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SNAP E&T Operations Handbook:

A Step-by-Step Guide to
Developing, Implementing,
and Growing a SNAP E&T
Program

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SNAP E&T Operations Handbook: A Step-by-Step Guide to Developing, Implementing, and Growing a SNAP E&T Program

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Introduction to the *SNAP E&T Operations Handbook*

The purpose of the *Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T) Operations Handbook* is to provide States and their partners a roadmap to building a SNAP E&T program that primarily uses third-party providers for the delivery of SNAP E&T services. True to its name, this resource is primarily focused on *operational* best practices. This means that it focuses on the nuts and bolts of how to build a SNAP E&T program that uses third-party partners to provide services. It does not include information on programmatic best practices (i.e. evidence-based strategies that help SNAP participants gain skills and find work) or provide official policy guidance. The U.S. Department of Agriculture (USDA), Food and Nutrition Service (FNS) has published other materials on these topics that can be found on the FNS website.

The Handbook provides guidance that is general enough to be useful to all States while still offering a level of detail that will allow State agencies to take meaningful steps forward with their programs. States that do not utilize third-party partnerships may also find sections of this Handbook useful to their work.

SNAP E&T Program Basics

The following section provides a brief overview of the SNAP E&T program. For a comprehensive guide to the program and Federal SNAP E&T policy, please refer to the [SNAP E&T Toolkit](#) on the FNS website.

SNAP E&T can help SNAP participants gain skills, training, or work experience to increase their ability to obtain regular employment that leads to economic self-sufficiency. The program offers funding to States to provide a package of employment and training and related supportive services to SNAP participants, which States set forth in their annual SNAP E&T plans. States have considerable flexibility to determine which SNAP participants to serve (including whether participation will be voluntary or mandatory), which specific services (components) to offer, and who will provide the services (the State and/or partners engaged by the State).

Allowable components include job search, job search training, workfare, work experience or training, educational programs, self-employment programs, and job retention.

There are three types of Federal funding for SNAP E&T: 100 percent funding, which is provided to States annually through grants; 50/50 funding, which can be used to support administrative costs or participant reimbursements; and Able-Bodied Adults Without Dependents (ABAWDs) pledge funding, which is dedicated to State agencies that pledge to serve all at risk ABAWDs in the last month of the 3-month time limit by placing them in a qualifying component. A full discussion of Federal SNAP E&T funding, including allowable costs and relevant cost principles, can be found in the [SNAP E&T Toolkit](#).

Due to limited 100 percent funding, States have increasingly relied on the use of SNAP E&T 50/50 funding to grow their programs. This funding stream allows States and their partners to use non-Federal

Using this Handbook with a State's Planning Group

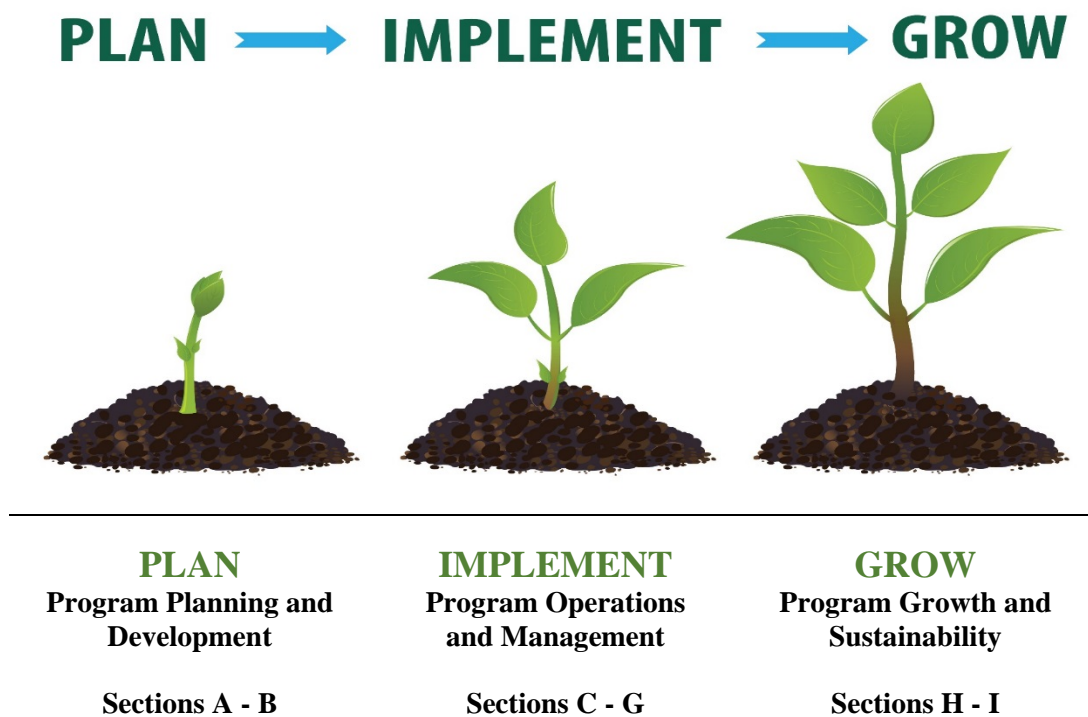
Section A of the *SNAP E&T Operations Handbook* provides information on organizing a State SNAP E&T Planning Group and a planning process for developing an expanded SNAP E&T program. It lists the types of agencies and organizations that States can consider for their Planning Group, and describes how this Group can be helpful in advancing a SNAP E&T plan. States should provide group members with **copies of this Handbook and companion resources** early on to help them develop understand the elements of a strong SNAP E&T program.

funds to provide services and supports to SNAP E&T participants and receive a 50 percent reimbursement by USDA on those expenditures.

A common way for a State to leverage SNAP E&T 50/50 funding is by partnering with third parties (e.g., community-based organizations and community colleges) to deliver services. This is referred to as a “third-party partnership”. In this model, organizations can use non-Federal funding for allowable SNAP E&T services and supports, which are then eligible for a 50 percent reimbursement through the State’s SNAP E&T program. Since State funding is often limited, third-party partnerships can allow States to grow their programs, reach more SNAP participants and improve their program outcomes by tapping into existing high quality providers that serve the community.

Organization of the *Operations Handbook*

The *SNAP E&T Operations Handbook* is organized chronologically to reflect how States typically progress through the three-stage process of building a SNAP E&T program. The three stages are: **PLAN** (*Program Planning and Development*), **IMPLEMENT** (*Program Operations and Management*), and **GROW** (*Program Growth and Sustainability*).



In the **PLAN** stage, States work on program planning and development. They might conduct an assessment of their existing SNAP E&T programs, create teams and processes to carry out program planning and development, and draft an implementation plan to guide their work.

In the **IMPLEMENT** stage, States work to strengthen program operations and management. They implement their plan for developing or expanding their SNAP E&T programs. Relevant sections of the Handbook cover topics such as collecting and reporting outcome data, securing and operating third-party partnerships, and building systems of participant referral, eligibility, and invoicing.

Finally, in the **GROW** stage, States work on program growth and sustainability. They expand on their initial program. Relevant sections of the Handbook cover key considerations for moving from initial SNAP E&T program implementation to a larger, sustainable, effective and efficiently-run program.

While the Handbook is organized chronologically in stages, each section stands alone. States can use only those sections that are relevant to their needs at a particular point in time and return to the document as their needs change. Some sections identify additional resources that States and their partners may find useful. These resources are part of the [SNAP to Skills Project Resource Library](#), available on the *SNAP to Skills* [website](#).

Where to Go for More Information

This Handbook is just one important tool for States and other stakeholders to use in planning and implementing a SNAP E&T program. The following resources provide additional guidance and technical assistance:

- The **SNAP E&T Toolkit** provides key policy guidance and information from FNS on allowable costs and best practices in SNAP E&T.
- The *SNAP to Skills* [website](#) provides additional information, tools and resources on SNAP E&T, including policy briefs on key topics (e.g., Serving Able-Bodied Adults without Dependents, Integrating SNAP E&T into Career Pathways Systems, Building State SNAP E&T Infrastructure), success stories from States and participants, and links to policy guidance on SNAP E&T.
- The **SNAP E&T State Plan Handbook** provides guidance to State agencies administering the SNAP E&T program on how to prepare and submit their annual plans to FNS for approval.

About *SNAP to Skills*

Launched in October of 2015, *SNAP to Skills* is a project of USDA's Food and Nutrition Service to provide States the tools and resources – including this *Operations Handbook* – that they need to develop employer-driven SNAP E&T programs that help SNAP participants find jobs and work toward self-sufficiency. The project seeks to help advance SNAP E&T programs in all States through these tools and resources. In addition, the Project provides direct technical assistance to select States. Seattle Jobs Initiative was selected to operate the *SNAP to Skills* Project.

PLAN: Planning & Development



A. Organizing a Planning Group and Process

The first step in expanding or enhancing a SNAP E&T program is to develop a plan. States will likely dedicate a large part of their planning processes to engaging stakeholders to help build their programs. These stakeholders may be internal or external partners to the State SNAP E&T agency.

This section describes the key steps a State might take to initiate the planning process, specifically how to:

- Conduct a self-assessment
- Build a planning group
- Establish a planning process



Conduct a Self-Assessment

The first step in the planning process is typically to conduct a **self-assessment**. Results of the self-assessment will help develop a clear picture of the current strengths and weaknesses of a SNAP E&T program. For example, it may help States identify service gaps by examining what types of services their program offers and comparing these to skill needs across the State. It may also include a review of the opportunities and challenges that may arise as the State expands its program. For example, a self-assessment may reveal challenges such as a lack of staffing resources or adequate data systems, or opportunities such as strong existing employment and training providers and initiatives. An honest and thorough self-assessment is a valuable tool at the start of the planning process.

Establish a Planning Group

Next, a State should identify who to involve in the planning process and develop a **Planning Group**. This may include individuals, organizations, or agencies that have needed expertise, are key decision-makers, or will be impacted by the decisions made about the SNAP E&T program. The State must determine each stakeholder's appropriate level of involvement in the planning process (e.g., who will drive plan development, who must make final decisions or provide input at key points in the process, who simply needs to be kept informed). There may even be a need for multiple planning groups, to tackle various aspects of the SNAP E&T planning process.

Key Members of the Planning Group

Key members of the Planning Group could come from the following internal and external agencies, systems, and organizations:

Internal Stakeholders

- **State SNAP E&T agency leadership** is key to guiding the vision of the State's SNAP E&T program. Leadership from other State agencies (e.g. workforce development, education) may also be important partners in the planning process.

PLAN: Planning & Development



- **State SNAP E&T agency staff** know the SNAP E&T program, directly support agency leadership, and will operate the program on a day-to-day basis. Staff might include representatives from headquarters and local service areas, as well as county SNAP agencies (in county-administered States). Members could include policy and program staff, as well as fiscal, contracting, data, and IT systems staff. States may consider including at least one full-time staff (or equivalent) to manage the planning process.

External Stakeholders

- **State agencies and systems** involved in workforce development, human services, and data collection can provide valuable insights into the operation of other relevant State programs, facilitate access to data, and offer proven strategies. These entities could include the State workforce agency or board, the State labor agency, the community college/postsecondary education system, the agency that administers the Temporary Assistance for Needy Families (TANF), the agency that administers child care, and the agency responsible for enforcing child support.
- **Community colleges and community-based organizations**, particularly those likely to be initial SNAP E&T third-party partners. Engaging these organizations early in the planning process can ease program implementation.
- **Other community leaders and potential project funders**, including local or regional philanthropic organizations. These organizations could provide direct financial support for the program, connect States and their partners with other potential funders, and serve as champions for SNAP E&T in the broader community.

Key Considerations for Establishing a Planning Group

When establishing a Planning Group, a State should consider the following:

Include individuals with knowledge of best practices. This includes knowledge of SNAP E&T, the population(s) to be served, workforce development, labor market information, and fiscal, contracting and data issues.

Include individuals with knowledge of existing systems, processes, and policies. SNAP E&T programs work best if States integrate them into existing agency structures and they complement a State's workforce development system.

Tip: Appoint a Strong Project Manager

The planning process will run smoothly if there is a highly organized Project Manager on the Planning Group who can perform the tasks listed below. The Project Manager does not necessarily have to be the leader of the Planning Group; she or he can work in collaboration with the leader. Some key duties of the Project Manager may include:

- Documenting roles and responsibilities within the Planning Group and leadership, including developing a Project Charter, if desired
- Drafting project plan(s) with milestones and owners
- Sending project plan status updates to the Planning Group, leadership, and other stakeholders
- Scheduling meetings
- Sending out meeting notes and action items
- Setting deadlines and holding group members accountable to deadlines

PLAN: Planning & Development



Include individuals able to make and implement decisions. The group may be more effective if its members have sufficient authority within their agencies and organizations to act on their behalf.

Create a “core” Planning Team. Ideally, the Planning Group should be small and nimble enough for members to work and communicate efficiently. If the group is too large, it may be difficult to meet and make decisions in a timely manner. If this is true for your agency’s SNAP E&T program, consider creating a small core Planning Team which will carry out the primary work, and a larger Planning Group, or even multiple groups, which will have the opportunity to inform key decisions and/or receive regular updates on the team’s planning efforts.

Strategies for Building a Planning Group

As with any new project, it may be challenging get stakeholder to commit adequate time and attention to the effort. Below are some example strategies for bringing **internal State Agency departments** to the table:

- **Speak individually** or in a single meeting to the head of each department that needs to be involved in the planning process.
- **Provide department heads with background information** on SNAP E&T, and explain the purpose of the Planning Group, the need to have a department staff member involved in the planning process, and the time and work commitment required. Share a team **Project Charter** (see description below, under “Planning Resources”) or a briefing paper describing the SNAP E&T work. Request that the department heads appoint staff members to join the Planning Group.
- **Ask leadership for assistance in assembling the Planning Group.** A supportive and involved agency leadership team can speak to the heads of all departments that need to be represented in the planning process.
- **Do not be discouraged** if some agencies or department heads do not show support. If they are not essential partners to begin a SNAP E&T program, start with those who are willing.

Establish a Planning Process

States may want to determine the structure and timeframe for the planning process itself, as well as milestones that will let them know if they staying on track. States should keep detailed records of the progress they make toward their planning goals that will help rebuild momentum if faced with staffing changes, delays, or other obstacles.

Planning Resources

At the outset, the State should provide the Planning Group with some foundational resources to facilitate the planning process. Key resources include a completed State self-assessment for SNAP E&T program readiness (described above under “Conduct a Self-

Tip: Make the Planning Process Collaborative

A collaborative planning process is key to developing a high-quality SNAP E&T program. Any successful SNAP E&T program – particularly one that uses a robust third-party reimbursement model – will involve multiple partners. It is helpful if the planning process includes these partners from the beginning so that they have the opportunity to shape their roles and the processes they will be expected to carry out. Establishing strong relationships with planning partners from the outset will set the stage for ongoing collaboration and continuous improvement after SNAP E&T program implementation.

PLAN: Planning & Development



Assessment”), this *SNAP E&T Operations Handbook*, and the FNS SNAP E&T Toolkit. In addition, the Planning Group (or Project Manager) may create a formal **Project Charter** – a project management tool which sets forth the purpose and objectives of the planning project, parameters of the planning process, roles, and responsibilities. The Charter, which members of the Planning Group and agency leadership can review and sign, can help ensure that members’ expectations are aligned at the outset of the planning process, leading to greater clarity and less confusion as planning progresses. It also provides both the Planning Group and leadership with a guiding document to which they may continuously refer.

Involving State Agency Leadership in the Planning Process

State agency leadership can provide direction to the Planning Group and help ensure that its work aligns with the high-level goals of the agency. Agency leadership can assist the group in securing resources and raise awareness of the SNAP E&T program throughout the agency and among key external stakeholders.

There are several ways to gain support of leadership prior to and during the planning process. Chief among them is educating leadership on the potential of SNAP E&T and how it can help the agency reach its goals. To educate effectively, the State agency and members of the Planning Group must have a solid understanding of both SNAP E&T and the goals of their respective agencies/organizations, and how SNAP E&T aligns with these goals. As stated, Planning Group members can utilize a Project Charter, or other white paper, brief, or planning documents to present the opportunity of SNAP E&T to agency leadership.

Once leadership is involved, the Planning Group might establish a process for keeping leadership involved and updated on the progress of the planning process. This might include regular status updates and/or monthly or quarterly update meetings.

PLAN: Planning & Development



B. Developing a SNAP E&T Implementation Plan

An **Implementation Plan** supports initial SNAP E&T program development, as well as implementation and expansion. The process of drafting an Implementation Plan can help States and their partners identify goals for their program and develop a better understanding of the elements of, and supports necessary to, an effective program. The Planning Group might consider creating this plan as one of its first goals.

This section describes the four key components of an Implementation Plan:

- Vision
- Objectives
- Services
- Infrastructure and Resources



Vision

A vision statement that succinctly describes the ideal future state and impact of the SNAP E&T program can guide the Implementation Plan. Ideally, the vision statement would inspire stakeholders, bring them together around a common goal, build support for the program among State agency leadership and other key stakeholders, and attract new partners. A vision statement can unify the Planning Group, agency leadership, and other stakeholders throughout the planning process, especially if there is a need to regain momentum or a sense of teamwork.

Powerful vision statements often evoke images or pictures. The Planning Group might consider developing a vision statement by first brainstorming a set of key words, pictures, and/or slogans that describe the State’s future SNAP E&T program and its impact. Once the Planning Group has created a vision statement, it might consider developing a small set of very high-level characteristics or guiding principles to clarify or expand on the vision of the State’s future SNAP E&T program and its impact. Guiding principles can establish general program parameters based on key values held by the State, such as being results-oriented, being data-driven, helping people work toward self-sufficiency, or creating a skilled workforce.

Objectives

Once the Planning Group establishes a vision for the State’s expanded and enhanced SNAP E&T program, the Group can define the broad objectives of the SNAP E&T program. Objectives describe the purpose of the program, the target population, desired outcomes for participants, and alignment with State workforce development efforts.

States may consider developing a “pilot” program that serves a specific geographic area or population with a high level of need. Pilots give States the opportunity to build their State SNAP E&T infrastructure and to develop policies and procedures necessary to support a full-scale program, while identifying and addressing technical challenges at a more manageable scale.

PLAN: Planning & Development



The Planning Group might consider the following questions when defining the program's objectives:

What are the broader goals for SNAP E&T program participants?

The objectives of a State's SNAP E&T program and the services it will provide depend on the outcomes a State seeks to achieve for participants in its SNAP E&T program. Typical goals include skills development, attainment of employer-valued credentials, and the ability to become economically self-sufficient.

How will SNAP E&T fit into the State's current workforce development priorities?

States should consider how their expanded SNAP E&T programs will align with other State workforce development priorities, such as increasing postsecondary attainment, growing a skilled workforce and meeting labor market demand. There may be sectors and occupations where labor supply is not meeting employer demand, thus presenting an opportunity for SNAP participants. States might also consider how SNAP E&T might support the State's workforce planning and implementation pursuant to the Workforce Innovation and Opportunity Act (WIOA).

Who will the SNAP E&T program serve?

States must determine whether participation in their SNAP E&T programs will be voluntary or mandatory. State policy may not provide flexibility on this but it is an important decision to make early on as the mandatory or voluntary nature of a program shapes subsequent decisions and requirements. Further, States need to consider whether their programs will broadly target all work registrants or whether they will focus on specific areas of the State or specific populations, such as ABAWDs.

The following factors may inform decisions about who the SNAP E&T program will serve: information about participant skills and employment needs, gaps in existing employment and training services for particular populations and/or geographic areas, availability of resources and partner providers, and labor market and demographic information. State legislative requirements and overarching policy may also play a role. As mentioned previously, a small pilot project may be a good opportunity for a State to try a new or different approach to its existing SNAP E&T model. A State may determine a target number of individuals to serve, taking into consideration administrative workload capacity and available resources.

Tip: Integrating Labor Market Information into SNAP E&T Programs

Successful SNAP E&T programs are **employer-driven**: they prepare individuals for occupations that are in demand by local and regional employers and, in so doing, help participants gain the skills needed to secure good, available jobs in the local economy.

Employer-driven SNAP E&T programs integrate current **labor market information (LMI)** – data related to worker supply and demand, wages and training associated with specific occupations/industries, and unemployment levels. Every State has an LMI program in its employment security or labor agency.

SNAP E&T Planning Groups (and subsequently SNAP E&T administrators) can partner with State employment security or labor agencies, including by adding them as Planning Group members, to provide LMI to inform the development of SNAP E&T plans and ensure they complement the State's overall workforce priorities. States can then direct SNAP E&T investments – including those via third-party partnerships – to services that support employer-driven workforce development priorities within the State.

PLAN: Planning & Development



Services

A SNAP E&T Implementation Plan can also describe the program’s services, including the specific services (components) the program will offer, the intensity of each service, and potential service providers. The types of services provided may be informed by the needs of the target population, intended participant outcomes, and objectives for advancing State workforce development priorities. States should offer services that are evidence-based and aligned with workforce development best practices. A concise summary of research on evidence-based SNAP E&T programs can be found in the [*SNAP Employment and Training \(E&T\) Best Practices Study: Final Report*](#).

States have considerable flexibility to support a wide variety of workforce development services and supportive services. They might also consider how SNAP E&T can fill gaps in services in other programs/funding streams, including Federal and state student aid, WIOA, TANF, and other major workforce programs. States should also examine the need for qualifying components that help ABAWDs fulfill work requirements while working toward economic self-sufficiency.

Infrastructure and Resources

Finally, the Implementation Plan can describe the infrastructure and resources that the State will use to administer SNAP E&T, at least upon initial implementation of the expanded program. Importantly, States do not need to build their SNAP E&T programs from scratch; it is often best to—at least at the beginning—use existing infrastructure and resources.

To complete this portion of the Implementation Plan, States should identify all the infrastructure and resources required to implement their SNAP E&T programs, then map their existing resources onto this framework to identify gaps. To do this, it may help to consider the core functions (and associated responsibilities) of the State and its partners in administering an expanded SNAP E&T program. These include:

- ➡ **Strategic Oversight – Program.** Includes long-term strategic planning; ongoing review of program data and monitoring of outcomes to build a results-driven program; continuous improvement and program adjustments; and strategic program expansion.
- ➡ **Strategic Oversight – Policy.** Includes SNAP E&T State Plan development; working with FNS; staying current on/applying Federal policy; and cultivating State leadership support.
- ➡ **Third-Party Partner Outreach and Training.** Includes identifying/assessing new partners; onboarding new partners; and organizing partner training/networking.
- ➡ **Contract Development.** Includes developing a statement of work (SOW) with new partners; developing contracts with new partners that include SOWs and budgets; and creating a system for compiling multiple contracts/budgets into a SNAP E&T State Plan.
- ➡ **Contract Monitoring and Management Evaluation.** Includes ensuring partners meet contract obligations and any performance outcomes; and conducting contract monitoring visits.
- ➡ **Management Information System (MIS).** Includes developing/adapting an MIS to utilize for participant enrollment, tracking, and outcomes monitoring and reporting; and potentially updating MIS to allow partner access and improve functionality.

PLAN: Planning & Development



- ➡ **Participant Referral, Eligibility, and Invoicing.** Includes developing overall processes; assessing and referring appropriate individuals to SNAP E&T services; ensuring all individuals enrolled in SNAP E&T are eligible for services provided; and reviewing and processing invoices to ensure only costs for allowable services to eligible individuals are submitted for reimbursement.
- ➡ **Participant Outreach.** Includes working with third-party partners and others to develop an outreach plan; educating potential participants about SNAP E&T and program options; promoting participation; coordinating efforts of multiple partners; creating marketing tools and resources; and developing/sharing success stories and promising practices.
- ➡ **Data Collection, Reporting, and Evaluation.** Includes pulling and reporting data to meet FNS reporting requirements; and collecting and analyzing data for continuous improvement, return on investment analyses, and evaluating program and partner outcomes.

The infrastructure and resources necessary to support these core functions could include: external stakeholders (who may or may not be on the Planning Group); State funding streams (e.g., State student aid); data systems from other State agencies that track education and employment outcomes; an MIS; systems for participant referral; internal staffing; office space; and materials such as tools and templates.

States can use the following strategies to support functions, staffing, and infrastructure:

USE EXISTING STAFF AND RESOURCES. With a smaller SNAP E&T program, some duties might be handled by existing State agency staff who have additional capacity, particularly some key administrative roles such as contracting, finance, and IT support at the agency central office, and participant outreach at local offices. Further, States can consider using or adapting existing infrastructure, such as their MIS, to support or streamline the referral and reporting processes for SNAP E&T. They can also access tools and resources already created by other States and the *SNAP to Skills* project.

States might also make use of available partner resources. Partners such as American Job Centers can serve as referral points, and State labor or employment security agencies can provide access to employment and wage data needed to track outcomes. At the same time, third-party SNAP E&T partners can play a significant role in everything from strategic planning support and providing peer training for new partners, to recruiting, referring, and enrolling new participants.

USE SOME OF THE 100 PERCENT SNAP E&T GRANT TO FUND NEW STAFFING AND INFRASTRUCTURE. States might consider shifting some 100 percent funds away from supporting partner contracts—which could then transition to 50/50 funding—and toward the new staffing and infrastructure costs of administering a larger program, including building an MIS systems for their SNAP E&T program. In some cases, legislative approval may be required for new staffing or infrastructure needs, whether they are being funded by SNAP E&T 100 percent funds or State funds.

CENTRALIZE FUNCTIONS TO SUPPORT EXPANDED SNAP E&T PROGRAMS. A State might consider locating most SNAP E&T program staff within a local “call center”. This center could handle all of the participant enrollment and invoicing functions with third-party partners, as well as some other duties, such as providing on-site services at third-party partner facilities. States can also use umbrella or intermediary contracts that can remove some of the State agency’s responsibilities around contracting and contract monitoring of third-party partners.

PLAN: Planning & Development



Crafting a SNAP E&T State Plan/State Plan Amendment from an Implementation Plan

Every State must produce a SNAP E&T State Plan and submit it to FNS for approval prior to executing any contracts and beginning services. The specific elements required for a SNAP E&T State Plan are set forth in detail in the *FNS SNAP E&T State Plan Handbook*. If a State wishes to change its SNAP E&T program services during a federal fiscal year, it must start by submitting a State Plan Amendment to FNS for approval. States can amend their SNAP E&T plans throughout the fiscal year.

A State's completed Implementation Plan could serve as a start toward gathering the information required for a SNAP E&T State Plan. For example, the Implementation Plan will likely include any new components, new third-party partner providers, core service levels, the target population, and the number to be served by each component. For the State Plan, States might consider setting up a process to collect necessary information from each third-party partner (including information about service components, target population, number of individuals served, and detailed budgets). This can form the basis of both the State Plan as well as individual contracts with partners. In crafting its State Plan, a State should communicate regularly with FNS regional staff to be certain all required elements are covered.

Ultimately, all plans need to describe the scope of the future SNAP E&T program at a level of detail required by FNS in annual or amended SNAP E&T State Plans.

IMPLEMENT: Program Operations and Management



C. Building a System for Data Tracking, Reporting, and Analysis

Critical to a successful SNAP E&T program is the ability to track, report, and analyze program outcomes. High-quality data can help States and their partners meet Federal reporting requirements, build support for their programs, and make program improvements over time. States likely have access to a range of existing resources and best practices to help them effectively track and report outcome data.

This section describes:

- Why States should collect and analyze data
- Best practices for developing data metrics
- Guidance on developing an outcome evaluation plan
- Resources for data tracking

Why Collect and Analyze Data?

Tracking participant outcomes is a Federal requirement of SNAP E&T, described in the interim final rule, [*Supplemental Nutrition Assistance Program \(SNAP\) Employment and Training \(E&T\) Program Monitoring, Oversight and Reporting Measures*](#).

In addition to meeting Federal reporting requirements, the ability for States to understand and report on SNAP E&T participant outcomes is critical for building stakeholder support for their programs, as well for continuous program improvement. A State can use data to share the successes of its SNAP E&T program, understand the impact of its program on participants, and make data-driven decisions to improve its SNAP E&T program over time. States should encourage their third-party partners to document and report individual success stories as these can be a key tool for gaining support for the program.

Best Practices for Developing Data Metrics

Federal rules establish national SNAP E&T reporting measures for which States must track and report annual data. States may also decide to collect additional data.

How do States determine what additional data to collect?

- States should first think about **how** they will use data to improve program services, then decide **what** to collect. They might ask how data collection will support their broader SNAP E&T program objectives.
- States should seek to align the SNAP E&T metrics with **other metrics already in use** by education and workforce partners in the State. This may also facilitate their ability to use existing State data clearinghouses and longitudinal data systems.
- States should consider **disaggregating results** by participant characteristics and SNAP E&T component(s) for all metrics. This will help States determine which services work best for whom.

Some commonly used workforce program metrics include: overall program completion, short-term employment and earnings; intermediate- and long-term employment and earnings; median earnings gains; credential attainment; and interim measures of education and employment progress (e.g., skill gains, high school equivalency completion, and college credit attainment).

IMPLEMENT: Program Operations and Management



Developing an Outcome Evaluation Plan

An **Outcome Evaluation Plan** describes a State's overall SNAP E&T program objectives and how these objectives will be supported by data tracking, reporting and analysis. It might also include the specific program outcomes that will be tracked, the infrastructure and resources that will be utilized and/or developed to track and evaluate data, and any relevant policies and procedures. This plan could be included as part of the State's Implementation Plan or Strategic Plan (see Sections B and H, respectively), or separately. States may develop the plan in collaboration with partners, such as State agencies and third-party providers, and update it throughout the life of the program.

Resources for Tracking Data

The following resources may be available to States to help them develop SNAP E&T data reporting systems and procedures that meet their Outcome Evaluation Plans:

SNAP E&T 100 PERCENT FUNDS. States can use these funds to develop or improve their data reporting systems.

DATA FROM OTHER STATE AGENCIES. States may be able to cross-match SNAP E&T participants with the State's Unemployment Insurance (UI) data, state data clearinghouses, and/or longitudinal data systems maintained by their State workforce boards and postsecondary education systems. Descriptions of workforce data available in each State can be found through the National Skills Coalition's [Workforce Data Quality Campaign](#) and the Federal Department of Labor's [Workforce Data Quality Initiative](#). To support data sharing, States might consider developing partnerships early on with their State workforce, labor/unemployment insurance, and postsecondary education agencies, through memoranda of understanding or other agreements. States can expand existing partnerships (e.g., a partnership to support TANF outcomes reporting) to include SNAP E&T.

MANAGEMENT INFORMATION SYSTEM (MIS). A State may already be operating an MIS that will allow its staff and/or third-party partners to track many participant outcomes using unique codes and participant identifiers. Existing MIS systems may need to be adapted specifically for SNAP E&T.

DATA FROM THIRD-PARTY PARTNERS. For States operating SNAP E&T programs using third-party partnerships, outcome data may be available directly from partners. Community colleges likely have data on a range of student achievement outcomes and may have an existing UI wage cross-match agreement in place that could be expanded to support SNAP E&T. In order to report outcomes to their funders, community-based organizations may have data on enrollment and completion of SNAP E&T activities, employment, and wages. States can require that third-party partners report these data through contracts with these providers.

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D. Securing Third-Party Partners

Third-party partnerships help States maximize the impact of their SNAP E&T programs by using 50/50 funds to build on investments and effective employment and training services provided by community colleges, community-based organizations (CBOs), and other organizations.

This section describes five steps that may help States secure high-quality third-party partners:

- Identify potential partners
- Educate potential partners about SNAP E&T
- Assess potential partners for fit and capacity
- Contract with providers
- On-board providers

Below is a graphic depiction of the five steps involved in securing third-party partners. The first three steps, though shown here in sequence, may be completed in a different order or simultaneously. More detail on this process can be found in the *SNAP to Skills* policy brief, [Securing Third-Party Partners for SNAP E&T Programs](#).



IDENTIFY Potential Third-Party Partners through Resource Mapping, Surveys, or Outreach

This step provides the State with a broad overview of providers with which to partner and who may have available reimbursable resources. Using a resource map or other means, the State collects high-level information about providers that indicates their potential to be a third-party partner. This might include information on 1) who they serve; 2) the types of services they provide; 3) their organizational mission; 4) their potential reimbursable resources; and 5) their capacity to serve more SNAP participants. This step might be most valuable for States that wish to develop a big picture of the potential for SNAP E&T expansion and have limited knowledge of employment and training funding streams, systems, and providers.

EDUCATE Potential Providers about SNAP E&T and the Requirements of Partnership

In this step the State presents to potential third-party partners its SNAP E&T program vision and objectives, and the specific requirements of being a contracted partner. This allows providers to make informed decisions about whether they wish to provide SNAP E&T services, self-assessing their own interest, alignment, and capacity to meet program obligations. This step might include in-person or virtual informational sessions and/or one-on-one meetings. States can also combine this step with the IDENTIFY or ASSESS steps.

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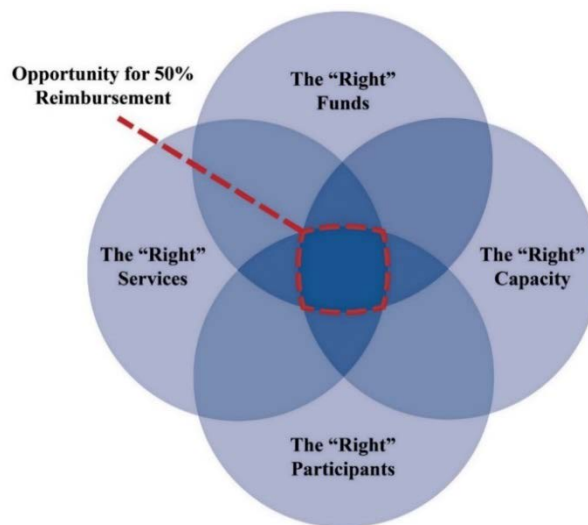


ASSESS Potential Third-Party Partners to Determine Program Fit and Capacity to Meet Program Requirements Through a “Partner Assessment”

A **Partner Assessment** allows the State to narrow the universe of potential providers. States can issue a Partner Assessment as a simple electronic survey, Request for Information, Request for Qualifications, or Request for Proposal. While the information gathered on providers described in the IDENTIFY step is limited in scope and intended mainly to be aggregated to form a big picture of the overall potential for SNAP E&T expansion, a Partner Assessment seeks the detailed information needed to determine whether given providers could be effective SNAP E&T partners. Assessments thus gather important information on prospective partners’ programs, including outcomes, staffing capacity, non-Federal revenue sources available for reimbursement, fiscal and contract compliance capacity, and more, through a series of targeted questions. States should consider developing a set of criteria by which to rate assessment responses.

Who are States Looking for in their Assessments?

States should consider looking for third-party partners that provide the **right services** (e.g., are skill-based, lead to industry-recognized certificates or credentials, align with SNAP E&T components, use high quality labor market information, employ best practices such as career pathways, fill critical gaps) with positive outcomes; that have the **right funds** (stable, non-Federal sources of funding); the **right capacity** (financial stability, good record on other Federal and State contracts, ability to meet contract requirements); and that serve the **right participants** (those who are or could be receiving SNAP, targeted populations and geographic areas).



Source: Hennepin County, Minnesota, and InsightWorks Consulting.

CONTRACT with Providers to Formally Become SNAP E&T Third-Party Partners

States will have their own contracting processes, but they should ensure they collect all the information needed for their annual or amended SNAP E&T State Plan. Contracts, which can be based on Statements of Work developed with partners, might include the following key elements:

- Detailed description of services to be provided,
- Target population and anticipated number to be served for each E&T activity provided,
- Outcome data tracking the number of participants expected to complete each activity and the number that become employed, and/or
- Budget that includes non-Federal funding as a source for 50/50 reimbursement

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In the contracting process, States may articulate monitoring guidelines through fiscal review, case file review, program checklists, and/or a review of best practices and opportunities for improvement. States should consider providing partners with guidelines regarding their costing methods/cost allocations, keeping an audit trail, and maintaining adequate documentation in participant files. States should also provide partners any guidelines relating to requirements, such as non-disclosure/client confidentiality, mandatory reporting (if applicable), and data security.

States can ensure that partners understand relevant guidelines by sharing formal policies and procedures. States might consider developing a **SNAP E&T Partner Handbook** for third-party partners that contains all the policies and procedures relevant to meeting their contractual obligations. When contracting with and on-boarding new third-party partners, States should consider ensuring that partners fully understand applicable policies and procedures.

ON-BOARD Contracted Third-Party Partners to Get Them up and Running as Smoothly as Possible

States may want to ensure new partners have the information and training they need to meet their contractual responsibilities. For example, partners may need training on invoicing procedures and accessing, entering, and sharing participant data with the State's MIS. States can use a Partner Handbook to facilitate the on-boarding process. They can also establish peer-to-peer support between new and more mature partners to reduce the burden of bringing on new providers and foster collaboration among partners and across the system.

States can consider using 100 percent funds to provide start-up resources for new partners for planning and initial program implementation. They might also consider creating a self-monitoring checklist providers can use to monitor their own procedures to be sure they are following all policies and procedures set forth in contracts and in a Partner Handbook.

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E. Building a System of Participant Referral

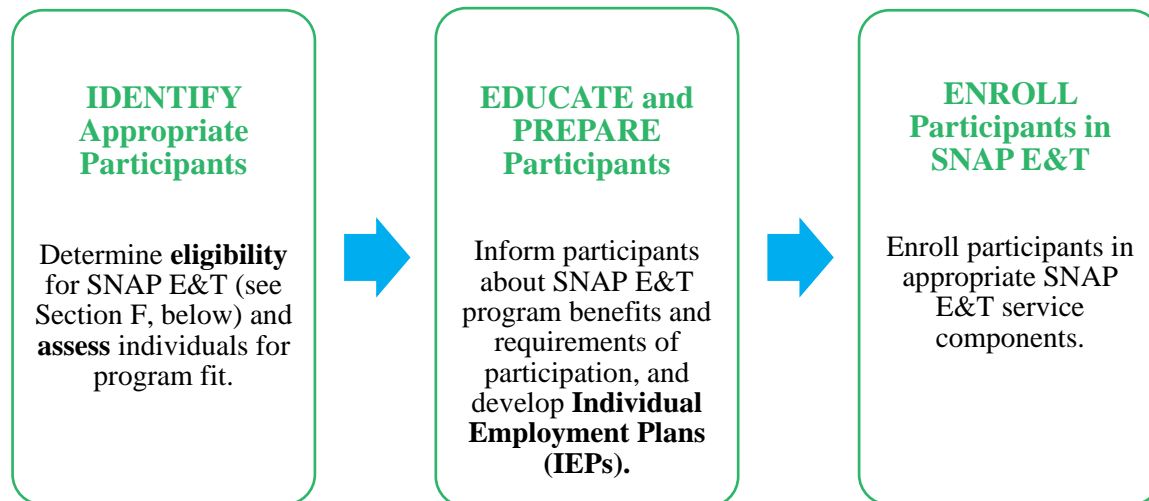
From where will the new SNAP E&T participants come in an expanded program? How will SNAP participants – or individuals who are SNAP-eligible – learn about the services offered through a State’s SNAP E&T program? What are the processes through which they will be formally referred into the program? Developing a comprehensive referral system will ensure that a State is serving its intended target population.

This section describes:

- Steps in the participant referral system
- Approaches to participant referral
- Growing participant referrals

Steps in Participant Referral System

A system of participant referral includes three general steps that lead to the enrollment of a participant in SNAP E&T. The graphic below depicts these steps.



Approaches to Participant Referral

There are two approaches to participant referral systems that a State may use in a third-party reimbursement SNAP E&T model: **State agency referral** and **reverse referral**. Note that whatever systems a State elects to use, SNAP E&T eligibility determination is typically a back-and-forth process between the State agency and third-party partners. States with third-party reimbursement models often utilize both a State agency referral and reverse referral system. However, there are many instances in which a State agency referral system would likely work better, for example, in rural States or areas without third-party partners.

State Agency Referral System

Through a State agency referral system, the State SNAP agency takes primary responsibility for referring eligible participants to services (components). This approach requires the State agency to have sufficient staffing to interview, assess, and evaluate prospective participants; assign SNAP E&T service components; and conduct follow-up or other case management duties for SNAP E&T participants. State agency staff participating in the referral process must be familiar with third-party partners and their

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eligible SNAP E&T services to ensure that they find the best fit for participants' needs. In many State SNAP agencies, local office staff are responsible for determining SNAP eligibility, but they may not be funded to do all the steps in the SNAP E&T assessment and referral process. State agencies could consider providing additional SNAP E&T funds to cover the costs of local staff doing this additional work if they choose a State agency referral system.

Reverse Referral System

A reverse referral system is a more decentralized approach in which third-party partners – such as community colleges or community-based organizations – have primary responsibility for completing the referral process. Rather than first going to the State SNAP agency, the entry point for a prospective participant is a third-party partner, which could conduct as many as all three steps in the referral process.

Through reverse referral, partners work with the State to determine SNAP E&T eligibility (see Section F, below). They will assess individuals approved by the State as eligible for SNAP E&T to ensure the appropriateness of referral to SNAP E&T programs and services. States can include in their policies and procedures guidelines for assessment and development of an IEP for each participant.

Use of a reverse referral approach has several advantages. It limits the burden on the State, while maximizing the number of referrals to SNAP E&T. Most third-party partners have experience conducting similar processes for their own programs, so establishing this approach requires little effort. Additionally, the individuals who come through their doors tend to be good matches for the services provided. That said, delegating control of the referral process means that the State agency and third-party partners must take extra caution ensuring eligibility for SNAP E&T-funded services during enrollment (see Section F). In addition, the reverse referral approach requires that States establish a system of cross-referral to ensure that each third-party partner does not engage in 100 percent self-referral, can refer participants to other third-party partners seamlessly, and can draw prospective participants from multiple sources.

Tip: Establish Multiple, Diverse Access Points

Regardless of the referral systems used, States should work with existing workforce and social services systems and agencies to build multiple points of access to maximize the number of referrals of appropriate prospective SNAP E&T participants. States might consider educating their own frontline staff as well as TANF and WIOA partners (including American Job Centers), food banks, housing agencies, local government agencies, and other community agencies serving low-income populations about SNAP E&T by providing materials that describe SNAP E&T program benefits, services offered by local third-party partners, and contact information for these partners. In time, a key referral source for high-quality programs that generate positive outcomes will be word-of-mouth from former or current participants.

Growing Participant Referrals

States can grow participant referrals by focusing on outreach planning, staffing, new strategies, and funding.

Outreach

States might consider developing a SNAP E&T Outreach Plan, possibly in conjunction with SNAP E&T third-party partners, to attract prospective participants. The plan might state the overall objectives, key messaging, marketing strategies, how these strategies will be executed, and by whom. In developing an

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outreach plan, States may want to be cognizant of the restrictions on the use of Federal funds on activities designed to persuade individuals to apply for SNAP.

Staffing

State SNAP agency staff might include SNAP outreach managers/administrators and SNAP outreach contractors. The outreach team could also include individuals from other State agencies and external partners with knowledge of the target audience and an existing set of effective marketing strategies, tools, and resources.

Strategies

States might consider the following strategies for growing participant referrals:

- **Give third-party partners a key role** in defining and executing marketing strategies. Partners are typically skilled at this work and have close contact with the community and potential participants. States could assist their partners by helping them to frame consistent messaging and materials that individual partners can tailor as needed.
- **Use targeted marketing**, rather than generalized marketing, to reach potential SNAP E&T participants. Mass mailings often are not as effective.
- **Create a SNAP E&T website** that includes information about the program, including program requirements, available services, and a list of/links to third-party partners. States could encourage third-party partners as well as other referral points to include links on their websites to the SNAP E&T website.
- **Create a SNAP E&T email account** specifically for SNAP E&T questions and answers and referrals.

Funding

SNAP E&T informational activities may be funded by 100 percent or 50/50 funds, but in either case they must be included in the SNAP E&T State Plan to be supported with Federal funds. States may also want to be aware of Federal requirements for all SNAP and SNAP E&T informational materials per 7 CFR 277.4(b)(5).

Documenting Policies and Procedures

States might want to establish policies and procedures governing how participants will be referred into the SNAP E&T program and to third-party partners. These policies and procedures could describe how SNAP E&T programs will assess prospective participants to ensure they are appropriate for SNAP E&T and for the specific partner/services to which they are referred. They could also describe how and by whom participants will be assessed. They might also describe the minimum requirements for developing IEPs for each participant, and possibly include a template for partners to use. These policies and procedures can be included in a State's **SNAP E&T Partner Handbook** and the **State's SNAP E&T Plan**.



F. Building a System for Participant Eligibility Confirmation and Invoicing

One of the most important attributes of the SNAP E&T program is that all participants must be SNAP applicants (if the State opts to serve applicants) or participants. Therefore, SNAP E&T programs—and particularly those that use third-party providers—should consider how to develop effective and accurate participant verification and invoice review processes.

This section describes:

- Systems for determining participant eligibility
- Systems for invoicing

Systems for Determining Participant Eligibility

The State and third-party partners should consider working together to verify that all participants are eligible for services received and that funds are both spent on allowable costs and eligible for reimbursement. The State is responsible for ensuring that participants enrolled in SNAP E&T are eligible for the services provided. States cannot use Federal SNAP E&T funds to pay for services for ineligible participants.

The process for determining SNAP E&T eligibility will always involve a back-and-forth exchange between the State agency and third-party partners. It is a best practice to verify SNAP eligibility at multiple points in the enrollment process. The State and its partners may want to verify eligibility for SNAP E&T upon participant enrollment as well as at the point when a provider is preparing to invoice for services. This process can take place through an online shared case management system or a manual system. Either way, the State should document its approach in its program policies and procedures, as well as in its Partner Handbook if one is created.

Shared Case Management

A shared case management system gives third-party partners the ability to access and directly interface with a State's (or county's) SNAP MIS. Typically, this arrangement gives partners limited information about potential participants, rather than full access to case files, and it does not permit partners to make changes to case files. This allows partners to confirm SNAP E&T eligibility at the time of referral and enrollment, during the period of services provision, and during the invoicing process. A shared system may also allow partners to directly report participant activity within the system, for example, by updating monthly case notes and SNAP E&T activity components/hours. SNAP eligibility may change while a participant is enrolled in SNAP E&T and a shared case management system allows providers to ensure that they are invoicing only for allowable charges. Notably, a shared case management system is not only applicable to States using reverse referrals.

A shared case management system significantly reduces the administrative workload for States. This is particularly true as a SNAP E&T program grows. As the number of partners and participants increases, manual processes can become particularly burdensome. It also helps partners by reducing or eliminating delays in determining SNAP E&T eligibility that are inherent in a manual system. Overall, a shared system engenders effective coordination of services, strong communication, and high quality data reporting.

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States might not need to start from scratch to build a shared case management system within their MIS. They can explore whether they can modify or expand the platforms and general format of existing data systems to fulfill SNAP E&T functions. For example, most States already have instituted participant tracking and reporting systems for their TANF welfare-to-work programs that they may be able to repurpose or streamline for SNAP E&T. States can consult their information technology staff to determine the technical requirements for a shared system and whether they can modify any existing systems.

Tips for Developing Effective Eligibility Confirmation Processes

- Consider developing processes and procedures for participant eligibility confirmation collaboratively with third-party partners.
- Ensure State agency staff and third-party partners clearly understand processes and procedures, which may require extensive training.
- In a manual eligibility confirmation system, consider setting a target for a one-week or shorter turnaround for the State to verify eligibility of participants.
- Use an on-site contract monitoring process to review partners' compliance and accuracy within systems of participant eligibility and invoicing.
- Work to streamline processes as much as possible while still maintaining accuracy. The State can facilitate this by implementing ideas and recommendations from partners.

Manual Eligibility Verification

States may not have the capacity to offer a shared case management in the early stages of their SNAP E&T programs. If that is the case, they can use manual processes while the shared system is developed.

In a State agency referral system, the steps of manual eligibility verification are fairly straightforward. As part of the referral process, State agency staff will make the determination of whether potential participants are eligible for SNAP E&T and enroll them accordingly. States then refer those who are eligible to appropriate provider partners. States could put in place a manual process (e.g., utilizing fax or secure email) through which the partner confirms with the State agency that activities have commenced for referred participants, which activities (components) these are, and the planned start and end dates for each activity.

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In a reverse referral system, the manual eligibility verification process is more complicated. The steps are likely to include:

Partners compile eligibility lists of potential participants. For each participant, the list includes:

- Information necessary to identify the participant
- Planned SNAP E&T activity component (the State may develop a code for each component, such as job search or vocational education)
- Planned start and end date for the activity or component



Partners submit eligibility lists to designated staff at either local or central SNAP agency offices. This may be done via fax or secure email.



SNAP agency staff review submitted lists and determine SNAP E&T eligibility. They then let partners know if each participant is approved (or if not, the reason for ineligibility).

System for Invoicing

The billing/invoicing process for SNAP E&T can sometimes make or break a third-party partner relationship with the State. It is important to have an efficient, fair, and clearly understood process that reimburses third-party partners for allowable services in a timely fashion. States have flexibility regarding how frequently they would like third-party partners to invoice them for services (e.g., monthly or on a quarterly/semester basis), what forms and materials must be submitted with their invoices, and how direct participant reimbursements should be requested by third-party partners (e.g., using State-created forms and templates). To ensure that third-party partners understand the invoicing process, States should establish clear policies and procedures governing how partners will invoice the State for reimbursement for their expenditures on eligible SNAP E&T services. These can be included in a Partner Handbook.

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The general steps of a billing/invoicing process are likely to include:

Partners compile participant billing rosters and submit to State agency for each billing period. This list includes participant identifier/information and should only include individuals the State has screened as being SNAP participants prior to services being provided (participant eligibility).



SNAP agency reviews billing rosters and sends approved rosters back to partners. The agency verifies SNAP eligibility at the time services were provided for each individual on billing roster. If an individual was not eligible during the month services were provided, the agency cannot approve costs for that individual, and provides comments on returned rosters reflecting the reason for ineligibility.



Partners submit billing packets based on final roster. With the approved final roster back from the State agency, the partner submits a billing packet that might include:

- State billing form that indicates the amount being billed by category and funding category (administrative, participant reimbursement, 100 percent funds, if any, and the 50/50 funds for each category)
- Signed certification form that confirms partner has needed eligible non-federal funds to cover what is being billed
- Final (Approved) participant billing roster



SNAP agency program management team approves billing packets and sends to fiscal staff for payment. The agency fiscal staff remits reimbursement payment to third-party partners.

The contract Statement of Work and/or Partner Handbook can also describe the supporting documentation that the partner must maintain in participant records/folders and within their fiscal tracking systems. State agency program staff might consider periodically reviewing billing documentation during contract monitoring visits. States and their third-party partners can address any gaps through the corrective action process laid out in the contract. The SNAP agency might consider developing a dispute resolution process for those cases disallowed for billing.

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G. Operationalizing Third-Party Partnerships

An earlier section (Section D) described the five steps that States can take to *secure* third-party partnerships. This section describes the key factors that States should consider when *operating* third-party partnerships. It also highlights elements unique to community colleges and community-based organizations (CBOs), since these are the most common SNAP E&T partners.

This section describes the following key factors to consider when operating third-party partnerships:

- Service delivery considerations
- Administration of third-party partners
- Funding sources and uses
- Staffing at third-party partners

Service Delivery Considerations

One of the best ways to expand a State’s SNAP E&T program is to tap into existing services in the community offered by a network of high-quality service providers. States have flexibility to determine policies and procedures governing SNAP E&T service delivery and may want to work with service providers to determine what works best for both the provider and the State.

For example, there is no Federal requirement to use a cohort approach to SNAP E&T services (i.e., funding classes of only SNAP participants). Providers may choose to use a cohort model to serve SNAP E&T participants, or they may choose to cost allocate across programs. The approach will likely depend on the size of the SNAP E&T population to be served in the State and by a given service provider. There may not be enough people interested in the same training to fill a cohort and cost allocating across programs can reduce the “waiting” time for a given SNAP E&T participant to enroll in training.

SNAP E&T participants may also enroll with multiple service providers (known as “co-enrollment”) to ensure that participants receive a comprehensive set of services. For example, community colleges typically provide vocational education and some support services, while CBOs, which often have knowledge of a particular population or community, might provide wrap-around supports, such as navigation and case management, transportation vouchers, childcare, and clothing. When SNAP E&T programs co-enroll participants with multiple service providers, States should ensure that providers can track participant activity and support service delivery in one place (such as a shared case management system) so that providers do not duplicate services.

Benefits of State-Community College Partnerships

For State SNAP agencies, there are several benefits to working with community colleges. They are tapped into local labor market demand, they have connections to career pathways, their programs bridge pre-college to college-level work, and they may offer apprenticeships and other integrated learning models.

For community colleges, partnering with State SNAP agencies to support a SNAP E&T program is beneficial because it creates capacity for SNAP students to access programs (including academic and career advising), while receiving supportive services that can help students persist and complete their training.

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Third-Party Partners' Administrative Structures

It is important for States to understand how third-party partners are administered, as this will affect how States will work with them to operate SNAP E&T programs.

Community colleges and CBOs may be governed centrally (for community colleges, by a statewide college agency and for CBOs, by a national-, regional-, or State-level office), or they may be decentralized and operate independently. For community colleges in States with central leadership, one entity (e.g., State Board, Board of Regents) oversees the administration of a community college system throughout a state or region. Similarly, for CBOs, the organization's central office (at the national, regional, or State level) may operate/coordinate/oversee the work of local offices. When third-party partners operate under this leadership structure, it is important to meet with the governing boards early about SNAP E&T, determine their roles, and include them in any meetings with colleges and CBOs in the target area. A statewide college system or a CBO's central office might enter into an umbrella contract with the State's SNAP agency to administer the partnership.

When third-party partner leadership is decentralized, the State may contract with individual colleges or CBOs as SNAP E&T partners, or individual colleges or CBOs may be organized into a consortium. In this model, a group of community colleges or CBOs within a specific region or the entire State come together under a program or funding stream, such as SNAP E&T. A lead organization is appointed, through an umbrella contract with the State, to provide administrative oversight of the other consortium members. In some States, consortiums currently manage many Federal workforce grants (e.g., Trade Adjustment Assistance Community College and Career Training grants, Health Profession Opportunity Grants), so States can expand these existing structures to include SNAP E&T. In other cases, the State SNAP agency may collaborate with a group of community colleges or CBOs to create a new consortium exclusively for a SNAP E&T program.

Regardless of how third-party partners are administered, when developing partnerships with these entities, States might consider including offices or staff representing business interests, financial aid/financial supports, student services/participant supports, and in the case of community colleges, their workforce education departments.

Funding Sources and Uses

Before identifying and working with third-party partners, States might learn about potential non-Federal funding sources at these organizations and how they can be used by SNAP E&T programs. Types of funding can include targeted State-based funding available to colleges for students (e.g., grants for low-income students and worker-retraining funds), other State training funds for specific populations (e.g., returning citizens, individuals experiencing homelessness, etc.), SNAP E&T reimbursement funds, county and city funds, foundation or corporate funds, tuition set-asides, Community Development Block Grant funds, in-kind contributions (limited to government entities), and social enterprise funds. Whatever the source, it is important to identify stable and consistent funding.

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Third-party partners can use 50/50 or 100 percent funding to cover the costs of staff to administer the program and directly support SNAP E&T students, and for tuition and fees. Only 50/50 funds can cover books, supplies, and related supportive services. SNAP E&T funds cannot be used to defray the full cost of instruction of college attendance. They can only cover the same amount for costs (tuition, fees, books, etc.) that other, non-SNAP E&T students pay. Thus, SNAP E&T funds cannot cover any instructional costs that the State, or other sources, subsidize for non-SNAP E&T students. For example, many States provide adult basic education to students free of charge, so SNAP E&T funds cannot support the costs of instruction for these students. However, SNAP E&T programs can cover enhanced services they provide exclusively to SNAP E&T students, such as intensive advising and related supports. SNAP E&T programs can use SNAP E&T funding to fully or partially fund staff who support SNAP E&T activities.

Financial Aid and 50/50 Funds

SNAP E&T 50/50 funds can also be used as “bridge” funding to support students in training in the short-term until they become eligible for other sources of aid (for example, Pell grants). Once students are determined eligible for a Pell grant, then those grants must be the “first payer” of college expenses. However, SNAP E&T programs can continue to support students, for example, by funding additional supportive services not covered under Pell.

Colleges may have Federally-negotiated indirect rates. Depending on what has been included in these rates, indirect expenditures can be reimbursed by SNAP E&T if they are covered by non-Federal funding sources and are related to an allowed direct expenditure, such as salaries and benefits for staff who are supporting SNAP E&T students.

States and their third-party partners should be aware that third-party partners may have difficulty identifying and tracking multiple sources of funding for participants. Partners must ensure that Federal sources of funding are not “hidden” in other grants being used toward reimbursement. Third-party partners, particularly CBOs, may have difficulty paying for SNAP E&T services while they wait for reimbursement; community colleges could run out of funding before the academic year has ended.

Staffing at Third-Party Partners

Third-party partners may use SNAP E&T funding to support at least two categories of staff: those who directly support SNAP E&T participants and those who administer the program. Direct service staff include instructors, case managers, career navigators, coaches, and trainers. Administrative staff will work with the State on eligibility and invoicing, contract development and monitoring, etc.

Providers may find that the staffing required to administer their portion of a SNAP E&T program is significant. These organizations are likely to find that eligibility and invoicing processes (see Section F for more information on these topics) require intensive staff resources. Additionally, working with cost allocation systems and Federal funds requires fiscal expertise that may be missing from some organizations.



GROW: Program Growth and Sustainability

H. Planning for Growth

States should be thoughtful and intentional about how to continue SNAP E&T expansion and enhancement efforts. A larger program requires more administrative capacity, involves a greater number of partners, and serves more participants. Before moving forward, States might want to assess their readiness for program expansion and then consider developing SNAP E&T Strategic Plans that describe how they will sustain, grow, and continuously improve their SNAP E&T programs over a period of several years.

This section covers:

- Key indicators of readiness for program expansion
- Developing a SNAP E&T Strategic Plan

Key Indicators of Readiness for Program Expansion

States might not want to significantly grow their SNAP E&T programs until key indicators suggest they are ready to do so. Ultimately, what is most important is that a State has fully implemented its initially expanded and enhanced SNAP E&T program per its Implementation Plan and that this plan is on firm footing.

Indicators of a strong SNAP E&T program that is ready for further expansion include:

- **A solid – though potentially still limited – administrative foundation** within the SNAP agency (staffing, infrastructure, and foundational policies and procedures, including a clear participant flow process) and capacity to build on this foundation to administer a larger program;
- **Third-party partners that are operating successfully**, both in terms of providing SNAP E&T services and meeting their contractual obligations;
- **Existing opportunities for expansion** through the identification of new potential third-party partners and non-Federal funding streams;
- **Continued support of the SNAP E&T program** by State agency leadership; and
- **Data collection system** in place with consistent and accurate reporting.

Developing a Long-Term SNAP E&T Strategic Plan

A SNAP E&T Strategic Plan contains many of the same elements as an Implementation Plan (see Section B). However, rather than supporting initial program development and early expansion (1 to 2 years), a Strategic Plan describes how a State will sustain, grow, and continuously improve its SNAP E&T program in the long-term (typically 3 to 5 years and beyond).

Overall, a Strategic Plan should be useful and adaptable. It should provide a guidepost for key decisions made about the program as it grows. It should clearly articulate the State's priorities for the program to help ensure that stakeholders direct energy and resources to meet those priorities and that all stakeholders are working toward common goals and outcomes. It should reflect both internal realities, such as a State agency's capabilities and limitations, as well as external realities, such as the availability of partners, funding, and the State's political and economic landscape.

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As with a SNAP E&T Implementation Plan, a SNAP E&T Strategic Plan will likely articulate a vision for the program, describe key program objectives and services, and identify the infrastructure and resources required to implement the program.

VISION. The vision statement for SNAP E&T included in a State’s Strategic Plan may be very similar to its Implementation Plan vision statement, and developed in much the same way (see Section B). One difference is that the Strategic Plan vision will focus on the long-term and how to motivate stakeholders to meet new, longer-term objectives. In creating this vision, States might consider what success looks like for their SNAP E&T programs after a few years of continued growth and enhancement. What will the scope of the program be at that time? What will its overall impact be?

OBJECTIVES. A Strategic Plan sets forth specific goals and strategies for program growth. For example, it might describe the pace at which a State wants its program to grow over the period covered by the Plan, in terms of the number of people served and/or new third-party partners added each year. It may further describe the desired pattern of growth in terms of the types of partners to be added and/or new populations and geographies to be served. A Strategic Plan may also describe long-term goals related to participant outcomes, such as the attainment of jobs, wages, and credentials. It may set outcome targets for each year covered by the Plan.

SERVICES. A Strategic Plan can also describe SNAP E&T program services to be provided over the period of the Plan, including the addition or growth of specific service components over time. As a basis for developing this element of a Strategic Plan, States might consider evaluating their current range of SNAP E&T services to determine their effectiveness in generating targeted outcomes and to identify any gaps between the services provided and the needs of targeted populations. States can use this and other key information, such as current labor market information, to identify how they will improve and diversify available services over the period covered by the Strategic Plan. States might pay particular attention to the extent to which they will expand allowable supportive services over time to meet the needs of SNAP participants and ensure that greater numbers are able to participate and succeed in SNAP E&T activities.

RESOURCES AND

INFRASTRUCTURE.

A Strategic Plan can describe the resources needed to support proposed program growth and how this need will be met. For example, the plan might identify any new staffing and other infrastructure required to administer the SNAP E&T program as it grows and the time frame in which these elements will be added. The plan could also describe any improvements in infrastructure, as well as processes and procedures that might be put in

Tip: Collaborate with other stakeholders

Ideally, the strategic planning process should be collaborative, involving a cross-section of key individuals from the State agency and partner agencies, as well as from current third-party partners. Partners can provide important insight to inform the plan, including feedback on effective services and supports, marketing to prospective participants, securing new third-party partners, improving policies and procedures around participant referral, eligibility and invoicing, and more. A State can form a Strategic Planning Team – which will likely be different from the initial Planning Group.



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place, to create efficiencies to support program growth and articulate a plan for supporting these changes. The plan may also describe how outcome data will be collected and reported. Finally, a Strategic Plan may include strategies that the State and its partners will pursue to identify new local funding streams and third-party partners for the program over time to ensure sustainability and growth.

In addition to the key components described above, a Strategic Plan may also include goals and strategies for increasing the visibility of the SNAP E&T program over time. It may reference or incorporate key elements of an Outreach Plan (see Section E) related to increasing interest and enrollment in the SNAP E&T program among prospective participants. It may also describe how States and their partners can use outcome data, participant success stories, and marketing and outreach strategies to cultivate champions within the State who are necessary to help sustain and grow the program.

A Strategic Plan may also describe how the SNAP E&T program will be continuously evaluated and improved (annually or more frequently, as needed) and the stakeholders that will be involved, including any committee/work groups that might be created to work with the State in this regard. States might consider conducting at least a limited, internal evaluation of their SNAP E&T programs annually, for example, by analyzing aggregated and partner-specific participant data (e.g., demographics, outcomes), reviewing partner performance, and securing input from third-party partners and other key stakeholders on areas for improvement related to both program services and administration. Every few years, States might consider conducting formal evaluations that include more thorough participant data analysis and qualitative data gathering (e.g., focus groups, surveys, or interviews to secure input from multiple stakeholders, including participants). External evaluators could be retained to conduct these evaluations to provide the most objective feedback possible.



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I. Factors for Growth

Section H described how States can determine whether they are ready to expand their SNAP E&T programs and how to plan for long-term expansion. This section describes how to implement those plans, with a focus on four key factors for growth:

- Building infrastructure
- Building a system for adding new third-party partners
- Building robust policies and procedures
- Building smart funding strategies

By focusing on these factors, States will be well-positioned to ensure that program capacity keeps pace with program growth.

Building Infrastructure Needed for Growth

States will likely need to strengthen their existing infrastructure (e.g., staff capacity, resources, data systems) to effectively administer their SNAP E&T programs as they grow. States may consider carefully assessing what additional resources will be required over time to grow their programs and how to meet these requirements. States might first explore how best to utilize, adapt, and create efficiencies within their current infrastructure to support program growth.

STAFFING. States can consider working closely with agency leadership and other relevant agency departments to find ways to better align current agency staffing to support the program, including in the key areas of information technology, fiscal management, and contract management. States might consider new or expanded roles for existing staff, both at State agency headquarters and within local offices. States operating voluntary SNAP E&T programs may further reduce staffing needs, since these programs require fewer resources to address compliance issues.

MANAGEMENT INFORMATION SYSTEM (MIS). A growing SNAP E&T program also may warrant a more robust MIS. If a State has not previously developed a **shared case management system** (see Section F), it may consider doing so to support continued growth. By allowing third-party partners to directly access and enter information into the system, such a system can significantly decrease State agency workload while simultaneously helping partners operate more efficiently. States might consider whether they can repurpose existing data systems for long-term expansion or whether they should develop a new system.

Building a System for Regularly Adding New Third-Party Partners

States might consider putting in place systems that will allow them to effectively and efficiently add new third-party partners at the desired pace. If needed, States might want to review and refine their formal and informal processes for securing potential new partners (see Section D) to determine how they can improve these processes.

For example, some States have moved from a more formal and time-consuming Request for Proposal process for securing new third-party partners to a less formal Request for Information process. States can create efficiencies by developing a SNAP E&T webpage for potential third-party partners that includes information on the State's SNAP E&T program, requirements for third-party partners, and materials for organizations to submit to the State to express their interest in becoming an E&T provider. States might consider creating templates for new or prospective partners to complete that they can upload directly into individual contracts with each partner and into the SNAP E&T State Plan.



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Finally, States might consider reviewing, refining and enhancing processes for on-boarding of new providers as they expand their SNAP E&T programs. States are encouraged to seek input from current third-party partners to inform the improvement of these processes, and to request their direct peer-to-peer support in assisting newly-added partners in the on-boarding processes.

Building More Robust Policies and Procedures for Efficiency

The use of a Partner Handbook as a reference guide for providers can be invaluable in supporting program growth, as States augment and improve policies and procedures governing third-party partnerships as programs go to scale. A strong Partner Handbook can include policies and procedures governing participant referral, participant eligibility, invoicing, and data reporting, as well as any others that would help partners meet their contractual obligations to the State. States may capitalize on partners' expertise as well as the expertise existing within other State agency divisions (e.g., policy, fiscal, contracts, and IT) to develop and refine policies and procedures as programs expand. States should regularly update the Partner Handbook with any needed changes to rules or administrative code that will help support progress. A website can also be an effective way to communicate efficiently with current partners.

Building Smart Funding Strategies

SNAP E&T 100 percent funding is limited, so States that wish to scale their programs must make the most effective and efficient use of their 100 percent funds while maximizing 50/50 funding. As programs grow and additional infrastructure is required, States should consider increasing their use of 100 percent funds to support this capacity. In some cases, this may mean transitioning partners that are primarily utilizing 100 percent funds to primary or exclusive use of 50/50 funding. An additional use of 100 percent funds may be to “seed” new third-party partners – that is, to provide them funding for a limited duration while they put their SNAP E&T programs and processes in place before shifting to 50/50 funding. If they have not yet done so, States might also consider working with key partners to develop a resource map to identify non-Federal funding streams available to help grow their 50/50 funding.