



# SNAP E&T and Subsidized Work Based Learning

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# Work Based Learning in SNAP E&T



# 7 CFR 273.7(e)(2)(iv)(A)(2)

- 7 CFR 273.7(e) [Employment and training programs] (2) [Components] (iv) [work experience program] (A)(2) [work based learning program]
- This means WBL is subject to:
  - Component requirements (included in the State plan; approved by FNS; participants screened by State agency; provided participant reimbursements if they need them; and receive case management)
  - Work experience component requirements (improve employability; move promptly into employment; planned, structured learning experience; limited duration; private, non-profit, or public sector; subject to all labor standards including FSLA)
  - Work based learning requirements (sustained interactions with industry or community professionals; fosters in-depth, firsthand experience with the tasks associated with a given career field that are aligned to curriculum and instruction; emphasized employer engagement, includes specific training objectives, and leads to regular employment; can be subsidized or unsubsidized).

# FNS Guidance: WBL Programs Must

- Improve employability and enable participants to move promptly into regular public or private employment.
- Be a planned, structured learning experience that takes place in a workplace or simulated environment.
- Include sustained interactions with industry or community professionals in a real world or simulated environment.
- Foster in-depth firsthand engagement with the tasks required in a given career field.
- Be aligned with a curriculum (i.e., an instructor's plan for providing training and skill development) and instruction.
- Emphasize employer engagement in the development and/or execution of the training.
- Have specific training objectives (i.e., goals for what a participant is expected to learn and be able to do by the completion of the training).
- Follow an articulated and documented path that leads to regular, unsubsidized employment.
- Pay the individual a wage at least equal to the state or federal minimum wage, whichever is higher. Note this refers to the wage including the subsidy.
- Operate in compliance with all applicable labor laws.
- Not displace or replace existing employment of individuals not participating in E&T.
- Provide the same benefits and working conditions as non-E&T participants doing comparable work for comparable hours.



# FNS Guidance: WBL Programs Should

- Follow an evidence-based training plan with a clearly defined skills element that aligns with the participant's training plan.
- Be limited to six months (with exceptions noted on page seven for registered apprenticeships and other compelling programs).
- Permit individuals to participate only once per twelve-month period with some exceptions as described on page seven.
- Not constitute more than three percent of the workforce for private, for-profit employers and E&T providers.

# Effectiveness of WBL in SNAP E&T Pilots

Gretchen Rowe  
Mathematica



# WBL in SNAP E&T Pilots

- 10 SNAP E&T pilots (operated 2016-2019)
- Pilots allowed States to offer paid work-based learning activities that involve hands-on experience in a work setting
- Eight pilots planned to offer WBL, but implementation challenges led to only four with take-up rates over 5%

# WBL Implementation Challenges



Finding employers willing to participate



Finding jobs that were a good fit for participants and with growth potential



Competition from other workforce programs

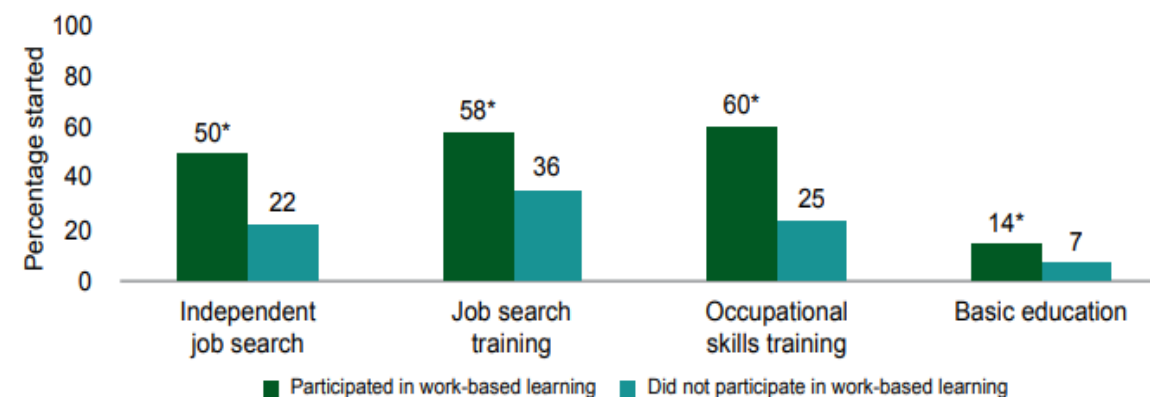


Requirements for entering WBL programs



# WBL Participation Led to More Engagement

- Among the four pilots, about 23% participated in WBL
  - Most were in paid work experience (65%) or work study (30%)
- Those who participated in WBL:
  - Stayed in pilots an average of two months longer
  - Were more likely to participate in other activities
  - Were nearly three times more likely to complete other activities



\* Difference in estimates between individuals who participated in work-based learning activities and those who did not is significantly different from zero at the 0.01 level, two-tailed test.

# WBL Participation Led to Increased Employment and Earnings

- Those participating in WBL had an increase in employment in the three years after enrolling in the pilot
  - Also had an increase in the number of hours worked and earning

Year after pilot enrollment	Change in employment		Change in annual earnings	
	Participated	Did not participate	Participated	Did not participate
Year 1	+ 11%*	-2%	-\$158	-\$77
Year 2	+ 8%*	0%	\$978*	\$90
Year 3	+ 5%*	0%	\$1,399*	\$292

\*Significantly different from individuals who did not participate in work-based learning at the 0.05 level, two-tailed test.

# Considerations for Implementing WBL

- WBL can be a tool to keep participants engaged continuing to build their skills
- Selection of WBL opportunities needs to be informed by both employers' and participants' needs
- States can leverage community partners or employer networks to identify WBL opportunities
- Prioritize employers where WBL can transition into unsubsidized employment
- Other subsidy programs available in the area could affect placement of SNAP participants



# For More Information

- SNAP E&T Reports and briefs are available on the FNS website: <https://www.fns.usda.gov/snap/expanding-opportunities-and-reducing-barriers-work-final-summary-report-evaluation-usdas>
- Gretchen Rowe at [growe@mathematica-mpr.com](mailto:growe@mathematica-mpr.com)

# Subsidized Work Based Learning in Massachusetts



# A Good Fit for Massachusetts?

Initially did not see SWBL as an option in MA:

- Some E&T providers already offering paid work-based learning, but not being reimbursed for participant wages
- DTA did not have funding with which to subsidize wages



# Opportunity



- Started thinking about the federal SNAP E&T reimbursement as the subsidy
- When we requested FY'22 budgets and program descriptions from providers, also sent a summary of the final rule changes (including possibility of SWBL)



# Enter Community Servings



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(It's a Trailblazer)

- Planned to expand paid E&T in FFY'22 regardless of the rule change
- Willing and able to continue working with participants even if they became ineligible for SNAP
- Established and trusted SNAP E&T partner
- Willing to work with DTA to test drive the new component



# Easier Than Expected

## Business as usual

Worked with the provider to:

- Compile a detailed description of the E&T program(s) to be offered (including schedule, curriculum, participation requirements & anticipated outcomes) and to create an itemized budget
- Establish that the program(s) to be offered meet component requirements
- Included information in the FY'22 State Plan

## What we did differently

- Provided extra training to provider staff regarding:
  - How participant wages might impact SNAP eligibility; and
  - SNAP simplified reporting requirements
- A SNAP case manager is available to troubleshoot and answer provider staff and program participants questions as needed
- Watched the SNAP cases of participants to see if, and at what point, the training income impacted the SNAP calculation

# Massachusetts SWBLs in FY'23

- Added the following question to the SNAP Path to Work Program Writeup Template:

Do participants receive any pay?	<input type="checkbox"/> Stipend	<input type="checkbox"/> Wage	<input type="checkbox"/> Other, please explain
<div></div>			

- When pay is indicated, provider is asked to complete a supplemental questionnaire which asks questions that help the State determine if the program meets SWBL requirements
- Community Servings has more than doubled the anticipated number of participants to be served
- A second provider has been approved for SWBL (working on approval for a 3<sup>rd</sup>)
- Exploring the feasibility of expanding DTA's successful TANF DTA Works program (paid internship) to include SNAP participants
- Considering systems enhancements to better support paid E&T programs

# Community Servings - What We Do



## Medically Tailored Meals

This year, Community Servings will prepare & deliver over 875,000 made from scratch, medically tailored meals to 4,000 critically ill individuals and their families.



## Nutrition Education & Counseling

Nutrition counseling & education for clients and the nutritionally vulnerable within the community.

# Community Servings - What We Do



## Volunteer Program

One of the largest volunteer programs in the Boston area. An average of 600 volunteers per month work in the kitchen, deliver meals, and help with fundraising efforts. More than 53,000 volunteer hours are donated each year.



## Local Food Initiative

Committed to increasing access to healthy, local foods & decreasing food waste. Also, a local pick-up site for local produce and local fish through a CSA and CSF.



# Teaching Kitchen - MA SNAP E&T Partner Since 2013



- Free 12-week culinary job training class, offering 8 class cohorts each year
- Hands-on curriculum includes classroom instruction, kitchen instruction, culinary internship, and job readiness & life skills training
- Preparation and administration towards the ServSafe certification exam
- Weekly classes in nutrition, digital literacy, and financial empowerment
- Graduates earn a certificate of completion, and receive ongoing job placement and job retention support

# Teaching Kitchen - Student Supports



- Hot lunch daily (prepared as part of the culinary training)
- E&T participants qualify for DTA issued transportation support and childcare vouchers, as needed
- Locker for each trainee
- Clean chef coats daily
- Letters of reference/support for employment, court, housing, etc.
- Case management, including referrals to community supports
- Hourly wage
- Job placement and job retention support after graduation

# Teaching Kitchen - Why SWBL? And How?



## Why SWBL?

- Expanded program access especially for individuals who are underemployed or returning home after incarceration
- Improved program retention, higher graduation rates

## How did we implement SWBL?

- Combined the SNAP E&T reimbursement in combination with wage funding the program received from grants to support more students
- Trainees sign in and out using a timeclock each day and are paid biweekly as temporary employees through Community Servings payroll

# Subsidized Work Based Learning in Oregon





# Oregon's Considerations for Subsidized Employment Placements

- Subsidized employment is allowable for internship, pre-apprenticeship/apprenticeship, and work-based learning-other components.
- Before a subsidized employment component placement is assigned, providers must first assess the work readiness of the participant.
- Limit number of hours a participant can engage in the program before SNAP closes, and they are no longer eligible for the SNAP E&T Program

# Oregon Process for Establishing Subsidized Employment Placements

SNAP E&T Providers must complete a number of steps when establishing placements for participants in subsidized employment. This includes:

1. Work Site Agreement (WSA) template approved by the ODHS
2. Training Plan and Training Progression Form approved by ODHS
3. Verification of maximum number of hours by ODHS

# Work Site Agreement

- Within the Work Site Agreement, Providers must include the following placement information:
  - Employer
  - Program participant
  - Wage
  - Tax identification numbers
  - Signatures from the employer, provider, and program participant
  - Conditions of employment

# Training Plan

Subsidized Employment Placement Training Plans (EPT) are comprehensive plans outlining how the participants will gain skills and be ready for employment at the end of the placement.

## Training Plans must include the following:

- An outline how a mentor will coach and support the participant
- An outline of the occupation-based skills the participant will be trained to based on assessment and the supports they need to be successful in the placement
- A description of the individualized training objectives for the participant
- A description of the goals and anticipated timelines the participant will meet during the placement including how the evaluation of those goals will be determined
- Identification of training materials to be used to implement the EPT

# Subsidized Employment Participant Evaluation

The Provider and employer develop an evaluation that accompanies the training plan to evaluate a participant's progress during the SE placement.

Initial	
Week 1	
Week 4	
Week 8	
Week 12	

Name: \_\_\_\_\_

Date: \_\_\_\_\_

Job Readiness Skills: Leave blank if not applicable at current warehouse	Not Proficient	Nearing Proficiency	Proficient	Highly Proficient
<b>Attendance:</b> I make it to 80% of my shifts, and I call in when unable to attend				
<b>Punctuality:</b> I am consistently on time				
<b>Appropriate dress:</b> I wear a uniform when required. My clothing is professional and appropriate for the setting. I wear appropriate footwear.				
<b>Work ethic:</b> I work hard, with a good attitude, and do a good job, asking for clarification if needed. I stay on task, follow all rules and procedures.				
<b>Cooperation/Interpersonal Skills:</b> I get along with coworkers, staff and customers				
<b>Accountability:</b> I take responsibility for my actions, I do what I say I will do				
<b>Flexibility:</b> I can change tasks when needs to, and can be flexible and do whatever is needed to get the job done				
<b>Communication:</b> I communicate respectfully with staff, coworkers and customers. I ask for help when needed, and call in to make arrangements if I need to adjust my schedule				
<b>Open to Feedback:</b> I can receive constructive feedback and am open to learning and growing				

(turn the page)

Job Skills:	Not Proficient	Nearing Proficiency	Proficient	Highly Proficient
<b>Equipment identification and usage:</b> I know the names of and can use, clean and store these tools:				
Pallet Jack				
Forklift				
Hand Trucks				
Electric Scales				
Other:				
<b>Food Safety:</b> I use proper food safety practices including temperature control, hand washing, proper food storage, and time/date standards				
<b>Safety:</b> I use proper lifting technique, take safety precautions, and adhere to safety regulations				
<b>Receipt of inventory:</b> I can correctly weigh, categorize, and inventory incoming product				
<b>Picking orders:</b> I correctly pull orders of product, I ensure accuracy, I can compile multiple orders				
<b>Bar Coding, Record keeping/data entry:</b> I accurately maintain written and electronic records of inventory and product information				
<b>Customer service:</b> I serve diverse customers with a friendly, pleasant demeanor, I make sure that their needs are satisfied and they go away feeling good about their interaction with me and FFLC				
<b>Quality of work:</b> my work is thorough, accurate, and tidy				

Additional comments:

# Verification of Hours

The Central Office, SNAP E&T Team, for Oregon is responsible for verifying the maximum allowable hours a participant can engage in a Subsidized Employment placement.

This is calculated based on:

- Wages paid to the participant
- Pay frequency
- SNAP eligibility requirements

# Collaboration is the Key to Success

## STEP Coaches

- Talent Identification in WorkSource Centers of STEP participants interested in OJT opportunity.
- Develop to Work-Ready Status.
- Warm hand off to Business Services.
- Maintain contact with STEP participant through the process to provide support services as needed.

## Business Services Staff

- Coordination with STEP Coaches for placement and any onsite issues.
- Develop business relationship.
- Management Worksite Agreement.
- Oversee the Training Agreement.
- Facilitate wage reimbursement.

# Partnership and Workforce Alignment

## Partnership with WIOA Title 1 & STEP

- Title 1 partner paid for CDL certifications and other education.
- OED provided funding for On-the-Job Training.
- STEP providers pay for or co-fund training and certifications.

## Alignment with Workforce Boards

- Placements targeted to Oregon's priority sectors.
- Healthcare, Transportation and Logistics, Advanced Manufacturing, Construction, Software, Natural Resources, Maritime, Leisure & Hospitality.





# Challenges

## Constant Communication is key

- Keeping the STEP Participant engaged in the process.
- Regular check-in with the participant and the employer.
- Participant attendance issues.

## Initial Employer Engagement

- Low unemployment, high labor market participation.
- Many employers wanted to hire without a training plan.
- Training wage not enough incentive.

# QUESTIONS