



POLICY

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DISTRIBUTION: CAREERSOURCE TAMPA BAY STAFF

PURPOSE: To establish a local policy that identifies the role of CSTB's management of SNAP E&T program in Region 15. This will guide SNAP E&T staff in administering SNAP E&T services.

BACKGROUND: On January 1, 2016, the State of Florida implemented the mandatory Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T) program to help Able-Bodies Adults without Dependents (ABAWDs) gain skills, training, and/or work experience that will increase their ability to move directly into employment. The Department of Children and Families (DCF) works closely with the Florida Department of Economic Opportunity (DEO) to ensure a strong working relationship and communication between the two agencies.

DCF is the agency responsible for administering the SNAP E&T program. DCF and DEO entered into a Memorandum of Understanding (MOU) and as part of that agreement, DCF continues to identify ABAWDs and refers these individuals to DEO for mandatory participation in the local SNAP E&T program. The delivery of local SNAP E&T services for Hillsborough County is provided by CareerSource Tampa Bay (CSTB). SNAP E&T Career Coaches and staff have been co-located within CSTB centers where ABAWDs can be served and referred to other workforce program services.

POLICY:

An ABAWD is defined in DEO's SNAP Employment and Training State Plan as an individual who is between the ages of 18 and 49, does not have dependents, and does not meet an exemption outlined in Title 7 Code of Federal Regulations (CFR) 273.7(b) or an ABAWD exception outlined in 7 CFR 273.24(c).

Work Requirements

ABAWDs are mandated to complete an 80 hour per month work requirement in order to maintain eligibility to receive food assistance. SNAP E&T components that are available to ABAWDs include the following activities:

- Job search

- Job search training
- Work experience
- Education and training
- Services offered through the Workforce Innovation and Opportunity Act (WIOA) and Trade Adjustment Assistance (TAA).

It is encouraged for SNAP E&T and WIOA co-enrollments to provide ABAWDs with an opportunity to become competitive in the workforce while receiving services and meeting the 80 hours per month work requirement.

ABAWDs who are job-ready and assigned to job search as their mandatory activity will be connected with universal services offered through the Wagner-Peyser program. These services will assist with continued skill-building through employability skills workshops, job search, job referrals, and placement assistance.

Notification of Participation and Initial Engagement

Mandatory SNAP E&T program ABAWDs are informed of their referral to the program through a Notice of Mandatory Participation (NOMP) letter. The NOMP letter is mailed by DEO on behalf of CSTB. The letter provides detailed instructions and action steps the ABAWD must take in order to maintain compliance with the SNAP E&T program as a condition to continue to receive their SNAP benefits. Failure to comply may adversely impact their receipt of food assistance benefits.

The NOMP also includes an exemption checklist and the opportunities and obligations form to help inform ABAWDs about exemptions, expectations and consequences of failure to comply with the program.

The initial engagement steps include: participation in an online or in-person orientation to the SNAP E&T program, completion of an online initial assessment, and schedule an appointment online to meet with their SNAP Career Coach.

ABAWDs are required to meet with a SNAP Career Coach during their scheduled appointment to be assigned to 80 hours of activities. This requirement is intended to encourage immediate interaction between the SNAP Career Coach and the ABAWD to begin the process of developing an Employment Plan that leads the ABAWD to self-sufficient employment. The employment plan details the ABAWDs assignment and participation in qualifying work requirement components. CSTB recognizes the following as qualified work requirements in Hillsborough County: job search, job search training, work experience, education, and vocational training. These qualified work requirements can be assigned to an ABAWD in a combination of ways, as long as it meets the 80 hours per month requirement and falls within DEO guidelines of maximum hours allowed in a specific activity. An ABAWD is only allowed to complete 39 hours per month of Job search or Job search training for a duration of 6 consecutive months. Additionally, when job search training and job search are combined, the total hours assigned cannot exceed 39 hours per month.

Non-Compliance and Sanctions

Failure to comply with the SNAP E & T program's work requirements may result in ABAWDs disqualification from the program, as well as food assistance. CSTB utilizes the One-Stop Service

Tracking (OSST) system to notify DEO if an ABAWD has fallen out of compliance. Reporting ABAWDs failure is required to be conducted between the 1st and 10th of each month, but no later than the DCF pull-down date.

Upon learning of the non-compliance, DCF will send a Good Cause Notice letter, pursuant to 7 CFR 273.24(b) (2) and 7 CFR 273.7(f) (1) (i). “Good Cause” is defined as a temporary circumstance beyond the ABAWDs control that prevented their participation in assigned SNAP E&T activities. The letter provides all of the possible good cause reasons for failure to comply and a deadline of when the request must be completed by the individual. DCF is responsible for determining good cause when an ABAWD has failed to comply with the program requirements. If DCF does not determine good cause, the sanction will be placed on the ABAWDs SNAP benefits.

ABAWDs have an opportunity to comply with the failed work requirement before the sanction is effective. Compliance will be determined by CSTB staff upon a full review of the ABAWDs case. CSTB staff will provide instructions to the ABAWD on what activities need to be completed for the compliance requirements in order to have the sanction lifted with compliance.

The penalty for failure to comply with the program requirements is the loss of food assistance benefits. When non-compliance is reported by CSTB, and DCF imposes a sanction, the penalty period becomes effective on the first day of the month. Sanction levels and associated penalty periods for failure to comply are as follows:

Sanction Level	Duration
1	Minimum 1-month penalty or until they have complied with the program’s requirements, whichever is later.
2	Minimum 3-month penalty or until they have complied with the program’s requirements, whichever is later.
3	Minimum 6-month penalty or until they have complied with the program’s requirements, whichever is later.

**Subsequent sanctions received after a level 3 sanction will continue to be administered as a level 3 sanction with the ABAWD serving a minimum 6-month penalty period or until compliance, whichever is later, each time there is a failure to participate in an activity.*

During the penalty period, an ABAWD is not allowed to engage in SNAP E&T activities. Once the penalty period has been served, the ABAWD must complete a compliance activity, as specified by CSTB, and then reapply for food assistance benefits with DCF. Upon DCF’s determination of SNAP benefit eligibility the individual will be referred to SNAP E&T program for reengagement.

Job Participation Rate (JPR) Hours

CSTB utilizes centralized data entry through the Management Information System (MIS) department. The SNAP Career Coach will create the initial entry for the assigned activity in OSST with an anticipated begin date. The MIS staff will update the activity code based upon the engagement or

updated documents submitted by the SNAP E&T Career Coach after completion of the ABAWD's follow-up appointment. If a question arises, MIS staff will email the SNAP E&T Career Coach and immediate supervisor for clarification.

The SNAP E&T ABAWDs will be required to submit their timesheets, paystubs, or other activity supporting documentation by the last day of each month unless otherwise noted on the employment plan, as long as their case remains open and in mandatory status. The SNAP E&T ABAWDs or staff may, upon review of the completeness of activity, scan the documents into the ATLAS electronic document management system (EDMS). Incoming documents are stored within an ATLAS queue system that is assigned, monitored and worked by the MIS staff. The MIS department ~~team~~ has targeted goals of data entry into the OSST system and storage to the customer's electronic file record within 48 hours of receipt.

CSTB will maximize the use of free online training resources and job search training resources. SNAP E&T ABAWDs are encouraged to complete their hours within a CSTB career center. The attending staff are on hand to assist, and will generate timesheets validating the time completed by the ABAWDs. CSTB will operate under the understanding that when ABAWDs utilize the online resources, they will be provided credit for the exact hours completed in the assigned activity. However, CSTB has set limitations on the maximum daily hours allowed to be completed at 8 hours per day. Any course showing more than 8 consecutive hours completed within a day will only be provided a maximum of 8 hours credit for that day.

Food Stamp Reimbursement (FSR)

ABAWDs participating in the mandatory SNAP E&T program may be eligible to receive a Food Stamp Reimbursement (FSR) for transportation expenses up to the state's maximum allotment of \$25 per month. FSR requests can only be made if transportation expenses were incurred as a result of traveling for participation in the components of the program, such as completion of the orientation or activities. Reimbursement requests are entered directly into the OSST system and are disbursed directly to the ABAWDs Electronic Benefits Transfer (EBT) card seven days from the FSR request date. The reimbursements may not exceed \$25 in one "earned" month. An earned month is defined as the calendar month in which the activity hours were completed and documented. ABAWDs may request FSRs for prior months in which they did not report transportation expenses if supporting documentation is provided. However, staff should not request FSRs for months outside of the current Federal Fiscal Year (FFY). CSTB requires ABAWDs to provide a signed Self-attestation form to verify their participation in the program's components, as well as proof of their incurred transportation costs while participating in an activity.

Employment

Employment by definition is not a component of the SNAP E&T program, but it is the desired program outcome. If an employed ABAWD is referred to the SNAP E&T Program, or if employment is attained while in the program, the job will be recorded in the One-Stop Service Tracking (OSST) system. If the individual is employed part-time, an assessment is completed to identify the reason for part-time employment. ABAWDs not working full time will be assigned to additional activities as appropriate. The total scheduled hours in employment and any combination of allowable activities should not exceed 120 hours per month. If an employed ABAWD is assigned to work experience, those hours

assigned for work experience shall not exceed the result of the benefit calculation. If the ABAWD's employment has not been reported to DCF already, CSTB will refer them to submit a notice of change for an update to their case.

References:

- SNAP Employment and Training State Plan Federal Fiscal Year 2019
[http://www.floridajobs.org/docs/default-source/lwdb-resources/lwdb-grants-management/supplemental-nutrition-assistance-program-\(snap\)---\(fset\)/2018-snap/ff-2019-snap-et-state-plan.pdf?sfvrsn=2](http://www.floridajobs.org/docs/default-source/lwdb-resources/lwdb-grants-management/supplemental-nutrition-assistance-program-(snap)---(fset)/2018-snap/ff-2019-snap-et-state-plan.pdf?sfvrsn=2)
- Title 7 Code of Federal Regulations (CFR) 273.7(b), 273.24(c), 273.24(b) (2), and 273.7(f) (1) (i) <https://www.govinfo.gov/app/details/CFR-2011-title7-vol4/CFR-2011-title7-vol4-sec273-7>

INQUIRIES: Any questions about this policy should be directed to the Chief Operating Officer or their designee.