

SNAP E&T and WIOA: Partnering to Raise Skills and Employment

Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T) and State and local workforce agencies share a common goal of helping low-income individuals gain the skills necessary to qualify for jobs leading to self-sufficiency. A March 2016 joint letter issued by the Department of Agriculture's Food and Nutrition Service (FNS) and the Department of Labor's (DOL) Employment and Training Administration (ETA) encouraged SNAP and the workforce system to collaborate on shared strategies that connect SNAP participants to employment and training services through American Job Centers (AJCs). In particular, the letter emphasized ways to provide services to Able-Bodied Adults without Dependents (ABAWDs).

How should SNAP agencies go about developing partnerships with workforce agencies and AJCs in their States and communities? This brief seeks to help States do the following:

- Learn about the Workforce Innovation and Opportunity Act's (WIOA) and SNAP E&T's respective priorities, requirements, and strengths to identify common interests and complementary capabilities;
- Think about how to use SNAP E&T funds strategically, along with WIOA resources, to better meet the needs of E&T participants and increase the impact of employment and training services; and
- Understand the potential for partnering, using young adults as an example, and highlighting other current E&T-WIOA State and local collaboration

What Do WIOA and SNAP E&T Each Have to Offer?

Though they have similar aims, WIOA and SNAP E&T each have different and complementary strengths for helping SNAP participants move toward economic self-sufficiency. For adult participants, WIOA's AJCs provide universal access to all jobseekers through "basic career services," and emphasizes providing targeted services to "individuals with barriers to employment," which includes low-income individuals. Basic career services include initial skill assessments, the matching of job seekers with employer-posted job openings, as well as information and referrals to programs and services. In addition to basic career services, some individuals are able to receive more personalized career services, which are called "individualized career services," which include comprehensive assessments, individual employment plans, work experiences, and other career planning. Some individuals may be eligible for training services if it is determined necessary for the individual to achieve self-sufficiency or attain comparable employment to their last job. Low-income individuals, which includes individuals participating in SNAP, are given priority of service when it comes to receiving higher-intensity services like "individualized career services" or training from the WIOA Adult program. Due to the design of the WIOA

Guidance documents lack the force and effect of law, unless expressly authorized by statute or incorporated into a contract. USDA may not cite, use, or rely on any guidance that is not available through their guidance portal, except to establish historical facts.

program and the range of allowable services, States and localities have considerable flexibility in designing a program that will best fit the needs of their communities and the general service delivery strategy.

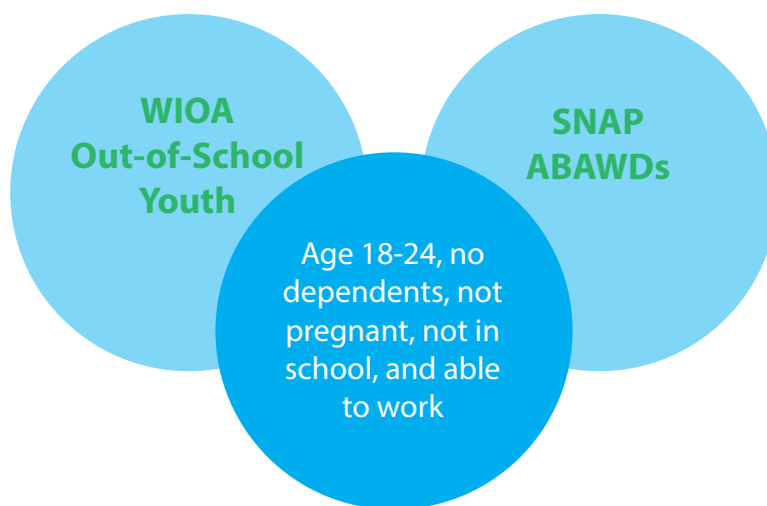
Overall, AJCs' strengths include the flexibility to accommodate a variety of service delivery strategies, the capacity to provide at least some modest level of service to relatively large numbers of job seekers, an understanding of the local labor market and employer needs, and knowledge of education, training, and support services available in a community.

By contrast, SNAP E&T is much more targeted to low-income individuals. More than half of SNAP work registrants and E&T participants, according to recent FNS research, report facing multiple challenges to employment, such as low basic skills, lack of transportation, housing instability/homelessness, mental or physical health issues, or criminal records.¹ SNAP agency staff typically have a

Neither system [WIOA or E&T] alone has the capacity to meet comprehensively the employment and training needs of low-income clients, a substantial number of whom face multiple challenges to finding and retaining jobs leading to self-sufficiency.

deeper knowledge of how to address these barriers than do frontline AJC staff. SNAP E&T also has more flexibility than WIOA does to fund a wide array of employment and training services and related expenses. Another important difference is E&T's potential for expanding both the quantity and quality of its services through partnerships with third party organizations which cover half of the E&T service costs themselves and are reimbursed for the other half through E&T's "50-50" reimbursement funds. In addition to leveraging non-E&T funds, such third party partnerships can create a mechanism for a locally-driven, ground-up approach to expanding services for SNAP recipients.

WIOA and SNAP E&T have clear incentives to work together. One incentive is that the two systems share populations that have, in recent years, become a higher priority for their employment and training services, such as [ABAWDs who must work or participate in work activities to receive SNAP benefits](#) for more than three months in a 36-month period. From the start of the Great Recession until 2016, many ABAWDs were not subject to this time limit because most States had Statewide waivers due to high unemployment. As the economy has improved, fewer areas qualify for waivers, and, as of April 2018, just five States had Statewide waivers and 28 States had waivers in part of the State.² Serving ABAWDs in partnership with WIOA can help SNAP E&T agencies expand the availability of qualified work activities for them because participation in a WIOA program is considered a qualifying activity for purposes of meeting ABAWD work requirements.³ Such collaboration to serve ABAWDs can help WIOA programs meet their goals, too, because approximately one-third of these individuals are between the ages of 18 and 25,⁴ and WIOA's Youth Program now faces sharply higher requirements to serve out-of-school youth (defined as age 16-24) than in the past. (See box p. 8) Beyond the ABAWD population, serving SNAP E&T participants generally could also help AJCs meet the law's requirements to give priority for employment and training services to public assistance recipients, other low-income individuals and those with low basic skills.



A second incentive for WIOA and SNAP E&T to partner is that neither system alone has the capacity to meet comprehensively the employment and training needs of low-income clients, a substantial number of whom face multiple challenges to finding and retaining jobs leading to self-sufficiency. SNAP E&T can invest strategically to build on WIOA's strengths, described earlier, relying on AJCs' own WIOA resources for provision of career and training services and making E&T funds available to fill critical gaps so that AJCs can provide more intensive, individualized services to E&T clients than they might otherwise be able to. SNAP E&T might add, for example, more comprehensive assessment, career navigators, support services, or education and training funds to supplement WIOA-funded Individual Training Accounts (ITAs). In a time of historically low unemployment, AJCs are more likely to encounter job seekers with more barriers to employment than in the years of the recession, when even those with substantial experience and marketable skills were unable to find work.

There are, of course, challenges to WIOA and SNAP E&T collaboration. The four national reporting metrics for SNAP E&T employment and earning outcomes are similar to the three WIOA performance indicators for these outcomes. However, there are some important differences between E&T and WIOA metrics and further examination of these distinctions are necessary. Historically the workforce development system's performance targets, which focused on short-term employment outcomes, and limited funding (relative to universal service goals) created disincentives for AJCs to serve individuals viewed as less employable and needing more intensive services. Changes made to the system under WIOA—such as adding credential attainment and interim skill gains measures—are intended to address some of those issues.

Another challenge is the risk that SNAP E&T programs and AJCs, if they are not careful to think strategically about collaboration, may simply wind up providing duplicative services rather than adding new or expanded services tailored to the SNAP population's needs. SNAP agencies have an important opportunity to align E&T and WIOA services to increase capacity to serve more disadvantaged populations, and to build robust partnerships with community colleges, community-based organizations, and employers to improve outcomes. In short, SNAP agencies should seek to add value with E&T funds to what AJCs already offer, not duplicate existing services. This will provide the most efficient, effective, and evidence-based package of WIOA and E&T services possible.

Guidance documents lack the force and effect of law, unless expressly authorized by statute or incorporated into a contract. USDA may not cite, use, or rely on any guidance that is not available through their guidance portal, except to establish historical facts.

What Do WIOA and SNAP E&T Each Have to Offer?

When embarking on a partnership with AJCs, SNAP E&T agencies may want to have in mind a set of guiding questions to consider what will help them invest E&T funds in a strategic way that complements and adds value to existing workforce development services. For example:

- Which types of clients and program outcomes are a priority for both programs? What are the “pain points” for both systems where working together could help solve them?
- What services do those shared clients already receive from AJCs?
- What additional skill-building, supports, or other services do they need in order to find jobs leading to self-sufficiency, and which of these can SNAP E&T invest in?
- What other partners in the community should be involved in order to deliver a comprehensive array of services to this population?
- Do these partners offer opportunities to leverage non-federal funds through 50-50 third-party reimbursement agreements?

State SNAP E&T and WIOA partnerships

While no systematic information exists currently on the extent of SNAP E&T and WIOA collaboration, some information can be gleaned from the State Workforce Plans that all States are required to submit to DOL. Under WIOA, each State or Territory must submit a Unified or Combined State Plan to the U.S. Department of Labor that outlines a four-year strategy for the State’s workforce development system. A Unified plan is the minimum requirement of WIOA and includes the core WIOA programs. States also have the option of submitting a Combined State Plan, which includes the core programs and one or more partner programs (e.g. SNAP E&T). Among the State Workforce Plans submitted to DOL in April 2016, nine States submitted Combined Plans that included SNAP E&T as one of the non-core partner programs.⁵ Several other States described SNAP E&T programs as part of their overall workforce strategy.⁶ More recently, some States, including ones without Combined Plans, have highlighted SNAP E&T-WIOA partnerships in their updates to their WIOA plans. These States, which in our examples below include Michigan, Colorado, West Virginia and South Carolina, illustrate that collaboration between SNAP E&T and WIOA can happen regardless of whether a State chooses to submit a Combined Plan.

Examples from 2018 State plan updates include:

In **Michigan**, where SNAP E&T is delivered through the Michigan Works! workforce system, the draft revised WIOA plan highlights its Food Assistance Employment and Training Plus program (FAE&T Plus). FAE&T Plus is expanding and improving SNAP E&T services with two local workforce development agencies, Detroit Employment Solutions Corporation and Grand Rapids’ West Michigan Works!, through 50-50 reimbursement partnerships with a variety of Plus Contractors, including Focus HOPE and Jewish Vocational Services. FAE&T Plus especially focuses on helping SNAP recipients with minor children and using these third party partnerships to expand services that “focus on employer demand while offering skills training and credentials required to obtain self-sustaining employment.”

Guidance documents lack the force and effect of law, unless expressly authorized by statute or incorporated into a contract. USDA may not cite, use, or rely on any guidance that is not available through their guidance portal, except to establish historical facts.



As in Michigan, SNAP E&T services in **Tennessee** are delivered through the workforce system, which is working toward full integration of SNAP E&T to ensure that all WIOA and partner training and education opportunities are made available to SNAP E&T participants. Tennessee had two 50-50 third party partnerships in 2017 — Goodwill Industries-Knoxville and the University of Tennessee Extension — with plans to expand to more partners and in to more areas of the State in 2018. In their State plan, the State noted that they consider the TN Reconnect initiative as a particularly promising potential third party training partner as it covers tuition and fees for adults to earn certificates or associate degrees at technical and community colleges, allowing WIOA and SNAP E&T to focus their resources on support services, case management, “soft skills” training, and other activities. For example, Tennessee envisions that the majority of SNAP E&T participants would first be referred to WIOA for training through partnerships with technical and community colleges, and then be given WIOA On-the-Job (OJT) opportunities not available to SNAP participants outside of the WIOA-SNAP E&T partnership. Tennessee has also implemented a common data and case management system, Jobs4TN, which integrates collection and sharing of data across WIOA programs (including adult education) and SNAP E&T, among other workforce programs.

Minnesota describes in its draft WIOA State plan update its overall emphasis on career pathways as a SNAP E&T strategy and highlights specifically the State-level workforce-human services interagency partnership that funds E&T projects from State funds (in addition to county-funded E&T services). The plan also notes collaboration to help WIOA recruit out-of-school youth from SNAP for WIOA employment and training activities. Other State efforts to integrate SNAP E&T and WIOA services include increasing referrals and co-enrollment; producing a crosswalk of WIOA, SNAP and adult career pathway activities; and conducting cross-training for Job Counselor staff across the workforce and human service local agencies, as well as other partner programs and community and nonprofit organizations.

Colorado’s draft revised WIOA plan notes that while county human services departments make their own decisions about SNAP E&T (called Employment First) service providers, several counties, such as Larimer Country, integrate Employment First and Career Center programs. According to the State, “Such local level collaboration provides customers an opportunity to apply for and receive SNAP assistance to help overcome barriers to employment, as well as allowing SNAP participants to access additional resources in their employment search.” Colorado also has a new data sharing effort between the workforce development system (known as Connecting Colorado) and TANF and SNAP, which will allow workforce center staff to track services given to TANF and SNAP participants and automatically migrate that information over to the human services data system for federal reporting.

West Virginia's draft revised WIOA plan highlights career pathways strategies and notes that the State "will expand skill-building services funded through Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T, including leveraging federal funding available through SNAP E&T 50-50 funds for employment, training, and related support services, and coordinate those services with WIOA core programs."

South Carolina's draft revised WIOA plan describes ongoing partnerships between SNAP E&T and WIOA programs, including adult education and several local workforce development areas. For example, in the plan, the State says the SNAP E&T and adult education partnership "helps SNAP E&T recipients gain skills, training, and work experience that increase self-sufficiency," with particular emphasis on earning a high school diploma or a high school equivalency diploma and the National Career Readiness Credential.

Beyond the WIOA-SNAP E&T collaboration described in these draft State WIOA plan updates, SNAP E&T programs and their partners are working to integrate WIOA and SNAP E&T services on the ground in a number of localities. One example is [Skagit Valley College](#) in Washington State, which has a partnership with the local Chamber of Commerce and the Northwest Workforce Development Council to help targeted groups of Skagit Valley College students, including SNAP E&T participants, obtain paid internships and job shadows in technical fields. This effort, called the Experience Work Project, provides a bridge between the business community, colleges, and job seekers; it is designed to help prepare students for the world of work. This work experience component is in addition to the other SNAP E&T services Skagit Valley College provides to support access to and success in community college education and training for SNAP recipients.

In **Portland, Oregon, Worksystems Inc.**, which staffs and supports the regional Workforce Development Board, integrates WIOA, SNAP E&T and other funding streams, such as the Community Development Block Grant, to invest in a range of workforce development activities that serve SNAP recipients, among others. They partner with employers, community-based organizations and American Job Centers, including through 50-50 third party match arrangements. Portland's SNAP E&T 50-50 program is called Career Boost and offers a suite of career coaching, job search training, occupational training, and job placement services tailored to the needs of SNAP recipients. Training is offered in several sectors, including healthcare, banking, manufacturing and construction, with employer involvement.

Finally, federal agencies continue to promote SNAP E&T and WIOA collaboration in several ways. In addition to FNS' SNAP to Skills Project, which includes briefs like this one and a range of other in-person and virtual technical assistance activities, DOL has recently launched a "State WIOA, TANF & SNAP Partnership Cohort Challenge." This effort seeks to assist States in creating a "complementary set of services through which the low-income participants of these programs can seamlessly transition on their way to obtaining skills, jobs and self-sufficiency." State teams representing the key programs will participate in technical assistance activities in their own State, with other States, and with national experts to strengthen State interagency partnerships and infrastructure, identify replicable models and outcomes, and develop cross-agency action plans aimed at integrating services, promoting co-enrollments, braiding funding, and leveraging resources.

Guidance documents lack the force and effect of law, unless expressly authorized by statute or incorporated into a contract. USDA may not cite, use, or rely on any guidance that is not available through their guidance portal, except to establish historical facts.

Partnering for better outcomes: WIOA out-of-school youth and SNAP E&T ABAWDs

The WIOA Youth Program provides funding for States and local workforce areas to help out-of-school and in-school youth with one or more barriers to employment prepare for postsecondary education and career opportunities, earn credentials, and find jobs with potential for advancement. Eligibility for WIOA out-of-school youth services overlaps with the ABAWD population definition.

WIOA Out-of-School Youth Eligibility	SNAP ABAWD Time Limited Population
<ul style="list-style-type: none"> • Age 16 to 24 • Not attending school (secondary or postsecondary) at time of enrollment, with exception of high school equivalency programs, dropout reengagement programs, Job Corps, YouthBuild, and WIOA Title II adult education. • Has one or more barriers to employment, one of which is being low-income and requiring additional assistance to enter or complete an educational program or to secure or hold employment. Receipt of SNAP currently or within the previous six months either by the individual or anyone in his or her family fulfills the low-income criteria. 	<ul style="list-style-type: none"> • Age 18 through 49 • Physically and mentally fit for employment • Not living in a household with a minor • Not pregnant • Not already exempt from general SNAP work requirements

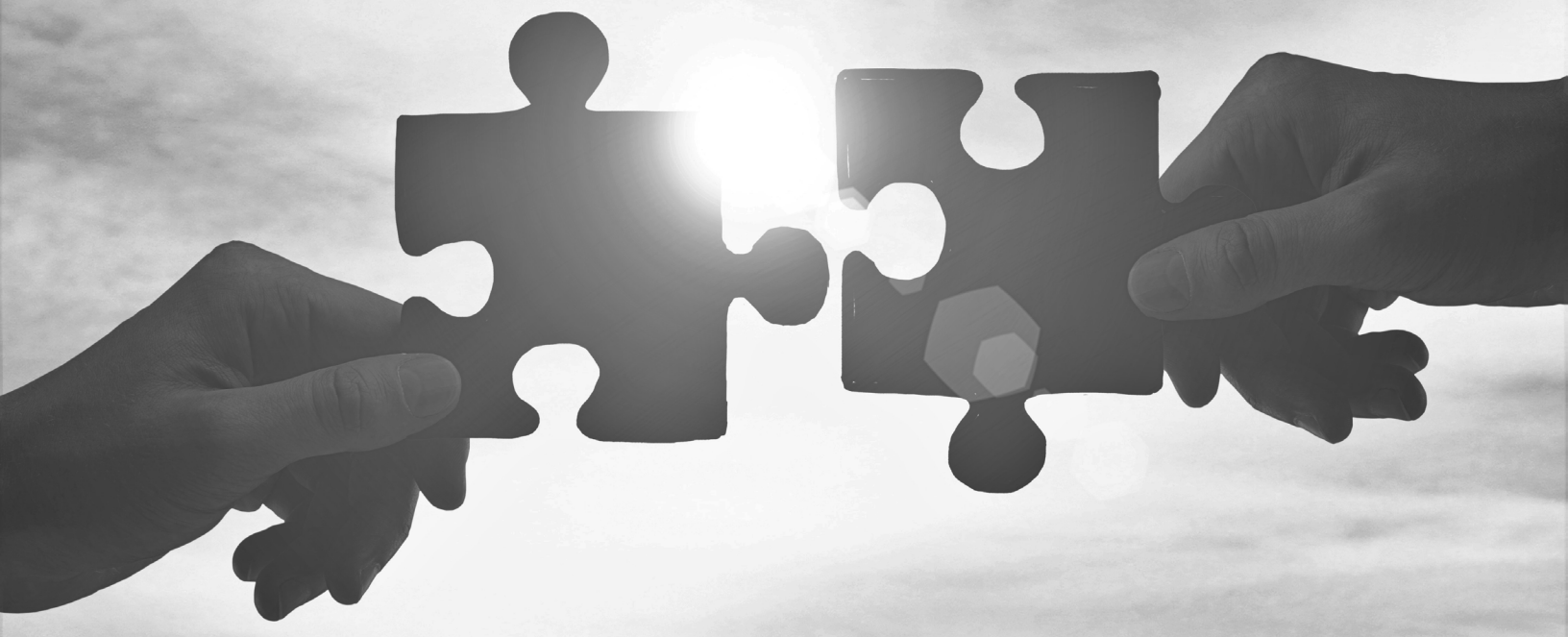
The overlap between WIOA out-of-school youth and ABAWDs, then, are SNAP recipients age 18 to 24, not in school, without dependents, not pregnant, and not physically or mentally unable to work. The most recent data suggest there are approximately 3.8 million SNAP participants who may be subject to ABAWD time limits and as noted above, approximately one in three of them are young adults. Under WIOA, local workforce areas must spend 75% of Youth Program funds on out-of-school youth. Referrals by SNAP E&T of young ABAWDs could assist workforce boards in meeting that challenge, while at the same time helping SNAP E&T agencies find countable work activities for these individuals that help them preserve their SNAP benefits and move them toward self-sufficiency.

In thinking about how SNAP E&T can fund services that complement WIOA services to improve outcomes for these individuals, it is important to step back and consider what we know about what works to help young, low-income adults increase their skills and find and retain employment. A recent review of the research found that key elements of effective strategies for recruiting and engaging low-income young adults in training and employment include:

- Financial incentives and opportunities for paid training and work experience
- Opportunities to feel connected to caring adults and to a community
- Support services that address a young person's barriers to participation, such as transportation
- Individualized service plans with short-term and long-term goals
- For the most persistently disconnected youth, intensive case management and trauma-informed services

Among these effective strategies which the WIOA Youth program can fund but SNAP E&T cannot, are incentive payments to recognize achievement directly tied to training activities and work experiences for reaching certain program milestones. WIOA Youth can also pay wages and training stipends directly to participants whereas E&T cannot, though it can subsidize employer costs of paid work experience through, for example, on-the-job training contracts. Both programs can fund other services or supports, such as tuition for job training, integrated basic education and training, and intensive case management/career navigation services. SNAP E&T agencies can use the guiding questions offered above to help determine which services E&T should consider funding for ABAWD young adults versus those that WIOA should cover. As a general rule, SNAP E&T should avoid funding those services which AJCs are already routinely providing and focus instead on adding complementary or enriched services.

WIOA Youth programs are expected to provide 14 elements. In practice, however, limited resources and other constraints may mean that out-of-school youth receive some of these WIOA services—such as career guidance, work experience, and leadership development—much more commonly than others. SNAP E&T programs, with their experience in working with individuals who face multiple challenges to employment, may be able to help AJCs identify and fund more intensive barrier removal and skill development services for out-of-school youth, to the extent this population overlaps with the SNAP population.



Conclusion

Whether or not SNAP E&T is formally part of a State or local workforce plan, integrating it into State and regional workforce strategies can improve services for SNAP recipients and contribute to meeting employers' workforce needs. State and local experience to date suggests some lessons for SNAP and workforce agencies to consider for how to go about such integration. State SNAP Agencies should:

- Set clear expectations for SNAP E&T services provided through State and local workforce agencies, including what the needs of SNAP participants in each region are, how they can best be served, and how E&T funds can expand the type of services available to improve outcomes;
- Not lose sight of the particular needs of individuals who face multiple barriers to employment, such as low skills or housing instability; and
- Together with WIOA agencies, look for overlapping goals and populations, such as in the case of out-of-school youth and ABAWDs, as focusing on those areas may help both systems be more successful in achieving their aims.

ENDNOTES

- 1 Rowe, Gretchen, Elizabeth Brown, and Brian Estes. SNAP Employment and Training (E&T) Characteristics Study: Final Report. Prepared by Mathematica Policy Research for the U.S. Department of Agriculture, Food and Nutrition Service, October 2017.
- 2 In addition to the five States, the District of Columbia and two territories also had full waivers. Other States had partial waivers from ABAWD time limits for certain areas of their States. <https://fns-prod.azureedge.net/sites/default/files/snap/FY18-Quarter3-ABAWD-Waiver-Status.pdf>
- 3 “Clarifying Obsolete Regulatory References to Employment, Training, and Service Programs,” Memo to SNAP Regional Directors. October 17, 2016. Food and Nutrition Service, U.S. Department of Agriculture. <https://fns-prod.azureedge.net/sites/default/files/snap/Clarifying-Obsolete-Regulatory-References-to-Employment-Training-and-Service-Programs.pdf>
- 4 Characteristics of Able-bodied Adults without Dependents. Accessed May 11, 2018 from FNS website at <https://fns-prod.azureedge.net/sites/default/files/snap/nondisabled-adults.pdf>. This data is primarily based on 2016 SNAP quality control (QC) data on nondisabled adults aged 18 through 49 who live in childless households. FNS notes that though this group is larger, its characteristics are similar to ABAWDs.
- 5 These 9 States are Alabama, Arkansas, Louisiana, Massachusetts, Minnesota, Missouri, Tennessee, Washington and Virginia.
- 6 Kaz, David. 2016. SNAP E&T: Opportunities for Alignment with WIOA. Seattle, WA: Seattle Jobs Initiative.



Prepared by: Julie Strawn, Abt Associates
Submitted to: Marcie Foster
Supplemental Nutrition Assistance Program, Office of Employment and Training
Food and Nutrition Service
U.S. Department of Agriculture
Contract #AG-3198-C-15-0024

In accordance with Federal law and U.S. Department of Agriculture policy, this institution is prohibited from discriminating on the basis of race, color national origin, sex, age, or disability.

To file a complaint of discrimination, write USDA, Director, Office of Civil Rights; Room, 326-W, Whitten Building, 1400 Independence Avenue, SW, Washington, DC 20250-9410 or call (202) 720-5964 (voice and TDD). USDA is an equal opportunity provider and employer.

Guidance documents lack the force and effect of law, unless expressly authorized by statute or incorporated into a contract. USDA may not cite, use, or rely on any guidance that is not available through their guidance portal, except to establish historical facts.