



Maine Department of Health and Human Services

EMPLOY ME

SNAP EMPLOYMENT AND TRAINING PROGRAM

PROVIDER MANUAL

Updated October 2023



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What Is the SNAP Employment and Training Program?

Overview and Purpose:

The purpose of this document is to describe the Maine Department of Health and Human Services (DHHS) Supplemental Nutrition Assistance Program (SNAP) Employment and Training Program (SNAP E&T). The document is written for Employment and Training providers who contract with the Maine DHHS to provide these services.

The United States Department of Agriculture (USDA) Food and Nutrition Service (FNS) funds the Supplemental Nutrition Assistance Program (SNAP), which provides financial assistance to certain low-income families to purchase food. While the SNAP program is funded by the USDA, states administer SNAP and SNAP E&T programs. The USDA, as authorized by the Food and Nutrition Act of 2008, as amended in 2014, requires states to operate Employment and Training programs to assist SNAP recipients with gaining skills, training, education, and work experience that will help them find jobs to make their families more economically self-sufficient. USDA provides an annual allocation to states to administer these programs, and most states and providers additionally fund some E&T services. States must submit an annual plan that details how they will operate their E&T programs. USDA requires states to operate E&T to the specifications and standards in the SNAP Employment and Training Toolkit. This toolkit is found at: <https://www.fns.usda.gov/snap/employment-training-program-toolkit>. USDA also requires states to submit an annual plan that outlines specific services and budgets to be delivered in the federal fiscal year that runs from October 1 to September 30.



In Maine, this employment and training program is called the SNAP E&T Program. The Maine SNAP E&T Program is administered by the State of Maine Department of Health and Human Services, Office for Family Independence. Maine DHHS uses State of Maine purchasing guidelines to contract with willing and qualified providers for SNAP E&T services. All E&T providers must have a contract with the Maine DHHS in order to deliver SNAP E&T services, or if the provider is a state agency such as Maine Department of Labor, there must be a Memorandum of Understanding (MOU) in place.

Through SNAP E&T partnership, employment and training providers contracted with the Maine DHHS assist low-income Maine residents enrolled in SNAP to participate in employment and training services with the goal of self-sustaining employment. The SNAP E&T program is voluntary for participants and is intended to provide funding for job training and post-secondary education to accelerate achievement of employment and independence from Maine's public assistance services. Maine SNAP E&T may also have other employment and training opportunities that providers contract with the State of Maine to deliver.

SNAP recipients who are aged 16 or older, currently enrolled in the federally funded SNAP Program, are able to and are seeking employment upon completion of SNAP E&T, are Maine residents, and are not TANF recipients are eligible for services through the SNAP E&T program. The primary target population is identified as SNAP recipients who are subject to federal SNAP work requirements (called Work Registrants), including Able Bodied Adults without Dependents (ABAWDs). While referrals may come from a number of sources, the Department makes the final determination of enrollment.

The SNAP Program meets federal requirements of its funding agency, USDA, and requires all providers to meet these federal requirements in addition to protecting the civil rights of its recipients. All vendors must assert they will meet the federal civil rights protections for all participants and provide annual training to all staff serving SNAP E&T participants to assure with these federal guidelines.

The Department requires E&T Providers to follow its Non Discrimination policy at <https://www.maine.gov/dhhs/about/non-discrimination-notice#:~:text=The%20Department%20of%20Health%20and,a%20claim%20or%20right%2C%20or.>



DEFINITIONS- What Do These Terms Mean?

Here is a list of commonly used terms and acronyms in this document and SNAP E&T.

| | |
|--------------|---|
| ABAWD | An ABAWD is a SNAP recipient who is determined able bodied and does not have dependents under the age of 18 in the SNAP household. ABAWDs are Work Registrants who have time limited benefits if they do not meet certain work requirements of 80 hours per month, volunteer for the value of their SNAP benefit, or are enrolled in State approved qualifying components of certain employment and training programs. As of October 2023, ABAWDs must be over age 18 and under age 52 on September 1, 2023, age 54 on October 1, 2023, and age 56 on October 1, 2024. There are exemptions from these time limited benefits if the recipient is unable to work due to a physical or mental limitation, pregnant, excused from the general work requirements, a veteran, experiencing homelessness, or age 24 or younger and in foster care on their 18 th birthday. |
| BES | Bureau of Employment Services with Maine’s Department of Labor |
| CareerCenter | Maine’s One Stop workforce development locations and service providers |
| CSSP | Competitive Skills Scholarship Program, established in Maine Statute: http://www.mainelegislature.org/ros/LOM/LOM123rd/PUBLIC352_ptA.a.sp . The CSSP program is in Maine DOL rules at 12-597, Chap. 2 at: http://www.maine.gov/sos/cec/rules/12/chaps12.htm . |
| DHHS | Maine Department of Health and Human Services |
| DOL | Maine Department of Labor |
| FNS | Food and Nutrition Service, a branch of USDA |
| IEP | An Individualized Employment Plan (IEP) is a written plan (referred to as an IEP) that must be developed by SNAP E&T Providers and participants that assesses skills, interests, and aptitudes of the participant, and identifies the specific services and supports necessary for the SNAP E&T participant to achieve employment goals stated in the Plan. Some providers may refer to this Plan as the Individualized Development Plan, or IDP. |
| OFI | Office for Family Independence, Maine Department of Health and Human Services |
| Participant | An eligible recipient who has enrolled in the SNAP E&T program |
| Plan | Employment and Training Plan submitted annually to and approved by USDA-FNS, which outlines approved services to be delivered Maine |

DHHS SNAP E&T providers under the SNAP Employment and Training Annual plan (referred to as “The Plan.”)

| | |
|-----------------|---|
| Recipient | A SNAP recipient who is currently eligible for and receiving SNAP benefits. |
| SNAP | Supplemental Nutrition Assistance Program – federal program for low-income individuals, also previously known as “Food Supplement” or “Food Stamp” program. |
| TOOLKIT | Employment and Training Toolkit, published by USDA SNAP program, to help states create and implement E&T programs, hereinafter referred to as “The Toolkit”, and serving as guidance and standards for services to be delivered. The toolkit is at: https://www.fns.usda.gov/snap/employment-training-program-toolkit . |
| USDA | United States Department of Agriculture – oversight agency of the federal SNAP program. |
| WIOA | The Workforce Innovation and Opportunity Act was signed into law on July 22, 2014. This legislation, serving as a reauthorization of the Workforce Investment Act, directed the workforce system to develop regional plans in conjunction with Adult Education and Vocational Rehabilitation, and develop industry cluster initiatives as an integral part of regional activities. |
| Work Registrant | A Work Registrant is a SNAP enrolled recipient between the ages of 16 through 59 who is physically and mentally able to work thirty or more hours a week, has no children under the age of six in the benefit household, and has no federally defined exemptions from work requirements, and defined in the Maine SNAP Program Manual (Chapter 301). |



What Services Can Be Provided Through SNAP E&T?

This section overviews employment and training services Maine SNAP E&T program will contract for with its SNAP E&T providers (contracted vendors). Maine DHHS intends its providers to deliver a full array of employment and training opportunities for its SNAP E&T Participants. Service components may include job search training, workfare, work experience, apprenticeships, education services, and job retention. These service components are outlined in *USDA Employment and Training Toolkit*: <https://www.fns.usda.gov/snap/employment-training-program-toolkit>. Maine SNAP E&T providers must also follow the rules of the Maine SNAP E&T Program Chapter 609 at: <https://www.maine.gov/sos/cec/rules/10/chaps10.htm>.

Maine DHHS requires all contracted providers to deliver services within standards that meet these state and federal guidelines. All services must be coordinated by SNAP E&T providers in collaboration with other employment and training or educational providers to assure no duplication for co-enrolled participants. SNAP E&T providers **must** provide case management for recipients while enrolled in all SNAP E&T components.

Maine SNAP E&T services are subject to annual funding limits and the availability of providers to contract with the Department to deliver such services. Most providers are reimbursed at 50% of allowable costs identified and capped contractually. Accordingly, SNAP E&T services are not an entitlement for participants since services are subject to funding and availability of providers.

Before providing services to participants, providers must assess the needs of applicants and develop an Individualized Employment Plan (IEP). Prior to development of an Individualized Employment Plan, the agency must assess the skills, interests, and aptitude of the SNAP E&T applicant to assure that the proposed services are a good fit and that the proposed plan realistically leads the participant to a well-paying job. Providers should use a standardized assessment form and process that will be approved by the Department. Final approval and enrollment for all SNAP E&T participants is determined by the Department.

The SNAP E&T components that may be provided *if* included in the provider contract follow. SNAP E&T providers determine which components they will deliver based on their agency expertise, and may choose from the following components of service:

Job Search Training will typically initiate SNAP E&T participation and are intended to help participants become job ready. Necessary services will be identified and provided to include interview workshops, resume writing, and Maine JobLink registration to apply for jobs online. Some participants may require more intensive services, including soft skills, to help them become work ready, including time management, budgeting, or assistance with transportation to work successfully. Participants will also be referred to WIOA or other employment and training providers whenever appropriate. An important part of job search training is the individual assessment that occurs during this phase. The goal of this component is for participants to successfully secure employment.

Providers will complete assessments that include creation of a job search plan, setting goals, action steps and objectives to meet goals. Providers will also deliver on-going support to include assistance during job search and post attainment.

Work Experience may include a variety of unique training and work “earn while you learn” opportunities. Work experience has the primary goal of developing work skills and employability of participants while they receive case management and coaching. Work experience may be paid or unpaid and may include but is not limited to internships (sometimes unpaid), on the job training, part-time or full-time work opportunities, pre-apprenticeships, and certified apprenticeship opportunities. These activities must be identified in the IEP.

Education- Maine SNAP E&T funds an educational component that improves employability both through basic education leading to a high school diploma or basic skills (English as a second language or other basic courses), specific job training and/or certification, and also by supporting post-secondary education for specific high skilled jobs.

Maine SNAP E&T also can reimburse post-secondary educational activities such as short-term vocational training, certification programs, and associates and bachelor’s degrees in programs that have direct links to employment. Post-secondary educational components must lead to a high-wage and in demand occupation, as determined by the Maine Department of Labor at: <https://www.mainecareercenter.gov/docs/2021/cssp/CSSP2021HighWageInDemandlist.pdf>.

Such programs may include Adult Basic Education (ABE), basic literacy, English as a Second Language (ESL), and high school equivalency (GED) and can be reimbursed when the services are not available to the participant in other free community programs.

Job Retention services can be reimbursed for a minimum of 30 days and up to one year following participation in SNAP E&T and attainment of a job through that SNAP E&T participation. This component allows case management services and some financial support for equipment, tools, uniforms, and transportation for participants who attained a job while participating in SNAP E&T. Maine has a Job Retention waiver in place (currently approved through September 30, 2024) that allows the provision of Job Retention for up to one year, which is longer than the 90-day standards allowed for other states.

SNAP E&T participants who have been previously SNAP enrolled and who attained employment through their SNAP E&T participation are eligible for Job Retention services for up to one year even if they lose SNAP benefits due to no longer being financially eligible. Job Retention is the only component that may be delivered to individuals who lose SNAP eligibility due to excess income when the employment is attained through SNAP E&T participation. Case management must continue for these individuals as well.

Case Management- While Case management is not defined as an E&T component, it is a service that all SNAP E&T providers must provide on an ongoing basis when providing any E&T service components. The primary purpose of case management is to monitor the participant’s progress and provide necessary support to reach Plan goals. Maine DHHS requires that case management be provided at minimum on a monthly basis. Expected documentation includes notes on progress towards Plan goals, changes in Plan, reimbursement (along with proper documentation such as receipts), job search logs, and progress notes.

Participant Supports- (sometimes called **Participant Reimbursements**) are intended to remove barriers for SNAP E&T participants, and may include financial assistance for transportation, childcare, books, tools, equipment, and work clothing and other allowable expenses necessary to assist participants in completing an approved IEP. All SNAP E&T providers **MUST** assure that participant allowable supports necessary to complete SNAP E&T programming are made available to the participant, whether or not Participant Supports are in the provider contract. Those providers who do not include participant supports in their budget and contract must attest to providing those supports necessary and identify the source of funding.

Maine SNAP E&T may reimburse federally allowable support services at a 50% reimbursement rate if the supports are necessary for the specific employment and training provided, addressed in the IEP, and do not exceed annual caps in the provider contract. All participant support services must be approved prior to purchase, and the approved costs can only be reimbursed directly to the contracted SNAP E&T vendor. Participant support services cannot include stipends; most living expenses; or services for recipients receiving TANF cash benefits.

SNAP E&T providers must assist participants who require a laptop computer or internet access to complete their IEP educational plan by obtaining a laptop through either a laptop loaner program or participant reimbursement, as identified in the provider contract. Internet access or hotspots are also allowable expenses when required to complete an approved IEP.

A guide of generally reimbursable items is available in the SNAP E&T Toolkit at: <https://www.fns.usda.gov/snap/employment-training-program-toolkit>. Pre-approval is required by OFI.



The following participant reimbursements are examples of supports reimbursable in SNAP E&T contracts to remove barriers from successful completion of E&T programming:

| Tuition or Participant Reimbursement Items That Can be Provided with Prior Approval: | Maximum Amount Reimbursed (cap) Per Participant Per Federal Fiscal Year |
|---|--|
| Tuition | \$6000 per year for full-time students and \$3000 for part-time students, after all other scholarships and grants are exhausted. |
| <u>Specific Caps for Participant Reimbursements</u> | |
| Dependent Care | Childcare rates may not exceed the rates set by the Maine Childcare Subsidy Program (CCSP) at: http://www.maine.gov/dhhs/ocfs/ec/occhs/provider-subsidy.htm . Recipients must apply for CCSP funding, and childcare will only be reimbursed when CCSP is not available. |
| Transportation | Mileage up to the State of Maine rate (current \$.46 per mile) and other modes of public transportation, Transportation must be reimbursed in the most economic manner feasible. Providers may use .46 per mile and distance to programming to calculate distribution of gas cards. |
| Eyecare* | \$200 |
| Dental Care* | \$500 |
| Books and Supplies | \$2000 per year |
| Uniforms, Tools, Equipment, work clothing, and automobile repair | \$1000 per year |

*After all other insurance or coverage is exhausted.

What Are Federal SNAP Work Requirements?

The SNAP program has federal work requirements that are identified in the federal code of regulations at 7 C.F.R. § 273.7. These work requirements include registering for work, not voluntarily quitting a job or reducing hours, taking a job if offered, and participating in employment and training programs if assigned by the State.

SNAP E&T programs are primarily designed to assist SNAP recipients with meeting these federal work requirements as well as getting training for better paying jobs and careers.

Some groups are exempt from these federal work requirements. They include children, seniors, pregnant women, and people who have physical or mental health conditions resulting in disability that impacts the ability to work.

What Is a Work Registrant?

People between the ages of 16 through age 59 who do not fit within an exemption must meet federal work requirements in order to be eligible for SNAP. These individuals are required to be “registered” for work annually, and they are often referred to as “work registrants.” Recipients who have children under age six in the benefit household, have a disability, care for a disabled adult, or are subject to other work requirements (such as TANF) are exempt from work registration. The Department expects providers to assist their SNAP E&T participants with meeting federal work requirements, since failure to comply with work requirements can result in disqualification from the SNAP Program.

What Is An ABAWD?

In addition to these general work requirements, a subset of this “work registrant” population includes able bodied adults without dependents (ABAWDS). ABAWDs are individuals between the ages of 18 through 50*, who are required to work or participate in a work program for at least 80 hours per month in order to receive SNAP benefits for more than 3 months in a 36-month period.

In Maine, ABAWDS are identified through the eligibility system and notified about these work requirements. ABAWDS must either meet the work requirement through employment or volunteering (self-initiated workfare). ABAWDs who believe they should be exempted from work requirements due to disability or who have questions about documenting their hours worked or volunteered must contact an OFI eligibility specialist at 1-855-797-4357.

- The Fiscal Responsibility Act of 2023 made changes to ages for ABAWDs subject to work requirements and added certain exemptions. As of October 2023, ABAWDs must be at least age 18 and under age 52 on September 1, 2023, age 54 on October 1, 2023, and age 56 on October 1, 2024. There are also new exemptions, see Definitions.

ABAWDs who reside in certain areas with higher unemployment rates are exempt from meeting these federal work requirements through a federally approved waiver that runs from October 1,

2023, through September 30, 2024. The status of exemption for ABAWD work requirements is subject to submission and approval of a renewed federal waiver annually.

Who Is Eligible for SNAP E&T Services?

Individuals must be currently enrolled in the SNAP program to be eligible for SNAP E&T, with the exception of job retention services as defined above. Current SNAP enrollment must be verified by OFI staff after a Release of Information Consent form is signed by the applicant.

Maine SNAP recipients who are enrolled in TANF and subject to TANF work requirements are not eligible for SNAP E&T, as they are subject to work requirements of the TANF program and must work with the Department's Break the Cycle vendor (currently Fedcap).

Because funds are received from USDA-Food and Nutrition Service, only those SNAP recipients open on the federal SNAP benefit are eligible. Maine SNAP recipients who receive the state-funded SNAP benefit are not eligible for SNAP E&T, which is federally funded.

Enrollment as a SNAP E&T participant is determined by the Department regardless of referral source.

In Summary: To qualify for Maine SNAP E&T, participants must:

- a. Be enrolled in the federally funded SNAP Program (with exception of Job Retention services defined above);
- b. Not be a recipient of TANF cash assistance;
- c. Be at least 16 years old;
- d. Live in Maine;
- e. Be legally eligible to work in the United States;
- f. Be seeking education or training for job that will lead to self-sufficiency measured by decrease of need for public benefits. The Department encourages providers to select training that leads to high-wage in-demand occupations, as identified on the Maine Department of Labor website, and that have an average wage at or above the average wage for all occupations in Maine;
- g. Not have a marketable post-secondary degree, as determined by the Department; and
- h. Have the ability to undertake and complete the education or training program, as assessed by SNAP E&T providers.

Which Agencies Can Provide SNAP E&T Services and How Do Providers Enroll?

Community agencies, post-secondary educational institutions, employers, and other entities with Maine locations that have expertise in providing employment and training services may request to be assessed as a Qualified Vendor of SNAP E&T services with the State of Maine Department of Health and Human Services. Potential contractors must be approved by both the Department and by USDA-Food and Nutrition Services. Potential contractors must have a contract executed with the Department before SNAP E&T services are provided or reimbursed. SNAP E&T providers must also meet qualifications detailed below, which includes having non-federal funds available to meet 50% of their employment and training service costs.

Providers who are interested in becoming a SNAP E&T provider should contact the Maine DHHS OFI:

Patricia Dushuttle, Special Projects Manager-SNAP
Maine Department of Health and Human Services
Office for Family Independence
11 SHS, 109 Capitol Street
Augusta, Maine 04333-0011
(207) 215-0995
Patricia.Dushuttle@maine.gov

Or Wanda Theobald, SNAP E&T Program Specialist
Maine Department of Health and Human Services
Office for Family Independence
11 SHS, 109 Capitol Street
Augusta, Maine 04333-0011
(207) 592-2452
Wanda.Theobald@maine.gov

The Department has a Willing and Qualified Vendor application process that allows potential SNAP E&T vendors to complete an application and Agency Assessment. The OFI then assesses the application, and if justified, may recommend that the Department enter into a contract with the SNAP E&T vendor. All contracts must be approved according to State purchasing guidelines before services are provided. All services are also subject to approval of the services in the annual SNAP E&T Plan and the availability of state (as applicable) and federal funding.

SNAP E&T providers must work with the DHHS Division of Contract Management (DCM) and meet all State Contracting requirements, which are available at:
<https://www.maine.gov/dafs/bbm/procurementservices/vendors>.

What Are the Rights of SNAP E&T Participants?

All SNAP E&T participants have certain rights and responsibilities in relation to the SNAP E&T program. Rights include being made aware of what services the SNAP E&T program offers, good cause, the availability of conciliation and administrative hearings, and disqualifications that may be applied for failure to comply with SNAP E&T rules or federal work registration requirements. Responsibilities include following the rules of the program with regard to participation, keeping appointments and abiding by provisions of the IEP.

Registrants must be advised orally and in writing of their rights and responsibilities by the SNAP E&T provider at the time of enrollment.

Rules governing the SNAP E&T program and participant rights and responsibilities are at: <https://www.maine.gov/dhhs/ofi/programs-services/food-supplement/fset/information-for-providers>.

What Qualifications Must A SNAP E&T Provider Have?

The Department encourages employment and training providers to contact the Department to discuss enrolling as a SNAP E&T provider. SNAP E&T providers will be required to have an accessible space available to serve the public and sufficient staff resources to provide services to its target population. The Department intends to contract with SNAP E&T providers who deliver high quality employment and training services leading to increased employment opportunities for SNAP recipients focused on employer recognized credentials and career pathways.

SNAP E&T providers must be able to clearly demonstrate their ability, experience, and success in the following areas:

1. Conducting employment and training services at standards identified in the Toolkit at: <https://www.fns.usda.gov/snap/employment-training-program-toolkit>;
2. Knowledge of the Federal Workforce Innovation and Opportunity Act (WIOA), to maximize opportunities through WIOA and to provide services at a comparable standard; and knowledge of Maine's WIOA plan and ability to work within expectations of the plan;
3. Knowledge of other employment and training programs available to low-income Mainers;
4. Ability to comprehensively assess the training needs of SNAP applicants;
5. Capacity and understanding of how to serve the target population of low-income SNAP recipients;

6. Delivery of culturally competent services;
7. Ability to perform all required administrative tasks, including tracking, reporting, billing, recruitment, and collaborative functions;
8. Ability to coordinate and work collaboratively with other community providers, state and federal government;
9. Ability to identify and measure program effectiveness by developing and targeting outcome measures as required by the federal E&T program; and
10. Demonstrated ability to obtain required non-federal funds for 50% of E&T funding. Since SNAP E&T programs are usually funded at 50%, providers must have other sources of non-federal funding available. The following illustration on the next page <https://snaptoskills.fns.usda.gov/about-snap-skills/what-is-snap-et>) demonstrates how funding is available for SNAP E&T providers.

How Do SNAP Providers Get Reimbursed for SNAP E&T?

The Department must execute a contract with SNAP E&T providers for the agency to be reimbursed. The contract will identify specific procedures for invoices and identify specifically what is to be reimbursed. Once a contract is in place, vendors must invoice on a monthly basis for services provided to eligible SNAP E&T participants. Invoices must properly identify what services and supports were provided to each eligible participant. Support services must be approved by the Department to assure eligibility and that caps are not exceeded. Receipts for support services are required documentation. The SNAP E&T provider must follow all DHHS Division of Contract Management requirements for billing and reporting: <https://www.maine.gov/dafs/bbm/procurementservices/vendors>.

SNAP E&T providers will be assigned a Single Point of Contact (SPOC) at the DCM to which all SNAP E&T invoices are sent. Invoices must NOT contain confidential individual participant information. A copy of those invoices with names must be sent to the SNAP E&T coordinator for coding and documentation purposes. The Provider must NOT send any information with Participant identifying information with the invoice that is submitted to the DCM mailbox. Invoices are submitted to: DHHS, Invoices-DCM Invoices-DCM.DHHS@maine.gov.

Generally, The OFI will contract with employment and training providers who are eligible for funding through “Third Party Reimbursement model,” that can reimburse 50% of allowable costs that providers expend using allowable non-federal funding. Qualifying non-federal funds can come from local government, non-profit entities, institutions of higher education, foundations or other eligible community-based organization that qualify for allowable federal SNAP reimbursement pursuant to the federal “Food and Nutrition Act of 2008,” Pub. L 110—246 (7 U.S.C. S2011 et seq.) The illustration on the next page from <https://snaptoskills.fns.usda.gov/about-snap-skills/what-is-snap-et> shows how funding works:

HOW SNAP E&T WORKS

FEDERAL SNAP E&T FUNDING

E&T PROGRAM GRANT (100 PERCENT) FUNDS

- Formula-based grants to States to plan, implement, and operate SNAP E&T services
- Total funding available in FFY 2016: \$90 million
- All States receive 100 percent funding. Some States do not spend their full allocations; remaining dollars may be reallocated to other States

50 PERCENT REIMBURSEMENT (50-50) FUNDS

- Reimbursement grants (50 cents per dollar obligated) for SNAP E&T program costs exceeding those covered by 100 percent funds or for supportive services provided to participants
- Funds eligible for reimbursement can include state or local funds OR non-federal funds put up by "third-party" providers contracted by States to offer E&T services
- States may request 50-50 funds from FNS

ABAWD ("PLEDGE STATE") GRANT FUNDS

- For States pledging to offer qualifying E&T services to ABAWDs at risk of losing SNAP eligibility due to time limits
- States may request to be a "pledge" State and thus, receive these funds
- Currently capped at \$20M annually for all pledge States, allocated based on size of ABAWD population

SNAP E&T SERVICES

- SNAP E&T is a package of services that includes participant assessment, employment and training activities, and supportive services
- States must describe services in an annual SNAP E&T Plan that is submitted to USDA
- SNAP E&T services are offered by States or State partners (Colleges, CBOs, American Job Centers contracted/engaged by State)



SNAP E&T FUNDS CAN PAY FOR:

100 PERCENT OR 50-50 FUNDS

ADMINISTRATIVE EXPENSES

- State staffing and overall planning, implementation, and operations
- Partner provider administrative expenses

DIRECT PROGRAM EXPENSES (*other than* participant reimbursements)

- Tuition and fees
- Case management/career navigation
- Job development

50-50 FUNDS ONLY

PARTICIPANT EXPENSES *reasonably necessary and directly related* to program participation (supportive services), including:

- Transportation
- Dependent care
- Equipment and supplies related to training
- Books
- Uniforms
- Licensing fees

What Other Employment and Training Opportunities Are Available in Maine?

There are other employment and training opportunities available in Maine that must be identified and coordinated to the extent possible to assure that there is no duplication of services. Maine requires SNAP E&T providers to collaborate with these other employment and training providers, including WIOA, Vocational Rehabilitation and other providers to use SNAP E&T funding most efficiently and to assure no duplication or supplantation of services. SNAP E&T participants may also be enrolled in other employment and training programs such as the DHHS HOPE program or the Maine DOL Competitive Skills Scholarship Program (CSSP).

Since the goal of SNAP E&T is to assist participants to jobs that lead to more self-sufficient lives, SNAP E&T requires providers to explore funding opportunities that do not require participants to take out student loans that leave them making payments upon completion. Providers must refer their participants seeking post-secondary educational programming to the Maine Educational Opportunity Center (MEOC) <https://meoc.maine.edu/>, which is funded by US Department of Education, so that they can explore potential funding and scholarship opportunities.

There are multiple funding and scholarship opportunities for those seeking employment and training services in Maine. Here is a partial list of other employment and training opportunities that are available to low-income residents in Maine and should be also discussed with potential clients:

Workforce Investment Opportunity Act (WIOA) Providers:

WIOA is designed to help job seekers access employment, education, training, and support services to succeed in the labor market and to match employers with the skilled workers they need. WIOA brings together, in strategic coordination, the core programs of Federal investment in skill development:

- Employment and training services for adults, dislocated workers, and youth and Wagner-Peyser employment services administered by the Department of Labor (DOL) through formula grants to states; and
- Adult education and literacy programs and Vocational Rehabilitation state grant programs that assist individuals with disabilities in obtaining employment administered by the Department of Education (DoED).
- Clients can be assessed for eligibility for WIOA by going to one of the CareerCenters in Maine for referral to the designated WIOA provider, or by going

directly to the WIOA provider designated in the area of the state in which the client resides.

Maine Department of Labor Competitive Skills Scholarship Program:

The Competitive Skills Scholarship is an additional source of funding that reimburses expenses often not covered by other educational grant and loan programs, including tuition and fees and supports including childcare, transportation, books, supplies, equipment, remedial and pre-requisite training. The Competitive Skills Scholarship reimburses several different education and training options, including certificate programs, two-year, and four-year degrees. Educational and training programs must be directly linked to an approved list of occupations that are higher wage and in demand.

The list of approved training programs includes those two year and less programs at: <https://www.mainecareercenter.gov/docs/2021/cssp/CSSP2021HighWageInDemandlist.pdf>.

Participants in CSSP must (1) be at least 18 years old, (2) live in Maine, (3) be legally eligible to work in the U.S., (4) be seeking education or training for a job in a high wage, in demand occupation, (5) not have a marketable post-secondary degree, (6) have a household income of less than 135% of the federal poverty level and (7) have the ability to undertake and complete the education or training program (as determined by assessment).

Applicants can apply for CSSP scholarships at Maine CareerCenters. CSSP funds may be allowable for third party reimbursement.

One Stop CareerCenters

Maine CareerCenters provide a variety of employment and training services at no charge for Maine workers and businesses. There are CareerCenter locations throughout the state, and the addresses are available at:

<http://www.mainecareercenter.gov/locations/index.shtml>.

The Higher Opportunity for Pathways to Employment (HOPE) program

The Maine DHHS HOPE program at: <https://www.maine.gov/dhhs/ofi/programs-services/hope> provides financial assistance for Maine families pursuing training and education beyond high school. The HOPE Program helps qualifying parents cover costs related to training and education. HOPE can help pay for:

- Tuition and Fees
- Prior Tuition and Fees preventing you from reenrolling in school
- Books, Supplies, Tools, and Equipment

- Child Care
- Transportation
- Automobile Repairs, Registration, Insurance, and Inspection
- Computer or other Technology
- Dental Care (if needed to help you stay in school)
- And other costs related to school.

Performance Measures That SNAP E&T Providers Must Report To OFI

The Department requires SNAP E&T providers to submit status reports and performance measures to OFI, so that federal reporting requirements can be met. This information is crucial to see how effective E&T services are for DHHS clients.

Status Reports:

OFI requires SNAP E&T providers to submit a monthly roster of SNAP E&T participants so that status in programming and continued SNAP benefits can be confirmed. In addition, SNAP E&T providers must report any changes in participation and/or employment status. Monthly billing requires submission of the roster and documentation of all participant supports reimbursed and billed for in the month.

Performance Measures:

In addition to other state reporting requirements, the federal SNAP E&T program requires providers to develop, track and report federally defined standards that are like those required by WIOA. These standards are identified at 7 C.F.R. § 273.7 and include the following:

- The number and percentage of E&T participants and former participants who are in unsubsidized employment during the second quarter after completion of participation in E&T;
- The number and percentage of E&T participants and former participants who are in unsubsidized employment during the fourth quarter after completion of participation in E&T;
- The median quarterly earnings of all the E&T participants and former participants who are in unsubsidized employment during the second quarter after completion of participation in E&T;
- The number and percentage of participants that completed a training, educational, work experience or an on-the-job training component;
- The number of all E&T participants who:
 - a. Are voluntary or mandatory participants;
 - b. Have received a high school degree (or GED) prior to being provided with E&T services;
 - c. Are able-bodied adults without dependents (ABAWDs);

- d. Speak English as a second language;
- e. Are male or female;
- f. Are within each of the following age ranges: 16-17, 18-35, 36-49, 50-59, 60 or older.

How Do SNAP E&T Providers Enroll Participants?

There is no wrong door for referrals to the SNAP E&T program. Providers may accept referrals from other community agencies or providers, recruit applicants from their internal pool of clients, or accept referrals from the OFI or other State agencies. The SNAP E&T coordinator makes the final determination for enrollment after screening and assessment is completed.

Applicants must first be confirmed as SNAP E&T eligible before being assessed for SNAP E&T participation and being approved for enrollment by the OFI. Applicants for SNAP E&T must complete eligibility verification and participate in a comprehensive assessment conducted by the SNAP E&T provider to determine their potential to succeed in the education and training program. Enrollment for post-secondary degree programs may also require additional eligibility requirements as determined by the institution providing services.

Individual training and support service needs must be identified and incorporated into a written Individual Employment Plan (IEP) developed by the SNAP E&T provider.

Here are the steps to follow to request to enroll a participant:

Step 1: CONFIRM SNAP E&T ELIGIBILITY:

1. Complete **Release of Information Consent Form** with the individual and email and submit to the OFI contact person. Note that client specific emails must be encrypted to ensure confidentiality.
2. Along with the Release of Information, ask the OFI SNAP E&T Program to confirm the individual is open on SNAP and eligible for SNAP E&T services.
3. Ask the OFI SNAP E&T Program to confirm if the individual is an ABAWD, which may result in additional work requirements for the individual and tighter timelines in which to serve the individual.
4. Confirm the individual is not receiving TANF cash benefits and subject to TANF work requirements that make them ineligible for SNAP E&T.
5. Receive Confirmation from OFI SNAP E&T team that the individual is eligible and may approved for SNAP E&T. This approval will be noted in the Job Connection Case file once all required forms are completed and reviewed by OFI.

Step 2: ASSESS THE INDIVIDUAL

1. Complete the OFI INITIAL SCREENING FORM provided by OFI SNAP E&T staff. Keep in mind that this is not the only assessment your agency should do. This is initial screening information required by OFI to determine if the individual is eligible for SNAP E&T assessment and services.
2. Complete assessments using the assessment tools your agency uses and has been approved by OFI. Agencies use a variety of comprehensive assessment tools, many of which are standardized, to assess the needs, skills, and strengths of their participants. This assessment must be uploaded to the Department's designated database and kept on file at your agency for each SNAP E&T participant. SNAP E&T providers must include the following as part of the assessment: basic skills, aptitude, career goals and interests, employment history, education level, barriers, and support needs.

Step 3: DEVELOP AN INDIVIDUALIZED EMPLOYMENT PLAN

Based on the assessment and, if the client is deemed appropriate for further services by the agency, develop an Individualized Employment and Training Plan (IEP). The IEP is developed after assessment is completed. The Plan must include career goals, skills, abilities, referrals to other providers, and any other job-related factors that need to be considered to meet the goals of the plan. Plans must be updated as appropriate to reflect current status and changes.

This Plan and all required participant documentation and progress notes must be uploaded to the OFI approved SNAP E&T database for each SNAP E&T participant. The OFI SNAP E&T Program staff reviews and approves all participant services identified in the IEP to assure that all proposed services are appropriate and allowable.

When Must SNAP E&T Providers Disenroll Participants?

Providers must disenroll Participants under certain circumstances. When a Participant is disenrolled, the Provider must notify the SNAP E&T Coordinator, record information in the Job Connection Tool, and indicate discharge date on the monthly roster. Some of the reasons for disenrolling a Participant include when the Participant completes programming, is no longer SNAP enrolled, when a Participant disenrolls for health or legal reasons such as incarceration, when a Participant withdraws voluntarily or loses contact with the Provider, or when a Provider determines that the Participant no longer is appropriate or benefiting from SNAP E&T. Once a Participant is disenrolled, no services or Participant supports may be reimbursed for the Participant. Disenrolled Participants may reenroll at any time should they become eligible, and the Provider and the Department determine their enrollment is appropriate. This next section details some of these situations.

If a participant withdraws from SNAP E&T services or if no contact can be made in two months, the SNAP E&T participant must be discharged from SNAP E&T programming and the State

E&T coordinator notified. All of this information must be recorded in the participant's case file and be made available to the Maine DHHS.

1. Disenrollment When a SNAP E&T Participant loses their SNAP eligibility

When SNAP E&T Participants lose their SNAP eligibility, they must be disenrolled from SNAP E&T. This is indicated on the monthly roster, and SNAP E&T funds can no longer be used for any services the Provider delivers to the former participant. An exception for disenrollment being required due to lost SNAP eligibility is when a Participant is enrolled in the Job Retention benefit. The Job Retention component is the only E&T component that federal rules allow continuation of services after SNAP enrollment discontinues.

2. Disenrollment when a Participant Voluntarily Disenrolls or disenrolls for health or legal reasons

If a Participant is disenrolled for any of these reasons, case notes must be entered to provide the justification for disenrollment and the roster must be updated to indicate reason for discharge and date of discharge.

3. Provider Determination that a SNAP E&T Participant Must be Disenrolled

Federal E&T regulations require that Providers disenroll Participants when they determine that the Participant is no longer appropriate or a good fit for the services or components being provided. Federal E&T regulations use the term "provider determination" to describe this decision that occurs when an individual wishes to participate, but the provider is unable to support them. Only the SNAP E&T provider has the authority and responsibility to make a provider determination. Since SNAP E&T providers know their programs best, providers have flexibility to use their own judgment to determine if an individual is not a good fit for their program. SNAP E&T providers must not discriminate against civil rights protected classes when making provider determinations.

The SNAP E&T Provider must inform the OFI SNAP E&T Coordinator of the provider determination prior to notifying the individual, in the case that another provider might be considered as a better fit for the individual. The OFI SNAP E&T Coordinator will review provider determinations to ensure SNAP E&T providers are making reasonable decisions about which individuals are not a good fit for their programs and that civil rights are not being violated.

In all instances, the Provider must notify the individual of the provider determination within 10 calendar days of the provider determination. There is no standard form for the SNAP E&T provider to use to send information about the provider determination to the district. All information must be documented in the Job Connection case records file.

Since a provider determination is not a sanction or a determination of ineligibility, an appeal or request of a fair hearing in accordance with 7 CFR 273.7(f)(6), is not provided to address a participant's disagreement with a provider determination.