



United States Department of Agriculture

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Food and  
Nutrition  
Service

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Center

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**DATE:** July 26, 2016

**SUBJECT:** Supplemental Nutrition Assistance Program – Section 4022 of the Agricultural Act of 2014 – Questions and Answers (Part I)

**TO:** Regional Directors  
All Regions  
Supplemental Nutrition Assistance Program

The attached questions and answers provide additional policy clarification responding to State agency questions concerning the interim final rule titled Supplemental Nutrition Assistance Program Employment and Training Program Monitoring, Oversight and Reporting Measures published in the *Federal Register* on March 24, 2016. These questions and answers serve as formal guidance for use by the Food and Nutrition Service Regional Offices and State agencies as they implement the provisions of Section 4022(a)(2).

If you have any questions related to the implementation of these provisions, please email [E&Treportingmeasures@fns.usda.gov](mailto:E&Treportingmeasures@fns.usda.gov).

Sincerely,

//signed//

Moira Johnston  
Director  
Office of Employment and Training

Attachment

Interim Final Rule: Supplemental Nutrition Assistance Program (SNAP)  
Employment and Training (E&T) Program Monitoring, Oversight and Reporting  
Measures - Questions and Answers (Part I)

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**National Measures**

**Question 1:** State agencies are required to report on unsubsidized employment in the 2<sup>nd</sup> and 4<sup>th</sup> quarter and on the median quarterly earnings in the 2<sup>nd</sup> quarter “after completion of participation in E&T.” Please elaborate on the phrase “after completion of participation in E&T.”

Answer 1: An individual who starts participating in an E&T component and then, for whatever reason, stops participating, has “completed participation in E&T” when the required timeframe for that component expires. For example, if an individual begins a six week job search component, he is considered to have completed participation in E&T at the end of the six weeks even if he stopped participating in the third week. The same is true for an educational component: if an individual starts attending a class, he would have completed participation in E&T when the class is scheduled to end regardless of whether the individual completes the class or not.

**Question 2:** What is the difference between an E&T participant and a former participant? Would all participants be former participants if they have completed participation in E&T?

Answer 2: An E&T participant is an individual who is currently participating in E&T services. A former participant is an individual who is no longer participating in E&T services, which may include individuals who are no longer receiving SNAP benefits.

**Question 3:** How far back do we consider an individual a former participant? For example, should we include individuals who were E&T participants 10 years ago?

Answer 3: State agencies must submit an annual report by January 1 each year that contains information for the Federal fiscal year (FY) ending the preceding September 30. The first report, which is due January 1, 2018, will report on individuals who were participants during FY 2017, or the period of October 1, 2016 through September 30, 2017. Due to lag time, outcome data for some individuals who complete participation in E&T in FY 2017 may not be available for this first report. Individuals who completed participation in E&T prior to October 1, 2016 will not be included in this first report. However, due to lag time for the data, subsequent reports may include individuals who completed participation in different fiscal years. For example, if an individual completed participation in E&T in the fourth quarter of FY2018, information from the second quarter of FY 2019 concerning their employment and earnings would be included in the FY2019 report (due January 1, 2020), even if that individual was no longer participating in SNAP in FY 2019.

**Question 4:** In determining the quarterly median income, would a State agency use hourly wages or total quarterly earnings?

Answer 4: The quarterly median income is determined by ranking the total quarterly earnings of all E&T participants from lowest to highest. The median is the income amount in the middle of the ranking.

**Question 5:** States agencies are required to report the number and percentage of participants that completed training, educational, work experience, or an on-the-job training component. If a participant is participating in multiple components, does the State agency count completion in each of the components? A client could potentially be counted multiple times if he is participating in multiple SNAP E&T activities (e.g., client completed job readiness training and vocational training) during the fiscal year.

Answer 5: If an individual completes several components, State agencies should take into account each component he completes. For example, an individual who completes a training component and a work experience component in the same fiscal year would be counted twice.

**Question 6:** For the National measure 7 CFR § 273.7(c)(17)(iv) regarding component completion, how should State agencies track component completion if a person is no longer a SNAP recipient?

Answer 6: State agencies are not required to track component completion if a person is no longer a SNAP recipient. State agencies must track and report on the number and percentage of participants who completed an education, training, work experience, or on-the-job training component.

**Question 7:** Are persons who self-enroll in a component considered “placed” for reporting purposes?

Answer 7: Yes, if a State agency offers components through its E&T program where individuals self-enroll, such as self-initiated workfare; this individual is considered as having been “placed” in an E&T component for reporting purposes.

**Question 8:** State agencies are required to report the number and percentage of participants who meet the characteristics identified under 7 CFR § 273.7(c)(17)(v) or (vi). How should the State agency handle instances when an individual’s characteristic changes during the Federal fiscal year?

Answer 8: State agencies should report the characteristics of participants at the time of initial enrollment in SNAP E&T services.

**Components That Are Expected to Include 100 or More Participants**

**Question 9:** In FY 2017 plans, State agencies are required to include reporting measures for components that are expected to include 100 or more participants. One suggested measure includes the percentage and number of participants who are in unsubsidized employment “subsequent to the receipt of those services.” What is the time frame in order for employment to be considered subsequent to the receipt of services?

Answer 9: State agencies have broad flexibility in determining reporting measures for individual components. The reporting measure mentioned above is an example of what State agencies could use for their individual components. Therefore, State agencies have discretion to determine the time frame for employment to be considered subsequent to the receipt of services.

**Question 10:** One suggested measure for individual components is the number and percentage of participants who obtain a recognized credential. What is the definition of a “recognized credential?”

Answer 10: State agencies have broad flexibility in determining reporting measures for individual components. The reporting measure mentioned above is an example of what State agencies could use for their individual components. Therefore, State agencies have discretion to define the term “recognized credential.” The Food and Nutrition Service (FNS) encourages State agencies to consult with their State workforce agency and consider a definition that is consistent with the Workforce Innovation and Opportunity Act programs.

**Question 11:** If a component has fewer than 100 participants, can the component still be included in a State’s E&T Plan?

Answer 11: Yes, a State agency may include a component in its E&T State Plan if the component is intended to serve fewer than 100 participants. Additionally, a State agency may, at its discretion, include reporting measures for components that intend to serve fewer than 100 participants.

**Question 12:** Can a State agency simply pick one of the suggested measures and use that as its component measure?

Answer 12: FNS encourages State agencies to work with their training providers, workforce agencies, and FNS Regional Office staff to create reporting measures that are appropriate for each component and that will yield useful data for identifying effective E&T programs.

**Question 13:** Will FNS provide flexibility to change/adjust reporting measures after they have been approved in the annual State E&T Plan? If a change/adjustment is approved, what measure will the State agency be required to include in the annual report?

Answer 13: Yes, 7 CFR § 273.7(c)(8) specifies that if a State agency modifies or alters the nature or location of its components or the number or characteristics of persons served, it must submit a revision to the E&T State Plan to the appropriate FNS Regional Office for approval at least 30 days prior to planned implementation. This requirement would extend to any proposed change to component reporting measures as well. If the proposed change were approved, the State agency would be required to include the revised measure in the annual report.

### **Able-Bodied Adults Without Dependents (ABAWD)**

**Question 14:** What is an "at-risk ABAWD?" Does this term apply to all ABAWDS?

Answer 14: An at-risk ABAWD is an ABAWD applicant or recipient who is:

- In the last month of the 3-month time limit;
- Does not live in an area covered by a waiver of the time limit; and
- Is not assigned a 15 percent ABAWD exemption.

**Question 15:** Which State agencies are required to submit reports on the E&T services provided to ABAWDS?

Answer 15: States that have committed to offering all at-risk ABAWDs a slot in a qualifying activity and have received an additional allocation of funds as specified in 7 CFR § 273.7(d)(3) are required to include in their annual reports the following information:

- The monthly average number of individuals in the State who meet the conditions of an at-risk ABAWD as described in 7 CFR § 273.7(d)(3)(i);
- The number of individuals to whom the State offers a position in a work program or workfare program described in 7 CFR § 273.24(a)(3) and (4);
- The number of individuals who participate in such programs; and
- A description of the types of employment and training programs the State agency offered to at-risk ABAWDs and the availability of those programs throughout the State.

### **Annual Report**

**Question 16:** When is the first annual report due?

Answer 16: The first annual report is due on January 1, 2018.

**Question 17:** Are State supervised, county administered programs required to provide and report on county-level reporting measures?

Answer 17: For the National measures, State agencies must report State level data, similar to the current practice for the FNS-583 E&T Program Activity Report. However, State agencies must include data for components that are expected to serve more than 100 participants in the annual report even if it operates in only one county.

### **Data Sources and Collection Methodology**

**Question 18:** What data sources and collection methodology should State agencies use to obtain data on employment and earnings of E&T participants and former participants?

Answer 18: Administrative data, such as Quarterly Wage Record (QWR) information, is the preferred source of data for information pertaining to employment and earnings of E&T participants and former participants because it is the most reliable and efficient. However, FNS recognizes that State agencies need lead time to negotiate data agreements, or in some cases may require State regulatory or statutory changes granting them access to such data. FNS expects State agencies to work towards this end. In the interim, as States move towards the use of administrative data, State agencies may determine the most appropriate data source for these measures. Sources may include: QWR, National Directory of New Hires, automated eligibility systems, off-the shelf tracking tool, calling participants, or sampling.

**Question 19:** May State agencies use a random sampling methodology to gather information on employment and earnings of E&T participants and former participants?

Answer 19: Yes, as an interim approach. Administrative data, such as QWR, is the most reliable and efficient source of data for information pertaining to employment and earning of E&T participants and former participants. While State agencies are working towards securing data agreements, use of a random sampling methodology is allowable. State agencies should include a sampling plan in its State E&T Plan, which is subject to the regular review and approval process. State agencies should also describe their plans to move towards the use of administrative data, and their efforts to resolve any issues that may prevent them from doing so.

**Question 20: May State agencies use a random sampling methodology to gather information on the characteristics of E&T participants identified in 7 CFR § 273.7(c)(17)(v)?**

Answer 20: This information should be readily available to State agencies through their eligibility systems. Therefore, use of a random sampling methodology should not be necessary.

**Question 21: May State agencies that have committed to offering all at-risk ABAWDs participation in a qualifying activity use a random sampling methodology to collect information required in 7 CFR § 273.7(c)(17)(viii).**

Answer 21: No. This information should be readily available to State agencies through their eligibility systems. Therefore, use of a random sampling methodology should not be necessary.

**Question 22: State agencies must identify reporting measures for components that will serve 100 or more participants. These may include things such as credential obtainment or skills acquisition. What data sources and collection methodologies should State agencies use to obtain data for the reporting measures?**

Answer 22: State agencies may determine the most appropriate source and collection methodologies for this information. FNS encourages State agencies to consult with their workforce agencies and training providers on this issue.

**Question 23: Can you provide more information regarding what a State agency should include in its State E&T Plan pertaining to the random sampling methodology?**

Answer 23: To obtain reliable results, the sample must be selected according to the criteria in the Employment and Training Plan Handbook (April 2016) and be of sufficient size to get reliable results. FNS expects State agencies to use the following sample size guidance.

Universe Size of E&T Participants for Reporting Measure	Reporting Measure Random Sample Size to be Completed
5000 and over	500
300 to 4,999	300
Under 300	All participants

**Question 24:** Should State agencies using a random sample include its sampling methodology in its E&T plan?

Answer 24: Yes, to ensure that the sample results are valid, FNS expects States to adhere to the methodology described in the Employment and Training Plan Handbook (April 2016) and include a description in the State E&T plan.

### **Funding**

**Question 25:** Can State agencies use 100 and/or 50 percent administrative funds to either build a new data system or make upgrades to a current system to capture this data?

Answer 25: Yes, 100 and/or 50 percent administrative funds may be used to develop data systems. If other programs benefit from the development of new data systems or data system upgrades, the cost of this development must be properly allocated.

**Question 26:** How should a State agency build the cost of data collection and reporting into its State E&T plan?

Answer 26: State agencies should include the anticipated costs of data collection, including system upgrades or modifications, in the estimated operating cost within their State E&T Plan. These expenses would be included under the appropriate line item in Table 5 and justified in the Budget Narrative.

**Question 27:** Will FNS delay FY 2017 grant awards if a State's E&T plan is not approved by October 1, 2016 due to reporting measures included in the plan?

Answer 27: FNS cannot release E&T funds to a State agency absent an approved plan. FNS will work with State agencies to ensure that adequate information pertaining to the reporting measures is included in the plan. However, FNS also recognizes that States may need additional lead time to finalize reporting measures and data sources. Therefore, FNS may consider contingent approvals on a case-by-case basis.