

U.S. DEPARTMENT OF AGRICULTURE
FOOD AND NUTRITION SERVICE

**Fiscal Year 2015 Pilot Projects to Reduce Dependency and Increase Work Requirements
and Work Effort Under the Supplemental Nutrition Assistance Program (SNAP)**

REQUEST FOR APPLICATIONS

CFDA#: 10.596

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I. Introduction

Authorization

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

The Act provided \$200 million total to the U.S. Department of Agriculture (USDA) to conduct and evaluate up to ten pilot projects. The Act authorizes \$10 million in fiscal year (FY) 2014 and \$190 million in FY 2015. USDA will award the majority of the \$200 million under this Request for Applications (RFA) while reserving some for an independent evaluation contract to be awarded under a separate solicitation.

Purpose

The E&T pilot projects funded through these grants must develop and test methods for E&T programs and services to increase the number of SNAP work registrants who obtain unsubsidized employment, increase the earned income of work registrants, and reduce the reliance of work registrants on public assistance.

Funding

This RFA is for a new, one-time initiative. Approximately \$165 million will be awarded for up to ten pilot projects in the form of cooperative agreements between the USDA's Food and Nutrition Service (FNS) and grantees. The remaining funds will be used for the associated independent evaluation. Each pilot project may operate for up to three years once funding is awarded. USDA expects to award up to ten grants between \$5 million and \$25 million each; however, there are no minimum or maximum awards. The period for the independent evaluation may be up to six years from the start of the pilot project.

The Act requires that State agencies interested in applying must commit to maintain at least the amount of State funding for SNAP E&T programs that they expended in FY 2013 for each year of the pilot. The Act also requires that funds made available through this funding opportunity shall be used only to supplement, not to supplant, non-Federal funds used for existing E&T activities or services. In other words, State agencies may not shift the cost of existing programs and services, like subsidized employment or mental health treatment programs that are currently funded through non-Federal resources, to the pilot project. However, State agencies may use pilot funds to supplement, or expand, these programs and services. States agencies may contribute additional funds obtained from other sources, including Federal, State or private funds, on the condition the use of the contributions is permissible under Federal law, to support pilot activities.

State agencies selected to operate an E&T pilot must provide payments or reimbursements to pilot participants for transportation and other expenses reasonably necessary and directly related to participation in an E&T pilot, and for dependent care costs that are determined by the state agency to be necessary for participation. States may use pilot funds to pay for these costs but are not required to do so. States may also use funds obtained from other sources, on the condition the use of such funds is permissible under Federal law. USDA will reimburse the State agency

in an amount equal to 50 percent of the total amount of payments made or costs incurred by the State agency in connection to transportation costs, dependent care costs, and other expenses reasonably necessary and directly related to participation in the E&T pilot.

Letter of Intent

The eligible applicant that intends to respond with an application should submit a Letter of Intent notice (see Attachment A) no later than September 26, 2014, 11:59 PM (EDT). This notice does not obligate the applicant to submit an application, but provides FNS with useful information in preparing for the review and selection process. The notice should include the potential applicant's name and address, organization's name, telephone number, and e-mail address of the primary point of contact.

Interested applicants may submit questions about this RFA by September 19, 2014, 11:59 PM (EDT). FNS will post the responses on the E&T pilot website (<http://www.fns.usda.gov/2014-snap-e-t-pilots>) by October 6, 2014.

The applicant should send the Letter of Intent and questions about the RFA via e-mail to the FNS Grants Officer identified below:

Carla Garcia
Grant Officer, Grants and Fiscal Policy Division
U.S. Department of Agriculture, FNS
E-mail: carla.garcia@fns.usda.gov

II. Background

In addition to being one of our nation's strongest defenses against hunger and poverty, SNAP is a critical work support for millions of low-income families. Although over half of SNAP participants are children, the elderly, or individuals with disabilities, thirty percent of SNAP households have earned income and over 42 percent of SNAP participants live in households with earnings. SNAP benefits help individuals and families put food on the table, often while household members look for a job or seek out higher paying jobs.

SNAP also provides E&T services to unemployed and under-employed participants. All 53 State SNAP agencies operate an E&T program to help job-ready SNAP recipients find work and assist others in gaining skills, training, or experience that lead to employment and greater self-sufficiency. Some States require certain SNAP recipients to participate in E&T as a condition of eligibility while other States allow SNAP recipients to self-initiate participation.

The FNA provides flexibility in the design of E&T programs so that States may determine what approaches and services best fit with local needs. State agencies choose the components that make up their E&T programs, which may include job search and job search training, workfare, education activities, self-employment or on-the-job training, and job retention services. Participants must be certified to receive SNAP benefits or be in the process of applying in order to receive SNAP E&T services.

USDA provides Federal grants to support State administered E&T programs for SNAP participants. A federal formula grant allocates \$90 million to State agencies for the cost of administering and operating an E&T program. An additional \$20 million grant is awarded to State agencies that pledge to offer all at-risk able-bodied adults without dependents (ABAWDs) a spot in a work activity that allows them to maintain SNAP eligibility. In addition to the federally funded formula grants, USDA reimburses 50 percent of the additional State expenditures on SNAP E&T that are over and above federal E&T grant(s). USDA also reimburses 50 percent of State expenditures on dependent care, transportation, and other participant expenses related to their participation in E&T services.

In FY 2013, USDA provided \$286.5 million in Federal funds to States for SNAP E&T services. Of this total, 34 percent or approximately \$98 million were 100 percent federal funds; and 66 percent or \$189 million were federal reimbursements to States for additional funds spent to provide services.

SNAP participants who are not specifically exempted by statute are subject to certain work requirements as a condition of eligibility. These requirements include registering for work, participating in a SNAP E&T program or workfare program if assigned, and not voluntarily quitting a job or reducing work hours to less than 30 hours per week. If a participant fails to comply, without good cause, he or she would be disqualified from SNAP for a minimum of one month. The FNA exempts SNAP participants from work requirements, including work registration, if they are: under the age of 16 or over the age of 59; physically and mentally unfit for employment; subject to and complying with the work requirements under title IV-A of the Social Security Act (TANF) or unemployment compensation; a parent or household member responsible for a child under 6 or an incapacitated person; a regular participant in a drug or alcohol treatment and rehabilitation program; employed or self-employed for at least 30 hours a week; or a student enrolled at least half-time in a recognized school or training program.

In addition to the above work requirements, ABAWDs must work at least 20 hours a week, participate for at least 20 hours a week in qualifying work programs, or participate in workfare in order to receive benefits for more than 3 months in a 36-month period. ABAWDs living in areas of high unemployment or where there is a lack of jobs may be exempt from the time limit, but must still comply with other SNAP work requirements.

SNAP regulations outline SNAP work requirements and exemptions from work registration at 7 CFR 273.7(a) - (b) and ABAWD requirements at 7 CFR 273.24. Regulations at 7 CFR part 273 can be found at the Electronic CFR: <http://www.gpo.gov/fdsys/pkg/CFR-2014-title7-vol4/xml/CFR-2014-title7-vol4-part273.xml>.

The purpose of the pilot projects under this solicitation is to raise the number of SNAP work registrants under section 6(d) of the FNA who obtain unsubsidized employment, increase the earned income of the registrants, and reduce the reliance of the registrants on public assistance because they have entered employment or increased earnings. These pilots present a unique opportunity to test a range of innovative and promising approaches and strategies that help SNAP work registrants increase employment, gain skills and education that may lead to jobs and increased earnings. In addition, USDA encourages States to target not only SNAP participants

who are work-ready, but also those with significant barriers to employment. They also present an occasion to develop or expand partnerships between Federal agencies, State agencies, and both the private and public sector.

Previous research indicates that many low-income adults face barriers to employment, including mental, physical, educational, and dependent care-related barriers. According to American Community Survey (ACS) data, working-age SNAP participants who are unemployed are less likely to have completed high school. About three-quarters of employed working-age adults have at least a high school education, compared to two-thirds of those not currently employed. Moreover, many unemployed, working-age SNAP participants, while they may not qualify for Supplemental Security Income (SSI), face serious physical, mental or emotional barriers to employment.

The longer SNAP participants have been unemployed, the more likely they are to report at least one barrier to employment. An analysis of ACS data shows that working-age participants who have not worked within the last five years are nearly twice as likely as employed participants to have less than a high school education. These participants are also more likely to have barriers beyond education. Thirty-nine percent of those unemployed for five or more years report at least one barrier to employment (excluding education level), compared to 16 percent of employed participants.

USDA is looking for a robust set of pilot proposals that reflect innovative strategies at the State and/or local level that are responsive to the needs and characteristics of the SNAP population. Pilot projects should enhance existing E&T activities in the State, as well as the employment and earning potential of pilot participants. We encourage eligible applicants to carefully read the application format requirements, evaluation criteria, and funding priorities described in this RFA. These criteria outline the qualities USDA expects successful proposals to have and they will also guide the reviewers' evaluation of proposals.

III. Eligible Applicants

Any of the 53 State agencies that administer SNAP (50 States and the District of Columbia, Guam, and the Virgin Islands) may apply for a grant. State agencies may apply on behalf of county-administered SNAP agencies that wish to operate a pilot. State agencies may submit more than one application. For example, a State agency may submit applications for two different project ideas or submit applications on behalf of several county-administered programs.

The Act sets specific criteria for pilot projects. To be eligible to participate, interested State agencies must:

- Agree to cooperate fully with the independent evaluation contractor that will be overseen by FNS. An agreement to cooperate with the evaluation contractor must be submitted in the application (see Attachment B). Tasks may include facilitating access to administrative data necessary for the evaluation, including data on SNAP participants' employment, earnings, and receipt of other public assistance (including TANF, Medicaid, and General Assistance) during the pilot and after participation in a pilot ends; facilitating access to participants; facilitating periodic interviews with agency staff; and assisting with arrangements for site visits for the evaluation contractor. Applicants should

understand that the evaluation will follow the precedents of previous welfare-to-work research and randomly assign participants (or possibly offices, job centers, or sites if it results in a more meaningful and rigorous evaluation) to treatment and control groups.¹ Random assignment will help ensure an appropriately rigorous evaluation and yield a credible, unambiguous, and clear answer to the question of whether the pilot procedures make a difference in term of employment, earnings, and program participation. Applicants should be prepared to accept significant responsibility for implementation of the randomization process, designed by and with technical assistance from the evaluation contractor.

- Applicants must provide evidence that the State has a robust data collection system for program administration and must agree to cooperate to provide data maintained by the State SNAP agency or other State agencies on the employment and training activities, employment and earnings, and public benefit receipt of participants to ensure proper and timely evaluation. Applicants may satisfy this requirement by describing the data collection system(s) currently in place, including the ability to access Federal data that contains comparable information. Refer to the Section VII. Evaluation of Grant Application Criteria for additional information.
- Commit to collaborate with the State workforce board and other job training programs in the State and local area. This collaboration includes a commitment from the State workforce board and other job training programs in the State or local area as well. Levels of collaboration may vary, from organizing pilot activities that complement the activities of the workforce board to offering services through the State or local workforce board. Applicants must submit a Letter of Commitment with the application package, signed by the appropriate authorizing authorities, outlining how the SNAP E&T agency, the State workforce board, and other job training program providers will collaborate if they receive grant funding (see Attachment C). Refer to the Section VII. Evaluation of Grant Application Criteria for additional information.
- Commit to maintain at least the same level of State funding for SNAP E&T programs and optional workfare as the State expended in FY 2013 for each year of the pilot. Applicants should provide the SNAP E&T and workfare expenditures as reported on the SF-778 report for FY 2013.

Eligible applicants should review this RFA carefully in order to maximize points.

IV. Program Requirements and Areas of Interest

A. Purpose

The Act provides funding for pilot projects that develop and test methods, including operating work programs with certain features comparable to work programs operated under the TANF

¹ Random assignment entails a selection process like tossing a coin or running a lottery. Similarly eligible people entering the system are placed in either the new E&T pilot program or the existing program.

program, for employment and training programs to raise the number of SNAP work registrants who obtain unsubsidized employment, increase the earned income of the registrants, and reduce the reliance of the registrants on public assistance. The Act requires an independent, rigorous evaluation to measure the impact of each pilot on participants' employment, income, and other measures of well-being to inform implementation of SNAP E&T programs.

In selecting pilot projects, the Act requires that USDA ensure that the pilot projects, when considered as a group, test a range of strategies, including those that:

- Target individuals with low skills or limited work experience, individuals subject to the requirements under section 6(o) of the FNA, and individuals who are working;
- Are located in a range of geographic areas and States, including rural and urban areas;
- Emphasize education and training, rehabilitative services for individuals with barriers to employment, rapid attachment to employment, and mixed strategies; and
- Test a range of programs that assign work registrants to mandatory and voluntary participation in employment and training activities.

Every pilot need not include all of the strategies listed above. USDA will select a group of pilot projects that reflect the range of approaches, strategies and target populations indicated by the Act. The pilots will test the impact of various services and activities on different sub-groups within the diverse pool of SNAP work registrants.

The Act also directs USDA to consider:

- The degree to which the pilot project would enhance existing E&T programs;
- The degree to which the pilot project would enhance employment and earnings of E&T participants;
- Whether the pilot project could be replicated; and
- The States' demonstrated capacity to operate high quality E&T programs.

Proposed projects should build on and extend the promise of prior research that has demonstrated effectiveness in connecting low-income participants with employment and/or increased earnings or, at a minimum, provide a strong logic model illustrating how the proposed project will increase employment and earnings among SNAP work registrants. The Departments of Labor, Commerce, Education, and Health and Human Services compiled a synthesis of available evidence on job training programs, which is available here:

<http://www.dol.gov/asp/evaluation/jdt/jdt.pdf>. Interested State agencies may also want to review the collection of research and findings available at the Department of Labor's Workforce System Strategies web site: <http://strategies.workforce3one.org/>

B. Areas of Interest

In his State of the Union address, President Obama said that we need to “train Americans with the skills employers need, and match them to good jobs that need to be filled right now.” On January 30, 2014, President Obama issued a memorandum for the Secretaries of Labor, Commerce, and Education outlining his plan to ensure all Federal job training programs take a job-driven, integrated and effective approach to the workforce training system. As part of this effort and the government-wide review led by Vice President Biden, the Departments of Labor,

Commerce, and Education developed a job-driven checklist for Federal agencies to use in reviewing grants related to training or employment. USDA has incorporated some elements of this checklist into the selection criteria for the projects funded under this RFA. The elements of the job-driven checklist are defined below:

Engaging Employers: Work up-front with employers to determine local or regional hiring needs and design training programs that are responsive to those needs.

Earn and Learn: Offer work-based learning opportunities with employers- including on-the-job training, internships, pre-apprenticeships, and Registered Apprenticeships – as training paths to employment.

Smart Choices: Make better use of data to drive accountability, inform what programs are offered and what is taught, and offer user-friendly information for job seekers to choose programs and pathways that work for them and are likely to result in jobs.

Measurement Matters: Measure and evaluate employment and earnings outcomes.

Stepping Stones: Promote a seamless progression from one educational stepping stone to another, and across work-based training and education, so individuals' efforts result in progress.

Opening Doors: Break down barriers to accessing job-driven training and hiring for any American who is willing and able to work, including access to job supports and relevant guidance.

Regional Partnerships: Create regional collaborations among American Job Centers, education institutions, labor, and non-profits.

Considering job-driven program elements in the context of pilot project designs will help connect SNAP participants with and prepare them for available employment opportunities. The rigorous, independent evaluation will enable USDA and State partners to evaluate the effectiveness of various practices, which will inform program implementation on a broader scale.

More information about the job-driven checklist can be found here:
http://www.whitehouse.gov/sites/default/files/docs/skills_report.pdf

USDA is interested in funding a range of projects that reflect the diversity of the SNAP work registrant population, the various needs of this population, and the needs of employers. USDA encourages States to leverage and align or build on other public and private resources. USDA also encourages State agencies to design job-driven projects with services and activities that are aligned with local or regional in-demand industries or occupations or programs that offer a career pathway into a high growth industry or occupation. For the purpose of this RFA, USDA has defined in-demand industries or occupations as:

- an industry sector that has a substantial current or potential impact (including through jobs that lead to economic self-sufficiency and opportunities for advancement) on the

State, regional, or local economy, as appropriate, and that contributes to the growth or stability of other supporting businesses, or the growth of other industry sectors; or

- an occupation that currently has or is projected to have a number of positions (including positions that lead to economic self-sufficiency and opportunities for advancement) in an industry sector so as to have a significant impact on the State, regional, or local economy, as appropriate.

In consultation with other Federal agencies and workforce experts, USDA has identified several specific approaches and strategies of interest. Proposed projects may include these strategies in the project design if there is a logical connection between the target population, activities and project goals, but applicants are not required to include these strategies in order to be considered for funding nor will they receive additional points under the evaluation criteria for including these strategies. Applicants should make clear why they have proposed specific approaches and strategies, how these activities meet the needs of work registrants targeted by the pilot, and how this is different from the services already available to potential participants; applicants will be awarded points based on the quality and clarity of the design of their proposed approaches and strategies.

USDA is interested in projects that incorporate the following:

- Activities or services targeted to individuals with significant barriers to employment
- Case management
- Career pathways
- Work-based learning, including pre-apprenticeship programs and on-the-job learning
- Public-private partnerships

Activities or Services Targeting Populations with Significant Barriers

The SNAP population faces unique barriers and challenges, many of which can be overcome with a little additional help or support. However, some among this population face more significant barriers to employment. They may face barriers such as unstable housing, substance abuse issues, or mental health or other health problems, have language or education barriers, or be chronically unemployed. This population may require longer term or more intensive activities or services. Projects that target this population may focus on identifying and addressing barriers, and eventually assisting individuals with obtaining skills or education or job search training that leads to employment.

Case Management

Comprehensive case management services may help individuals navigate barriers and challenges that they face in obtaining and retaining employment. E&T case managers, sometimes called career specialists or employment counselors within the workforce system, play a critical role in helping participants successfully obtain and retain employment. In an effective case management model, the case manager guides, motivates and supports job seekers by continually assessing their needs and barriers, identifying resources, and advising on career and training opportunities. USDA is particularly interested in projects that provide comprehensive case management services to ABAWDs, who are subject to time-limited benefits unless they meet additional requirements.

The Supporting Integrated Intake and Effective Case Management in the Workforce System, a project sponsored by the Department of Labor Employment and Training Administration, provides additional information and technical assistance on effective case management. For more information, see: https://effectivecasemanagement.workforce3one.org/page/resource_map

Career Pathways

The term “career pathway” means a combination of education, training, and other services that enable individuals to secure industry relevant certification and to obtain employment within an occupational area that enables one to advance to higher levels of future education and employment in that occupational area.

A career pathways system links education programs to the workforce development system and local business needs so that participants receive industry-recognized credentials, potentially along a route to a post-secondary degree. Career pathways are characterized by multiple entrance and exit points that make the programs more accessible for participants who may face barriers to entering or advancing in the workforce.

For example, a career pathway approach might match educational activities with the local demand for a trained healthcare workforce. A participant could start with a four-month program to become a Certified Nursing Assistant and start work upon completion. Later, he or she might pursue additional education and study to become a Licensed Practical Nurse or eventually a Registered Nurse.

Career pathways can also include rigorous, sequential, efficient curricula that “bridge” basic education with vocational or technical skills training. One promising model for this is Washington State’s Integrated Basic Education and Skills Training (I-BEST), which blends adult literacy training with workplace skills to train students for jobs in demand at the local level. In a non-experimental study, I-BEST participants were more likely to earn college credit, attain a credential, and demonstrate basic skills gains than a comparison group.

USDA is particularly interested in projects that include accelerated training strategies for jobs in in-demand, emerging, or high growth industries. These projects can include classroom occupational training that is accelerated and contextualized for adult workers, distance learning and technology-based learning, or a combination of classroom and distance education.

For example, a proposed pilot might include accelerated training models that have a distance education component coupled with a classroom component that is designed to equip participants with the same skill and knowledge set that a 2-year program includes in a quarter of the time. Projects using this model should be based on existing programs or curricula that are new to the SNAP work registrant population or being tried in a new geographical area.

Additional resources for career pathways:

Joint Letter on Career Pathways from the U.S. Department of Labor’s Employment and Training Administration, the U.S. Department of Education’s Office of Career, Technical and Adult Education, and the U.S. Department of Health and Human Services:

http://wdr.doleta.gov/directives/attach/TEN/ten2_36_11.pdf

The WorkforceOne Career Pathways Initiative: <https://learnwork.workforce3one.org/>

Integrated Basic Education and Skills Training (I-BEST), Washington State Board for Community and Technical Colleges: <http://www.sbctc.ctc.edu/college/e-ibestcreateyourownprogram.aspx>

Work-Based Learning

The Act provides for work-based learning activities, such as on-the-job training, paid or unpaid work experience, and subsidized (full or partial) employment. Research suggests that work-based learning may have positive effects on employment and income. In particular, one quasi-experimental evaluation found that participants in Registered Apprenticeship programs saw higher annual and lifetime earnings than a comparison group.

Please see “What Works in Job Training: A Synthesis of the Evidence” for more information: <http://www.dol.gov/asp/evaluation/jdt/jdt.pdf>

USDA is particularly interested in work-based learning that builds on pre-apprenticeship programs and on-the-job learning opportunities.

1. Pre-Apprenticeship Programs

This strategy includes programs that prepare SNAP work registrants for entry into Registered Apprenticeships. Registered Apprenticeship programs are registered by the National Apprenticeship Act of August 16, 1937 by individual businesses, employer associations or labor-management organizations that provide paid employment, on-the-job learning, and industry recognized credentials to participants.

These programs are registered with the U.S. Department of Labor, Office of Apprenticeship or State Apprenticeship Agencies in more than 1,000 occupations and industries spanning Healthcare, Information Technology, Manufacturing, Transportation, Hospitality, and Construction among others. Apprenticeships can be time- or competency-based and upon completion, apprentices are given a nationally recognized certificate of completion. Registered Apprenticeships are recognized by the U.S. Department of Education as a post-secondary certificate and many programs count as college credit towards a degree. Registered Apprenticeship sponsors help set the minimum qualification for applicants, including minimum education level, physical ability, previous work experience, and other factors that would equip participants for the specific field or occupation. Registered Apprenticeships may pay better than other low-skill, entry level positions. In FY 2011, the average starting wage for an apprentice was \$16.01 per hour or \$33,301 per year, with wages upon completion of a three- or four-year apprenticeship at \$26.36 per hour.

A pre-apprenticeship program would equip pilot participants with the basic knowledge, soft skills and technical requirements to qualify for a Registered Apprenticeship. The pre-apprenticeship programs funded under an E&T pilot should have a direct link or relationship with a Registered Apprenticeship program. Pre-apprenticeship programs should also meet the definition and quality framework established by the Department of Labor’s Employment and

Training Administration (ETA). ETA identifies quality pre-apprenticeship programs as ones that include the following elements:

1. Approved training and curriculum
2. Strategies for long-term success
3. Access to appropriate support services
4. Promotes greater use of Registered Apprenticeships to increase future opportunities
5. Meaningful hands-on training that does not displace paid employees
6. Facilitated entry and/or articulation

Pilot projects may use grant funds to subsidize part of an apprentice's wages and for education and training needs.

Additional resources on quality pre-apprenticeship programs:

http://wdr.doleta.gov/directives/attach/TEN/TEN_13-12.pdf

2. Enhanced On-the-Job Learning

This strategy would integrate basic education and preparation activities and on-the-job learning into one experience. Rather than complete a basic education component prior to a job placement, participants would be placed in on-the-job learning experiences while also taking classes or engaging in activities that cover basic knowledge, soft skills, and technical requirements for the job placement. USDA is particularly interested in integrated approaches that include paid employment and industry-recognized credentials which, where appropriate, may provide college credit through partnerships with community colleges.

Public-Private Partnerships

The Act requires that State agencies commit to collaborate with State workforce boards as a part of the qualifying criteria for the pilots under this RFA. USDA is also interested in projects that include a wide array of partnerships with public and private entities beyond the State workforce board.

The Workforce Innovation and Opportunity Act (WIOA) requires that State workforce development boards be composed of the Governor, one member of each chamber of the State legislature, and appointed representatives from business or trade organizations as well as workforce representatives from labor organizations, apprenticeships programs, and may include representatives from community-based organizations. The State Workforce Investment Board (WIB) supports and informs strategies of Local Workforce Investment Boards (LWIBs), which also consist of business and community leaders. LWIBs administer and manage American Job Centers, which provide case management and services funded under the WIOA.

Most State agencies coordinate SNAP E&T services with WIBs or the State workforce development system. A few State agencies administer SNAP E&T services through the State workforce agency. Beyond the collaboration with workforce entities required for pilots funded under this RFA, USDA encourages States to include additional partners that might contribute resources and expertise to the proposed project. Additional partners might include employers, local chambers of commerce, community colleges or other recognized institutions of higher

education, State and local k-12 education agencies that administer career and technical education programs, economic development agencies, and community- or faith-based organizations.

USDA is also interested in pilots that leverage the expertise and connections of the State workforce board and work more directly with State Economic Development Agencies to identify real, local training needs and new jobs. State Economic Development Agencies typically provide training and resources for businesses, as well as employee recruitment and training. A close partnership between the SNAP E&T program and the State Economic Development Agency would provide a direct and tangible link between E&T training activities and available jobs.

C. Pilot Requirements

Pilot projects must operate in accordance with the requirements of sections 6(d) and 20 of the FNA and the implementing regulations at 7 CFR 273.7 (review 7 CFR 273.7 at: <http://www.gpo.gov/fdsys/pkg/CFR-2014-title7-vol4/xml/CFR-2014-title7-vol4-part273.xml>), unless otherwise specified by the Act or this RFA. Sections 6(d) and 20 of the FNA require, among other things, that the State agency must:

- Exempt specific categories of SNAP recipients from work requirements, including the requirement to register for work;
- Disqualify individuals for a failure to comply without good cause (for more information, see below);
- Use the Federal definitions of good cause and voluntary quit (for more information, see below);
- Not require a participant to engage in E&T activities for more than 120 hours per month, although participants may volunteer for more;
- Not supplant non-federal funds, such as State or local education funds, with federal grant funding;
- Provide participant reimbursements for transportation, dependent care, and other necessary expenses to both mandatory and voluntary participants; and
- Not spend more SNAP E&T funds on TANF households than the State spent in 1995; 7 CFR 273.7(d)(1)(ii)(D)(1) provides that only four States claimed Federal E&T expenditures on this category of recipients in FY 1995 and are currently allowed to spend the equivalent amount of SNAP E&T funding on households receiving SNAP and TANF benefits. These States are: Colorado (\$318,613), Utah (\$10,200), Vermont (\$1,484,913), and Wisconsin (\$10,999,773).

As mentioned, sections 6(d) and 20 of the FNA, as well as the implementing regulations, apply unless otherwise provided by the Act or this RFA. Specifically, the Act contains provisions for pilot projects that differ from the following regular E&T program requirements:

- States do not have to submit an annual plan outlining activities (7 CFR 273.7(c)(6)) and to report participation in these activities on the FNS 583 E&T Program Activity Report (7 CFR 273.7(c)(8)-(11)) for pilot projects. FNS will monitor program activities and participation through quarterly reports required in the Cooperative Agreement and through the independent evaluation.
- Pilot projects are not subject to the restriction on subsidized employment as an allowable cost (7 CFR 273.7(d)(ii)(A)). Funding provided under a pilot project may be used for

subsidized employment. However, the restriction continues to apply to regular E&T grants.

- Pilot participants may be required to participate in substance abuse treatment or mental health treatment activities. Under normal program rules, such participants would be exempt from work registration requirement and E&T participation. More information on failure to comply in these circumstances is provided under the Compliance and Disqualification heading in section IV.E of this RFA.
- More information on the scope of allowable pilot project activities is provided in section IV.D of this RFA.

In accordance with section 16(h)(4) of the FNA and 7 CFR 273.7(d)(ii), E&T funding, including E&T pilot funds, cannot be used for certification procedures, including determining whether an individual must be work registered, the work registration process, or any further screening performed during the certification process, nor for sanction activities. The certification process is considered ended when an individual is referred to an E&T component for assessment or participation.

The Act also requires USDA to establish standards to ensure that work registrants participating in subsidized or unsubsidized employment who fail to comply for reasons beyond the control of the individual are not determined as ineligible. More information on standards for work activities can be found in section IV.D Allowable Activities of this RFA.

Screening and Assessment

In accordance with 7 CFR 273.7(c)(2), the State agency is responsible for screening each work registrant to determine whether or not it is appropriate, based on the State agency's criteria, to refer the individual to an E&T program, and if appropriate, referring the individual to an E&T program component. For purposes of the pilot, the screening must include at a minimum an identification of basic needs and barriers.

The State agency's screening process should include an upfront comprehensive assessment of each pilot participant to identify barriers and basic needs prior to placement in an activity. A strong comprehensive assessment collects general information about demographics, educational attainment, basic skills, literacy, work experience, and public benefits. It also assesses objective and subjective barriers to work, such as disabilities, criminal background, family composition, housing circumstances, childcare needs, and transportation needs. State agencies are encouraged to provide an on-going comprehensive assessment as well.

For pilots that require mandatory participation in E&T activities, the State agency must assess whether the work registrant is participating in substantial employment and training activities outside of the pilot project that are expected to result in the work registrant gaining increased skills, training, work, or experience consistent with the objectives of the pilot project; and if determined by the State agency to be acceptable, count hours engaged in the activities toward any minimum participation requirement. State agencies may provide participant reimbursements to work registrants already engaged in unsubsidized employment when referred to a pilot project.

Additional information on comprehensive assessments and lessons learned in TANF programs:

Participant Reimbursements

Section 6(d)(4)(I) of the FNA requires that the State agency provide payments or reimbursements to both mandatory and voluntary participants in E&T programs for the actual cost of transportation and other costs that are reasonably necessary and directly related to participating in E&T, and the actual costs of dependent care that are determined by the State agency to be necessary for the individual to participate. This requirement applies to the pilot projects as well. As provided by 7 CFR 273.7(d)(4)(v), the State agency must inform all mandatory participants that they may be exempted from mandatory participation if their monthly expenses that are reasonably necessary and directly related to participation in an assigned activity exceed the allowable reimbursement amount.

States agencies may, but are not required to, use pilot funds for 100 percent of the costs that are reasonably necessary and directly related to participation in E&T. A State agency may also use State funds, or funds leveraged from other sources, and USDA will reimburse the State 50 percent of these costs, on the condition that the use of the contributions is permissible under Federal law.

D. Allowable Activities

The FNA outlines several activities, or components, that a State agency may include in its E&T program that may also be included in these pilots. These activities are:

- Job search and job search training programs that include job skills assessments, job finding clubs, training in techniques for employability, job placement services, or other direct training or support activities that expand the job search abilities of participants;
- Workfare programs operated under section 20 of the FNA;
- Programs designed to improve the employability of participants through actual work experience or training;
- Educational programs or activities to improve basic skills and literacy, or otherwise improve employability, including educational programs that expand job search abilities;
- Programs designed to increase the self-sufficiency of recipients through self-employment training and activities;
- Job retention services, such as ongoing case management, for up to 90 days; and
- Other programs as approved by the Secretary or the State under regulations aimed at accomplishing the purpose of the E&T program. These are typically described as “unique components” in State plans and on the E&T Program Activity Report and constitute a combination of one or more of the above activities.

The Act provides additional flexibility on allowable activities that may be included in a pilot. Allowable programs and services under pilot projects include currently allowable SNAP E&T activities, as well as activities authorized under TANF, including:

- Employment in the public or private sector that is not subsidized by any public program.
- Employment in the private or public sector for which the employer receives a subsidy from public funds to offset all or a part of the wages and costs of employing an adult. Applicants proposing such a model should provide details on how they plan to subsidize wages, including the length and level of the wage subsidy and expectations for

employers. Work registrants placed in subsidized employment may not work for the employer at the time the individual enters the pilot and is placed in a job.

- A work activity that is performed in return for public benefits; provides an adult with an opportunity to acquire the general skills, knowledge, and work habits necessary to obtain employment; is designed to improve the employability of those who cannot find unsubsidized employment; and is supervised by an employer, work site sponsor, or other responsible party on an ongoing basis. Participants engaged in these activities cannot be required to work more than household benefits divided by Federal or State minimum wage, whichever is higher.
- Training in the public or private sector that is given to a paid employee while the employee is engaged in productive work and which provides knowledge and skills essential to the full and adequate performance of the job.
- Job search, obtaining employment, or preparation to seek or obtain employment, including life skills training; substance abuse treatment or mental health treatment, determined to be necessary and documented by a qualified medical, substance abuse, or mental health professional; and rehabilitation activities, supervised by a public agency or other responsible party on an ongoing basis. While substance abuse and mental health treatment are allowable activities, USDA prefers that these will not be the primary activities in any of the pilot projects, but instead act as a complement to other services or activities.
- Structured programs and embedded activities: in which adults perform work for the direct benefit of the community under the auspices of public or nonprofit organizations; that are limited to projects that serve useful community purposes in fields such as health, social service, environmental protection, education, urban and rural redevelopment, welfare, recreation, public facilities, public safety, and child care; that are designed to improve the employability of adults not otherwise able to obtain unsubsidized employment; that are supervised on an ongoing basis; and with respect to which a State agency takes into account, to the maximum extent practicable, the prior training, experience, and skills of a recipient in making appropriate community service assignments.
- Career and technical training programs that are directly related to the preparation of adults for employment in current or emerging occupations; and supervised on an ongoing basis.
- Training or education for job skills that are required by an employer to provide an adult with the ability to obtain employment, or to advance or adapt to the changing demands of the workplace, and supervised on an ongoing basis.
- Education that is related to a specific occupation, job, or job offer, and supervised on an ongoing basis.
- In the case of an adult who has not completed secondary school or received a certificate of general equivalence, regular attendance that is in accordance with the requirements of the secondary school or course of study, at a secondary school or in a course of study leading to a certificate of general equivalence; and supervised on an ongoing basis.
- Providing child care to enable another recipient of public benefits to participate in a community service program that does not provide compensation for the community service, is a structured program designed to improve the employability of adults who participate in the program, and is supervised on an ongoing basis.

While unsubsidized or subsidized employment are allowable activities, the State agency must ensure that placement in these activities meet the criteria for suitable employment in 7 CFR 273.7(h):

(h) Suitable employment. (1) Employment will be considered suitable unless:

(i) The wage offered is less than the highest of the applicable Federal minimum wage, the applicable State minimum wage, or eighty percent (80%) of the Federal minimum wage if neither the Federal nor State minimum wage is applicable.

(ii) The employment offered is on a piece-rate basis and the average hourly yield the employee can reasonably be expected to earn is less than the applicable hourly wages specified under paragraph (h)(1)(i) of this section.

(iii) The household member, as a condition of employment or continuing employment, is required to join, resign from, or refrain from joining any legitimate labor organization.

(iv) The work offered is at a site subject to a strike or lockout at the time of the offer unless the strike has been enjoined under section 208 of the Labor-Management Relations Act (29 U.S.C. 78) (commonly known as the Taft-Hartley Act), or unless an injunction has been issued under section 10 of the Railway Labor Act (45 U.S.C. 160).

(v) It fails to meet additional suitability criteria established by State agencies.

(2) In addition, employment will be considered suitable unless the household member involved can demonstrate or the State agency otherwise becomes aware that:

(i) The degree of risk to health and safety is unreasonable.

(ii) The member is physically or mentally unfit to perform the employment, as documented by medical evidence or by reliable information from other sources.

(iii) The employment offered within the first 30 days of registration is not in the member's major field of experience.

(iv) The distance from the member's home to the place of employment is unreasonable considering the expected wage and the time and cost of commuting. Employment will not be considered suitable if daily commuting time exceeds 2 hours per day, not including the transporting of a child to and from a child care facility. Nor will employment be considered suitable if the distance to the place of employment prohibits walking and neither public nor private transportation is available to transport the member to the jobsite.

(v) The working hours or nature of the employment interferes with the member's religious observances, convictions, or beliefs.

Standards for Unsubsidized and Subsidized Employment

The Act provides for pilot projects to include new allowable activities, including unsubsidized and subsidized work. The Act requires USDA to establish standards for unsubsidized and subsidized work, which are allowable E&T activities for pilot projects, to ensure that failure to work for reasons beyond the control of an individual, such as involuntary reduction in hours of employment, shall not result in ineligibility for SNAP. The standard for failure to work due to circumstances beyond an individual's control is different than the standard of refusal without good cause as it relates to mandatory participation in non-work E&T activities.

USDA cannot enumerate every circumstance where failure to work might be beyond an individual's control. Therefore, to ensure that pilot participants assigned to mandatory subsidized or unsubsidized work activities do not lose SNAP eligibility as a result of failure to work for reasons beyond their control, USDA is requiring that, in order to sanction an individual for failure to comply with mandatory subsidized or unsubsidized work, the State agency must first establish willful misconduct on the part of the individual. Although not exhaustive, a performance failure that results from an inability or incapacity of the recipient to perform the work assigned or to obtain a job, does not constitute willful misconduct.

For purposes of this pilot willful misconduct is: 1) conduct showing intentional and substantial disregard of the employer's interests or of the employee's duties and obligations to the employer; 2) refusal to report to an employer if referred by the State and the potential employment is suitable; and 3) refusal to accept a bona fide offer of suitable employment.

Under these pilots, the State agency must establish willful misconduct by contacting the employer, obtaining evidence, including a written statement from the employer and the pilot participant's response, and documenting that the individual's failure to work due to willful misconduct before it may initiate the sanction process. An individual may not be sanctioned in the instance where an employer fails to provide such evidence.

A State agency that proposes a mandatory E&T program that includes work as an activity must provide information as to how it will ensure that an individual whom the State fails to establish as having failed to work due to willful misconduct on the job, will be able to continue to meet the E&T requirements, and not lose eligibility.

The requirements that apply to workfare and work experience under sections 6(d) and 20 of the FNA shall also apply to the new work activities, including that work placements shall not provide any work that has the effect of replacing the employment of an individual not participating in a pilot or regular SNAP E&T program, and that work activities shall provide the same benefits and working conditions that are provided to employees not participating in the pilot.

In addition, unsubsidized and subsidized work placements shall comport with the requirements of the Fair Labor Standards Act, the Americans with Disabilities Act, and section 504 of the Rehabilitation Act. States serving mandatory E&T participants and offering unsubsidized and subsidized activities through these pilots must adhere to these standards.

E. Pilot Participants

In order to participate in a project funded under this RFA, individuals must be a SNAP applicant, recipient, or have entered the pilot project and engaged in services before exiting SNAP. Under normal program rules, State agencies may require SNAP applicants to participate in any E&T component at the time of application and must reimburse applicants for expenses, including transportation and dependent care, reasonably necessary and directly related to participation in the E&T component. This pertains to the pilots, as well. However, also in accordance with the regular program rules, the State agency must not impose requirements that would delay the determination of an individual's eligibility for benefits or in issuing benefits to any household that is otherwise eligible.

In addition, State agencies may continue to provide job retention services to pilot participants leaving SNAP as a result of increased earnings for up to 90 days after employment.

The purpose of these pilots is to increase employment and earnings among SNAP work registrants, so at least 85 percent of all pilot participants must meet the criteria of a work registrant at section 6(d) of the FNA. Projects may serve no more than 15 percent of SNAP participants who are exempt from the SNAP work requirements but elect to volunteer for services offered under a pilot project.

Compliance and Disqualification

The Act provides that no work registrant shall be eligible to participate in SNAP if the individual refuses without good cause to comply with an E&T program under a pilot, to the extent required by the State. In accordance with section 6(d)(1) of the FNA and 7 CFR 273.7(i), the State agency must determine whether the participant had good cause refusing or failing to comply before initiating the sanction process. The standard for good cause for refusal or failure to comply with mandatory E&T requirements is different than the standard for failure to work due to circumstances beyond the individual's control as it relates to mandatory subsidized or unsubsidized employment as discussed in section IV.D of this RFA. For additional information on good cause, please review 7 CFR 273.7(i) (available at: <http://www.gpo.gov/fdsys/pkg/CFR-2014-title7-vol4/xml/CFR-2014-title7-vol4-part273.xml>).

In accordance with section 6(d)(4) of the FNA, pilot participants may not be required to work or participate in E&T activities for more than 120 hours per month but may choose to do so if fairly compensated for additional work hours. Additionally, work registrants who voluntarily participate in pilot projects are not subject to sanction for failure to comply.

For those required to comply with mandatory E&T requirements that refuse or fail to do so without good cause, section 6(d)(1)(C) of the FNA and 7 CFR 273.7(f) provide the timeframes for disqualification:

7 CFR 273.7(f) (2) Disqualification periods. The following disqualification periods will be imposed:

(i) For the first occurrence of noncompliance, the individual will be disqualified until the later of:

- (A) The date the individual complies, as determined by the State agency;*
- (B) One month; or*
- (C) Up to three months, at State agency option.*

(ii) For the second occurrence, until the later of:

- (A) The date the individual complies, as determined by the State agency;*
- (B) Three months; or*
- (C) Up to six months, at State agency option.*

(iii) For the third or subsequent occurrence, until the later of:

- (A) The date the individual complies, as determined by the State agency;*
- (B) Six months;*
- (C) A date determined by the State agency; or*
- (D) At the option of the State agency, permanently.*

The State agency retains the option at section 6(d)(1)(B) of the FNA and 7 CFR 273.7(f)(5) to sanction the entire household if the head of household fails to comply with mandatory E&T requirements without good cause.

State agencies cannot sanction participants who qualify for a federal exemption from SNAP work requirements as outlined at 7 CFR 273.7(b). However, there is one exception for participants placed in substance abuse treatment or mental health treatment. Under normal program rules, a work registrant who is referred to an E&T component but later, upon assessment, is placed in a drug addiction or alcohol treatment and rehabilitation program would be exempt from SNAP work requirements and could not be sanctioned for a failure to comply with E&T activities. However, the Act specifically allows E&T activities in pilot projects to include substance abuse treatment or mental health treatment activities, determined to be necessary and documented by a qualified medical, substance abuse, or mental health professional. Therefore, if a work registrant is required to participate in substance abuse treatment or mental health treatment in the pilot, and fails to comply without good cause, he or she may be sanctioned by the State agency.

Informed Consent

Participants in a pilot program must agree to allow the State agency, FNS, and the evaluation contractor to collect outcome data for up to six years after an individual enters into the E&T pilot (even if he or she subsequently stop receiving SNAP benefits). FNS will work with State agencies and the evaluation contractor to develop procedures and materials to ensure legally effective and prospectively obtained informed consent from participants in the evaluation sample. An individual who does not provide informed consent cannot be sanctioned for a failure to comply and must be allowed to opt out of the pilot's evaluation. However, the State agency may still require the individual to participate in a pilot activity or the regular E&T program.

F. Cooperative Agreement

FNS will award this grant in the form of a cooperative agreement. This agreement is a legal instrument reflecting a relationship between the Federal government and the Grantee (the State, U.S. Territory, or the District of Columbia). The principal purpose of this relationship is to

transfer something of value to the grantee to carry out a public purpose of support or stimulation authorized by law. Cooperative agreements are subject to the same administrative requirements as grants; however, they are different from either a grant or a contract. Cooperative agreements will allow more involvement and collaboration by FNS in the project compared to a grant, and they provide less direction of project activities than a contract. The roles and responsibilities of both the State agency and FNS will be stated in the terms and conditions of the cooperative agreement.

1. Roles and Responsibilities

FNS. FNS will oversee the pilot projects and provide direction and technical assistance both to the Grantee and the evaluation contractor and coordinate their efforts. FNS will approve major aspects for the pilot projects in advance of their implementation in a manner and time frame agreed upon between the Grantee and FNS. FNS will establish a funding mechanism consistent with grants to the selected State agencies and provide the Grantee with detailed directions on claiming and accounting for funds.

The Act provides that USDA shall establish and implement a process to terminate a pilot project for which the State has failed to meet the mandatory criteria outlined in this RFA. In keeping with its standard process for cooperative agreements, FNS retains the right to approve or deny specific activities or require that the State agencies adjust pilot projects to meet the qualifying criteria and priorities established by federal legislation and this RFA. If FNS determines that a State agency grantee is not in compliance with the selection criteria of this solicitation and the requirements of the grant award, including full cooperation with the requirements of the independent evaluation, FNS will give the State agency up to 180 days to correct the issue, as required by the Act. If a State agency does not come into full compliance, FNS will terminate the pilot project. FNS will outline the details for this process in the cooperative agreement.

Grantee. The Grantee is the State agency that will be selected competitively based on the merits of its application to operate the pilot project. The Grantee has overall responsibility for planning, implementation, and operations of the pilot project.

The Grantee shall:

- Select or hire appropriately credentialed personnel to manage and operate the pilot project.
- Delegate responsibilities to agency staff or other partners as appropriate.
- Conduct appropriate training and provide necessary support for agency staff and other partners to successfully handle pilot project responsibilities. These responsibilities include, but are not limited to:
 - providing data on employment and training services provided to participants and their outcomes (such as recruitment, enrollment, retention, completion, certification or credential obtainment, job entry, employment retention and advancement, and earnings) to the evaluation contractor;
 - facilitating access to participants for the evaluation contractor;
 - providing agency and partners with necessary support, resources and oversight.
- Cooperate fully with the FNS evaluation contractor to:
 - support implementation of evaluation requirements;

- implement a random assignment process to support a rigorous evaluation, designed by and/or with technical assistance from the evaluation contractor;
- facilitate access to or provide existing administrative records maintained by the SNAP or other State agencies, such as employment and earnings from Unemployment Insurance data systems and receipt and value of public assistance benefits from State management information systems;
- facilitate periodic interviews with agency staff;
- maintain and provide access to records on employment and training services provided and project costs; and
- assist with arrangements for site visits from FNS and the evaluation contractor.
- Cooperate with FNS to acquire necessary consent and access to data on individual employment and earnings for up to six years after an individual enters a pilot.
- Seek FNS approval at critical junctures and checkpoints after award of cooperative agreement, including management plan, budget plan, training plans, and design and implementation plans that are submitted in preliminary form in the application.
- Meet specific obligations and approval points that will be further delineated by FNS in the terms of the cooperative agreement between FNS and Grantee upon award.
- Make data on the pilot project available for inspection or audit by FNS at any time.
- Submit timely progress reports, financial reports and special reports throughout the award, and a final progress report and a final financial report.
- Attend orientation and close out meetings at FNS headquarters.
- Make a formal presentation to FNS at the close out meeting.
- Attend progress meetings via teleconference as needed.
- Account for pilot project funds separately from federal food nutrition assistance administrative funds, and establish financial and management reporting and controls to assure that pilot project funds are not commingled or used inappropriately. A separate and distinct audit trail must be established and maintained for the expenditure of pilot project funds that clearly demonstrate that they are used solely for pilot project purposes.

Independent Evaluation Contractor. The Grantees must cooperate with the evaluation contractor competitively selected by FNS through a separate solicitation. The evaluation contractor will work closely with the awarded grantees throughout the duration of the cooperative agreement. The primary objective of the evaluation contractor will be to conduct an independent evaluation of each pilot project, using rigorous study designs and methods necessary to provide credible, unambiguous, and clear answer to the question of what works. The evaluation will focus on the key outcomes of interest – changes in employment and/or earnings among work registrants and in reliance on public assistance. See Attachment B for the specific expectations of the evaluation agreement.

The Grantees must also cooperate with the evaluation contractor to assure the project areas are large enough to support independent evaluation and random assignment. Past evaluations of less intensive employment and training approaches such as outreach, job search and placement assistance programs suggest impacts on employment and earnings are likely to be important but modest, which entails that overall and individual site samples will need to be relatively large to detect a policy-relevant difference. Based on past welfare-to-work research, USDA expects the cumulative research samples necessary to evaluate such less intensive approaches to be on the

order of 3,000 to 5,000 per pilot; distributed between pilot and control groups. However, more intensive employment and training approaches may have relatively greater impacts on employment and earnings. Such approaches may be effectively evaluated with a smaller number of pilot participants. The Grantee must work with the evaluation contractor to assure that projects that serve smaller numbers of participants are large enough to assure an effective evaluation.

An agreement to cooperate with the evaluation contractor must be submitted in the application (See Attachment B).

Other Partners. To be eligible to participate in a pilot project, State agencies are required to commit to collaborate with the State workforce board and other job training programs in the State and local area. A State agency may engage additional partners in the pilot projects. Duties of such partners should be clearly outlined in the application, along with an overview of how the State agency will provide oversight of their activities throughout the pilot project. A Letter of Commitment from the partner(s) must be submitted with the application (See Attachment C).

Applicants are encouraged, but not required, to consult or work with:

- Employers,
- Community colleges or other institutions of higher education,
- Local chambers of commerce,
- State and local k-12 education agencies that administer career and technical education programs,
- American Job Centers,
- State Economic Development Agencies, and
- Community-based organizations.

2. Project Administration

Orientation and Close-out Meetings. The Grantee shall attend an orientation meeting along with all other grantees at FNS headquarters within two months following the award of the cooperative agreement to meet FNS and the evaluation contractor, to review the research design, and to discuss preparations for meeting the research objectives. The Grantee shall also attend a follow-up meeting at the conclusion of the pilot project to present findings and exchange information on lessons learned. The Grantee shall provide a formal presentation to FNS at that time. Travel expenses for Grantees to attend these meetings may be charged to the pilot project and should be included in the budget summary and budget narrative.

Monthly Conference Calls. Monthly conference calls with FNS shall provide an overview of the activities conducted during the previous month, major accomplishments with completion dates and budget, deviations from the proposed plan, difficulties encountered, solutions developed to overcome difficulties, assistance needed from FNS on technical issues, and major planned activities for the next month. Should a major issue arise between monthly calls, the grantee should contact the FNS Grants Officer immediately. The Grantee shall provide FNS with an agenda 5 business days prior to each call. The Grantee shall also prepare minutes for each call and distribute to FNS no later than 5 business days after the call.

3. Project Reporting Requirements.

Quarterly Progress Reports. Quarterly progress reports and quarterly financial reports must be submitted to FNS. As outlined in 7 CFR 3016.40, Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments, quarterly progress reports must provide a description of the activities conducted during the reporting period, major accomplishments with completion dates and budget, deviations from the proposed plan, difficulties encountered, solutions developed to overcome difficulties, and major planned activities for the next quarter. The Grantee is responsible for obtaining the necessary information from the other partners to complete this report. These reports are due within 30 days after the end of each Federal quarter.

Interim Reports, as needed. In the event that FNS identifies compliance or implementation issues, FNS may require the Grantee to submit additional interim progress reports. FNS will work with the Grantee to identify the content of interim reports and reporting schedule.

Final Progress Reports. A final written progress report (no more than 20 pages in length) will be due 90 days after the close of the pilot project (unless otherwise noted and justified in the application). The final progress report will be composed of a short Executive Summary and the following:

- description of the pilot project site and project including a rationale for project design, how it was implemented, challenges encountered and solutions;
- major accomplishments;
- difficulties encountered and solutions developed to resolve the difficulties;
- costs of implementing and operating pilot project;
- discussion of lessons learned; and
- recommendations for future policy consideration.

Financial Reporting Requirements. The Grantee will be required to enter the SF-425, Financial Status Report data into the FNS Food Program Reporting System (FPRS) on a quarterly basis. In order to access FPRS, the Grantee must obtain USDA e-Authentication certification and access to FPRS. More detailed instructions for reporting will be included in the FNS Federal financial assistance award package.

Quarterly Reporting: Use Form SF-425, Federal Financial Report, to report status 30 days after the end of each quarter for which funding is received. (For example January 30, April 30, July 30, and October 30.)

Final Financial Report. Use Form SF-425, Federal Financial Report to report final expenditures. The final Federal Financial Report is due 90 days after the end of project period of performance.

More detailed specifications for progress and financial reporting, assistance with preparation of FNS yearly reports to Congress, and the final project and financial reports will be included in the cooperative agreement established with the Grantee.

4. Presentation.

The Grantee shall make a formal presentation to FNS at the close-out meeting, which will take place within 90 days of the close of the pilot project (unless otherwise noted and justified in the application).

G. Funding and Duration

FNS will award approximately \$165 million for up to ten pilot projects to reduce dependency and increase work requirements and work effort under SNAP through a competitive process. The remaining funds will be used for an independent evaluation of each project.

All costs must be allowable, allocable, necessary and reasonable in accordance with OMB Circulars that establish the principles for cost determination found at 2 CFR Part 220, Education Institutions (OMB Circular A-21); 2 CFR Part 225, State, Local and Indian Tribal Governments (OMB Circular A-87); and 2 CFR Part 230, Non-Profit Organizations (OMB Circular A-122). Any Federal laws, regulations, or USDA directives released after this RFA is posted will be implemented as instructed.

Allowable use of funds includes, but is not limited to, personnel costs; training; translation of forms; other supplies; printing, duplication, and dissemination of materials; and technology (both hardware and software) necessary and allocable for operating the pilot project and/or participating in the evaluation of the pilot project. An audit trail and strict accounting system to guard against commingling or improper expenditure of funds is necessary.

FNS plans to enter into cooperative agreements with State agencies by February 2015. Assuming a February 2015 award date, the general expectation is that the pilot projects will be in effect by October 1, 2015 and will operate for not more than 3 years. FNS will not extend E&T pilot projects beyond the period specified in the cooperative agreement.

V. Special Instructions, Application Format, Required Forms

Special Instructions:

Initial Screening:

- Applications submitted without the required supporting documents, forms, and certifications will not be considered and will be deemed ineligible. Required supporting documents are: SF-424, SF 424-A, SF-424B, and the SF-LLL.
- Applications not submitted via the Grants.gov portal will not be considered and will be deemed ineligible.
- Applications submitted after the application deadline will not be considered.
- USDA will not consider additions or revisions to applications once they are received.

Commitments:

- Applications must include a Letter of Agreement to cooperate with the evaluation contractor to define the roles, functions, and responsibilities of State and local program representatives and of contractor staff for the full period of the agreement, to implement a

random assignment process with technical assistance from the contractor, to provide for the periodic submission of administrative and program data and other reporting requirements, and to provide other reasonable and necessary support (see Attachment B for template).

- Applications must include a Letter of Commitment from the State workforce board or other job training programs in the State or project area. Letters of commitment should outline the level of collaboration between the applicant and the workforce board or training program specific to the proposed project (see Attachment C for template).
- Applications must include a commitment to maintain at least as much State funding for SNAP E&T programs and optional workfare as the State expended in fiscal year (FY) 2013.
- Applications must include a commitment to use pilot funds to supplement, not supplant, non-Federal funds for existing E&T activities or services.
- Applications must include a commitment to assessing work registrants participating in E&T activities outside of the pilot and counting hours engaged in these activities towards any minimum participation requirement.
- For proposed pilot projects that include mandatory subsidized or unsubsidized employment as an E&T activity, applicants must agree to adhere to the standards of willful misconduct for failure to work.
- Pilot projects must operate in accordance with sections 6(d) and 20 of the FNA and the implementing regulations, unless otherwise provided by the Act and the guidance in this RFA.
- Applications must include assurance that at least 85 percent of pilot project participants must be work registrants, as identified in section 6(d) of the FNA.

Other

- FNS reserves the right to use this solicitation and competition to award additional grants in the next fiscal year should additional funds be made available through future appropriations.
- Grant awards are subject to availability.
- Grantees will have up to 3 years, or 36 months, to operate the pilot project.

Application Format:

USDA strongly encourages applicants to adhere to the following application format. In addition, USDA strongly encourages applicants to review the section VII. Evaluation of Grant Application Criteria to inform them on how the project narrative and budget summary and narrative should be structured and the criteria USDA will be looking for in those documents.

Presentation: The application should be typed on 8 ½” X 11” white paper with at least 1 inch margins on the top and bottom. All pages should be single-spaced, in 12 point font and all pages must be numbered.

Cover Sheet: The **one-page** cover sheet should include, at a minimum:

- Applicant’s name and mailing address
- Primary contact’s name, job title, mailing address, phone number and e-mail address

- Grant program title and subprogram title (if applicable)

Table of Contents: The **one-page** table of contents lists relevant page numbers with topics.

Project Narrative: The project narrative should clearly identify what the applicant is proposing and how it will address a need, the expected results and/or benefits of the proposed activities, and how it will meet the RFA program scope and objectives. The project narrative should include the following sections: 1) a statement of need, 2) the proposed pilot project design, 3) the implementation plan and organizational capacity, and 4) the capacity to support an independent evaluation. Applicants should refer to the section on Evaluation Factors and Criteria for additional details on how the projective narrative should be organized and what criteria FNS expects the project narrative to include. The project narrative should be **no more than 25 pages**, not including the cover sheet, table of contents, resumes, letter of commitment(s), endorsement letter(s), budget narrative(s), appendices, and required forms.

Application Budget Summary and Narrative: (In addition to 25 page Project Narrative)
The applicant should provide a **one-page** application budget summary and an accompanying budget narrative. The budget narrative should correspond with the proposed project narrative and application budget. The narrative must justify and support the bona fide needs of the budget's direct cost. If the budget includes indirect costs, the applicant must provide a copy of its most recently approved Federal indirect cost rate agreement. The budget narrative is **not to exceed 5 pages**.

Required Grant Application Forms:

All applicants must complete the following forms:

The following grants.gov forms are required of grant applicants. They are located at:
<https://apply07.grants.gov/apply/FormsMenu?source=agency>

Non-Construction Grant Projects Forms: SF-424 Family

1. Application and Instruction for Federal Assistance (SF424)
2. Budget Information and Instruction (SF-424A)
3. Assurance-Non-Construction Programs (SF-424B)

And:

SF LLL (Disclosure of Lobbying Activities): Indicate on the form whether your organization intends to conduct lobbying activities. If your organization does not intend to lobby, write "Not Applicable."

VI. Application Administrative Information

FNS Application Instructions

Letter of Intent

The eligible applicant that intends to submit an application should submit a Letter of Intent notice by September 26, 2014. This notice does not obligate the applicant to submit an application but provides FNS with useful information in preparing for the review and selection process. Eligible applicants may submit an application without submitting a Letter of Intent. The notice should include the potential applicant's name and address, organization's name, telephone number, and e-mail address of the primary point of contact. The applicant can send the letter via e-mail to the FNS Grants Officer identified below:

Carla Garcia
Grant Officer, Grants and Fiscal Policy Division
U.S. Department of Agriculture, FNS
E-mail: carla.garcia@fns.usda.gov

Application Due Date

The complete application must be uploaded on www.grants.gov by 11:59 PM, Eastern Time **November 24, 2014**. Applications received after the deadline date will be deemed ineligible and will not be reviewed or considered. FNS will not consider any additions or revisions to an application once it is received. FNS will not accept mailed, faxed, or hand-delivered applications; FNS will deem applications submitted outside of www.grants.gov as ineligible. FNS strongly recommends that applicants start the application process in www.grants.gov at least two weeks before the application deadline.

Applicants experiencing difficulty submitting applications to www.grants.gov should contact the grants officer or the www.grants.gov help desk at 1-800-518-4726 (local toll free, international callers, please dial 606-545-5035) or at support@grants.gov.

Submission of Applications

In order to submit your application via www.grants.gov, you must have obtained a Data Universal Numbering System (DUNS) number and registered in both the new Systems for Award Management (SAM) and on Grants.gov. The applicant is strongly advised to allow ample time to initiate its grants.gov application submission. All applicants must have current Central Contractor Registry (CCR) status at the time of application submission and throughout the duration of a Federal Award in accordance with 2 CFR Part 25. Please visit the following websites to obtain additional information on how to obtain a DUNS number (www.dnb.com) and register in SAM (<https://www.sam.gov/portal/public/SAM/>).

What is SAM?

The System for Award Management (SAM) is combining Federal procurement systems and the Catalog of Federal Domestic Assistance into one new system. This consolidation is being done in phases. The first phase of SAM incorporated the functionality from several systems, including the Central Contractor Registry (CCR).

For additional information regarding SAM see the following link:

https://www.acquisition.gov/SAM_Guides/Quick%20Guide%20for%20Grants%20Registrations%20v1.pdf

Below is some additional information that should assist the applicant through this process:

DUNS Number: In order to obtain a DUNS number, if your organization does not have one, or if you are unsure of your organization's number you can contact Dun and Bradstreet via the internet at <http://fedgov.dnb.com/webform> or by calling 1-888-814-1435, Monday thru Friday, 8am-9pm EST. There is no fee associated with obtaining a DUNS number. Obtaining a DUNS number may take several days to obtain.

SAM Registration: For applicant organizations that were previously registered in the CCR, relevant applicant information is already in SAM; set up a SAM account as necessary to update any information. To register in SAM, the applicant's DUNS number, Tax ID Number (TIN), and taxpayer name (as it appears on the applicant's last tax return) are all required. SAM verifies all information submitted by the applicant using several systems. This verification takes at least **48 hours** after your registration is submitted to SAM. Applicants must have a valid SAM registration no later than 3 days prior to the application due date of this solicitation. **Applicants that do not receive confirmation that SAM registration is complete and active should contact SAM at: <https://www.fsd.gov/app/answers/list>.**

Grants.gov Registration: In order to apply for a grant, your organization must have completed the above registrations as well as register on Grants.gov. The Grants.gov registration process can be accessed at www.grants.govapplicants/get_reistered.jsp. Generally, the registration process takes between **3-5 business days**.

Allow your entity ample time to complete the necessary steps, for the submission of your grant application package, on grants.gov.

Please be aware that the grants.gov system provides several confirmation notices; applicants should ensure receipt of confirmation that the application was accepted.

Electronic Submission: The complete application must be uploaded to www.grants.gov by 11:59 PM, Eastern Standard Time, on **November 24, 2014**. Applications received after the deadline date will be deemed ineligible and will not be reviewed or considered. USDA will not consider any additions or revisions to an application once it is received. USDA will not accept mailed, faxed, or hand-delivered applications.

Applicants experiencing difficulty submitting applications to www.grants.gov should contact the grants officer listing above for further instructions.

SAM Presentation/Training

GSA has created a presentation of a SAM training. To view the presentation, please visit: <http://www.youtube.com/watch?v=mmHcKCchaiY>

This will be extremely useful for SAM users that are:

- Registering at SAM for the first time
- Setting up user permissions from CCR into the SAM registration (called migrating)
- Updating / renewing CCR record in SAM

PLEASE BE AWARE: In some instances the process to complete the migration of permissions and/or the renewal of the entity record will require **5-7 days or more**. We strongly encourage grantees to begin the process at least **3 weeks before** grant the due date of the grant solicitation.

NOTICE: Special Characters not Supported

All applicants **MUST** follow grants.gov guidance on file naming conventions. To avoid submission issues, please follow the guidance provided in the grants.gov Frequently Asked Questions (FAQ):

Are there restrictions on file names for any attachment I include with my application package?

File attachment names longer than approximately 50 characters can cause problems processing packages. Please limit file attachment names. Also, do not use any special characters (example: &, -, *, %, /, #, ', -), this includes periods (.), spacing followed by a dash in the file and for word separation, use underscore (example: Attached_File.pdf) in naming the attachments. **Please note that if these guidelines are not followed, your application will be rejected. FNS will not accept any application rejected from www.grants.gov portal due to incorrect naming conventions.**

Please be aware that the grants.gov system provides several confirmation notices; you need to be sure that you have confirmation that the application was accepted.

VII. Evaluation of Grant Application Criteria

FNS will pre-screen all applications to ensure that they contain the required documents and information. Applications submitted without the required supporting documents (SF-424, SF 424-A, SF-424B, and the SF-LLL) will be deemed non-responsive. If an application does not include all appropriate information, FNS will consider the application to be non-responsive and will eliminate it from further evaluation.

After initial screening, FNS will convene an evaluation panel to consider the merit of each grant application. Each application that passes initial screening will be given to the panel to be evaluated and scored according to how well it addresses each application component. FNS will not award points for application components that are required. FNS will also not award additional points based on the type of approach or strategy that the application proposes to test, but rather FNS will award points based on the clarity and quality of the applicant's design of the proposed approaches and strategies. The panel members will recommend applications for consideration for a grant award based on the evaluation scoring.

The selecting official reserves the right to award a grant to meet agency priorities, program balance, geographical representation, or project diversity, notwithstanding the points awarded to each application. To the extent possible, USDA will ensure that the pilot projects, when considered as a group, test a range of strategies including those that target certain populations, are in rural and urban areas, that include a variety of strategies, and that are mandatory and voluntary programs. In addition, the Secretary has identified certain areas of interest such as activities or services that target those with significant barriers to employment, those that provide case management, those that test on-the-job training and career pathways, and those that include public-private partnerships. USDA may also ask applicants for additional clarification prior to final selection. FNS reserves the right to use this solicitation and competition to award additional grants in the next fiscal year should additional funds be made available through future appropriations.

Evaluation Factors and Criteria

The following selection criteria will be used to evaluate applications for this RFA:

Criteria	Points
Statement of Need	10
Project Design	50
Implementation Plan and Organizational Capacity	15
Capacity to Support Independent Evaluation	15
Application Budget Narrative	10

I. Statement of Need (10 points)

This section should describe the need for the project, provide an overview of the labor market and employer needs in the area where the pilot will operate, and discuss the needs and barriers of the target population. The statement of need should lay the groundwork for the project design, linking in-demand, emerging or growth industries to the proposed activities and the target population for the proposed pilot. Not to exceed 5 pages.

Project Area Information

- Applicant provides an overview of the geographic size, urban/rural breakdown, economic circumstances, and the needs of both businesses and potential pilot participants to explain the need for the project.
- The application includes the SNAP-participating population size in the project area, the size of the target population, and the number of participants expected to receive services under the pilot project specified by year or in total.
- Applicant demonstrates that project areas are large enough to support the independent evaluation and random assignment.

Target Population

- Applicant provides a clear description of the target population and how the project will ensure at least 85 percent of participants are work registrants.
- Applicant identifies whether the target population includes at least one of the following target populations: individuals with low skills or limited work

experience, individuals subject to the requirements under section 6(o) of the FNA, or individuals who are already working. Applicant indicates if proposed approach targets those with significant barriers.

- Builds a sound, logical case for how the targeted population could be prepared for, trained, or attached to the jobs available in the local economy.

Labor Market Information

- The applicant identifies and cites evidence for specific in-demand, industries or occupations in the project area. Evidence should include the source of the information such as the Bureau of Labor Statistics, the state workforce agency's sources, employers or other written labor market information provided by employers or workforce experts.
- The applicant discusses the specific skills and competencies needed for these occupations.

II. Project Design (50 points)

This section should outline the employment and training approach; partnerships and collaborative efforts; outreach, referral and sanction process; assessment and placement; and participant reimbursements. The project design and activities must reflect compliance with sections 6(d) and 20 of the FNA, as well as the implementing regulations, except where specifically provided by the Act and guidance in this RFA. Not to exceed 15 pages.

Employment and Training Approach (25 out of 50 points)

- The applicant's project design in linking the proposed approaches and strategies, labor market characteristics, and the characteristics and needs of participants to ensure pilot participants obtain employment and/or increase earnings is clear and logical. The primary goal of the overall approach or strategy, such as education and training, rehabilitative services for individuals with barriers to employment, rapid attachment or a mix of multiple strategies, is clear.
- The application identifies the providers of each service or activity and information on the included roles and responsibilities of each provider. The roles and responsibilities assigned to partners are appropriate given the capacity and expertise of each partner or service provider. The application should clearly explain how partners or the services provided will enhance the pilot.
- The length, duration, and level of support associated with each pilot activity are clearly defined.
- Application must state whether participation in a pilot is mandatory or voluntary.
- Application identifies the services, activities or approaches that will be provided under the pilot. Applicants will not be awarded points for the type of service, activity or approach that the applicant proposes to test in the pilot project, but rather will be awarded points based on the clarity and quality of the applicant's design of the proposed services and activities. For example:
 - For projects that include case management services, the application describes the role and activities of case managers in helping participants prepare for, obtain, and retain employment. If applicable, the application describes the pilot's process for addressing barriers faced by the target population.

- For proposed projects that include job retention services, the application explains the types of services and duration of support. Applicants should specify whether the pilot will continue to provide services for up to 90 days after participants leave SNAP due to increased earnings.
- For proposed projects that include subsidized employment, the application includes details on the length and level of the subsidy to employers. The application explains the process for selecting employers and outlines the expectations placed on employers, including the sustainability of employment once the subsidy is no longer available.
- For projects that include substance abuse and mental health treatment, the application provides detail on how these services fit into job search, obtaining employment, or preparation to seek or obtain employment.
- For projects that include career pathways or projects that link education and training, the application identifies the industry-recognized credentials or college credit associated with proposed activities.
- For projects that include training, the application provides a clear description of how project design ensures consistency with occupational laws, standards, and licensing requirements, where relevant, and where training includes credentialing, the design promotes progression between credentials including offering credit for prior learning and linking any credentials offered to higher-level degrees in the workforce and education systems.
- For a list of other allowable activities under the pilot, please see section IV.D Allowable Activities.
- For a list of other approaches, please see section IV.B Areas of Interest.
- As a whole, the applicant presents a strong logic model demonstrating how the proposed activities will lead to short- and long-term improvements in employment and earnings and describes why the proposed project is well-suited for the target population. Applicant explains how the project design and proposed activities build on promising practices, evidence-based strategies or a strong logic model. Evidence, if provided, is appropriate and relevant to the proposed pilot approach or strategy.
- Applicant provides clear description of how the proposed pilot is consistent with labor market information and the needs of the target population.
- Applicant provides clear description of how the proposed activities enhance the State's existing E&T program. Applicant demonstrates that proposed activities are new and/or innovative, not simply an expansion of existing services.
- Applicant describes how the proposed project could be replicated by other States or political subdivisions.

Additional elements of Project Design (25 out of 50 points)

Partnerships and Collaborative Efforts

- Application includes a Letter of Commitment from the State Workforce Board or other job-training programs in the State or project area that describes the level of collaboration between the applicant and the workforce board or training program specific to the proposed project (see Attachment C for template).

- Application is clear how collaborative efforts enhance the pilot project beyond what the State agency could do in the absence of those efforts.
- If applicable, the application provides information on additional partnerships with other organizations, networks, and businesses and provides evidence of how these partnerships enhance the pilot.
- If applicable, a Letter of Commitment from each proposed partner that will contribute financial or in-kind resources toward the project or that intends to provide work-based learning opportunities is included (see Attachment C for template). Letter outlines capacity of partner organizations, how the State agency will monitor the partners and the information sharing mechanisms between State agency and the partners.

Outreach, Referral, and Sanction Process

- The application includes a clear description of the plan to ensure 85 percent or more of the pilot participants are subject to SNAP work requirements and work registration.
- Applicant identifies target of how many participants will be served each month through the pilot. The target number of participants must be sufficient to support a randomized control trial evaluation.
- For voluntary programs, application includes a clear and reasonable outreach plan outlining the process for identifying, informing and engaging participants. Application clearly states volunteers will not be sanctioned for failure to comply.
- For mandatory programs, application clearly outlines the screening and referral process that will be used to ensure that mandatory participants do not meet an exemption under section 6(d) of the FNA and how the screening process will account for and treat work or other training activities in which a participant is already engaged prior to placement in a pilot activity.
- For mandatory programs, application describes the process for monitoring compliance, criteria for good cause for refusal or failure to comply, and the process for determining good cause and implementing sanctions.
- For mandatory programs that include unsubsidized or subsidized employment, application describes how it will assess whether an individual's failure to work was due to willful misconduct, and how it will ensure that an individual, whom the State fails to establish has having failed to work due to willful misconduct, will be able to continue to meet the E&T requirements and not lose eligibility.

Assessment and Placement

- Applicant clearly describes a reasonable assessment process, which at a minimum must include identification of basic needs and barriers, that will be used after an eligible participant is referred to the proposed pilot before he or she is placed in an activity, and if applicable, the on-going assessment process.
- There is a logical connection between the proposed assessment and how it will be used to inform the placement of pilot participants in specific activities.
- If the assessment will be conducted by a partner organization, the applicant demonstrates that the capacity of the organization is sound and describes how it will monitor partner's performance and compliance.

Participant Reimbursements

- Applicant lists and describes the participant reimbursements it plans to provide pilot participants and justifies why these services meet the standard of reasonably necessary and directly related to participation in E&T. If participant reimbursement services will be provided by a partner organization, the applicant demonstrates that the capacity of the organization is sound and the measures in place to monitor the partner's expenses and activities are sufficient to ensure proper use of funds.
- The application must indicate whether it will use pilot funds to provide participant reimbursements, and if so how much. If State will use other funds, the State must identify the source, amount and whether it will request 50 percent reimbursement.

III. Implementation Plan and Organizational Capacity (15 points)

This section should briefly describe the project timeline, including all necessary implementation and start-up activities. This section should also describe the organizational capacity of the applicant and address any issues related to the State's regular SNAP E&T program. Not to exceed 5 pages.

Implementation Plan

- Timeline with key dates for planning, implementation, and evaluation is reasonable and realistic. Pilot services will be implemented by October 1, 2015.
- Timeline includes provisions for a pre-testing period of up to two (2) months of new processes and procedures, including random assignment to treatment and control groups.

Organizational Capacity

- Applicant demonstrates the capacity to operate a high quality E&T program within the State agency or by partner organizations formally involved in operating the pilot. If applicable, describe the capacity of the State agency to manage these partners to ensure compliance with pilot requirements.
- Applicant reports management evaluation findings from FY 2012 and 2013 and explains any corrective action taken or planned corrective action to address the findings.
- Application includes an appropriate staffing plan for the pilot that clearly describes the roles and responsibilities of key personnel and partners involved in the pilot projects.
- Application attaches resumes that demonstrate that the proposed project staff has the appropriate technical and experiential backgrounds for their proposed roles. If the applicant is unable to identify the project director or manager and key staff, the application includes job descriptions for positions that must be advertised.

IV. Capacity to Support Independent Evaluation (15 points)

State Data Collection System

- Application provides evidence that the State has a robust data collection system for program administration. The application describes the data collection system in place and clarifies whether it is able to capture entry, participation, and completion of employment and training activities and post participation outcomes (such as recruitment, enrollment, retention, completion, certification or credential obtainment, job entry, employment retention and advancement, earnings, and public benefit (SNAP, TANF cash assistance, Medicaid, and General Assistance) receipt)).
- If that capacity does not currently exist, the application describes the process the State agency will put in place to create that capacity and demonstrated soundness and timeliness of the plan.
- The application describes the data available from the eligibility system and the process required to pull caseload data for the evaluation contractor.
- The application demonstrates that the State has adequate systems in place to track participant-level data on participation in employment and training services.
- The application demonstrates that the State has an adequate process in place (or demonstrates ability to create an adequate process) to gain access to and provide quarterly employment and earnings records through State Unemployment Insurance data systems and participation in public assistance programs.

Evaluation Capacity

- The application provides estimates of the total participants that would be served through the proposed pilot or be part of the control group are sufficient to support a timely and meaningful evaluation. The application explains how the participation targets were identified and how the targets fit into the overall timeline of the grant implementation plan.
- The application identifies any procedures or approvals needed to access administrative records, field participant surveys, and track participant data after exit from SNAP, and the steps the State agency will take to facilitate such approvals.
- The application identifies previous experience with the implementation of randomized control trials or provides firm evidence of willingness and capacity to implement random assignment with technical assistance from evaluation contractor.

V. Application Budget Narrative (10 points)

The budget narrative should correspond with the proposed project narrative and application budget. The narrative must justify and support the bona fide needs of the budget's direct cost. Not to exceed 5 pages in addition to 25 page Project Narrative.

- The budget narrative corresponds with the proposed project narrative and application budget. The narrative must justify and support the bona fide needs of the budget's direct cost.
- The total funding amount requested is appropriate for the scope of the project.

- Proposed costs are reasonable, necessary and allocable to carry out the project's goals and objectives.
- The budget includes a line item description for every allowable cost and shows how it supports the project goals.
- Budget calculations and documentation show clearly how the budget components were developed and costs estimated.
- If indirect costs are included, the applicant agency's Indirect Cost Rate Agreement with a Federal agency is provided and the indirect cost rate is applied correctly to allowable direct costs.

VII. Administrative Notices and Requirements

A. Confidentiality of an Application

When an application results in an award, it becomes a part of the record of FNS transactions, available to the public upon specific request. Information that the Secretary determines to be of a confidential, privileged, or proprietary nature will be held in confidence to the extent permitted by law. Therefore, any information that the applicant wishes to have considered as confidential, privileged, or proprietary should be clearly marked within the application. The original copy of an application that does not result in an award will be not released to the public. An application may be withdrawn at any time prior to the final action thereon.

B. Conflict of Interest and Confidentiality of the Review Process

The agency requires all panel reviewers to sign a conflict of interest and confidentiality form to prevent any actual or perceived conflicts of interest that may affect the application review and evaluation process. Names of applicants, including States and tribal governments, submitting an application will be kept confidential, except to those involved in the review process, to the extent permitted by law. In addition, the identities of the reviewers will remain confidential throughout the entire process. Therefore, the names of the reviewers will not be released to applicants.

C. Award Notice

Unless an applicant receives a signed award document with terms and conditions; any contact from a FNS grants or program officer should not be considered as a notice of a grant award. No pre-award or pre-agreement costs incurred prior to the effective start date are allowed unless approved and stated on FNS' signed award document.

The Government is not obligated to make any award as a result of this RFA. Only the recognized FNS authorized signature can bind the USDA, Food and Nutrition Service to the expenditure of funds related to an award's approved budget.

D. Financial Reporting

The award recipient will be required to enter the SF-425, Financial Status Report data into the FNS Food Program Reporting System (FPRS) on a quarterly basis. In order to access FPRS, the grant recipient must obtain USDA e-authentication certification and access to FPRS. More detailed instructions for reporting will be included in the FNS Federal financial assistance award package.

E. Progress Reporting

The recipient will be responsible for managing and monitoring the progress of the grant project activities and performance. The award document will indicate the reporting schedule for submitting project performance/progress reports to FNS. Any additional reporting requirements will be identified in the award terms and conditions.

F. Administrative Regulations

Debarment and Suspension 2 CFR Part 180 and 2 CFR Part 417

A recipient chosen for an award shall comply with the non-procurement debarment and suspension common rule implementing Executive Orders (E.O.) 12549 and 12669, “Debarment and Suspension,” codified at 2 CFR Part 180 and 2 CFR Part 417. This common rule restricts sub-awards and contracts with certain parties that are debarred, suspended or otherwise excluded from or ineligible for participation in Federal assistance programs or activities. The approved grant recipient will be required to ensure that all sub-contractors and sub-grantees are neither excluded nor disqualified under the suspension and debarment rules prior to approving a sub-grant award by checking the Excluded Parties List System (EPLS) found at www.epls.gov.

Universal Identifier and Central Contractor Registration 2 CFR Part 25

Effective October 1, 2010, all grant applicants must obtain a Dun and Bradstreet (D&B) Data Universal Numbering System (DUNS) number as a universal identifier for Federal financial assistance. Active grant recipients and their direct sub-recipients of a sub-grant award also must obtain a DUNS number. To request a DUNS number visit: <http://fedgov.dnb.com/webform>.

The grant recipient must also register its DUNS number in the new Systems for Award Management (SAM). If you were registered in the CCR, your company’s information is already in SAM and you will just need to set up a SAM account. To register in SAM you will need your entity’s DUNS and your entity’s Tax ID Number (TIN) and taxpayer name (as it appears on your last tax return). Registration should take **3-5 days**. If you do not receive confirmation that your SAM registration is complete, please contact SAM at <https://www.fsd.gov/app/answers/list>.

FNS may not make an award to an applicant until the applicant has complied with the requirements described in 2 CFR 25 to provide a valid DUNS number and maintain an active CCR registration with current information.

Reporting Sub-award and Executive Compensation Information 2 CFR Part 170

The Federal Funding Accountability and Transparency Act (FFATA) of 2006 (Public Law 109–282), as amended by Section 6202 of Public Law 110–252 requires primary grantees of Federal grants and cooperative agreements to report information on sub-grantee obligations and executive compensation. FFATA promotes open government by enhancing the Federal Government’s accountability for its stewardship of public resources. This is accomplished by making Government information, particularly information on Federal spending, accessible to the general public.

Primary grantees, including State agencies, are required to report actions taken on or after October 1, 2010, that obligates \$25,000 or more in Federal grant funds to first- tier sub-grantees. This information must be reported in the Government-wide FFATA Sub-Award Reporting

System (FSRS). In order to access FSRS a current CCR registration is required. A primary grantee and first-tier sub-grantees must also report total compensation for each of its five most-highly compensated executives. Every primary and first-tier grantee must obtain a DUNS number prior to being eligible to receive a grant or sub-grant award. Additional information will be provided to grant recipients upon award.

Duncan Hunter National Defense Authorization Act of Fiscal Year 2009, Public Law 110-417 Section 872 of this Act requires the development and maintenance of a Federal Government information system that contains specific information on the integrity and performance of covered Federal agency contractors and grantees. The Federal Awardee Performance and Integrity Information System (FAPIIS) was developed to address these requirements. FAPIIS contains integrity and performance information from the Contractor Performance Assessment Reporting System, information from the CCR database, and suspension and debarment information from the EPLS. FNS will review and consider any information about the applicant reflected in FAPIIS when making a judgment about whether an applicant is qualified to receive an award.

G. Code of Federal Regulations and Other Government Requirements

This grant will be awarded and administered in accordance with the following regulations and the corresponding OMB Circulars that establish the principles for cost determination found at 2 Code of Federal Regulations (CFR), Subtitle A, Chapter II: Part 220, Education Institutions (OMB Circular A-21); Part 225, State, Local and Indian Tribal Governments (OMB Circular A-87); and Part 230, Non-Profit Organizations (OMB Circular A-122). Any Federal laws, regulations, or USDA directives released after this RFA is posted will be implemented as instructed.

Government-wide Regulations

- 2 CFR Part 25: “Universal Identifier and Central Locator Contractor Registration”
- 2 CFR Part 170: “Reporting Sub-award and Executive Compensation Information”
- 2 CFR Part 175: “Award Term for Trafficking in Persons”
- 2 CFR Part 180: “OMB Guidelines to Agencies on Government-wide Debarment and Suspension (Non-Procurement)”
- 2 CFR Part 417: “Office of the Chief Financial Officer: Department of Agriculture Implementation of OMB Guidance on Non-Procurement Debarment and Suspension”
- 41 U.S.C. Section 22 “Interest of Member of Congress”

USDA Regulations

- 7 CFR Part 15: “Nondiscrimination”
- 7 CFR Part 3015: “Uniform Federal Assistance Regulations”
- 7 CFR Part 3016: “Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments”
- 7 CFR Part 3018: “New Restrictions on Lobbying”
- 7 CFR Part 3019: “Uniform Administrative Requirements for Grants and Cooperative Agreements with Institutions of Higher Education, Hospitals, and other Non-Profit Organizations”

- 7 CFR Part 3021: “Government-wide Requirements for Drug-Free Workplace (Financial Assistance)”
- 7 CFR Part 3052: “Audits of State, Local Governments, and Non-Profit Organizations”

IX. RFA Application Checklist

All proposals submitted under this RFA must contain the applicable elements as described in this announcement. The application must be submitted electronically through www.grants.gov, by midnight on [add the deadline date]. The following checklist has been prepared to assist in ensuring that the proposal is complete and in the proper order prior to submission.

- ✓ Read the RFA carefully, usually more than once.
- ✓ Have you obtained a Dun and Bradstreet Data Universal Numbering System (DUNS) number and registered the number in the System for Award Management (SAM)?
- ✓ Have you verified that your Central Contractor Registration is active?
- ✓ Have you registered your entity in grants.gov and are you authorized as a user in grants.gov to submit on behalf of your agency?
- ✓ Have you prepared and submitted the appropriate forms as shown under the Required Grant Application Forms section of this RFA?
- ✓ Have you included the RFA CFDA # [enter the number] on your application?
- ✓ Have you included your contact information: telephone number, fax number, and e-mail address?
- ✓ Have you addressed, met, and considered any program specific requirements or restrictions?
- ✓ Is the project’s proposal clearly stated?
 - Does it comply with any format requirements?
 - Does it comply with the page limitation?
 - Most importantly does it directly relate to the RFA’s objectives and priorities?
 - Don’t assume that reviewers know anything about your organization and its work.
- ✓ Have one or more persons read your proposal who did not participate in its writing and ensure that it was clear to them?
- ✓ Does the proposed project and budget meet the bona fide needs of the RFA?
- ✓ Is the budget summary included?
 - Does it agree with the calculations shown on the OMB budget form?
 - Is the budget in line with the project description?
- ✓ Be sure to submit a timely application into www.Grants.gov in order to meet the RFA application deadline.
- ✓ FNS reserves the right to request additional information not clearly addressed in the initial application.

X. RFA Budget Narrative Checklist

This checklist will assist you in completing the budget narrative portion of the application. Please review the checklist to ensure the items below are addressed in the budget narrative.

NOTE: The budget and budget narrative must be in line with the proposal project description (statement of work) bona fine need. FNS reserves the right to request information not clearly addressed.

	YES	NO
Personnel		
Did you include all key employees paid for by this grant under this heading?		
Are employees of the applicant’s organization identified by name and position title?		
Did you reflect percentage of time the Project Director will devote to the project in full-time equivalents (FTE)?		
Fringe Benefits		
Did you include your organization’s fringe benefit amount along with the basis for the computation?		
Did you list the type of fringe benefits to be covered with Federal funds?		
Travel		
Are travel expenses itemized? For example origination/destination points, number and purpose of trips, number of staff traveling, mode of transportation and cost of each trip.		
Are the Attendee Objectives and travel justifications included in the narrative?		
Is the basis for the lodging estimates identified in the budget? For example include excerpt from travel regulations.		
Equipment		
Is the need for the equipment justified in the narrative?		

Are the types of equipment, unit costs, and the number of items to be purchased listed in the budget?		
Is the basis for the cost per item or other basis of computation stated in the budget?		
Supplies		
Are the types of supplies, unit costs, and the number of items to be purchased reflected in the budget?		
Is the basis for the costs per item or other basis of computation stated?		
Contractual: (FNS reserves the right to request information on all contractual awards and associated costs after the contract is awarded.)		
Has the bona fide need been clearly identified in the project description to justify the cost for a contract or sub-grant expense(s) shown on the budget?		
A justification for all Sole-source contracts must be provided in the budget narrative prior to approving this identified cost.		
Other		
Consultant Services. – Has the bona fide need been clearly identified in the project description to justify the cost shown on the budget. The following information must be provided in the justification: description of service, the consultant’s name and an itemized list of all direct cost and fees, number of personnel including the position title (specialty and specialized qualifications as appropriate to the costs), Number of estimated hours X hourly wages, and all expenses and fees directly related to the proposed services to be rendered to the project.		
For all other line items listed under the “Other” heading. - List all items to be covered under this heading along with the methodology on how the applicant derived the costs to be charged to the program.		
Indirect Costs		

<p>Has the applicant obtained a Negotiated Indirect Cost Rate Agreement (NICRA) from a Federal Agency? If yes, a copy of the most recent and signed negotiated rate agreement must be provided along with the application.</p>		
<p>If no negotiated agreement exists, the basis and the details of the indirect costs to be requested should also be reflected in the budget.</p>		

FOR GRANT APPLICANT USE ONLY. DO NOT RETURN THIS FORM WITH THE APPLICATION

ATTACHMENT A: Letter of Intent to Apply

State agencies² intending to submit an application for an Employment and Training (E&T) pilot project are requested to submit a Letter of Intent. This can be fulfilled by completing the information below and sending it to FNS by September 26, 2014 no later than 11:59 PM (EDT). This Letter of Intent does not obligate the State agency in any way but will provide useful information to us as we prepare for the application reviews and selection process. FNS thanks State agencies in advance for their cooperation with this request.

The Letter of Intent may be mailed or emailed. Please submit letter of intent to:

Carla Garcia, Grants Officer, Carla.garcia@fns.usda.gov
or
Food and Nutrition Service, USDA
Grants and Fiscal Policy Division
SNAP E&T Pilot Projects
U.S. Department of Agriculture, FNS
3101 Park Center Drive Room 732
Alexandria, VA 22304

Fiscal Year 2015 Pilot Projects to Reduce Dependency and Increase Work Requirements and Work Effort Under the Supplemental Nutrition Assistance Program (SNAP)

INTENT TO SUBMIT AN APPLICATION

Applicant (State agency name and address):

Contact Person: _____ **Title:** _____

Telephone: _____ **Email:** _____

² "State agency" refers to the agencies of the 50 States and the District of Columbia, Guam, and the Virgin Islands that are direct grantees of SNAP E&T funds.

ATTACHMENT B: Letter of Agreement

As an applicant for a Supplemental Nutrition Assistance Program (SNAP) Employment and Training (E&T) pilot project, (State SNAP Agency Name) understands its responsibility to participate fully in the pilot's evaluation and to cooperate fully with the FNS-selected evaluation contractor and its designated agents in all aspects of the evaluation, including but not limited to:

- developing and implementing, in cooperation with FNS and the evaluation contractor, procedures and materials to ensure legally effective and prospectively obtained informed consent from participants in the evaluation sample;
- implementing a random assignment process to create treatment and control groups, designed by and supported with technical assistance from the evaluation contractor;
- providing data on employment and training services provided to participants and their outcomes (such as recruitment, enrollment, retention, completion, certification, job entry, employment retention and advancement, and earnings);
- providing access (including all necessary approvals) to administrative records maintained by the SNAP or other State agency on employment, earnings and public benefit receipt (including TANF, Medicaid, and General Assistance) of members of the evaluation sample;
- facilitating access (including updated contact information) for evaluation contractor interviews or site visits with evaluation sample participants, agency staff, and other partners or stakeholders in pilot operations;
- providing copies of relevant pilot documents, such as meeting notes, memoranda, and procedural manuals;
- working in cooperation with the evaluator to trouble-shoot and resolve issues and refine procedures to the extent feasible; and
- making all efforts to maintain the integrity of the evaluation and ensure the quality of the data provided to the contractor.

(Signed by representative with authority to obligate State Agency to this agreement).

ATTACHMENT C: Letter of Commitment

State agencies³ intending to submit an application for an Employment and Training (E&T) pilot project are requested to submit letters of commitment from all partners planning to collaborate in the planning and/or implementation of pilot activities. Letters of commitment should be included with the application package, submitted via www.grants.gov

Such letters may be addressed to the FNS Grant Officer or the applicant's project director. The applicant's letters of commitment must:

- Be on the respective organization's letterhead;
- Be signed by an authorizing official with the authority to obligate the agency or organization to this commitment;
- Describe the organization's role in the project;
- Identify the amount of staff time, in-kind or financial contribution (if applicable) and other resources it intends to commit to the project; and
- Include an attestation of involvement in planning of the project

³ "State agency" refers to the agencies of the 50 States and the District of Columbia, Guam, and the Virgin Islands that are direct grantees of SNAP E&T funds.