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United States
Department of
Agriculture

Food and
Nutrition
Service

3101 Park
Center Drive

Alexandria, VA
22302-1500

SUBJECT: SNAP—Funding Education Components in the Employment and Training Program

TO: Regional Directors
Supplemental Nutrition Assistance Program
All Regions

Recently, groups and private consultants have been urging States to take advantage of Federal funding as a “generous, user-friendly, and readily available source of funds for State and local agencies, community colleges, non-profit community organizations and other education and training entities.” Further, “Department of Agriculture guidelines for [Employment and Training (E&T)] programs includes the provision for States to use any non-Federal funds to draw an equal amount of matching [E&T] funds in order to provide services to all [Supplemental Nutrition Assistance Program (SNAP)] recipients.” (Jeffrey Jablow: “Food Stamp Employment and Training 50/50 Match Funding,” October 2005)

Such statements are convincing State legislatures that using Federal E&T funds is an accessible way to lessen their financial burden during a time of economic stress. However, they are misleading and, in the latter case, incorrect. Federal funds, whether 100 percent E&T grant funds, 50 percent reimbursement of State agency administrative expenditure over and above the 100 percent grant, or 50 percent reimbursement of participant expenses, are provided to support approved activities for a relatively select few SNAP recipients who are placed in—or volunteer for—E&T components designed to help them achieve self-sufficiency.

The purpose of this memorandum is to reinforce the importance of carefully monitoring the funding of E&T activities—especially education components—operated by State agencies as part of their SNAP E&T programs.

A typical scenario for a community college seeking to tap Federal money is for it to run computer matches of student rosters against SNAP participant rolls. All matched students are considered E&T “volunteers” and the institution claims 50 percent reimbursement of administrative costs for all students receiving SNAP.

Such a procedure does not comply with the participant confidentiality requirements of the Food and Nutrition Act of 2008 (the Act) and conflicts with the provisions of the Act and Federal SNAP regulations on the proper use of E&T funding. To clarify FNS’s policy on education components, the following points are critical.

- An education component must be described in the State’s E&T plan of operations and reviewed and approved by FNS.

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The contents of this guidance document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.

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- A participant—whether mandatory or volunteer—must be assigned to or placed in an approved education component by the State agency as part of the participant's overall plan for self-sufficiency. A self-initiated placement during the period of time the participant is enrolled in E&T is acceptable provided that the E&T program has a suitable, approved education component and the State agency accepts the placement.
- Federal funds—whether 100 percent or 50 percent reimbursement—made available to operate an education component must not be used to supplant non-Federal funds being used for existing services and activities. The State agency may use Federal funds to operate its approved education component to the extent that E&T component costs exceed the normal cost of services provided to students not participating in E&T.
- A SNAP recipient who is an eligible student already attending the institution (without benefit of E&T participation) is exempt from SNAP work requirements, including E&T participation. While the student may volunteer to participate in another E&T activity, his or her education costs are already being met and it is not be appropriate to use Federal funds to subsidize those expenses.

These points also apply to any activity in which a State or local agency, non-profit organization, or any other entity, aims to "leverage" Federal funds to defray the cost of education and training services. It is the State agency's responsibility to ensure that Federal dollars are spent in accordance with the applicable law and regulations. Please share this information to your respective State agencies and advise them to seek assistance if they have any questions about E&T funding issues.

If you have any questions or concerns, please call Micheal Atwell (703)305-2449 or Dale Walton (703)305-2404), or contact them via email.



Arthur T. Foley
Director
Program Development Division