods covered by a State's regular SNAP E&T Plan due annually to FNS and covering a single federal fiscal year (FFY), and the four-year period covered by WIOA Combined Plans. Pursuant to WIOA, inclusion of SNAP E&T would require a State to provide SNAP E&T program information for each of the four years covered by the Combined Plan.^{xxii} This meant that States would have to forecast and provide fairly detailed information on annual SNAP E&T program activities and associated operating budgets for FFY 2017 through FFY 2020, utilizing FY 2016 as a basis. States were required to complete comprehensive tables showing categories of program components, a description of each component, and for each component the geographic area served, target population, monthly participation numbers, costs, and provider services. Operating budgets for each FFY needed to include direct, indirect and participant costs, a description of each of these, costs per year, and the amount of 100 percent and 50-50 funds to be utilized.

The incongruity of SNAP E&T and WIOA Combined Plan time periods is also of consequence because FNS receives funding for SNAP E&T to allocate to States on an annual basis. Thus, although FNS was responsible for approving the SNAP E&T element within Combined Plans for the four-year period, the approval had to be given contingent on the availability of funds each year. FNS stated in the March 13 memorandum that once FFY 2017 allocation information was available, impacted States would be required to submit modifications to the SNAP E&T portion of their Combined Plan or order to access the full allocation amount.^{xxiii} Presumably, similar modifications will be required in future years.

Note that while Unified Plans were not required to provide information on SNAP E&T, both Unified and Combined Plan types had to include an overall strategic plan for States' workforce systems, and plans could include reference to SNAP E&T's role in these systems. Some States did, in fact, include brief mention of their SNAP E&T programs within their Unified Plan in terms of the general role the program would play as part of their overall workforce strategies. Some examples are provided in a later section of this brief.

While guidance from DOL and USDA/FNS on crafting Combined Plans did offer some technical guidance on inclusion of SNAP E&T, in practical terms, what form alignment or integration of these programs will take "on the ground" is clearly the purview of the States and local workforce boards. The logical nexus for SNAP E&T alignment with WIOA is to make SNAP E&T a partner in the WIOA AJC one-stop delivery system. In a few States, the one-stop system has already been responsible for administering SNAP E&T, but has not been utilizing SNAP E&T to its full potential, rather more as a funding source to support SNAP participants to receive the regular set of WIOA-funded core program services. Under WIOA, local workforce boards are charged with developing local (or regional) plans, choosing one-stop operators and training providers, and coordinating activities of their area education and training providers, among other key functions. Local plans and operational practices may ultimately determine the extent to which SNAP E&T and WIOA are aligned.

A partnership between SNAP E&T and AJCs has been encouraged recently by the federal government. A joint USDA/DOL letter issued to SNAP Commissioners/Directors, State Workforce Administrators, WIOA Liaisons, Workforce Development Boards and American Job Centers, in March 31, 2016 informed these entities that USDA and DOL “are partnering to encourage State Supplemental Nutrition Assistance Program (SNAP) agencies and State and local workforce agencies to work together to develop shared strategies that will better connect employment and training opportunities through the American Job Centers (AJCs).”^{xxiv} USDA and DOL were responding to a serious concern in many States about losing their waivers for Able Bodied Adults without Dependents (ABAWDs), who would now be required to work or engage in employment and job training activities for at least 80 hours per month to maintain their food assistance benefits. The letter encouraged regional and local collaboration so that AJCs, as well as SNAP E&T, might help them meet this requirement while securing job-driven education and training opportunities to advance to self-sufficiency.

Finally, the WIOA strategic planning process, itself, offered an opportunity for “SNAP E&T representatives, including program administrators and provider organizations [to] engage in the planning process to help identify opportunities for collaboration between SNAP E&T, the AJC one-stop delivery system, and education and training providers.”^{xxv} In fact, as will be discussed, this is one tangible outcome of the WIOA State planning process in terms of building SNAP E&T and WIOA alignment.



SNAP E&T AND WIOA ALIGNMENT: STATE RESPONSES

A. Overview

Among all States submitting their WIOA State Workforce Plans to DOL this past April, just ten (10) States submitted Combined Plans that included SNAP E&T as one of the non-core partner programs. These States are: Alabama, Arkansas, Louisiana, Massachusetts, Minnesota, Missouri, Pennsylvania, Tennessee, Washington and Virginia. A few other States submitting Unified Plans did reference SNAP E&T in their strategic plan overviews as a part of their overall workforce strategies during the four-year period.

None of the ten Combined Plans nor the Unified Plans referencing SNAP E&T that were reviewed for this research give much evidence of exactly how the program will be aligned or integrated within States' broader workforce systems or specifically with the six core WIOA programs. Most States reference SNAP E&T in their strategic plan narratives as one part of their efforts to provide employment and training services to low-income and vulnerable populations and then (in the case of the Combined Plans), as required, insert information about their SNAP E&T program activities and budgets for the four-year period covered by the plans. It thus appears that in reality, the extent to which SNAP E&T will be aligned will happen at the implementation or operational level, such as within the AJCs, in a manner as yet to be determined.

In general, some States (including Connecticut, which submitted a plan that does not reference SNAP E&T at all) reported that simply the process of developing their State plans was valuable in and of itself in bringing SNAP E&T, and other programs such as TANF, to the workforce table in a significant way for the first time. Connecticut reported that it was able to utilize this opportunity to introduce SNAP E&T to many workforce stakeholders who had not been aware of the program or its potential, along with generally representing the interests of the SNAP population to secure employment and training through the one-stop system and core WIOA programs.

It seems the case, then, that passage of WIOA and the ability of States to submit Combined Plans did not serve to codify any significant changes, either positive or negative, in State's SNAP E&T programs. Any changes are likely to happen moving forward as States and localities work to operationalize their State Plans and continue the dialogues that may have been spurred between different agencies by the planning process. The State of Tennessee, described in the following case study, offers a glimpse at what burgeoning alignment of SNAP E&T and WIOA may look like at a strategic and operational level.

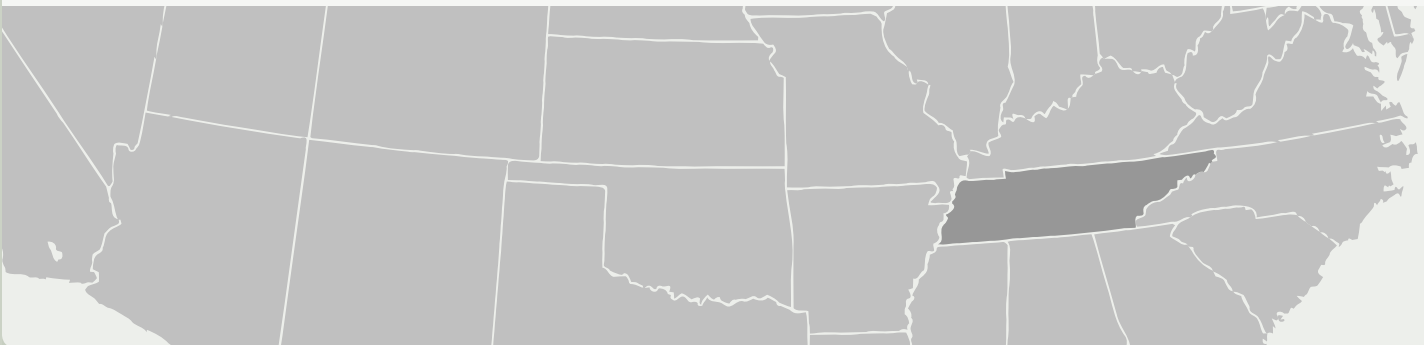
CASE STUDY: TENNESSEE

A. SNAP E&T Development in Tennessee

The State of Tennessee, led by the Tennessee Department of Labor and Workforce Development (TDLWD) Division of Workforce Services, in cooperation with the Tennessee Department of Human Services (TDHS), made a commitment in the fall of 2015 to begin working with SJI to expand and enhance its SNAP E&T program as a way to improve employment and training services and outcomes for low-income residents of the State.

Tennessee was selected to receive technical assistance from SJI as part of this project because the existing integration of the State's SNAP E&T program within its workforce system presented an opportunity to create a model for other States, in developing and implementing WIOA Plans, of an expansive and aligned SNAP E&T program. In Tennessee, TDLWD is the direct grantee of SNAP E&T funds. Although TDLWD is the administrative entity for SNAP E&T, the program has been operated as a partnership between TDLWD and TDHS. TDHS makes the eligibility determination for SNAP benefits and refers participants to TDLWD for SNAP E&T services through an automated interface. Communication is maintained throughout each individual's participation in SNAP E&T to ensure his or her status is accurately tracked by both departments.

TDLWD has a number of divisions and programs that provide a vast array of services that combine to support jobs and workforce development in Tennessee. The Workforce Services Division is responsible for delivering the Department's employment and educational services to employers and job seekers in local AJCs, partner agencies, and online. SNAP E&T, while limited in scope, had been fully integrated within that structure, offering training and educational opportunities to SNAP E&T participants in 13 of 95 counties utilizing exclusively SNAP E&T program grants (100 percent funds). SNAP E&T activities supported were primarily the typical services offered at the AJCs and by the adult education system, with limited focus on skills training and supportive services.



When the project with SJI commenced, Tennessee did not have in place a SNAP E&T 50-50 reimbursement program utilizing third-party partners that would allow for significant program expansion and diversification. Yet the opportunity was clear for this to be developed. The AJC workforce services structure allowed for the potential leverage of non-federal funds of partner programs/agencies to create these 50-50 partnerships to expand services and move more SNAP E&T participants to self-sufficiency. Other employment and training providers – including community colleges and community-based organizations – were interested in becoming SNAP E&T partners with the State. And other key initiatives in Tennessee were investing significant resources for employment and training that could potentially be reimbursed via SNAP E&T 50-50 funding. These include the *Drive to 55* Initiative’s College Reconnect program, which provides funds for adults to attend college, and the *Tennessee Promise* Initiative, which provides funds for youth coming out of high school to attend college.

Work began in the fall of 2015 in Tennessee to move the State’s SNAP E&T program forward to an expanded, job-driven third-party partnership model. A TDLWD-led SNAP E&T planning group was formed to work on developing and executing a SNAP E&T Business and Implementation Plan, calling for the piloting of a SNAP E&T third-party partnership model in three counties (Know, Shelby and Davidson) with an eventual target of 42 counties. A vision statement was established for the program: “Working together to navigate a path toward success for all Tennesseans.” Several initiatives were identified in the Plan to support the SNAP E&T pilot effort designed to increase the number of participants employed as well as job retention and wage progression, including: establishing partnerships with at least three colleges and three community-based organizations in the target counties; potentially partnering with the Tennessee Board of Regents (TBR) to build SNAP E&T within the State’s community colleges and Tennessee Colleges of Applied Technology (TCATs); placing a focus on providing adult education, vocational education, case management, and career development in the pilot area for approximately 48,000 ABAWDs and 43,000 other work registrants; and exploring resources and opportunities for further program expansion beyond the initial pilot counties.

TDLWD established and has been working toward achieving a set of key milestones for its SNAP E&T pilot development including: (1) signing a Memorandum of Understanding (MOU) with TDHS to cover the eligibility verification process for TDLWD staff and SNAP E&T contractors; (2) amending Tennessee’s SNAP E&T state plan; (3) developing initiatives and programs with community-based agencies, TCATs, and community colleges that can be funded through SNAP E&T 50-50 reimbursement dollars; (4) developing contracts with employment and training service providers; (5) developing needed policies and processes such as for contracting, billing, payment, and reporting; (6) developing a child care eligibility model for SNAP E&T participants; (7) establishing a “reverse referral” process between TDLWD and TDHS; and (8) establishing processes for monitoring contracts and evaluating the pilot project.

TDLWD has set about the process of identifying potential providers for SNAP E&T services in the three targeted counties. By running a potential partner assessment process, TDLWD has established third-party partnerships with several providers, including Goodwill of Mid-Tennessee, Advance Memphis, Goodwill East Tennessee, TCAT Knoxville, Southwest Community College (Shelby County), and TCAT Nashville. Matching funds will be pledged by the community-based agencies or TCATs specifically for SNAP E&T participants. Sources of matching funds include State and local government, private foundations, and the participating agencies themselves.

B. SNAP E&T Development in Tennessee

Initial planning for SNAP E&T program expansion in Tennessee coincided with the completion of the State's Combined Plan pursuant to WIOA.^{xxvi} Both efforts were led by TDLWD. This was fortuitous because TDLWD brought its commitment to developing an expansive, aligned and job-driven SNAP E&T program into its WIOA planning efforts.

TDLWD was determined to ensure that its Combined Plan language was at a high level in terms of its discussion of SNAP E&T so that it would not interfere with the development of SNAP E&T or its annual SNAP E&T Plan. The thinking was more about how to better coordinate services on the ground, not just with SNAP E&T, but TANF (Families First, also in the Combined Plan), rather than capturing these details in the Plan itself. Essentially, the planning process reflected how these programs – WIOA, TANF and SNAP E&T – can work in coordination to better serve low-income individuals in the State. For example, TDLWD envisioned a system whereby TANF participants who can benefit from one-stop services can be smoothly referred to AJCs for services, or where SNAP E&T can be utilized to create a TANF diversion strategy or help participants transition from TANF to SNAP E&T. SNAP E&T would be required to be part of the certification process for AJCs in the State, through which the Governor periodically reviews each AJC to ensure it is carrying out activities required to meet local performance measures and that locally appointed boards can thus continue as constituted. This will place increased pressure on the AJCs to be on board with providing SNAP E&T services (as opposed to the previous system where AJCs could opt-in to providing SNAP E&T).

As SJI worked with TDLWD on SNAP E&T development, it became clear that the agency's senior leadership, including its Commissioner, were committed to SNAP E&T alignment with WIOA. Agency leadership as well as most of the Directors of the State's 13 Labor and Workforce Development Areas (LWDAs) attended all three days of SNAP E&T technical assistance sessions involving SJI in January 2016 as the State honed its Combined Plan. TDLWD leadership

made it clear that they were committed to providing critical services to the SNAP population through the AJCs and would not be held back by concerns about potential impact on WIOA performance data. Leadership shared the need to change the current employment model to get underemployed people re-connected, and specifically to get SNAP recipients recognized as a potential workforce for employers. With multiple employers moving to or expanding within Tennessee, TDLWD stressed to the LWDA directors that SNAP E&T must be part of the solution to meet their needs for skilled workforce.

Within Tennessee's Combined Plan, SNAP E&T remains characterized as a partnership of TDLWD and TDHS, with the latter making eligibility determinations for SNAP benefits and referring participants to the TDLWD Workforce Services Division through an automated interface. The Division is then responsible for delivering employment and educational services within the AJCs and partner agencies. As a result of WIOA legislation that requires recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient to be given priority of service for adult career and training services, Tennessee's SNAP participants are now a priority for all programs offered under WIOA youth and adult/dislocated workers. A majority of participants will be referred to WIOA for training through core programs or SNAP E&T.

C. On the Ground: SNAP E&T Integration in Tennessee's American Job Centers

Where SNAP E&T and WIOA are visibly starting to come together in Tennessee is within the AJCs. TDLWD is still in the process of working through the respective duties of its office and TDHS in serving participants in the one-stop system as well as how individuals are referred between agencies. To help the transition, TDLWD has moved dedicated SNAP E&T direct service staff (Career Specialists) to multiple one-stops and in the 13 LWDA's. They have the following role in delivering SNAP E&T services:

- Provide intensive case management for all SNAP E&T participants
- Process referrals from TDHS and sends Invitation/Appointment letters to participants
- Authorize participant reimbursements
- Enter and track all participants in the State's new data management system (VOS)
- Create Individual Employment Plans in VOS with all participants
- Complete monthly follow-up to address all barriers until completion of the program
- Assist participants in the selection of their most suitable component
- Travel to surrounding counties within the LWDA to address needs of participants
- Provide detailed program overview, Soft Skills Training, and Orientation presentations

With a customer-centered approach at its core, TDLWD's goal is to ensure programs and funding sources, including SNAP E&T and WIOA funds, are integrated seamlessly for individuals. TDLWD staff has put in significant time informing AJC staff about SNAP E&T through conferences and workshops involving both SNAP E&T and WIOA staff together, also helping them to start viewing themselves as teams.

Instead of referrals back and forth between SNAP E&T and WIOA, TDLWD is moving toward braiding funds for individuals on SNAP. Individuals enrolled in SNAP E&T may be referred, where appropriate, to AJC services, including Adult Education, WIOA Youth and WIOA Adult and Dislocated Worker programs, as well as Self-Initiated Work Experience/Individual Employment Search. SNAP E&T is braided with WIOA funding to help cover the full costs of SNAP E&T participants' tuition for skills training programs (WIOA Youth and WIOA Adult and Dislocated Workers), focused on short-term programs within in-demand fields. Without SNAP E&T, participants in WIOA alone can run short of tuition funds required for these training programs.

On the ground, the participant enrollment and referral process TDLWD is seeking to create is straightforward. When a customer enters an AJC, they receive an orientation from a staff member who is well-versed in both SNAP E&T and WIOA programs, as well as adult education programs for those without a GED or high school diploma, and the training partner program offerings associated with each. After this orientation, an assessment is completed, exploring the customer's current level of educational attainment and skills, training and career goals. Individuals looking for work experience or training are typically referred to WIOA, with SNAP E&T able, as mentioned, to supplement training costs for those on SNAP as well as cover supportive services.

Although Tennessee has just recently added third-party partners to its SNAP E&T program, it anticipates that this process will not change much. The community-based organizations selected as SNAP E&T third-party partners already have relationships with local area AJCs. The difference will involve funding, as these partners will now be able to access reimbursement through SNAP E&T. Third-party partners will not only receive referrals through TDHS and the AJCs, but through a reverse referral model will be able to refer potential participants in their SNAP E&T programs to TDHS. AJCs will need to become more familiar with third-party partners – who they are and what services they offer. The eligible training provider list developed for WIOA will simply add in those providers that also provide – or exclusively provide – SNAP E&T services.

Tennessee has also refined its MIS system for WIOA — Virtual One Stop (VOS), launched in 2014 — by developing a unique customized SNAP E&T module that will better integrate the two programs. Within the module, the eligibility agency creates a SNAP E&T account for each new participant. Assessment data and SNAP E&T activity components are entered for the participant in the module. Outcomes can be tracked through the MIS, as can activities of individuals applying for jobs and employers looking at job candidates. A “virtual recruiter” will send job postings to individuals that match their uploaded resumes. The system also cross-refers to individuals enrolled in WIOA and eventually to those enrolled in the adult education system. Third-party SNAP E&T contractors do not yet have the ability to enter data into the new system, but this is being planned.

Ultimately, TDLWD believes that alignment between WIOA and SNAP E&T — as well as TANF — means breaking down barriers of language, policies and procedures, so that agency leadership and frontline staff alike know that they are frequently serving the same customers, especially now with the new priority of service under WIOA to focus on vulnerable populations. TDLWD is communicating to partners that their work should not be about the funding source, but rather leveraging all of the services and funds available to create a customer-focused program design.

B. Case Studies: Examples from the States

In addition to learning through direct work with Tennessee, SJI reviewed other States' approaches to developing their WIOA Unified or Combined Plans, including those that make minimal reference to SNAP E&T. As mentioned, though they did not submit a Combined Plans, some States referenced SNAP E&T in their Unified Plans. For example, the State of California includes in its Unified Plan overview of the State's workforce development system a description of its SNAP E&T program (known as CalFresh E&T). It discusses the population served by CalFresh E&T as well as the strengths and weaknesses of the program.^{xxvii}

The State of Georgia makes several mentions of SNAP E&T in its Unified Plan, holding that the State will "leverage the services and coordination efforts of programs outside the Unified Plan including, but not limited to SNAP, TANF, TAA and other state programs providing employment-related services."^{xxviii} Georgia's plan goes on to discuss alignment of WIOA programs with TANF and SNAP E&T, stating that "TANF and SNAP will coordinate with other core partner agencies to provide support services to assist participants. This includes providing shared assessments, sharing case management systems, cross-training program staff, and implementing family-oriented policies."^{xxix} It also states that SNAP E&T will promote community connections and resources that address basic skills deficiencies and identify employment barriers, and enhance referral of SNAP customers eligible for WIOA services. Finally, the Georgia Plan maintains that State agencies will collaborate to reduce the number of residents relying on SNAP by creating a "long-term reemployment solution to assist this population in regaining meaningful employment."^{xxx}



Connecticut

The State of Connecticut provides an interesting example in which a Unified Plan was created with scant mention of SNAP E&T.^{xxxii} Conversations with the State's Department of Social Services (DSS) which operates Connecticut's SNAP and SNAP E&T program are instructive, however, in demonstrating how WIOA planning may have presented a first opportunity for future alignment. DSS reported that being invited to the State's stakeholder meetings (specifically service design subcommittee meetings) for WIOA plan development gave DSS a chance to advocate on behalf of services for SNAP participants under WIOA core programs in customer flow discussions, as well as for SNAP E&T expansion. DSS took the opportunity in some of these meetings to present a "SNAP E&T 101" and the historical demographics of SNAP (and TANF) populations in the State. Within the workforce board representation, DSS believes that many had little idea what SNAP E&T was. While DSS is unclear how these presentations were received, the agency hopes that they lead to a growing relationship with workforce system stakeholders and a system of meaningful referrals of SNAP participants (particularly those not qualified for SNAP E&T) to WIOA core programs and of individuals to SNAP E&T from the AJCs. DSS also hopes that it will be successful in developing future agreements with the State's five local workforce development boards – which are the hubs of regional workforce development work in the State – to ensure that those on public assistance, including SNAP, TANF and Medicaid, receive priority of service as envisioned in WIOA. DSS feels strongly that it will need to play a monitoring role to ensure these individuals are getting served by the AJCs. DSS states that Connecticut's workforce system currently can't identify SNAP clients, and a new MIS system is needed to counter this. The State Plan does not mention TANF or SNAP clients within the hard to serve constituents to be served, but simply mentions SNAP E&T and TANF as a suite of employment and training programs. There is no discussion about linkages with these programs.

Massachusetts

The Governor of Massachusetts established a Workforce Skills Cabinet to align the economic, workforce, and education systems in order to better address the skills gap in the State. The Cabinet is chaired by the Secretary of Labor and Workforce Development and comprised primarily of the Secretaries of Education, Housing and Economic Development. As part of this alignment, the State is moving towards a customer-centric approach where participants can be served by the program(s) that best suit them, including SNAP E&T.

SNAP E&T is a partner in Massachusetts' WIOA Combined Plan^{xxxii} and as such, the goal is for SNAP E&T to be integrated with other WIOA partner programs to:

- Design career pathways across partners so they align with business demand
- Improve foundational skills and transitions to postsecondary education and training for individuals with barriers to employment
- Assist low-income individuals and families to achieve economic self-sufficiency through support services, labor-market driven credentials, and employment
- Meet the needs of job seekers and businesses who engage in the public workforce system

The Combined Plan holds that this integration will happen through improved communications, staff crossing-training, and the ability to track participants across different programs. The agencies are working on common intake tools, and the Department of Career Services, which operates AJCs in the State, uses an information system that interfaces with the MIS for SNAP E&T.

Currently, Massachusetts' SNAP E&T program offers participants assessment, job search, job readiness training, education (such as HiSET, ESOL, and ABE), vocational training, and community service (for ABAWDs only). The program utilizes third-party partnerships, and is marketed to potential participants through reverse referrals unless individuals contact SNAP E&T staff directly. The Department of Transitional Assistance works with community colleges to expand access to post-secondary credentialing using SNAP E&T reimbursements, and plays an important role in the implementation of the State workforce strategy. The State also is working to improve and expand partnerships with community-based organizations as third-party SNAP E&T providers.

The Massachusetts Combined Plan describes the creation of career pathway "service flow charts" for specific populations and pathway mapping/customer-centered design for particular populations, including TANF and SNAP.^{xxxiii} It states that the AJCs will give priority of service to individuals with barriers to employment, including SNAP participants.^{xxxiv} The Plan describes professional development and cross-training for all partners in the workforce system, including SNAP partners, on online technology tools and the impact of work on wages and public benefits.^{xxxv} The Plan further notes that conversations have begun between the Department of Transitional Assistance and Executive Office of Community Colleges to find ways to utilize SNAP E&T to expand access to postsecondary credentials through recruitment and utilization of 50-50 reimbursements.^{xxxvi} Finally, the Plan states that "although TANF and SNAP funding is not subject to federal indicators, the state is working to ensure that assessments of how well programs impact TANF/SNAP-affiliated individuals are considered as part of the additional state-focused indicators."^{xxxvii}

Minnesota

Minnesota's WIOA Combined Plan focuses on two primary goals: 1) to reduce educational and employment disparities based on race or disability; and 2) to build employer-led industry-sector partnerships that focus on better understanding of the skills that employers need and connecting skilled workers to those opportunities.^{xxxviii} These goals are to be achieved through continued investment in career pathways, enhanced engagement with stakeholders, and better alignment between policy and systems.

Because the State's earliest efforts in career pathways programming targeted populations receiving public assistance, SNAP E&T is an important part of workforce development and is one of the WIOA partner programs in Minnesota. The Minnesota Department of Human Services (MDHS) is the lead agency for SNAP E&T. Within the Plan, the State's SNAP E&T program is integrated with workforce development programs through MDHS and the Department of Employment and Economic Development (DEED), through the latter's joint supervision of SNAP E&T in addition to the role DEED serves as the lead agency for WIOA Titles I, III and IV, and other Combined Plan partner programs. Both agencies use Workforce One to track services for more than 100,000 participants, and both are interested in braiding SNAP E&T funds with other sources of anti-poverty funding.

The Minnesota SNAP E&T Program currently offers assessment and employment planning, job search, job seeking skills, job club, education (such as HiSET and ESL), vocational training (including Career Pathways and Minnesota Job Skills Partnership bridge training), workfare, and job retention services, in addition to referring participants to other relevant agencies and programs for further assistance. The Program offers reimbursements for transportation and dependent care. Minnesota is currently working to significantly expand its SNAP E&T program through a third-party partnership model utilizing SNAP E&T 50-50 funds.

Washington State

Washington State has one of the most well-developed SNAP E&T programs in the nation, Basic Food Employment & Training (BFET). Since launching this first-of-its-kind third-party partnership SNAP E&T model in October 2005, BFET has grown into a program with an annual budget exceeding \$30 million, involving all 34 of the State's community colleges and more than 60 community-based organizations as provider partners, and serving tens of thousands of SNAP participants each year.^{xxxix} The all-voluntary BFET program now operates in 26 counties and includes a robust set of employment and training services offered through its wide network of provider partners, including a significant focus on skill-building, credential attainment and support services provided to improve participants' chances of success.

Washington presents an interesting case in how a large, successful and well-established SNAP E&T program might fare in the process of the State developing a Combined Plan pursuant to WIOA. Due to the size and strategic importance of both BFET and TANF, the State agency that manages both of these programs – the Department of Health and Social Services (DSHS) – was involved as a key stakeholder in Washington’s WIOA planning process, including serving on the Steering Committee, and was able to provide input specifically as to how best to serve low-income individuals on SNAP.



Washington’s Combined Plan^{xi} includes a vision in which all programs included within it work seamlessly to help residents, and disadvantaged individuals in particular, find and keep jobs that lead to economic self-sufficiency and close the skills gaps for employers in high-demand industry sectors. The State plans to fulfill its vision by prioritizing the move from a program-centric to a customer-centric service model, increasing business engagement, embracing the use of technology, and making adjustments to performance metrics that properly account for outcomes when participants can move into and across multiple programs at any given time.

While this vision indicates an opportunity for the alignment of BFET with other programs, DSHS reports that the short timeline for developing and submitting the Combined State Plan meant that there was little emphasis on actionable alignment or integration of the various employment and training programs included in the Plan, including BFET. With regard to BFET, DSHS essentially utilized its existing approved SNAP E&T State Plan, extrapolated the information out to the four-year period covered in the Combined State Plan, and added this information into the Combined State Plan.

Practically, DSHS reports that it does not currently have the intention to require BFET third-party providers to be integrated into the AJCs. BFET providers may certainly do so of their own accord, such as by providing E&T services to SNAP participants in conjunction with the AJCs. At the State level, DSHS is thinking about how better to integrate staff supporting TANF at the AJCs, who will also be well-versed in BFET and can appropriately refer individuals entering the AJCs to SNAP E&T providers. Overall, the goal at present for DSHS is to create more linkages between BFET and the State’s workforce system and greater awareness within the workforce system of BFET. DSHS expressed overall support within the planning process for this limited approach, with all parties agreeing to continue to look for future opportunities for greater alignment. DSHS is currently placing greater emphasis on better integration between TANF and BFET than between these programs and WIOA.

Virginia

The State of Virginia submitted a Combined Plan that includes SNAP E&T.^{xii} According to the Plan, SNAP recipients made up almost 11 percent of the population who faced barriers to employment in Virginia as of 2014, and some of these recipients participate in SNAP E&T, which offers job search, job search training, education, vocational training, and work experience activities.^{xiii}

Although SNAP E&T is a partner under the Combined State Plan, the program is not yet fully coordinated with other workforce programs. To enhance coordination across different programs, the Governor has appointed a Chief Workforce Development Advisor who is charged with putting together a workforce development strategic plan that takes into account the State's economic development policy, and coordinates Virginia's workforce development activities. In moving towards an integrated workforce strategy under WIOA, the State is working to make sure participants have access to all workforce services for which they qualify and improve customer service levels by enhancing operational efficiencies. For instance, the agencies are working to co-locate all federally-funded employment services in AJCs, co-enrolling participants in all programs that benefit them while making sure workforce partners get credit for the services they provide. The State is in the process of developing a common screening tool and deploying a customer relations management tool to track participant outcomes.

DSS, which administers the State's SNAP E&T program, was involved to some extent in the WIOA planning process in Virginia. Pre-dating this process, the State had already been in conversations about how to better integrate all of its workforce programs, including SNAP E&T. Recent State legislative action mandated that all 24 federal and State workforce programs in Virginia – administered by eight different agencies – be held to common performance metrics based on college attainment, employment, wages and employer involvement. DSS and SNAP E&T were included in this mandate. This effort followed a previous one in 2008 to get all of these programs working under a career pathways framework. Despite the inclusion of multiple programs in the Combined Plan and in these legislative measures, State representatives report that operationalizing this will be challenging, especially because funds for these programs flow into multiple local jurisdictions, and programs utilize different MIS system that don't easily integrate.

MOVING FORWARD: IDEAS FOR ALIGNMENT OF SNAP E&T AND WIOA

For the most part, the passage of WIOA and States' development of Combined or Unified Plans appears to have done little as yet to either foster or inhibit the growth of SNAP E&T or its alignment with WIOA. Many representatives from State labor/workforce agencies interviewed for this research considered the WIOA State planning process too harried to allow for the development of more than a high-level concept of what alignment or integration of various workforce programs, SNAP E&T or otherwise, might look like. Many expressed that their States planned to determine the form program alignment would take at an operational level subsequent to the submission of their Plans, as they continue to work on plan refinement and operationalization for months and years to come. Some cited the opportunity to formally refine their plans two years into the four-year strategic plan duration, or at least in time for the submission of their next plans in 2020.

One potentially positive development is that WIOA may have served as a prompt for workforce agencies and stakeholders in some States to become familiar for the first time with SNAP E&T, as well as the potential role of SNAP E&T in States' broader workforce systems. Building robust SNAP E&T programs may, as a result, have become a higher priority for States. Moving forward, it should be paramount for States to begin to utilize SNAP E&T to its full potential. As has been set forth, SNAP E&T provides significant flexibility for States to develop programs that serve low-skilled individuals with high barriers to success. While WIOA places a greater emphasis on this population than did WIA, a well-thought-out SNAP E&T program can complement WIOA core programs to focus on what they traditionally have done less effectively. SNAP E&T can support innovative programs focused on skill-building while providing critical supportive services that facilitate success in training and in transitions to employment. And SNAP E&T's 50-50 funding model allows States the opportunity to build on what's working, facilitates new investments and collaborations, and lends itself to long-term sustainability.

The opportunity presented for States to build robust, job-driven SNAP E&T programs will be much diminished for States which, under the aegis of workforce system integration or alignment, simply utilize SNAP E&T funds to support the same set of services offered by the AJCs. SNAP E&T can and should bring something new to the table, including flexible programs readily accessible to SNAP populations, a focus on skill-building in combination with robust supportive services, and collaboration between the State and local government, funders, colleges and community-based organizations. A strong SNAP E&T program existing alongside WIOA-funded programs presents a great opportunity at present for better alignment of services for vulnerable populations.

As States and localities move forward with operationalizing their WIOA plans while building job-driven SNAP E&T programs, some ideas for better alignment of these programs that they might consider include:

- **Continue Planning and Coordination Processes Involving State Human/Social Services and Labor/Workforce Agencies**

WIOA prompted many States to bring the agencies that administer SNAP/SNAP E&T and TANF together with the stakeholders – e.g., Labor Agencies, Workforce Development Boards, AJCs – that run public workforce system programs under WIOA. In many instances, the former were invited to provide input on the workforce strategies developed and implemented through WIOA in the State Plans, providing an opportunity to bring SNAP E&T to the workforce table, perhaps for the first time. In some cases, while this did not lead to inclusion of SNAP E&T in a Combined Plan (or reference to it in a Unified Plan), it introduced SNAP E&T and its potential, as well as the specific employment and training needs of SNAP participants, for the first time to many workforce stakeholders. As plans get implemented, refinements made, and work begins toward the next four-year plans, these conversations should continue and deepen, with State agencies finding ways to better integrate services and strategies. Further, SNAP E&T agencies should take it upon themselves to find opportunities to remain engaged in WIOA implementation, such as through “participating in state workforce board meetings and contributing to the development of career pathways, sector partnerships, and other key skills strategies.”^{xliii}

- **Deepen Partnerships Between SNAP E&T and AJCs Through Cross-Referrals**

Regardless of whether or not SNAP E&T dollars flow through a State’s workforce system, the AJCs should be a place where individuals can access SNAP E&T services, either directly or through referral. Under WIOA, individuals who receive public benefits, and others who are low-income, are to receive priority for career and training services at the AJCs.^{xliiv} A benefit of closer coordination between SNAP E&T agencies and a State’s workforce system are AJCs that are knowledgeable about the SNAP E&T program, including who qualifies for services, the types of services offered, and the specific providers of SNAP E&T services. A SNAP E&T handbook or website produced by the State SNAP E&T agency can provide this information in one place. AJC staff may then refer individuals that are appropriate for SNAP E&T to the State agency or third-party SNAP E&T partner provider for enrollment. Similarly, SNAP participants may be referred to AJCs for services if those are more appropriate than SNAP E&T, so familiarity with one-stop system programs and services is needed on the part of SNAP E&T program administrators and partners. As discussed, USDA/FNS and DOL are encouraging the referral of SNAP recipients – particularly ABAWDs – to AJCs for employment and job training activities that will allow them to remain eligible for SNAP benefits while increasing their opportunities for advancement to economic self-sufficiency.^{xliv}

- **Deepen Partnerships between SNAP E&T and AJCs through Common Assessment**

One way that SNAP E&T and AJCs can more closely align to create a more seamless system for jobseekers is to consider utilizing a common (or similar) assessment tool and process for participants of SNAP E&T and WIOA programs. Such assessment can determine, for example, an individual's current skills, education and job experience, career goals, and barriers. It can determine what public benefits the individual might qualify for, including whether they are on SNAP or might be eligible for SNAP. The assessment would help determine the best employment and training services needed, including SNAP E&T, WIOA core programs or others, and lead to an appropriate referral. Common assessment can also facilitate the collection of similar data points on participants of each program that can be shared, analyzed and compared.

- **Shared Data and Data Systems**

One important way that SNAP E&T and the AJC system can better align is through the sharing of data and data systems. FNS has recently instituted reporting requirements for States for SNAP E&T that align with those required of WIOA programs. The interim final rule, Supplemental Nutrition Assistance Program (SNAP) Employment and Training (E&T) Program Monitoring, Oversight and Reporting Measures, was published in the Federal Register in March 2016, requiring States to include reporting measures in their SNAP E&T State Plans beginning in FFY 2017.^{xlvi} States must submit their first reports on January 1, 2018. SNAP E&T reporting measures include employment, median earnings, program completion, as well as a variety of participant demographics. With similar data being collected, it makes sense for SNAP E&T programs and WIOA programs, potentially along with other key partners such as college systems, to share outcomes data being reported to federal agencies with one another. This may afford an opportunity to compare outcomes for different program types and populations to inform the overall workforce system and better serve clients.

Taking this one step further, States might consider sharing data systems for WIOA and programs such as SNAP E&T and TANF. One documented barrier to the growth of SNAP E&T programs in many States, in fact, is the need for a robust data system that is able to capture participant enrollment and outcome information. A best practice for SNAP E&T program growth is to modify or adapt current MIS systems already being utilized for other programs to meet the needs of SNAP E&T. Washington State, for example, modified its TANF data system for use in its SNAP E&T program, while States like Tennessee (as described) and Maryland have developed or are developing SNAP E&T modules as a part of the larger development of new data systems for WIOA. Shared data systems will facilitate the tracking of individuals being served by multiple workforce system programs and their outcomes, as well as compare program demographics and outcomes as described.

- **Third-Party Contracts**

Whether or not SNAP E&T is administered through State labor/workforce agencies, as in a few States, or by SNAP agencies, both entities should be mindful of the fact that, particularly as SNAP E&T programs expand third-party partnerships with providers, it can often be the case that providers are the recipients of both WIOA and SNAP E&T contracts and funds. In this regard, even if AJCs and SNAP E&T are not working in collaboration at a policy or strategic level, providers may be working, either poorly or well, to coordinate the use of these funds at the operational level. A provider with both WIOA and SNAP E&T contracts is likely to be making a determination of which program to enroll each individual who comes through its doors based on a variety of factors typically revealed through assessment. Better strategic coordination of WIOA and SNAP E&T based on an understanding of these practices can lead to informed guidance of providers and hopefully better outcomes for those served by each program. States, AJCs and providers can collaborate on strategies to create better linkages of WIOA and SNAP E&T programs and funding streams at the ground level so that participants can move seamlessly between funding sources as they seek to advance their skills and careers.

- **Career Pathways as a Framework for Alignment**

Since 2012, the U.S. Department of Labor has actively promoted the use of career pathways within the public workforce system as a best practice to help job seekers, particularly those with limited skills, to secure skills and industry-recognized credentials to advance in their careers. Career pathways offers “an efficient and customer-centered approach to training and education by connecting the necessary adult basic education, occupational training, postsecondary education, career and academic advising, and support services for students to prepare for, obtain and progress in a career.”^{xlvii} WIOA provided an updated definition of and framework for the implementation of career pathways, and requires States to facilitate the development of career pathways as part of their public workforce systems.^{xlviii} Career pathways relies on building cross-agency partnerships and alignment of programs and policies at the federal, State and local levels to create a seamless workforce system that is easily navigable by job seekers and employers, alike. At the federal level, a Skills Working Group was formed in 2014 to maintain and advance the job-driven agenda put forward in the White House’s *Ready to Work* report. This group now includes USDA, in an effort to ensure that SNAP E&T is part of the career pathways framework.

States should consider utilizing the career pathways framework to better align SNAP E&T with WIOA and other employment and training programs. For example, SNAP E&T might be utilized to support individuals with limited skills, education and/or work experience in the first steps of career pathways, such as programs focused on basic skills connected to employment, short-term vocational training, and job-readiness training. As individuals complete these steps and begin to advance in their skills and employment, other funding sources and programs, including WIOA and Pell, would be available to support their continued advancement, such as through longer-term postsecondary education programs.

- **Opportunity to Better Align SNAP E&T and TANF**

The passage of WIOA and the ensuing State planning process not only presented an opportunity to think through coordination of non-core programs with WIOA programs, but the coordination of non-core programs with one another. This includes SNAP E&T and TANF. Often administered by the same State agencies, SNAP E&T and TANF can be strategically aligned such that low-income individuals who are prepared for employment and/or training – and can benefit from SNAP benefits and E&T supportive services – can be enrolled in SNAP E&T and not TANF. Thus “diverted” from TANF, they are not only able to receive skills training but are stopping the clock (or preventing the clock from starting) on use of their time-limited TANF benefits. Similarly, those who are nearing the end of their TANF benefits can transition to SNAP E&T as a next step toward self-sufficiency while receiving needed supportive services. Frontline staff working with TANF and SNAP E&T participants can help manage these transitions between programs to provide them the best opportunity to maximize these services to allow the stability, support and services individuals need to achieve self-sufficiency.

APPENDIX A

Other Examples Where SNAP E&T is a Program Partner in WIOA State Combined Plans

Alabama^{xlix}

Alabama envisions a workforce system that is aligned with the needs of its businesses and skills up its workers. In 2014, Governor Bentley established the Alabama Workforce Council to advise and support the State's workforce development and education system. The Governor and Legislature have adopted the following Council recommendations:

- ◇ Alabama will implement a Workforce System based on Accelerate Alabama 2.0.
- ◇ Implement a longitudinal data system.
- ◇ Develop a strong network of Regional Workforce Councils.
- ◇ Implement a streamlined funding system that meets business needs and the needs of citizens.
- ◇ Create or identify streamlined funding channels for training coupled with clear performance metrics.
- ◇ Develop and support a statewide education and training resource system that excels at meeting business needs.

SNAP E&T is a partner program under the Alabama State Combined Plan as the State pushes forward to achieve its workforce vision. As of FFY 2016, it provides job search assistance to ABAWDs through Career Centers.

Arkansasⁱ

The State of Arkansas submitted a Combined Plan that envisions coordination of its workforce development efforts across three departments (Workforce Services, Career Education, and Human Services) and includes SNAP E&T as one of the partner programs. It is hoped that by bringing different departments together, workforce programs can be better aligned, duplication prevented, and access to services for job seekers and employers improved.

SNAP E&T is offered in 13 counties and consists of the following six components: job search, job search training, education (such as GED, ESL, vocational training), work experience, on-the-job training, and job retention. Supportive services – namely, transportation – to reduce barriers for education and employment are offered as part of SNAP E&T as well. Arkansas is currently working to expand its SNAP E&T program by engaging third-party partners such as Goodwill, utilizing 50-50 funds.

The State’s Combined Plan mentions that some integration of SNAP E&T and WIOA already exists in Arkansas. Coordination between SNAP E&T and other workforce programs takes place primarily at the intake level at Arkansas Workforce Centers (AJCs). In addition, the Arkansas Workforce Integrated Networks System (ARWINS), originally developed to track TANF families, may be modified to track and share participant information across multiple programs including SNAP E&T and WIOA.

Louisiana^{li}

Louisiana submitted a Combined State plan that includes SNAP E&T. The Plan envisions a workforce system that provides pathways for all residents, including individuals who are receiving public assistance, the unemployed or underemployed, those who are deficient in basic skills, persons with disabilities, and others who have significant barriers to employment. As employers increasingly demand workers with postsecondary credentials, the State plans to improve workforce training so as to overcome both low K-12 academic achievement and a below average high school graduation rate in the State. As an example, the Louisiana Workforce Investment Council (WIC) was established in accordance with Section 101 of WIOA to support an employer-led, demand-driven workforce development system where job seekers receive training under a career pathways framework so they can qualify for high-wage, high-demand career opportunities.

That said, WIOA partner SNAP E&T – known in the State as Louisiana Job Employment Training (LaJET) – serves primarily as a referral point for training that would lead its mandatory participants to credentials or certificates. Staff in the local parish Department of Children and Family Services offices identifies LaJET participants, then passes that information onto LaJET providers on a weekly basis. Other than referrals to WIOA, LaJET offers only job search, job search training plus employer contact, and does not expect to serve any volunteers in FFY 2016.

Missouri^{lii}

The State of Missouri submitted a Combined State plan that includes SNAP E&T as a partner program. Per the Plan, Missouri aims to build an integrated demand-driven workforce system that leads participants to self-sufficiency. This goal will be achieved primarily through partnerships, sector strategies, career pathways, and allocation of resources that generate new partnerships. Missouri’s SNAP E&T program, also known as Missouri Employment and Training Program (METP),

offers job search, job search training, work-based learning, vocational training, education, entrepreneurial training, and unsubsidized employment. The State is currently working to expand METP, including through the addition of third-party partners supported through 50-50 funds. SNAP E&T/METP is referenced only minimally in Missouri's Combined Plan. According to the Plan, SNAP E&T staff will participate on State steering and planning committees to effectuate the Combined Plan. SNAP E&T is operated through the Missouri Job Centers, and each SNAP recipient will be co-enrolled in WIOA Title I and Title III services.

Pennsylvania^{liii}

Pennsylvania submitted a Combined State Plan that includes SNAP E&T as a program partner. According to the Plan, the Pennsylvania Governor is committed to integrating workforce programs to make sure skills are taught that are relevant to employers and provide residents with jobs that pay. This vision is implemented through:

- ◇ Career pathways to up-skill, credential or provide degrees for workers.
- ◇ Expansion of public-private investment in workers, especially for targeted industry sectors.
- ◇ Opportunities for youth to participate in work-based learning such as summer employment, pre-apprenticeship, apprenticeship, and internships.
- ◇ Multi-employer workforce partnerships to improve the connection and responsiveness of workforce programs to the demand side of the labor market, and support the spread of employer practices that create jobs that pay.
- ◇ Data sharing across state agencies and workforce development partners to better understand education and employment outcomes and to inform State efforts.

The State's voluntary SNAP E&T program is one of the WIOA partners relied upon to achieve this mission. SNAP E&T in Pennsylvania falls under the Department of Human Services (DHS) and offers 11 components: job search; job readiness; ESL; adult basic education (ABE); GED; vocational training; work experience; advanced degree program (ADP) / postsecondary education; WIOA; community service; and job retention. It also provides reimbursements for supportive services such as dependent care and transportation. DHS also funds the Keystone Education Yields Success (KEYS) program to provide support and guidance to TANF and SNAP recipients attending a Pennsylvania community college. A KEYS student facilitator is located at each college to assist eligible students with identifying career goals, scheduling courses, applying for financial aid, transportation and child care needs.

In terms of coordination and integration with WIOA programs, SNAP E&T uses PACareerLink® at AJCs to provide job search services to participants. Data on human service, workforce and wage records are shared through the Workforce Data Quality Initiative (WDQI) across multiple agencies in order to track program outcomes. There is also a proposed plan to incorporate Adult and Basic Literacy Education and Office of Vocational Rehabilitation data, as well as its pre-k through grade 12 statewide longitudinal student level data into WDQI to enable the reporting and analysis of performance metrics from a centralized platform. Lastly, an interagency work group has been established to meet regularly to consider ideas, discuss initiatives, best practices and goals, and how best to achieve those goals.

Other State Plan(s) with SNAP E&T Mention

Mississippi^{liv}

Mississippi submitted a Combined Plan that, while it does not include SNAP E&T as a program partner, makes reference to SNAP E&T as an important part of the State's workforce development strategy. The Plan describes the State's SNAP E&T pilot program and, in an assessment of the State's workforce system strengths, notes that "SNAP E&T funds provide support for community college training and will provide a key source of additional allocated and matching funds to the most vulnerable Mississippians in accessing training for in-demand occupations while providing funds to assist with food security and to overcome barriers such as childcare and transportation."^{lv} The Plan further states that the Mississippi Department of Human Services (MDHS) will engage employers to hire SNAP recipients who have work requirements, and will "assist work-eligible SNAP recipients who enroll in approved training programs to leverage WIOA Title I, Pell, E&T matching funds, and other training resources to support training."^{lvi} The Plan states that SNAP E&T funded supportive services will help work-eligible SNAP recipients to address barriers to training, and that MDHS will align its SNAP E&T efforts with State economic development strategies by supporting participants in pathways that meet the sector priorities of its State workforce system.^{lvii}

ⁱ H.R. 803 (113th): Workforce Innovation and Opportunity Act (enacted July 22, 2014).

ⁱⁱ *Ready to Work: Job-Driven Training and American Opportunity*. The White House, Washington, D.C. July 2014. Available at https://www.whitehouse.gov/sites/default/files/docs/skills_report.pdf

ⁱⁱⁱ The Agricultural Act of 2014, Pub. L. 113-79, amended section 16(h) of the Food and Nutrition Act (FNA), 7 U.S.C. 2025, by authorizing SNAP E&T pilot projects to develop and test best practices for helping SNAP participants obtain employment and increase their income.

^{iv} Kaz, David with Rick Krauss, *Washington State's Basic Food Employment & Training Program*, Seattle Jobs Initiative, June 2014.

^v Gragg, Rachel and David Kaz, *Replicating Success: Recommendations and Best Practices from Washington State's SNAP E&T Program (BFET)*, National Skills Coalition and Seattle Jobs Initiative, June 2014.

^{vi} DeRenzis, Brooke and David Kaz, *Building Skills Through SNAP Employment and Training: Recommendations from Lessons Learned in Four States*, National Skills Coalition and Seattle Jobs Initiative, April 2016.

^{vii} *Id.*, Footnote 5. Citing Social Policy Research Associates, *PY 2014 WIASRD Data Book*. Revised January 19, 2016 (with regard to WIOA) and Administration for Children and Families, *TANF and MOE Spending and Transfers by Activity, FY 2014*, available at www.acf.hhs.gov/programs/ofa/resource/tanf-and-moe-spending-and-transfers-by-activity-fy-2014 (with regard to TANF).

^{viii} Official communication from Kevin W. Concannon, Undersecretary Food, Nutrition and Consumer Services to all SNAP Commissioners, available at http://www.fns.usda.gov/sites/default/files/E&T_121615.pdf

^{ix} See USDA Announcement at www.usda.gov/wps/portal/usda/usdahome?contentid=2015/10/0302.xml&contentidonly=true

^x U.S. Department of Labor, Employment and Training Administration: DOLETA Fact Sheet: Developing a Globally Competitive Workforce. Available at https://www.doleta.gov/WIOA/Docs/Workforce_Fact_Sheet.pdf

^{xi} U.S. Department of Labor, Employment and Training Administration, WIOA Overview. Available at <https://www.doleta.gov/wioa/Overview.cfm>

^{xii} Lee, Helly. *WIOA: What Human Service Agencies and Advocates Need to Know*. Center for Law and Social Policy (CLASP), February, 2015

^{xiii} Bird, Kisha, Marcie Foster and Evelyn Ganzglass, *New Opportunities to Improve Economic and Career Services for Low-Income Youth and Adults: Key Provisions of the Workforce Innovation and Opportunity Act (WIOA)*, Center for Law and Social Policy (CLASP), September 2014.

^{xiv} *Id.*, p. 21.

^{xv} *Ready to Work* report

^{xvi} *Ibid.*

^{xvii} U.S. Department of Labor, Employment and Training Administration, WIOA Overview. Available at <https://www.doleta.gov/wioa/Overview.cfm>

^{xviii} *Ibid.* Available at <http://www.fns.usda.gov/sites/default/files/snap/WIOA-Combined-State-Plans.pdf>

^{xix} United States Department of Agriculture/Food and Nutrition Service, Memorandum to Regional SNAP Directors, *Supplemental Nutrition Assistance Program Employment and Training, WIOA Unified and Combined State Plans*, March 14, 2016.

^{xx} *Ibid.*

^{xxi} *Ibid.*

xxii *Ibid.*

xxiii *Ibid.*

xxiv United States Department of Labor, Memorandum to Commissioners and Directors of the Supplemental Nutrition Assistance Program, State Workforce Administrators, WIOA Liaisons, Workforce Development Boards, and American Job Centers, *Partnering to Help Connect Low-Income Able-Bodied Adults to the Public Workforce System*, March 31, 2016. Available at <http://www.fns.usda.gov/sites/default/files/snap/USDA-DOL-letter-ABAWDs.pdf>

xxv DeRenzis, Brooke and David Kaz, *Building Skills Through SNAP Employment and Training: Recommendations from Lessons Learned in Four States*, National Skills Coalition and Seattle Jobs Initiative, April 2016.

xxvi See Tennessee's State Plan at https://www.tn.gov/assets/entities/labor/attachments/TN_WIOA_Combined_State_Plan.pdf

xxvii See California's State Plan at http://cwdb.ca.gov/res/docs/state_plans/Final%20Approved%20State%20Plan/Unified%20State%20Plan%20Preface%20Through%20Chapter%209%20%28for%20submission%20and%20public%20posting%29.pdf (pp. 68-69)

xxviii See Georgia's State Plan at <http://www.georgia.org/wp-content/uploads/2016/04/State-of-Georgia-2016-Unified-State-Plan.pdf> (p. 62)

xxix *Id.*, pp. 62-63

xxx *Id.*, p. 67

xxxi See Connecticut's State Plan at http://www.ct.gov/brs/lib/brs/pdfs/brs/wioa/wioa_state_plan_for_the_state_of_connecticut-approved.pdf

xxxi See Massachusetts' State Plan at <http://www.mass.gov/massworkforce/state-plan/wioa-2020/ma-wioa-state-plan-final-4-7-16.pdf>

xxxi *Id.*, pp. 52, 58, and 73.

xxxi *Id.*, p. 71

xxxi *Id.*, pp. 74-74, and 88.

xxxi *Id.*, p. 85.

xxxi *Id.*, p. 98.

xxxi See Minnesota's State Plan at <http://www.gwdc.org/docs/WIOAstatecombinedplan4252016.pdf>

xxxi Kaz, David with Rick Krauss, *Washington State's Basic Food Employment & Training Program*, Seattle Jobs Initiative, June 2014.

xl See Washington's State Plan at <http://wtb.wa.gov/Documents/TAPPlanStrategicandOperational2016.pdf>

xli See Virginia's State Plan at <https://web.archive.org/web/20160702124749/http://www.elevatevirginia.org/wp-content/uploads/2014/04/Virginia-WIOA-Combined-State-Plan-Draft-for-Public-Comment.pdf>

xlii *Ibid.*

xliii DeRenzis, Brooke and David Kaz, *Building Skills Through SNAP Employment and Training: Recommendations from Lessons Learned in Four States*, National Skills Coalition and Seattle Jobs Initiative, April 2016.

xliiv *Ibid.*

xliiv United States Department of Labor, Memorandum to Commissioners and Directors of the Supplemental Nutrition Assistance Program, State Workforce Administrators, WIOA Liaisons, Workforce Development Boards, and American Job Centers, *Partnering to Help Connect Low-Income Able-Bodied Adults to the Public Workforce System*, March 31, 2016.

^{xlvi} The interim final rule, SNAP E&T Program Monitoring, Oversight and Reporting Measures, was published in the Federal Register on March 24, 2016. See <http://www.fns.usda.gov/fr-032416>

^{xlvii} Multiple federal agencies, Career Pathways Joint Letter. Available at <http://www.fns.usda.gov/sites/default/files/snap/Career-Pathways-Joint-Letter.pdf>

^{xlviii} H.R. 803 (113th): Workforce Innovation and Opportunity Act (enacted July 22, 2014), Section 3(7)

^{xlix} See Alabama's State Plan at <http://governor.alabama.gov/assets/2016/04/WIOA-Combined-Plan.pdf>

^l See Arkansas State Plan at <http://www.arkansas.gov/esd/AWDB/pdfs/public%20comment/Draft%20State%20Plan%20for%20Public%20Comment%202-8-2016.pdf>

^{li} See Louisiana's State Plan at http://www.laworks.net/Downloads/WIOA/WIOA_State_Plan_FINAL.pdf

^{lii} As of this writing, the Missouri State Plan is not posted.

^{liii} See Pennsylvania's State Plan at <http://www.pawork.org/wp-content/uploads/2014/08/Pennsylvania-WIOA-Combined-State-Plan-Final-Published.pdf>

^{liv} See Mississippi's State Plan at http://www.mississippiworks.org/downloads/WIOA_MS_03_21_2016.pdf

^{lv} *Id.*, p. 40

^{lvi} *Id.*, p. 70

^{lvii} *Ibid.*