



**SNAP E&T MANUAL
DESCRIPTION OF CHANGES ATTACHMENT
REVISED SECTIONS – ISSUED 10/2013**

The following sections contain American Recovery and Reinvestment Act (ARRA) and statewide ABAWD waiver related changes. ARRA and the statewide ABAWD waiver end September 30, 2013. Mandatory work provisions for ABAWDs will begin on 10/01/13.

§4.9 (County Agency Functions).

§4.12 (Employment Services Provider (ESP) Functions).

§5.3 (SNAP E&T Services).

§5.6 (SNAP E&T Orientation).

§5.12 (Employment Plan (EP)).

§6.6 (Able-Bodied Adults Without Dependents (ABAWDS)).

§6.15 (Sanctions for Failure to Comply).

Supplemental Nutrition Assistance Program (SNAP) participants receive employment services through the county's Supplemental Nutrition Assistance Program Employment & Training (SNAP E&T). SNAP E&T provides services to mandatory non-public assistance SNAP participants (Able-Bodied Adults Without Dependents (ABAWDs)). See [6.6 \(Able-Bodied Adults Without Dependents \(ABAWDs\)\)](#).

In addition to administering the SNAP program, each county human services agency and reservation is required to operate a SNAP E&T program if it has not been granted a waiver. See TEMP Manual TE02.05.68 (ABAWD FSET Exempt Reservations), TE02.05.69 (ABAWD FSET Exempt Counties).

The county agency either directly provides these services, or contracts with 1 or more ESPs to provide local SNAP E&T services and activities.

County agencies and SNAP E&T providers each have certain functions/responsibilities. For provider responsibilities, see [4.12 \(Employment Services Provider \(ESP\) Functions\)](#).

The purpose of this program is to assist members of SNAP households in gaining skills, training, work, or experience that will increase their ability to obtain regular employment.

Each county agency must provide SNAP E&T services or contract for SNAP E&T services with outside providers. County agency administrators must ensure that SNAP E&T services providers follow SNAP E&T services requirements. The county agency is ultimately responsible for the operation of SNAP E&T and clients' participation in the program.

County agency procedures and interactions with SNAP E&T providers may vary depending on how the county sets up its SNAP E&T services. Follow your county agency's procedures.

County agency functions may include:

- **ADMINISTER SNAP PROGRAM ELIGIBILITY AND WORK REQUIREMENTS**

- Determine SNAP eligibility.
- Determine which SNAP participants must be registered for work and which are exempt from work registration.
- Determine which SNAP participants are required to participate in SNAP E&T and which are exempt or deferred from mandatory participation. You must record this information in MAXIS on the Work Registration (WREG) panel.
- Upon notification from the ESP that a participant failed to comply with SNAP E&T, determine if the participant had good cause.
- Implement SNAP sanctions for participants who failed without good cause to cooperate with or participate in SNAP E&T.

- **CLIENT NOTIFICATION**

- Inform SNAP Able-Bodied Adults Without Dependents (ABAWDs) that they are only eligible for 3 months of SNAP benefits in a 36-month period, but that they can "earn" additional months of benefits by working or participating in work program activities.
- Inform SNAP participants about the SNAP E&T program.

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- Inform ABAWDs of the requirement to participate and the consequences of failing to comply.

- **REFERRAL/COMMUNICATION WITH ESP**

- Refer mandatory participants to the ESP as soon as SNAP eligibility is approved. A referral to the ESP will be done via the Workforce One (WF1) System automatically when SNAP benefits are approved in the MAXIS system.
- Notifying the ESP when referring an ABAWD so the provider is aware of the participant's time-limited SNAP eligibility and can quickly develop potential work or work program activities that will help the participant "earn" additional months of benefits.
- Notify the ESP of the following changes.
 - Deferral status.
 - Mandatory participant status.
 - Circumstances that indicate good cause for failure to cooperate.
 - Start of employment.
 - Hours of employment.
 - End of employment.
 - Address.
 - Telephone number.
 - Household composition.
 - Amount of assistance payment.
 - Suspension or closing of financial assistance case.
 - Other changes in status that affect employment and training or support services (for example, changes in the amount of child care or transportation provided).

Use the [Supplemental Nutrition Assistance Program Employment and Training \(SNAP E&T\) Status Update Form \(DHS-3165A\)](#) to report changes.

- **OPERATE AND MANAGE SNAP E&T SERVICES**

- If either the County agency or ESP becomes aware of circumstances that indicate a participant's exemption status has changed, inform the other of the change. The county agency should then review the participant's exemption status. If the participant has become exempt, the county must notify the participant and the ESP, update the MAXIS exemption code on the WREG panel and redetermine if the ABAWD months were counted properly.
- At the time the county agency notifies the household that it is eligible for SNAP, notify all non-exempt participants that they must attend an orientation and comply with the SNAP E&T program each month. The county worker will issue the SNAP

E&T Orientation notice through the MAXIS system.

- Operate an SNAP E&T program in compliance with state and federal laws, regulations, and guidelines.
- Provide an orientation and SNAP E&T services to all SNAP participants who are required to participate. See [5.6 \(SNAP E&T Orientation\)](#).
- Provide needed support services so that participants are capable of participating in SNAP E&T without out-of-pocket costs.
- Assess, monitor, evaluate, and manage service delivery by the county agency's ESPs.
- Complete program funding requirements.

When a client moves to a different county or there is a change in service provider, the former county or former service provider who performed the initial assessment and Employment Plan (EP) or has the pertaining documents must make those documents available to the new county or the new provider.

DHS retains ownership of any SNAP E&T document for which it has reimbursed the cost. This declaration must be incorporated in any service contract between the county and a service provider.

EMPLOYMENT SERVICES PROVIDER (ESP) FUNCTIONS

4.12

SNAP E&T providers have certain functions/responsibilities. Follow the provisions of this section for SNAP E&T provider responsibilities. For information on county agency responsibilities, see [4.9 \(County Agency Functions\)](#).

Each Employment Services Provider (ESP) operates under a formal written agreement with the county agency to provide SNAP E&T services to Supplemental Nutrition Assistance Program (SNAP) participants. Services may begin as early as the date SNAP eligibility is approved, but must start no later than the 1st day of the month after the month SNAP eligibility is approved. Under county agency administration, ESPs provide the following services:

• ORIENTATION AND ASSESSMENT

- Orient participants to the SNAP E&T program.
- Assess the participant's literacy level and refer the participant to local literacy programs when appropriate.
- Complete an individual assessment and an Employment Plan (EP) for each participant.
- Identify Able-Bodied Adults Without Dependents (ABAWDs) who have time-limited SNAP eligibility, so that potential work or work program activities can be quickly developed to help them earn additional months of SNAP benefits.
- Identify the need for and coordinate support services such as transportation, purchase of equipment or tools.

• IMPLEMENTING THE EP

- Implement the participant's EP, whether through direct service provision or referral to other agencies for services that are needed, so that the participant can successfully complete the plan and find employment.
- Monitor participant performance and participation.
- Modify the participant's EP as necessary.

• NOTIFICATION

- Provide notices to the participant and county agency when the participant has failed to participate or comply with SNAP E&T program requirements.
- Provide the county agency with information that may affect a participant's program eligibility, or benefit amount. The ESP must notify the county agency anytime a participant's employment status changes.
- If either the County agency or ESP becomes aware of circumstances that indicate a participant's exemption status has changed, inform the other of the change. The county agency should then review the participant's exemption status. If the participant has become exempt, the county must notify the participant and the ESP, update the MAXIS exemption code on the WREG panel and redetermine if the ABAWD months were counted properly.

Use the [Supplemental Nutrition Assistance Program Employment and Training \(SNAP E&T\) Status Update Form \(DHS-3165A\)](#) to report changes.

• COORDINATION AND PROGRAM RECORDS

- Coordinate with the county agency regarding program activities and outcomes, expenditures, individual participant services and progress, and participant sanctions.

- Maintain needed program files and documentation, and record relevant participant data on the Workforce One (WF1) system as necessary. When a participant moves to a different county or there is a change in service provider, the former county or service provider that initially provided services must make program documents and information available to the new county or the new provider.

Counties and ESPs may employ whatever combination of skilled staff is necessary to provide SNAP E&T services.

Supplemental Nutrition Assistance Program (SNAP) provides Employment Services (ES) to program participants. SNAP participants are served by the Supplemental Nutrition Assistance Program Employment & Training (SNAP E&T) program. SNAP E&T provides services to Non-Public Assistance SNAP participants whose participation is mandatory (Able-Bodied Adults Without Dependents (ABAWDs) between the ages of 18 and 50). For those who are not exempt or do not meet an exception criteria, participation in Employment Services is mandatory. See [6.9 \(Who Must Participate in SNAP E&T\)](#), [6.9.3 \(Who Is Exempt From SNAP E&T\)](#).

Some SNAP participants are required to register for work. The client registers all assistance unit members who are required to be work registered by signing the [Combined Application Form \(DHS-5223\)](#) or the [Combined Application - Addendum \(DHS-5223C\)](#). Some SNAP participants are NOT required to be referred for work, see [6.3.3 \(Who Is Exempt From SNAP Work Registration\)](#).

Sanction or disqualify people if they do not cooperate with Employment Services requirements. See [6.12 \(Failure to Comply With SNAP E&T Requirements\)](#).

An orientation must be provided to all SNAP E&T participants, see [5.6 \(SNAP E&T Orientation\)](#).

Each county must provide an Employment Services component or contract with Employment Services Providers (ESPs) for such services. The county agency may choose to use the same or different providers for each Employment Services activity. SNAP E&T services must be provided through a Workforce Development Center unless such services are not available through a local Workforce Development Center.

The ESP and the county agency must develop procedures to ensure that clients comply with Employment Services requirements. The county agency must refer, exempt, and sanction clients when they do not comply with the requirements, and oversee the ESPs.

Employment Services programs may pay for some client Employment Services related expenses. See [5.23 \(Support Services Allowed\)](#).

The following services may be provided and funded with the county's SNAP E&T allocation:

- SNAP E&T Orientation and mandatory responsibilities: Includes notices, contacts, and other activities needed to schedule newly referred SNAP E&T participants. Provide to all SNAP E&T participants.
- Counseling services: Includes individual assessment, testing, development of the Employment Plan (EP), vocational counseling, encouragement and support, placement assistance, referrals, and coordination of services.
- Training and education services: SNAP E&T participants may participate in short-term technical or post-secondary education (up to 2 years). The ES Provider must approve the program as part of the participant's Employment Plan.

Training/education services may include:

- English as a Second Language (ESL) classes for participants who do not speak English well enough to obtain employment.
- Adult basic education (ABE) for participants who need remedial education in order to obtain employment.
- High school education or equivalent programs for participants who have not completed high school.
- Post-secondary education or training of 2 years or less in duration.

- On-the-job training (OJT).
- Job search, job search training, and job club.
- Workforce Investment Act (WIA) programs.
- Work experience placements (Workfare). Work experience is unpaid work in a public or private non-profit agency. See [7.3 \(Work Experience/Workfare\)](#).

When circumstances require intervention in areas outside the expertise of the ES Provider or require other resources, make referrals to the appropriate county or community agency. Issues, which often require a referral, include:

- Chemical dependency.
- Mental or emotional health problems.
- Family violence.
- Physical health problems.
- Legal problems.

The county agency or its Employment Services Provider (ESP) must provide an orientation to the SNAP E&T program for each Able-Bodied Adult Without Dependents (ABAWD) referred to the program. The purpose of the orientation is to explain participation requirements, describe available services, identify the ESP, explain that SNAP E&T can help ABAWDs meet their eligibility and work requirements, and encourage the participant to move to self-sufficiency through employment.

Mandatory participants must be notified of the requirement to participate in an orientation. The county agency must send the SNAP E&T Orientation Notice from the MAXIS system to the FSET participant. The SNAP E&T Orientation notice must contain the following information:

- The requirement that the participant attend an orientation.
- Date of the orientation.
- Time the orientation.
- Place of the orientation.
- Name and telephone number of an ESP contact person.
- A statement that Supplemental Nutrition Assistance Program (SNAP) assistance will end if the mandatory participant fails, without good cause, to comply with SNAP E&T requirements.

An orientation must be provided to mandatory participants within 30 days of the county approving SNAP eligibility. Mandatory participants who fail to attend or comply with the orientation are subject to SNAP E&T program sanctions. See [6.12 \(Failure to Comply With SNAP E&T Requirements\)](#), [6.15 \(Sanctions for Failure to Comply\)](#).

An orientation must be provided at least once during any 12 consecutive calendar month period. The 12 consecutive calendar month period begins on the 1st of the month after the month of eligibility, and ends on the last day of the 12th consecutive month.

The orientation may be done either individually or in a group setting. It may be provided through audio-visual methods as long as the participant has the opportunity for face-to-face questions and answers.

The orientation must include:

- Work or work program activities that may enable ABAWDs to earn more than 3 months of SNAP benefits in a 36-month period.
- The requirement to participate in SNAP E&T program activities and services.
- The name, address, and telephone number of the ESP.
- The services, including support services, available through SNAP E&T and from other providers of similar services.
- The date, time, and address to report for SNAP E&T services.
- The consequences for failing, without good cause, to participate in SNAP E&T services or to comply with program

requirements, including accepting suitable employment.

- Encouragement to view public assistance as a temporary means of supplementing the family's needs as the family moves toward self-sufficiency through employment.

The Employment Plan (EP) is a written plan specifying in detail the services to be provided to a participant, the requirements with which the participant must comply and the consequences for failure to comply. An EP must be developed within 30 days of the person being referred to SNAP E&T and must be based on the employability assessment conducted for the participant. The employability assessment and EP must be done in consultation with the participant. The participant must sign and receive a copy of the EP. Participants who refuse to cooperate with development of the plan or to sign the plan are considered non-compliant with SNAP E&T.

Use the [Food Support Employment and Training \(FSET\) Program Employment Plan \(DHS-6020\)](#) developed for SNAP E&T clients.

Counties may develop their own Employment Plan form. The county designed EP form must contain these standard components:

- A specific employment objective that the participant is working toward.
- The specific services to be provided that will lead to that objective.
- The dates, times, and locations of where services will be provided.
- The hours of activity required each week.
- Requirements for daily activity.
- Job search, job acceptance, and job retention requirements.
- Information about the consequences of failing to comply with the EP.
- The name and telephone number of an Employment Service Provider (ESP) contact person.

The plan of services must address the need to work or participate in work activities at least 80 hours per month in order to earn additional months of Supplemental Nutrition Assistance Program (SNAP) eligibility. Except for SNAP E&T job search and job club, all SNAP E&T activities count toward the 80-hour per month Able-Bodied-Adults Without Dependents (ABAWD) work requirement. Participation in Workforce Investment Act (WIA) job search WILL count toward the 80-hour requirement, if participants are co-enrolled in WIA for job search. The ESP is responsible for co-enrolling a participant.

An EP must be developed for each episode of SNAP eligibility.

ABLE-BODIED ADULTS WITHOUT DEPENDENTS (ABAWDS)

6.6

Unless exempt from SNAP eligibility time limits or is meeting monthly work requirements, Able-Bodied People Without Dependents (ABAWDs) are eligible for SNAP for only 3 months in any 36-month period. The 36-month period begins the 1st full month SNAP is received. Once started, the 36-month period continues to run uninterrupted, even during times the participant does not receive SNAP or is exempt from the time limit.

The 3 entitled months do not have to be consecutive. Do not count a month if for that month the person meets the 20 hour per week (80 hours per month) work requirement, is exempt from the 3-month time limit, or receives only prorated (partial month) benefits.

The 3-month entitlement limit applies only to adults receiving SNAP.

A person meeting any of the following exemptions is not subject to the 3-month limit:

- Receiving cash assistance.

- Under age 18, or age 50 or older.

- Responsible for the care of a child under age 18 in the household. If there are 2 parents in the unit, both are exempt. If there is doubt as to whether non-parents should be given this exemption, determine if the child is under the parental control of the non-parent. An adult who has parental control of the child is entitled to this exemption.

- Medically certified as pregnant.

- Exempt from work registration. Code his/her work registration status carefully on the MAXIS STAT/WREG panel. This information is used by MAXIS when sending workers appropriate DAIL messages. It is also used for reporting and funding purposes.

- Lives in any of the counties or Indian reservations where all participants are exempt from ABAWD provisions. See TEMP Manual TE02.05.68 (ABAWD FSET Exempt Reservations), TE02.05.69 (ABAWD FSET Exempt Counties).

The county worker must retroactively count (or uncount) an ABAWD's month of benefits as 1 of the 3 months of entitlement to SNAP benefits if you later learn that your determination of the ABAWD's exemption status, or whether or not the ABAWD met monthly work requirements, was incorrect. You must make this change in MAXIS.

As long as the participant meets an exemption for some part of the month, he/she is exempt for the entire month.

ABAWDs may "earn" ADDITIONAL MONTHS of eligibility, or avoid using 1 of their 3 entitled months, when they work or participate in work activities an average of 20 hours per week (80 per month). These do not have to be consecutive months. For each month that the participant works or participates in work activities at this level, the participant "earns" a month of SNAP benefits. Countable work or work program activities are:

- Working in paid employment, including self-employment. This includes use of accrued sick or vacation time, if available.

- Participating in Workforce Investment Act (WIA) services.

- Participating in Trade Adjustment Act (TAA) services.

- Participating in SNAP E&T activities. NOTE: SNAP E&T job search and job search training do not count toward the 20 hour

ABLE-BODIED ADULTS WITHOUT DEPENDENTS (ABAWDS)

6.6

per week/80 hour per month requirement unless the participant is co-enrolled in WIA.

- Participating in Work Experience. However, instead of averaging 20 hours a week, the required number of hours of participation is the household's monthly SNAP allotment divided by the HIGHER of:
 - The state minimum wage.
- OR
- The federal minimum wage.

An ABAWD who has used up the initial or subsequent 3 months of SNAP eligibility can “earn” an additional month of benefits by working or participating in approved work activities for 80 hours in a calendar month. The ABAWD need not be a current SNAP participant to regain eligibility. (**NOTE:** SNAP E&T is available only to current SNAP participants.) The hours must be completed before eligibility can be granted. Once the participant has worked the required number of hours, eligibility can be granted back to the beginning of the month or the date of application, whichever is later. Once eligibility is granted, eligibility will continue as long as you prospectively anticipate that the participant will work the required number of hours for the next month. Track work hours per month. The Employment Services Provider (ESP) will track hours of participation in work program activities.

A participant who has re-established SNAP eligibility by working or participating in work activities for 80 hours in a month, as described above, can qualify for 1 additional 3-month period of eligibility. If the participant's job or work activity ends, or if the hours are reduced below 80 hours per month, the participant qualifies for the additional 3-month period of eligibility. This provision does not apply if the participant voluntarily quits the job without good cause.

The new 3-month period of eligibility starts the 1st day of the 1st month in which SNAP benefits are provided under this 2nd 3-month eligibility period. It runs uninterrupted until the 3-month period is completed, regardless of whether the participant received benefits all 3 of those months. This 2nd 3-month period is only available once in any 36-month period.

The county or the ESP must explain these provisions to ABAWDs during the intake and eligibility determination process.

All ABAWDs are mandatory participants and must be referred to SNAP E&T when SNAP eligibility is determined or when the participant's exemption from ABAWD provisions ends. You must inform the ESP of the participant's ABAWD status so that this can be taken into consideration when determining the SNAP E&T services needed.

SANCTIONS FOR FAILURE TO COMPLY

6.15

For information on whether or not to sanction clients, see [6.9.3 \(Who Is Exempt From SNAP E&T\)](#), [6.12 \(Failure to Comply With SNAP E&T Requirements\)](#). For information on sanctions for refusing or quitting suitable employment, see [6.15.6 \(Refusing or Terminating Employment\)](#), [7.6 \(Suitable/Unsuitable Employment\)](#).

The following sanction provisions apply to non-Public Assistance mandatory SNAP E&T participants who fail to participate, comply, accept employment, or voluntarily quit suitable employment while participating in SNAP E&T. When a mandatory participant fails, without good cause, to comply with these requirements, the county agency must determine if it must sanction the participant or the entire Supplemental Nutrition Assistance Program (SNAP) unit.

- If the participant is the Principal Wage Earner (PWE), the county agency will sanction the ENTIRE UNIT. NOTE: During a sanction the unit cannot designate someone else as the PWE simply to avoid the sanction.
- If the participant is NOT the PWE, the county agency will sanction ONLY the PARTICIPANT.

The county agency determines the Principal Wage Earner (PWE) at the time of application, recertification, and when unit composition changes.

If there is more than 1 adult, the county agency will give the adults in the unit the option to designate which adult is the PWE.

- For units with NO CHILDREN in the unit who do NOT designate which adult is the PWE: The PWE is the unit member with the most earned income in the 2 months before the date of application, voluntary quit, or work registration non-compliance.
- For units that include an adult parent(s) with children in the home OR an adult unit member(s) with parental control over children in the home who do NOT designate which adult is the PWE: The county will designate the PWE.
- If you cannot determine who to designate as the PWE based on the information above, the primary contact person is the PWE.

As a result of the sanction, the participant's or household's SNAP benefits will be terminated starting on the date specified in the county agency's 10-day notice to the participant.

Apply the length of the sanction for each occurrence as follows:

- **FOR THE 1ST OCCURRENCE:** Loss of SNAP for 1 month or until compliance, whichever is longer.
- **FOR THE 2ND OCCURRENCE:** Loss of SNAP for 3 months or until compliance, whichever is longer.
- **FOR THE 3RD AND ANY SUBSEQUENT OCCURRENCE:** Loss of SNAP for 6 months or until compliance, whichever is longer.

Apply the sanction policy until the client does 1 of the following:

- Serves the minimum sanction period, requests resumption of benefits, and complies with the requirement(s).
- Leaves the unit's home.

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- If a unit member who failed to comply joins another unit as that unit's PWE, the entire new unit is ineligible for the remainder of the sanction period.
 - If a unit member who failed to comply joins another unit where that person is NOT the PWE, ONLY that person is ineligible for the remainder of the sanction period.
 - If a unit is disqualified because the PWE failed to comply and a new person who is not under SNAP E&T sanction joins the unit as the PWE, the county agency will end the sanction for the other unit members. The county will require a new application and prorate benefits from that date.
 - Becomes exempt from work registration or SNAP E&T participation. However, the sanction will not end for this reason until the minimum sanction period has been served.

Applicants for SNAP who have been in SNAP E&T sanction status continuously for at least 1 year do not have to comply with the previous requirements that caused the sanction.

After continuously being in SNAP E&T sanction status for at least 1 year, a participant who meets all other eligibility conditions qualifies for reinstatement of benefits by reapplying for SNAP.