SNAP Employment and Training: Opportunities for Growth in Nebraska

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The Supplemental Nutrition Assistance Program (SNAP, formerly known as the Food Stamp Program) is the nation’s primary anti-hunger, work support program. Across the country, it helps more than 45 million low-income Americans access nutritious food every month.\(^1\) Close to 70 percent of SNAP recipients are families with children and more than 25 percent of recipients are in households with seniors or people with disabilities.\(^2\) In Nebraska, there are around 176,000 people receiving SNAP assistance every month.\(^3\)

SNAP generally is available to households with low incomes, earning no more than a net income after deductions of about $20,000 per year for a family of three. The specific eligibility criteria are set at the federal level and are generally uniform across the country,\(^4\) although states are able to make some eligibility decisions. SNAP requires recipients to comply with work requirements in order to receive benefits unless otherwise exempt.\(^5\) SNAP also limits eligibility for adults without children to 3 months in a 36 month period if they are unemployed, unless they are participating in a qualifying job training program. These adults are known as Able-Bodied Adults Without Dependents (ABAWDs).

Beyond providing food assistance to low-income families, the SNAP program also includes an Employment and Training (E&T) component; a skills and job training program for SNAP participants administered by the U.S. Department of Agriculture’s (USDA) Food and Nutrition Service (FNS).\(^6\) This program is a significant resource for states to help SNAP participants gain the skills and training required to find gainful employment and move ahead.

In today’s economy, the need for SNAP participants to engage in education and training is increasingly urgent, as the vast majority of jobs in the future will require at least some postsecondary education.\(^7\) In the United States, over 1.2 million working families that fall under 100% FPL have at least one parent without a high school diploma or equivalent.\(^8\) Over 6,000 of these working families live in Nebraska.\(^9\)

If SNAP participants lack access to training and education to meet the rapidly changing demands in the labor market, the chances SNAP participants have of getting a better job and reducing or eliminating their need for assistance is diminished.\(^10\) Historically, states like Nebraska have under-utilized SNAP E&T programming as a resource to provide employment and training programming for SNAP recipients, despite the requirement that every state administer some level of E&T services.\(^11\) However, the USDA is investing more resources into bolstering E&T programs by staffing new positions in the national and regional offices. Nebraska should capitalize on this renewed focus by evaluating its SNAP E&T programs and taking advantage of opportunities growth.
This report will provide background information on the structure and funding of the SNAP E&T program, map out the current SNAP E&T program in Nebraska, lift up a few states as models for an effective E&T program, and suggest efforts that Nebraska could take to improve its E&T program.

<table>
<thead>
<tr>
<th>Component</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Job search</td>
<td>A job search component requires a participant to make a certain number of job inquiries to prospective employers either individually or in a group setting. Many states offer a job search component to connect work-ready individuals to available jobs. Also, job search is one of the least administratively burdensome and least expensive programs to offer.</td>
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<tr>
<td>Job search training</td>
<td>Job search training is a component that teaches participants how to effectively seek employment. This component can take a variety of forms from skills assessments, job finding clubs, or job placement services.</td>
</tr>
<tr>
<td>Workfare</td>
<td>This component requires SNAP recipients to work off the value of their monthly SNAP benefit amount. This can be done through an assignment at a public or private non-profit agency. Participants do not receive wages from this work, but rather are compensated by receiving their monthly SNAP allotment.</td>
</tr>
<tr>
<td>Work Experience</td>
<td>This component is designed to enhance the employability of a participant through actual work experience or training. Participation in this component may not replace the employment of a regularly employed individual.</td>
</tr>
<tr>
<td>Education</td>
<td>An education component can include a wide variety of activities that improve participants’ basic skills. Examples of educational activities include Adult Basic Education, English as a Second Language, a high school equivalency (GED), and sometimes postsecondary education. Only educational components that establish a direct link to job-readiness will be approved by FNS.</td>
</tr>
<tr>
<td>Self-employment training</td>
<td>This component trains participants how to structure and run a small business. Very few states offer this component.</td>
</tr>
<tr>
<td>Work Training under WIOA</td>
<td>This component consists of services that are developed and administered under the Workforce Investment and Opportunity Act (WIOA). Some potential activities in a WIOA component include basic skills training, occupational skills training, and job search training.</td>
</tr>
<tr>
<td>Job retention</td>
<td>This component provides supportive services for up to 90 days to participants who have secured employment. Only those who have received other E&amp;T services are eligible for the job retention component.</td>
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SNAP E&T Program: Components, Funding and Requirements

Programming Components

In 1987, Congress established the Food Stamp Employment and Training (E&T) Program to assist able-bodied food stamp recipients in obtaining employment. The intent of the E&T program was to help SNAP households gain skills, training, work, or experience that will increase self-sufficiency. The Food and Nutrition Act of 2008 gave state agencies flexibility in designing their E&T programs, however, every state’s E&T program must include one of several types of programming; from job search to work training to GED preparation, among other things (see sidebar above). E&T programs typically include a combination of services, such as assessments, education and skill component activities, participant reimbursement for supportive services and follow-up. A SNAP client must be assessed before placement in an E&T component to evaluate the client’s employment skills and determine how to best move the client into employment. Based on the assessment, a state agency should determine whether or not it is appropriate to refer the client to a specific E&T component.

Beyond administering these components directly, a state can also form partnerships with third parties already offering programs that achieve the purpose of E&T. Third-party partners are generally community colleges or other community-based organizations offering training or services to improve employability. Third-party partnerships will be discussed in greater detail below.

E&T Work Requirements: Mandatory, Voluntary and ABAWDs

As stated above, some SNAP recipients are required to engage in a work or training activity to be eligible for the program. One way SNAP recipients can complete their work requirement is through a SNAP E&T program. States are given the choice of whether to operate their E&T program as mandatory, voluntary or a combination.

Mandatory SNAP E&T participants are those who are not exempt from SNAP work requirements and are required by the state to participate in SNAP E&T or face sanctions. States have significant flexibility to determine whom within SNAP E&T they wish to serve, how they wish to serve them, and the level of repercussions for noncompliance.

On the other hand, voluntary SNAP E&T participants are those who are exempt from SNAP work requirements but choose to participate in E&T. These participants cannot face sanctions for failure to participate since they are exempt from work requirements. Many states choose to run their E&T program on a voluntary basis in order to focus on higher motivated participants, to eliminate concerns of non-compliance sanctions, and to reduce
administrative burdens. States are not required to serve everyone who volunteers. States are required to reimburse voluntary participants for costs directly related to E&T participation but only up until their cap is met.

As of FY 2011, 23 states were running their programs as strictly voluntary. States cannot mandate more than 120 hours per month but participants can choose to participate more. States also must reimburse mandatory participants for costs directly related to E&T participation even if those costs exceed the state cap.

**Able-Bodied Adults Without Dependents (ABAWDs)** as a group face additional challenges to maintain eligibility for SNAP, unless they are exempt from additional requirements. ABAWDs are limited to three countable months of SNAP benefits, in a thirty-six month time frame, unless fulfilling work requirements. Importantly, ABAWDs can meet their work requirement through SNAP E&T, by participating in E&T education or training or E&T work experience for 20 hours or for a combined total of 20 hours if paired with another program. Whether ABAWDs may or must participate in E&T depends on whether the state has a mandatory or voluntary E&T program.

**Funding**

The funding mechanisms that support SNAP E&T are complex. However, an understanding of how E&T funding works is critical to ensure a state is capitalizing on all available federal resources and maximizing its own investment through federal match funds. There are three basic types of funding for SNAP E&T: (1) Program Grants, often referred to as “100 percent funds” because they are fully funded by the federal government; (2) ABAWD or “pledge grants” because they are contingent upon states committing to serve every ABAWD in their third month of the thirty-six month limit; and (3) 50 percent reimbursement funds, often referred to as “50-50 funds.” With 50-50 funds there is an opportunity to use a model called a third party partnership. Each of these funds come with conditions that dictate how they may be used.

It is important to note that federal funding and reimbursement for educational activities within SNAP E&T must be used to supplement state funding on existing educational programs instead of replacing it. This applies specifically to educational programming but concerns all categories of federal funds (100 percent funds, ABAWD pledge grants, and 50-50 funds). Congress and FNS chose to focus federal funding on new efforts to enhance employability rather than financing existing activities, so reimbursements will only be approved if they are supplemental. Due to this focus, federal E&T reimbursement funds can only be used to supplement, rather than supplant, state funding for existing educational services or activities.
For example, if a state offered subsidized tuition and fees to all students of a particular program at no cost but then sought reimbursement for the tuition and fees of an E&T participant in the program, the state would treat E&T participants differently and state funds would be supplanted.

**Grants programs receiving 100 percent federal funds**

**Program Grants**

Every state is required to offer some form of E&T programming, and every state receives a “program grant” in order to do so. The program grant is a 100 percent grant designed to fully compensate each state for the costs of administering its E&T program. A program grant can be used for the “planning, implementation, and operation of a state's E&T program.” The program grant may not be used to reimburse E&T participants for costs associated with participating in E&T activities, such as uniforms, transportation, or childcare.

Program grants are drawn from a reserved federal fund of $90 million. The amount of the program grant provided to each state is determined based on the number of work registrants in the state and the number of ABAWDs in the state.

**ABAWD Pledge Grants**

Another type of 100 percent grant available to states is the ABAWD pledge grant. In order for a state to receive an ABAWD pledge grant, a state must pledge to serve all “at-risk” ABAWDS, or those close to losing SNAP benefits if they do not participate in a qualifying work activity.

ABAWD grant money is drawn from a reserved fund of $20 million and is allocated proportionally between pledge states based on each state’s ABAWD population compared to the sum total of ABAWDs in each pledge state.

Few states take advantage of the ABAWD pledge grant. Each year, only about five states receive E&T funding from the ABAWD pledge grant (Colorado, Delaware, South Dakota, Texas, and Wisconsin are pledge states in 2016). States may not avail themselves of the ABAWD pledge grant because “the cost of actually providing a qualifying activity exceeds the amount of federal funds a state typically receives under the pledge.” In fiscal year 2011, the participating state agencies received substantial additional funding from the ABAWD pledge grant. To become a pledge state, a state must include specific information in their SNAP E&T plan indicating their commitment to offering E&T programming to ABAWDs and how those services will be administered.
Grants programs requiring a 50 percent match

Administrative Grants

When a state’s administrative costs exceed the amount of its program grant, the state can seek federal reimbursement to cover half the outstanding cost of administering its E&T program. For example, if a state received a $200,000 program grant and the cost of administering its E&T program was $250,000, the state could seek an administrative grant for $25,000 of the outstanding cost. Unlike the program grant and ABAWD pledge grant, this 50-50 match fund is uncapped. However, this funding is subject to several restrictions. The funds must go towards the cost of administering the state’s E&T program. Allowable administrative expenses include the salaries and benefits of E&T program personnel, office equipment and supplies, travel expenses, development and production of E&T materials where no others exist, and lease and rental costs. Moreover, administrative match funds must be “reasonable and necessary.”

Participant reimbursement grants

Another type of 50-50 match fund is the participant reimbursement fund. SNAP regulations require states to reimburse E&T participants, including volunteer participants, for “all expenses that are reasonable, necessary, and directly related to participation in an E&T component.” This could include reimbursements for things like the cost of text books, work clothes, course registration feeds, child care cost, and more. However, a state may cap the amount of reimbursement a participant can receive. Like the administrative cost match fund, the participant reimbursement match fund is an uncapped source of funding; the federal government will reimburse a state for half of the cost of participation.

Third party partnerships

One effective strategy for maximizing 50-50 match funds is through third-party partnerships. A state agency can work together with a community college or other community based organization to provide E&T programs. To do this, a state may contract with a third party organization to provide an E&T component. The third party then may use non-federal funds to pay for allowable expenses and submit a claim for reimbursement through the state. FNS reimburses the state for 50% of the allowable expenses, and the state passes the reimbursement to the third party organization. For example, if a community college is offering a training program that a SNAP recipient enrolls in, the state could pull down matching funds to reimburse the community college for a portion of the cost of the program. Using third party partnerships allows money that is already being spent on employment and training programs to go farther by drawing down federal matching funds.
These partnerships generally follow one of two models. In the first, the state contracts out only SNAP E&T direct services (the components) to a third party agency but retains the duty of assessment, placement, and tracking.\textsuperscript{53} In the second, the third party agency not only provides the direct services but is also responsible for assessment, placement, and tracking.\textsuperscript{54} In either case, the state is responsible for filing the state’s SNAP E&T plan, securing federal reimbursements, and reporting to FNS.\textsuperscript{55}

**Nebraska’s SNAP E&T Program**

Currently, Nebraska operates a very modest E&T program; available only to SNAP recipients in the Central Service Area (which encompasses nine counties in central Nebraska).\textsuperscript{56} This service area was targeted because no local Nebraska Department of Labor Career Centers exist in this region. Nebraska’s E&T program is a voluntary program, which means SNAP recipients will not be disqualified from receiving benefits for non-participation in the E&T program.\textsuperscript{57} In 2015, the only SNAP E&T program components offered in Nebraska were job search training and job search support services.\textsuperscript{58}

Nebraska’s E&T operating budget for FY2015 was $391,381.\textsuperscript{59} Of that, $246,513 came from the yearly federal 100 percent grant.\textsuperscript{60} The state spent $30,134 towards administrative costs to be matched by the federal government, and another $42,300 towards participant reimbursements to be matched.\textsuperscript{61} In 2015, the state employed one full time employment and training specialist who was responsible for virtually every aspect of the program including recruiting, assessment, placement, providing services, reviewing and updating curriculum, tracking and collecting various data, mentoring, and completing reports.\textsuperscript{62}

More recently, DHHS is working with an FNS E&T Analyst to “find ways to expand access to more participants and more areas of Nebraska.”\textsuperscript{63} In 2016, the Nebraska Department of Health and Human services added adult basic education, vocational training with job placement and coaching, and retention programs to the array of available SNAP E&T programs. However, these services are still confined to the central service area and not available in the eastern or western parts of the state.

Nebraska will only receive $160,603.20 from the federal program grant for FY2016 (as compared to $246,513 in FY2015).\textsuperscript{64} The state will likely spend more than this on the
administration of E&T services, particularly given the expansion of services offered. State administrative expenditures above the program grant amount can be matched by the federal government. For FY2016, the state has only budgeted $33,000 for participant reimbursement funds (compared with $42,300 from the FY2015 budget for participant reimbursement). In short, Nebraska is trying to expand E&T programming but has less 100% federal grant funds to use.

Currently, very few Nebraskans participate in SNAP E&T programs. The anticipated number of voluntary E&T participants for 2016 was 360. This means that less than 0.02% of SNAP recipients in the state participate in E&T programs. The low participation rate could be due to SNAP programs only being available in the central service area and the fact that, until recently, the only E&T programs offered were job search tools. However, in the central service area there are around 9,000 adult SNAP recipients and only 360 participate in E&T programs.

The 2016 Nebraska SNAP E&T Plan indicates the state planned to connect with Central Community College and the University of Nebraska Commercial Driver’s License (CDL) Program to request contracts for E&T components (basic education – ABE, ESL, GED - from Central Community College and CDL classes from the University of Nebraska). However, the plan makes it clear the state intended to fund the tuition for these programs with 100% federal grant funds. While the state is attempting to contract with third party organizations to provide E&T programming, it is not following a third-party match model in doing so and is instead expending a portion of the federal program grant to cover the costs. By not using a third-party match system, the state and the partners with which it contracts are missing out on federal reimbursements. Moreover, if the state was pulling down federal reimbursements for these third party arrangements, the program grant funds it is currently using to pay these contracts could be spent expanding E&T programming elsewhere.

**Promising E&T Models from Around the Country**

**Washington** state’s Basic Food Employment and Training (BFET) is one of the strongest E&T programs in the country. BFET “is a public-private partnership wherein investments made by state and local government and philanthropy collaborate to leverage additional federal SNAP E&T funding to provide job search and training services to recipients of SNAP.” BFET increases resources available to community colleges and other community-based service providers.
The program began as a pilot, and was the first of its kind to use non-governmental (third-party) spending to provide the non-federal portion of the 50-50 SNAP E&T participant reimbursement funding. Fifty percent of any allowable expenses incurred by a third-party participating in the BFET program is reimbursed by the federal government. Currently, BFET includes all of Washington’s community and technical colleges as well as many participating community-based service providers in 18 counties across the state. The colleges and community-based providers identify students who wish to participate in the E&T program and create internal tracking processes for all expenditures that can be reimbursed.

There is a wide array of E&T components offered under BFET, including job search, job search training, educational services, skills training, and support services. The majority of participants take part in vocational education activities, with about 20 percent participating in job search, another 20 percent participating in multiple services, and about 8 percent participate in basic education. All of these components are offered through community and technical colleges or other community-based organizations. BFET participants are also eligible for some supportive services such as transportation assistance, child care, and clothing assistance. As of December 2013, a total of 53,000 people had participated in BFET. About ten percent of eligible Washington SNAP recipients participate in BFET every year. Outcomes for people who began participation in the program in 2009 show that 71 percent became employed in jobs with a median hourly wage over $11 per hour. Participants who received vocational training showed an even higher median wage of $11.44 per hour. Overall, the program generated over $33 million for community colleges and nonprofits delivering program services.

Minnesota is a good example of using successful strategy known as “resource mapping.” A resource map is a formal way for state agencies to identify potential third party partners and measure “qualified funding streams” or non-federal funds used to implement employment and training services that may be eligible for reimbursement. Resource mapping can be a good first step for states looking to engage third party partners who are already offering programs that would qualify for federal reimbursement.
Hennepin and Ramsey Counties (representing the urban centers of Minneapolis – St. Paul in Minnesota) developed a SNAP E&T Resource Map in 2015. They gathered information on 32 providers, 29 public programs (state, county, and local), and 10 foundations that provide funding for services to SNAP-eligible populations. This was done through a “broadly cast Solicitation of Interest” followed by a targeted set of interviews and other research. The resource map specifically included an inventory of funding sources, proportion of SNAP-eligible individuals served, and organizational capacity to track SNAP eligibility and participation.

The completed resource map identified over $17 million in employment and training expenditures in the two counties targeted to individuals enrolled in, or likely eligible for, SNAP benefits. Through this process, the counties identified new potential partnerships and uncovered millions of dollars in previously existing employment and training expenses that were potentially eligible for federal reimbursement. With additional federal dollars available through matching, these E&T programs are able to expand the scope of their programming.

**Iowa, Oregon, and Maryland** have established systems that make career pathways and sector partnerships accessible to SNAP participants. In Iowa, the Pathways for Academic Career and Employment (PACE) program and Gap Tuition Assistance Program work in concert to assist low-income students in obtaining occupational credentials. The PACE program uses adult basic education, workforce readiness, and occupational skills training, as well as career counseling. The Gap program provides tuition assistance and covers direct training costs and fees. Both programs are funded by the state and are eligible for reimbursement from federal E&T match funds.

**Oregon’s** community colleges provide career pathways programs that offer credit-bearing certificates for in-demand occupations. These certificates can be earned in less than a year and can count towards more advanced degrees. Students in these programs can also seek guidance from pathway navigators at the school. Oregon intends to use SNAP E&T to increase SNAP participants’ access to these pathways. **Maryland’s** Employment Advancement Right Now (EARN) program provides grants and technical assistance to 40 sector partnerships across the state for the development and implementation of skills training. By partnering with community based organizations that receive EARN grants and assistance, Maryland may be in a position to increase SNAP recipients’ access to job training programs.
Opportunities to Maximize E&T Funding and Expand Programming in Nebraska

Nebraska’s current SNAP E&T program offers a limited array of components, in a small geographic area, in which only a small fraction of eligible SNAP recipients participate. However, now is a great time to explore how to secure more funding to expand our E&T programs and make sure that every dollar the state is spending on E&T programming is going as far as it can. Pulling down additional federal funding and maximizing the return on state investment could result in a broader array of E&T components, a larger number of participants benefiting from them, and a statewide E&T program.

**Nebraska should use SNAP E&T programs to build on existing workforce development strategies**

Nebraska should consider following Iowa, Oregon and Maryland’s models of building E&T programming to compliment existing workforce development strategies. Specifically, DHHS should coordinate with the Nebraska Workforce Development Board, as well as local workforce development boards, to maximize the effectiveness of E&T programs.

Indeed, the Nebraska legislature recently passed the Sector Partnership Program Act to support local sector partnerships, close skills gaps in high-demand sectors of the state economy, and connect education and training providers with employers in key industries.\(^88\) The Act also created the Sector Partnership Program Fund\(^89\) to “pursue sector partnership activities, including, but not limited to, labor availability and skills gap studies by the Department of Labor and Department of Economic Development” as well to cover the administrative costs of the Department of Labor and Department of Economic Development associated with sector partnership activities.\(^90\)

DHHS should collaborate with these Departments to determine whether our state investment in sector partnerships, or any other workforce development strategy, could be reimbursed by federal matching funds. Further, an E&T representative should help develop and implement career pathways and ensure that all available WIOA or E&T funds are being used to provide supportive services. Additionally, E&T should be incorporated into Nebraska’s WIOA state plan and an E&T representatives should engage in the WIOA planning process to identify other opportunities for collaboration.

Nebraska is already spending state resources on increasing access to education and training and creating career pathways into high demand sectors of our state economy. Aligning
SNAP E&T programs with these existing efforts could not only result in maximizing our state investment in workforce development through federal matching funds, but could provide more opportunities for participants to continue their skill-building after they exit SNAP.

**Nebraska should explore becoming an ABAWD pledge state**

A significant source of additional funding for E&T programming could come from the ABAWD pledge grant. Nebraska does not currently draw any funding from this source, but it should explore the possibility of doing so, particularly in light of the qualifying activities it intends to create.

Until now, it was not possible for Nebraska to pull funds from the ABAWD pledge grant because E&T programming in the state only consisted of job search and job search training, which are not qualifying components. However, Nebraska’s intent to expand the scope of E&T services includes education and training activities that should qualify. Moreover, Nebraska’s existing E&T programs already serve ABAWDs through program grant funds.

Thus, Nebraska appears to be in a good position to take advantage of the ABAWD pledge grant and draw down additional federal dollars, since DHHS has placed emphasis on expanding E&T programming in the state to include qualifying components, and since Nebraska already serves the ABAWD population through SNAP E&T. If Nebraska were to receive ABAWD pledge funds, it would supplement the E&T programs already available to ABAWDs and free up program grant funds to continue the improvement and expansion of E&T services.

**Nebraska should institute the use of third-party partnerships to enable the expansion of E&T services**

The second major way Nebraska could expand its E&T program is by investigating and potentially piloting the use of third party partnerships. Washington State’s BFET program (discussed above) is an example of expanding SNAP E&T programs by leveraging the capabilities and resources of third party partners.91

The 2016 Nebraska Employment and Training plan indicates that the state already partners with several third-party organizations, including Central Community College and the University of Nebraska CDL Program.92 However, those partners are not taking advantage of the potential 50-50 match fund.93 DHHS should assess where third-party entities already offer programming that could qualify for federal reimbursement and take necessary actions to
draw down federal funds. Forming third party partnerships with entities already performing qualifying activities under a third party match model could help expand E&T programming beyond the central service area.

Moreover, DHHS should consider engaging new third party partners. DHHS could begin by identifying potential third-party partners through resource-mapping, surveys, or other outreach activities, particularly in metropolitan areas with high SNAP participation. DHHS could then pilot a third party match model with a few interested entities.

In order for Nebraska to support the cost of a robust third party partnership system, DHHS should consider ways to utilize a portion of Nebraska’s program grant to seed new partnerships. This may include dedicated E&T staff responsible for brokering and managing partnerships. Nebraska is currently utilizing all of its program grant funds, but if Nebraska became an ABAWD pledge state, it could free up some of the program grant funds for this purpose. Another productive way Nebraska could use available program grant funds to develop third party partnerships is investing in the development of new administrative systems to be used by partner organizations. The administrative complexities associated with providing E&T services can create barriers for organizations that would otherwise be a good fit as a third party partner. These barriers can be eliminated with an upfront investment from the state – an investment that, in Nebraska’s case, could come from available program grant funds should the state become an ABAWD pledge state.

**Conclusion**

SNAP is intended to be a temporary support system, providing access to food for low-income families struggling to meet their basic needs. However, SNAP participants who have no access to education or training have an increasingly difficult path out of poverty and off assistance programs. SNAP E&T is an important tool states can use to break down barriers between SNAP participants and economic self-sufficiency, but has not been utilized to its fullest extent by many states, including Nebraska.

With the USDA investing resources into SNAP E&T, now is the time for states to evaluate whether they could be doing more. Every state should be using all of the 100% program grant and maximizing use of 50-50 match funds for any administrative costs that exceed the program grant and participant expenses. Any state, like Nebraska, that targets ABAWDs for E&T programs should consider pulling down additional federal funding by becoming an ABAWD pledge state. Once all of the funding mechanisms are working to a state’s advantage,
the state should further develop the E&T programs available by securing third-party partners and tailoring E&T programs to build on existing workforce development strategies and systems.

In today’s economy, people need skills to find quality, family-supporting jobs. SNAP E&T can be a powerful tool for removing barriers between SNAP participants and gainful employment. With the USDA refocusing on SNAP E&T efforts nationwide, now is the time for states, including Nebraska, to ensure they are utilizing SNAP E&T to the fullest extent possible.

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Endnotes


2 Id.

3 This is the most recent figure available and captures the number of SNAP recipients in Nebraska as of July 2016. Taken from the July 2016 Participation Table found at http://frac.org/wp-content/uploads/2011/01/snapdata2016-jul.pdf.

4 Under federal rules, in order to be eligible to receive SNAP assistance, a household must meet the following three criteria: (1) the household’s gross monthly income must be at or below 130% of the federal poverty rate. This amounts to about $26,000 per year for a family of three. (2) the household’s net monthly income (after deductions are applied for certain items like housing and child care costs) must be less than or equal to 100% of the federal poverty rate. This amounts to about $20,000 per year for a family of three. (3) The household’s assets must fall below certain limits. In other words, apart from being low-income, an eligible household must not possess assets in excess of a set amount.

5 Id.

6 United States Department of Agriculture, SNAP to Skills, Why Now is the Time for States to Build Their SNAP E&T Programs, Policy Brief 1, April 2016.

7 Id.


9 Id.

10 Id.


13 Employment and Training Toolkit, U.S. Dep’t of Agric. Food & Nutrition Serv. Supplemental Nutrition Assistance Program 7 (2013), http://www.fns.usda.gov/sites/default/files/ET_Toolkit_2013.pdf. Programs must include at least one of the following: (1) a job search program; (2) a job search training program; (3) workfare program; (4) work experience or training; (5) state, local, or Workforce Investment Act (WIA) work programs; (6) education programs such as Adult Basic Education (ABE), GED preparation, and English as a Second Language (ESL) classes; and (7) self-employment. See Id. at 4.

14 Id. at 16.

15 Id.

16 Id. at 20.

17 Id.

18 Id. If noncompliant with work requirements, a recipient may face anywhere from one month to indefinite suspension of SNAP benefits, depending upon state policy and number of occurrences.

19 Id.

20 Id.

21 Id.

22 Id.

23 Id.


26 Id.

27 Id.

28 Id.

29 ABAWDs may be exempt from these additional requirements if they are: under 18 or over 50, living in a household with a child under 18, physically or mentally unfit for employment, or pregnant. See U.S. Dept. of Agriculture Food and Nutrition Service, Guide to Serving ABAWDs Subject to Time-limited Participation (2015).
These months need not be consecutive, but the thirty-six month time frame can be judged on a fixed-clock (starts new every three years) or rolling-clock (look back three years from the current day) depending on state choice. To remain in compliance ABAWDs must either: work twenty or more hours per week averaged monthly, participate in a work program twenty or more hours per week, participate in a combination of work or work program for twenty or more hours per week, or participate in a workfare program.

Note that E&T job search and job search training is not a qualifying activity unless paired with another E&T component and accounts for less than half of required hours.

The Program Grant is determined by the following formula, below. Note that $P$ is the Program Grant, $SW$ is the state's work registrant population, $NW$ is the national work registrant population, $SA$ is the state's ABAWD population, and $NA$ is the national ABAWD population.

$$P = \frac{90,000,000 \cdot \left( \frac{9SW}{10NW} + \frac{SA}{10NA} \right)}{90,000,000}$$

Thus, the formula for calculating a state’s ABAWD Grant, if it has pledged to serve at-risk ABAWDs, is as state below. Note that $G$ is the ABAWD grant amount, $SA$ is the state’s ABAWD population, and $PA$ is the ABAWD population of the other participating states.

$$G = \frac{20,000,000 \cdot SA}{PA}$$

In order to become a pledge state, states must include in their SNAP E&T plan: their pledge to offer a qualifying component to every at-risk ABAWD; the estimated cost to do so; a description of management control in place to meet pledge requirements; a discussion on their ability to serve; information on the size and needs of their ABAWD population; and information on the education, training, and workfare components the state will offer to ABAWDs. From: FNS, Guide to Serving ABAWDs Subject to Time-limited Participation (2015).
48 Id. at 13-14.
49 Id. at 48-49. Allowable expenses may include books, clothing for job interviews, course registration fees, dependent care costs, gasoline, personal safety items, training materials, and uniforms.
50 Id. at 14.
51 See Id. at 13-14; see also Kaz, supra note 43, at 6.
52 National Skills Coalition, Tools for Skills-focused SNAP E&T Programs, April 30, 2015.
54 Id.
55 Id.
56 Id.
57 Id.
58 In Nebraska’s 2015 SNAP E&T state plan, the only program components included were “job search training and support” and “independent job search and support.” The “job search training and support” component consisted of working with participants to offer 32 hours of individual job search training” coupled with “seven weeks of job search” which includes a recommended six job contacts per week. The “independent job search and support” consisted of the job search requirements described above for an eight week period. This component was available only for select individuals, such as those who are dislocated workers, already have marketable skills and necessary job search skills, are working less than 30 hours per week, are able to work but are restricted to working less than 30 hours per week due to health reasons.
60 Id.
61 Id.
62 Id.
63 Id.
64 Id.
65 Id.
66 SNAP Data from Voices for Children
67 Id. at 12.
69 Id.
70 Id.
72 Id.
73 Id.
74 Id.
76 Mohan, supra pg. 4.
77 Rachel Gragg and David Kaz, National Skills Coalition, Replicating Success, Recommendations and Best Practices from Washington State’s SNAP E&T Program (BFET), June 2014.
78 Id.
79 Id.
80 Id.
81 Id.
82 See Pathways for Academic Career and Employment Act, Iowa Code Chapter 260H.
83 See Gap Tuition Assistance Act, Iowa Code Chapter 260I.
84 National Skills Coalition, supra.
85 Id.
86 Id.
87 Id.
90  Id.
91  National Skills Coalition, Building Skills Through SNAP Employment and Training: Recommendations from Lessons Learned in Four States (April 2016).
92  NEB. DEP’T HEALTH & HUM. SERVS., NEBRASKA’S EMPLOYMENT AND TRAINING PLAN 2016 Amendment, pg. 10 (2016).
93  Id.
95  National Skills Coalition, Building Skills Through SNAP Employment and Training: Recommendations from Lessons Learned in Four States (April 2016).
96  Id.