



Food and
Nutrition
Service

1320 Braddock Place
Alexandria, VA
22314

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SUBJECT: Supplemental Nutrition Assistance Program (SNAP) – Use of SNAP Employment and Training (E&T) Funds for SNAP Recipients Who Are Attending High School

TO: All SNAP State Agencies
All Regions

Issuing Agency/Office:	FNS/SNAP
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Summary:	This memo provides guidance on the use of SNAP E&T funds to pay for services for individuals who are attending high school. In most cases, it is likely neither legal nor appropriate to use E&T funds to pay for services for individuals are attending high school. In some instances, however, it is allowed and encouraged to use E&T funds for individuals who are of high school age, such as for individuals aged 16-17 who are subject to SNAP work requirements.
Disclaimer:	The contents of this guidance document do not have the force and effect of law and are not meant to bind the public or FNS in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.

Recently, FNS has received several questions about whether SNAP Employment and Training (E&T) program funds can be used to pay for services for SNAP participants who are already attending high school. Given the flexible nature of SNAP E&T, there is no one-size-fits all answer.

General Allowability

The regulations at [7 CFR 273.7](#) provide that, unless otherwise exempt, SNAP recipients between the ages of 16 and 60 are subject to general work requirements, including participating in E&T, if required by the State.

Individuals ages 16 or 17 are usually exempt from these requirements because they are not the head of household or are attending school. Students 18 years or older enrolled at least half time in high school are also exempt.

States have the option to serve SNAP participants who elect to participate in SNAP E&T. This includes individuals who are exempt from the general work requirements, such as those who attend high school, but who wish to participate in SNAP E&T.

However, while it is generally allowable, each specific situation must be looked at closely to determine if it is an allowable cost, or appropriate given State laws regarding the age of compulsory school attendance.

Factors Affecting Allowability of Costs

Federal Cost Principles

The Office of Management and Budget Uniform Guidance found at [2 CFR part 200](#) governs the cost principles for Federal grants, and FNS regulations at [7 CFR part 277](#) further elaborate on that guidance. Under these authorities, among other things, allowable costs must be necessary and reasonable for proper and efficient administration of the Program, be allocable thereto under these principles, and, except as specifically provided, not be a general expense required to carry out the overall responsibilities of State or local government. A cost is reasonable if, in its nature and amount, it does not exceed that which a prudent person would pay under the circumstances prevailing at the time the decision was made to incur this cost.

Necessary costs are incurred to carry out program functions, cannot be avoided without adversely affecting program operation, and do not duplicate existing efforts.

Use of Funds Under the SNAP E&T Program

The regulations at [7 CFR 273.7](#) govern the use of SNAP E&T funds. SNAP E&T grant funds can only be used for the administrative costs of planning, implementing and operating a SNAP E&T program. A SNAP E&T program includes case management and one or more component(s), such as supervised job search, workfare, or education. The purpose of SNAP E&T is to assist members of SNAP households in gaining the skills, training, work, or experience that will increase their ability to obtain regular employment, and SNAP E&T components must be designed to help SNAP recipients move promptly into unsubsidized employment.

State Laws Regarding Compulsory Age of School Attendance

All States have laws that require children within certain age ranges to attend school. Compulsory age requirements vary by State, but generally the upper age limit varies from 16 to 18. State agencies should consider whether it is appropriate to refer high school students to SNAP E&T. Careful consideration and deference should be given to State laws regarding compulsory school attendance. In most circumstances, it is likely not appropriate nor allowable to use SNAP E&T funds to pay for services for individuals attending high school.

Use of SNAP E&T Funds for Individuals Attending High School

Prohibition on Use of SNAP E&T Funds for Costs Associated with High School

State agencies may not use SNAP E&T funds to pay for costs associated with programs or courses offered through public high schools. Federal regulations at 2 CFR 200.444(a)(4) provide that Federal funds cannot be used for the general costs of State or local government. This includes general types of government services normally provided to the general public, such as public education.

In addition, paragraph (C)(1)(a) of Appendix A to 7 CFR part 277 explains that SNAP E&T costs cannot be general expenses required to carry out the overall responsibilities of State or local governments. Providing a free public education is an overall responsibility of State or local governments.

The prohibition extends to paying for costs associated with programs offered through private high schools. Since a free public education is available through the State public education system, it is neither reasonable nor necessary to pay for services that are available to the individual for free.

This is true even if the course meets the purpose of SNAP E&T. For example, if a public high school offers a curriculum choice for a class that leads to an industrywide credential, SNAP E&T funds cannot be used to pay for any costs associated with that class.

Use of SNAP E&T Funds for Costs Associated With Out-of-School Activities

While there are instances when it may be appropriate to provide SNAP E&T services to these individuals after school or on the weekends (i.e. outside of a high school setting), State agencies must ensure that:

- 1. The costs are reasonable and necessary.** Most individuals aged 16 to 18 are required to be in school and are already receiving services through the State's education system. Many States provide free high school education beyond age 18. Today, most high school curriculums are designed so that students are college or career ready upon graduation, as mandated by the Every Student Succeeds Act (P.L. 114-95). Providing services through SNAP E&T may be duplicative, and therefore neither reasonable nor necessary.

- 2. The components or activities offered meet the purpose and design requirements of SNAP E&T.** The purpose of SNAP E&T is to help SNAP household members gain skills, education, or experience that help them obtain regular employment. SNAP E&T components must be designed to move SNAP recipients promptly into employment. Therefore, there should be a direct link between the activities and the member's ability to obtain employment. E&T participants, if offered regular employment, should be in a position to accept it. Programs designed for individuals who are still in high school are unlikely to meet these requirements.

For example, drop-out prevention programs, career exploration activities, or summer youth employment programs, while admirable, do not meet these requirements. However, a program where an industry sponsor provides specific job training after school or in the evenings that is designed to lead directly and promptly to regular employment may be allowable.

Use of SNAP E&T Funds for Individuals Above the Age of Compulsory Education and Not Attending High School

Individuals age 16 or 17 who are head of the households or not attending school may be subject to the work requirements. In such cases, it would be appropriate for a State agency to refer them to SNAP E&T. The associated costs must be allowable as detailed above.

FNS also encourages State agencies interested in serving SNAP participants who are aged 16 or 17 and who are not attending high school, to work with their State workforce agencies to coordinate such services with those available through the Workforce Innovation and Opportunity Act (WIOA) Youth program. The Workforce Innovation and Opportunity Act (WIOA) of 2014 enacted a comprehensive youth employment program for serving eligible youth, ages 14-24, who face barriers to education, training, and employment. Funds for youth services are allocated to States and local areas based on a formula. The WIOA Youth Program focuses primarily on out-of-school youth, requiring local areas to expend a minimum of 75 percent of WIOA youth funds on them.

Conclusion

FNS encourages States to review their State plans to determine whether they are using SNAP E&T funds to serve individuals who are attending high school, and to prioritize serving those individuals who are not in high school, including unemployed and underemployed adults. States that do serve students attending high school must ensure that costs associated with the programs meet Federal costs principles and regulations governing use of funds under the SNAP E&T program. In addition, States should consider whether it is legal or appropriate, given State laws on compulsory age of attendance and availability of free public education, to refer these individuals to SNAP E&T. Finally, States should consider other programs, such as WIOA Youth programs, that are designed specifically for this population.

FNS stands ready to provide technical assistance to States to make sure they are serving this population efficiently and effectively in compliance with the appropriate laws and regulations. Please reach out to your FNS Regional Office if you have any questions.

All SNAP State Agencies

Page 5

Pursuant to the Congressional Review Act (5 U.S.C. §801 et seq.) and Executive Order 13891, the Office of Information and Regulatory Affairs has designated this memo as not major and not significant.

/s/ Moira Johnston

Director

Office of Employment and Training