



Skills-Based SNAP Employment and Training Policy TOOLKIT

PART OF NSC'S SKILLS EQUITY AGENDA



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A **skills-based SNAP E&T policy** makes skill building an integral part of a state SNAP E&T program's vision. Partnerships between state agencies and community colleges provide education, training, and support services that put participants on a pathway to a career.



Skills-Based SNAP Employment and Training Policy Toolkit

SECTION I. PURPOSE OF TOOLKIT

This toolkit provides resources to state policymakers, advocates, and practitioners on state policies to advance skills-based Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T). It is among a set of state skills equity policies being promoted by National Skills Coalition. These policies are aimed at expanding equitable access to middle-skill training, credentials, and family-supporting careers, particularly for those who have faced barriers to economic opportunity.

Skills are one of the key factors affecting family economic security. Higher levels of education are associated with more employment, higher wages, and less poverty. Middle-skill jobs, which require more than a high school degree but not a bachelor's degree, make up the largest share of the labor market.¹

Training for these middle-skill jobs can improve low-income people's jobs and earnings prospects. A recent Aspen Institute study found that industry-recognized credentials or completion certificates from well-regarded, industry-focused training programs led to earnings boosts for low-income training participants.² Access to middle-skill training and supports like transportation, child care, and books and supplies is particularly important for SNAP recipients, many of who need

better skills to find and keep family supporting jobs that can help them move out of poverty. Seventy percent of long-term SNAP recipients have no education beyond high school and half have less than a high school education.³

Fortunately, states can adopt policies that direct their SNAP E&T programs to provide education, training, and support services for SNAP recipients who are interested in building their skills. This toolkit provides information that state policymakers, SNAP E&T program administrators, advocates, and service providers can use to advance skills-based SNAP E&T policies at the state level. It contains:

- Guidance on the key components of a model skills-based SNAP E&T state policy
- State examples of skills-based SNAP E&T policy components
- A skills-based SNAP E&T policy template that can be used to as the basis for state legislation or executive order

It's important to note that SNAP E&T operates within the SNAP program, which as the nation's largest hunger safety net program, provides nutrition assistance to millions of low-income people. As such, states should use SNAP E&T to help those who want to build their skills do so while at the same time protecting nutrition assistance for those who can't participate in employment and training.

What is skills-based SNAP E&T?

SNAP E&T is a federal program administered by the U.S. Department of Agriculture's Food and Nutrition Services (FNS). While all states must operate a SNAP E&T program, they have flexibility in regard to the size of their programs and the types of services offered. E&T activities can range from job search and workfare to vocational training and postsecondary education. States do not have to provide SNAP E&T services in all areas of the state, and E&T activities can vary from one community to the next.

SKILLS-BASED SNAP E&T programs provide a combination of education (including adult basic education and ESL), occupational skills training, and support services that put participants on a pathway to a career. While service delivery models can vary, model skills-based programs typically contract with partners, such as community colleges, community-based organizations, and others to provide these services for SNAP E&T participants. In doing so, skills-based SNAP E&T programs leverage the expertise and resources of partners who have experience helping low-income people prepare for skilled work.

While skills-based SNAP E&T programs can use formula-based federal program grants (called 100 percent funds) to support critical administrative functions and seed partnerships, they should aim to additionally use 50 percent reimbursement grants (called 50-50 funds) to increase program scope, capacity, and sustainability.⁴ Through 50-50 funds, the federal government reimburses states for 50 percent of SNAP E&T program costs paid for with non-federal dollars. In addition to supporting education and training activities, 50-50 funds can also be spent on certain participant support services, such as transportation, books and supplies, and child care.

While this brief focuses specifically on skills-based SNAP E&T, the Workforce Innovation and Opportunity Act (WIOA) provides additional opportunities for states to expand high-quality training to SNAP participants. States can prioritize WIOA services for SNAP and other public assistance recipients and ensure that SNAP recipients have opportunities to connect with key skills strategies like sector partnerships and career pathways.⁵

Why should states adopt skills-based SNAP E&T policies?

Because SNAP E&T has been a little-known program, governors and state legislators have rarely made decisions about whether their state's SNAP E&T programs should be skill-based. Instead, this decision has largely been left to state agencies that administer SNAP E&T. Limitations in regard to staff capacity, administrative resources, or expertise in workforce development may keep agencies from pursuing skills-based SNAP E&T programs.

However, there are concrete steps that agencies can take to address these challenges so they can build skills-based SNAP E&T programs. State policymakers can provide supportive leadership by adopting policies that promote skills-based SNAP E&T. Such policies can:

- **Expand SNAP participants' access to family-supporting careers.** Programs that combine education, training, and support services can help participants access training along with transportation, child care, books and supplies so they can address barriers that often stand in the way of program completion. By working with partners to provide these services, states can leverage additional funding to expand access to more SNAP participants. They can also connect SNAP E&T training to broader workforce development initiatives so that SNAP participants can continue to build their skills after leaving SNAP if they choose to do so.
- **Help employers meet their need for skilled workers.** By training SNAP E&T participants for jobs that are in demand, states can help close the gap between the number of skilled jobs available and the number of people trained to fill them.
- **Demonstrate policy leadership.** Although few states have developed model skills-based SNAP E&T programs, FNS is encouraging more to do so. In the past year, FNS has issued an official communication with recommendations on how states can make SNAP E&T programs more job driven by developing skill-building opportunities that train people for jobs in the labor market; it also launched its SNAP to Skills Project to provide technical assistance and resources to states.⁶ States that adopt policies directing agencies to plan for and implement skills-based SNAP E&T programs now will be at the leading edge nationally.

SECTION II. COMPONENTS OF A SKILLS-BASED SNAP E&T POLICY

National Skills Coalition considers a model skills-based SNAP E&T program to have the following characteristics:

- Skill building is an integral part of the program’s vision;
- A “third-party partnership model” is used to support skill-building; community colleges, community-based organizations, and others provide training services with non-federal funds, the costs of which are partially reimbursed using federal 50-50 funds;
- Participant reimbursements are used to provide support services like transportation, books and supplies and/or child care;
- Participation in SNAP E&T is voluntary and not required in order for SNAP participants to maintain eligibility for SNAP benefits; and
- Skill-building activities are accessible to SNAP participants in multiple parts of the state.

States without skills-based programs can adopt policies that direct their SNAP E&T agencies to plan for and implement model SNAP E&T programs. States with minimal skills-based programs can also use policies to make the program changes necessary to become a model program that includes all of the components listed above. This portion of the toolkit provides recommendations on how such policies can address each component of a model skills-based SNAP E&T program.

Make skill building an integral part of the SNAP E&T program vision

State policy leaders can direct state agencies to make skill building a central focus of the state’s SNAP E&T program. By adopting a vision for SNAP E&T that establishes skill building as a primary program activity, states can shift their program from one focused on moving participants into any job to one that puts participants on a pathway to skilled careers.⁷ Studies of welfare programs in California, Missouri, and North Carolina found that programs that stressed education and training yielded better employment and earnings outcomes in the long-term than did “work-first” programs focused on job search and immediate labor market attachment.⁸

With a skill-building vision firmly in place, states can center E&T activities and resources around ensuring that SNAP participants have the education, training, and support services necessary to find family supporting work.

Programs focused on helping participants build skills for family supporting careers should think carefully about how to measure success. States should focus on outcomes that help E&T participants move out of poverty – credential attainment, employment, and wages. Under a new FNS rule, states now have to collect information on employment and earnings outcomes for E&T participants and should consider how this data can be used to measure success.

STATE EXAMPLE

Maryland’s recently adopted vision statement focuses on providing participants “with job-driven training, tools, and access to career pathways that lead to family and individual supporting and sustainable jobs,” and the state Department of Human Resources is organizing employment and training activities to support that vision.⁹

Maryland shifted from a mandatory program to a voluntary program as a means of supporting its new skills-based vision. The state SNAP E&T plan explains this decision by stating that “quality will equate to providing SNAP recipients, who are motivated to participate, with programs focused on skill improvement and access to better jobs while giving flexibility to our vendor partners in creating programs that produce positive results.”¹⁰



Make participation in SNAP E&T voluntary for all

Under federal law, SNAP participants who are not eligible for exemptions due to age, disability, dependent caretaking, or other situations must register for work. However, states can choose whether to make SNAP E&T participation mandatory or voluntary for work registrants. In states with mandatory programs, those who do not meet federal or state exemptions must participate in a SNAP E&T program in order to receive benefits. By contrast, in states with all-voluntary SNAP E&T programs, SNAP recipients choose whether or not to participate in E&T.

Mandatory programs are intended to move people into jobs by making public benefits contingent on work related activities; however, rigorous evaluations of welfare-to-work programs found that work requirements did not lead to stable employment for most participants, nor did they lift them out of poverty.¹¹

Accordingly, states should adopt all-voluntary programs in order to focus on skill building that leads to sustainable skilled work. By making SNAP E&T programs all-voluntary, states can:

- Prioritize education and training activities for those who want to build their skills and are ready to prepare for a middle-skill job;
- Spend staff time and resources on developing and expanding education and training partnerships instead of using administrative resources to monitor and enforce compliance among mandatory participants; and
- Use SNAP E&T as a critical human capital program to meet the long-term skill needs of workers and employers.

Require the state SNAP E&T agency to create a strategic plan and timeline for developing a skills-based, third-party partnership model, starting with a pilot program.

Challenges such as limited experience in education and training, staff capacity, and constrained financial resources may keep state agencies from pursuing skills-based SNAP E&T programs. Luckily, SNAP E&T agencies don't have to develop skills-based programs on their own. Instead, they can leverage the expertise and resources of partner organizations to create and expand skill-building opportunities for participants.

Through a "third-party partnership model," SNAP E&T agencies can contract with community colleges, community-based organizations, and others who use non-federal funds to provide education and training services to SNAP E&T participants. These providers are then reimbursed with federal SNAP E&T 50-50 funds for up to fifty cents per dollar. This model allows SNAP E&T agencies to tap into existing training programs that have a track record preparing low-income people for skilled work. It also allows SNAP E&T agencies to utilize state, local, and philanthropic funds as a "match" for 50-50 funds – providing more resources to serve more people.

In order to establish and manage third-party partnerships, SNAP E&T agencies must have the capacity to identify appropriate education and training providers, broker and manage contracts, and track participation, costs, and reimbursements across partner programs. State agencies should determine what additional capacity they need to run a third-party partnership model, and how they plan to develop it.

States should use pilot programs to test systems for creating and maintaining third-party partnerships. By starting small with a pilot program, states can test and refine new programs, address challenges early on, and build stakeholder support by demonstrating what works.

A strategic planning process can help states figure out these issues. State policies should direct SNAP E&T agencies to use a strategic planning process to chart out how they will develop and pilot a skilled based, third-party partnership model. As discussed below, state policies can set criteria for the planning process, as well as for the contents of the plan itself.

The strategic plan can form the basis for the annual SNAP E&T plan that the state must submit to the federal Food and Nutrition Service. State SNAP E&T plans must describe SNAP E&T services, any third-party partnerships, and budgets for using 100 percent and 50-50 funds.

Criteria for the planning process:

- 1. Planning committee:** The SNAP E&T agency should establish and convene a planning committee to guide the strategic plan and inform the development of a pilot program. To ground the plan in a skills-based vision, the planning committee should include public agencies and community organizations with expertise in education, training, and other services for low-income people. The committee should also set milestones for completing the plan and a structure for the group to provide input throughout the planning process.
- 2. Dedicated staff:** The SNAP E&T agency should assign a staff member to lead the planning process and implement the pilot program. The staff person should regularly communicate with FNS regional staff to ensure that the strategic plan follows federal requirements and makes use of federal resources and guidance on building third-party partnerships.
- 3. Resource map, partner outreach and assessment:** The planning committee should complete a resource map that describes key state workforce development initiatives, potential third-party providers, and funding sources that are reimbursable. The resource mapping process should provide an opportunity to educate potential partners on SNAP E&T and to assess interested potential partners for their “fit and capacity” to serve as a third-party provider.¹⁴
- 4. Inventory of administrative tools:** The SNAP E&T agency, in partnership with the planning group, should conduct an inventory of the administrative tools required for establishing third-party partnerships, such as common assessments for potential third-party partners, templates for participant tracking, invoices, and reimbursement, and case management data systems.

STATE EXAMPLES

In developing the BFET pilot program, **WASHINGTON** used a planning group that included state and local level staff from its Department of Social and Human Services, as well as staff from



community-based organizations and a community college. This planning group laid the groundwork for developing collaborative partnerships that leveraged each organization’s specific expertise.¹²

CONNECTICUT

developed its capacity to create new third-party partnerships by using a portion of 100 percent funds to support two staff.



These staff members are dedicating 90 percent of their time to further developing and expanding a skills-based program through brokering and managing new partnerships with community colleges and community-based organizations.¹³

Hennepin and Ramsey Counties in **MINNESOTA** created a SNAP E&T resource map for their area that identified providers, public programs, and foundations that are supporting training for SNAP-eligible populations. The resource map will serve as a basis for identifying potential third-party providers and funding sources eligible for 50 percent reimbursement grants.¹⁵



To bring on new third-party providers, **MARYLAND**



developed template forms for participant tracking, invoices, and cost matching, as well automated processes for reporting and reimbursements.¹⁶

Criteria for plan contents:

Through a strategic planning process that uses the steps described above, states can create a strategic plan for a skills-based SNAP E&T pilot program. The strategic plan should include the following components:

- Skills-based program vision, supported by goals and objectives;
- A description of the planned pilot program, including the targeted geography, population of focus, education, training, and support services to be delivered, and number served;
- A list of proposed third-party providers, based on partner assessments, and their proposed roles and responsibilities;
- A description of staff functions, including roles and responsibilities;
- A system for tracking participants eligibility and enrollment, continued participation, outcomes, and other data;
- Performance milestones for the pilot program, and potentially for growth; and
- A program budget, including 50-50 fund match sources for each third-party partner.

STATE EXAMPLE

WASHINGTON'S BFET

planning team developed a business plan to set parameters for the pilot program, including the target population, number of people to be served, types of services offered, roles of contractors, costs, and funding sources.¹⁷ The business plan was then included in the SNAP E&T state plan submitted to FNS.



Set a deadline for launching the pilot program and require it to be included in the state SNAP E&T plan submitted to FNS.

State policies should set a deadline for launch of the SNAP E&T pilot program in order to ensure its implementation. They should also require the pilot to be included in the state SNAP E&T plan submitted to FNS, and the pilot launch date should correspond with plan approval.¹⁸

In order to officially launch the pilot program, the state SNAP E&T agency should execute contracts with third-party partners and on-board those partners to provide an orientation to SNAP E&T policies and procedures.¹⁹



Skills-Based SNAP Employment and Training Policy

LEGISLATIVE TEMPLATE

This section of the toolkit provides a template that can be used to develop legislation that promotes a skills-based SNAP E&T program. The template can also be used to inform an executive order or administrative policy instead of legislation.

SEC. 1: INTENT

The legislature intends that building the skills of Supplemental Nutrition Assistance Program (SNAP) recipients shall be a central mission of the state's SNAP Employment and Training (E&T) program. The purposes of this Act are to:

- Establish a skills-based SNAP E&T program that helps SNAP E&T participants develop their skills so they can enter and maintain self- and family-supporting employment.
- Leverage eligible state, local, and philanthropic resources to obtain federal 50 percent reimbursement grants for skills-based SNAP E&T.

To these ends, this Act establishes the SNAP E&T pilot program with the intent to expand the program statewide.

SEC. 2: DEFINITIONS

As used in this Act:

- a. Department means the [name of the state agency that administers SNAP E&T];
- b. Third-party partnership means an agreement between the Department and another organization to provide education, training, or support services for SNAP E&T participants.

SEC. 3: SNAP E&T PILOT PROGRAM

The Department shall convene a skills-based SNAP E&T planning committee. The committee shall include representatives of [the state board with oversight of community colleges], the Workforce Administrative Agency, local workforce development boards, community colleges, and non-profit organizations that provide employment and training services for low-income individuals, and may include representatives of other organizations. In consultation with the advisory committee the Department shall:

- a. Identify workforce development programs and resources that could serve as potential providers of education, training, and support services for SNAP E&T participants, including resources that could be reimbursed by funds from the United States Department of Agriculture;
- b. Identify administrative tools required for establishing third-party partnerships that may include common assessments for third-party partners; templates for participant tracking, invoices, and reimbursement; and case management data systems; and
- c. Create a plan for developing the skills-based SNAP E&T pilot program. The plan shall include:
 - i. A vision supported by goals, objectives, and action steps for the creation of the pilot program;
 - ii. A description of the pilot program, including the targeted geography and population; the education, training, and support services to be delivered; and the number of participants to be served;
 - iii. A list of planned third-party partnership providers and their proposed roles;
 - iv. A description of staff functions, including roles and responsibilities;
 - v. The process to provide reimbursements to participants for support services related to education or training, including child care, transportation, books, and equipment;

- vi. A system for tracking participants eligibility and enrollment, continued participation, outcomes, and other data;
 - vii. Performance milestones; and
 - viii. A program budget, including sources and amounts of non-federal funds to be used to request matching funds from the United States Department of Agriculture.
- d. The Department shall complete the plan for the pilot program by ____ and incorporate the plan into the annual state SNAP E&T plan submitted to the United States Department of Agriculture.
- e. Subject to the state plan's approval by the United States Department of Agriculture, the Department shall establish the skills-based SNAP E&T pilot program by ____.
- f. Individual participation in the skills-based SNAP E&T pilot program shall be voluntary. An individual's receipt of SNAP benefits shall not be contingent upon the individual's participation in the pilot program.

SEC. 4: PROGRAM EXPANSION

The Department shall use the experience of the pilot program, in consultation with the planning committee, to develop a plan for the statewide expansion of skills-based SNAP E&T. The plan shall include recommendations for any statutory changes that will facilitate statewide expansion. The Department shall submit the plan for statewide expansion to the Governor and the [appropriate committees of the state legislature] by ____.

SEC. 5: FUNDING

The Department shall use federal funds received for SNAP E&T to carry out the Department's duties under this Act.

ENDNOTES

¹ National Skills Coalition analysis of Bureau of Labor Statistics Occupational Employment Statistics by State, May 2012 and American Community Survey data, 2012.

² Jean Grossman et al. *The Value of Credentials for Disadvantaged Workers*. The Aspen Institute, 2015.

³ U.S. Department of Agriculture SNAP to Skills. *Why Now is the Time for States to Build their SNAP E&T Programs*. April 2016.

⁴ U.S. Department of Agriculture SNAP to Skills, *Securing Third-Party Partners for SNAP E&T Programs*. July 2016.

⁵ For more on this topic, see NSC Factsheet, *Aligned by Design: WIOA and SNAP E&T* at www.nationalskillscoalition.org/resources/publications/file/2015-07-Aligned-by-Design-WIOA-and-SNAP-ET-2.pdf and David Kaz, *SNAP E&T Opportunities for Alignment with WIOA* Seattle Jobs Initiative, September 2016 at www.seattlejobsinitiative.com/wp-content/uploads/SNAP_ET_WIOA_Alignment.pdf

⁶ Brooke DeRenzi 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.

⁷ Rachel Gragg and David Kaz, *Replicating Success: Recommendations and Best Practices from Washington State's SNAP E&T Program (BFET)*, National Skills Coalition, June 2014.

⁸ LaDonna Pavetti. *Work Requirements Don't Cut Poverty, Evidence Shows*, Center on Budget and Policy Priorities and Policy Futures, Updated June 7, 2016.

⁹ See Maryland Supplemental Nutritional Assistance Program Employment and Training State Plan of Operations October 1, 2015 through September 30, 2016, Revised September 22, 2015.

¹⁰ Maryland Supplemental Nutritional Assistance Program Employment and Training State Plan of Operations October 1, 2015 through September 30, 2016, revised September 22, 2015.

¹¹ Pavetti, 2016.

¹² David Kaz with Rick Krauss. *Washington State's Basic Food Employment and Training Program* Seattle Jobs Initiative, June 2014.

¹³ DeRenzi and Kaz, 2016.

¹⁴ FNS identifies key steps for states to take to secure SNAP E&T third-party partners. Steps include identifying potential third-party partners through resource mapping, surveys, outreach, or other activities; educating potential providers about SNAP E&T the requirements of partnership; and assessing potential third-party partners to determine program fit and capacity to meet program requirements.

¹⁵ USDA SNAP to Skills. *Securing Third-Party Partners for SNAP E&T Programs*.

¹⁶ DeRenzi and Kaz, 2016.

¹⁷ Kaz with Krauss, 2014.

¹⁸ SNAP E&T state plans are typically due to FNS in August for approval for start of the next federal fiscal year. States can request a plan amendment at any time throughout the year.

¹⁹ FNS lists as steps to securing third-party partners contracting with providers to formally become SNAP E&T third-party partners and on-boarding contracted partners to get them up and running.

ABOUT NATIONAL SKILLS COALITION'S SKILLS EQUITY AGENDA

National Skills Coalition is advocating for states to adopt a set of policies that expand equitable access to middle-skill training, credentials, and careers – particularly for those who have faced barriers to economic opportunity.

This effort includes scans of all fifty states to ascertain whether states have the policies in place to expand access to skills. NSC has also developed toolkits that provide resources, including model legislation, for policymakers and advocates to advance a skills equity agenda in their state. NSC's skills equity agenda includes state policies on Job-Driven Financial Aid, SNAP E&T, Stackable Credentials, Alignment, Integrated Education and Training, and Temporary Assistance for Needy Families Employment and Training.

Read more about NSC's Skills Equity Agenda at [nationalskillscoalition/skillsequity](https://nationalskillscoalition.org/skillsequity)

National Skills Coalition organizes broad-based coalitions seeking to raise the skills of America's workers across a range of industries. We advocate for public policies that invest in what works, as informed by our members' real-world expertise. We communicate these goals to an American public seeking a vision for a strong U.S. economy that allows everyone to be part of its success.

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