

SNAP EMPLOYMENT & TRAINING:

A Funding Source for Jobseekers Experiencing Homelessness or Housing Instability

January 2018, Stakeholder Resource

The Supplemental Nutrition Assistance Program (SNAP, formerly known as the Food Stamp program) is a critical federal safety net program that provides food assistance to low-income individuals and families. SNAP funding to states includes resources dedicated to employment and training services, with the intention of helping SNAP recipients increase their earned income in order to help them transition off of SNAP benefits.

SNAP Employment & Training (E&T) funding represents a potentially useful but underutilized resource for states and communities to deliver employment services to the people who need them the most. SNAP holds special potential for supporting efforts to prevent and end homelessness through access to employment and earned income.

This guide is intended to help community-based organizations and other employment service providers that serve people experiencing homelessness to 1) determine whether SNAP E&T funding is a good fit for their organizations, 2) determine whether their state is set up to partner with service providers to access E&T funding, and 3) learn how to advocate for SNAP E&T access and expansion to serve homeless jobseekers.

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Primary author: Chris Warland

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Introduction to SNAP E&T and How it is Administered by States:

SNAP E&T 50/50 funds are not capped at a specific amount and can be used very flexibly. States that do not work to maximize 50/50 E&T funding are forfeiting a potentially large and flexible source of support for workforce development services.

The Supplemental Nutrition Assistance Program (SNAP, formerly known as the Food Stamp program) provides food assistance to low-income individuals and families. SNAP funding to states includes resources dedicated to workforce development services, known as SNAP Employment & Training (E&T). SNAP E&T aims to help SNAP recipients increase their earned income so they can transition off of SNAP benefits.

SNAP E&T funds can be used by states to support a wide range of workforce services for SNAP recipients. The allowable uses of E&T funds are very flexible and cover the following employment-related services (or “components”):

- Vocational education;
- Basic skills;
- Supportive services;
- Job retention;
- Work experience;
- Job search;
- Job search training; and
- Workfare or community service.

Many CBOs are already delivering services to SNAP-eligible jobseekers for which they could receive 50 percent reimbursement were their state to draw down SNAP E&T 50/50 funds.

The Food and Nutrition Service (FNS) of the U.S. Department of Agriculture makes grants to state agencies that administer the SNAP program. Every state is required to operate an E&T program as part of its SNAP operations, and must create a SNAP E&T plan that is submitted for approval by FNS. There are two basic categories of SNAP funding available in every state: “100 percent” funds and “50/50” funds. One-hundred percent funds are granted to every state according to a formula to pay for administrative and programmatic costs of running its E&T program, and funds of this type are typically very limited. The 50/50 funds can reimburse 50 percent of non-federal dollars (such as state, municipal, or private funds) spent on allowable employment services. SNAP E&T 50/50 funds are not capped at a specific amount and can be used very flexibly—either to reimburse states for additional administrative costs of operating an E&T program or to reimburse for expenses associated with participation in an E&T program component. States that do not work to maximize 50/50 E&T funding are forfeiting a potentially large and flexible source of support for workforce development services. Moreover, many CBOs are already delivering services to SNAP-eligible jobseekers for which they could receive 50 percent reimbursement were their state to draw down those funds.

Community-based organizations cannot apply directly for SNAP E&T 50/50 funding. Providers of employment programming access E&T

SNAP E&T funds can reimburse support services that are typically more difficult to fund, such as childcare, transportation, and work equipment as well as services associated with “case management” and supportive service coordination.

funds primarily as “third-party” providers that have an agreement with their state SNAP agency to deliver employment services to SNAP enrollees, and are then reimbursed for a portion of their expenses after the services are delivered. Establishing and maintaining a third-party provider relationship with your state SNAP agency may require significant effort and advocacy as described below; however, the benefits of flexible funding to serve homeless jobseekers may make it worth the effort.

Why SNAP E&T May be a Good Match for Employment-Focused Community-Based Organizations Serving People Experiencing Homelessness:

There is significant overlap among SNAP-eligible individuals and people experiencing homelessness. A large portion of SNAP recipients, particularly able-bodied adults without dependents (ABAWDs), are currently experiencing homelessness or unstably housed.¹ These individuals are living in extreme poverty: the average SNAP ABAWD’s income in 2015 was just 17% of the poverty line, or about \$2,000 annually for an individual.² Moreover, virtually all individuals experiencing homelessness meet income requirements to receive SNAP benefits.

For providers that already offer allowable employment-related services to jobseekers experiencing homelessness, SNAP E&T 50/50 funds can potentially provide 50 percent reimbursement for services that you are already delivering to your participants, provided you successfully get them enrolled in SNAP and determine E&T eligibility. E&T funds are especially attractive for providers because they can reimburse support services that are typically more difficult to fund, such as childcare, transportation, and work equipment as well as services associated with “case management” and supportive service coordination. In addition to employment services, SNAP food assistance can be an important source of support for your participants, so it makes sense to determine eligibility and help them enroll whenever possible regardless of eligibility for E&T. Also, participation in your employment programming can help participants maintain SNAP food benefits in the face of time limits and work requirements.

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Community-based organizations interested in leveraging SNAP E&T 50/50 funds should be prepared to determine the current environment of E&T programming and policy in their respective states, conduct an honest assessment of their own capacity to administer E&T programming, and advocate with state officials and other decision makers to plan, implement, and sustain E&T programming.

Recommendations and Next Steps for Accessing SNAP E&T Funds to Serve Homeless Jobseekers:

Community-based organizations (CBOs) that provide employment services to homeless jobseekers, particularly CBOs that leverage significant non-federal funding sources to pay for services, have the potential to benefit greatly through SNAP E&T 50/50 funding. However, the process for accessing these funds may be complex and lengthy, and will vary significantly from state to state. Interested CBOs should be prepared to determine the current environment of E&T programming and policy in their respective states, conduct an honest assessment of their own capacity to administer E&T programming, and advocate with state officials and other decision makers to plan, implement, and sustain E&T programming that includes partnerships with homeless-serving CBOs.

#1: Investigate the Situation in Your State: A number of factors about how SNAP E&T is administered in your state will determine how you move forward. Interested CBOs should find out:

Does your state operate a mandatory or a voluntary E&T program? States can choose whether to operate SNAP E&T as a mandatory or voluntary program. In mandatory states, some SNAP recipients, primarily ABAWDs, are required to participate in work activities in order to receive benefits, while others are exempt—including people experiencing homelessness in some cases. In states with voluntary E&T programs, any SNAP recipient can choose to access employment and training services through SNAP (with the exception of individuals receiving cash assistance through Temporary Assistance for Needy Families). It is easier for states with voluntary E&T programs to access 50/50 funds in partnership with CBOs, and much easier for CBOs to enroll participants in E&T through “reverse referrals” (see more about the reverse referral process below).

Does your state SNAP E&T plan include third-party partnerships? In order for a state to draw down SNAP E&T 50/50 reimbursement funds, it must first include those activities in its state SNAP E&T plan, which must then be approved by the USDA Food and Nutrition Service. CBOs generally access E&T funds as “third-party partners” with state SNAP agencies. This means that a CBO has a formal agreement with the SNAP agency to deliver allowable employment services to individuals who are enrolled in the state’s E&T program. If your state’s E&T plan does not currently include partnering with third-party employment service providers using 50/50 fund reimbursements, your organization’s work to access E&T funding will likely need to begin with advocacy efforts (see the advocacy section below).

Does your state SNAP agency currently work with any third-party employment service providers? If your state currently works with any other CBOs, community colleges, or other service providers to deliver employment services for SNAP recipients, then the state SNAP agency is more likely to have an existing infrastructure through which

it contracts with providers. This existing infrastructure could include a standard proposal or application process, standard processes for invoicing, reporting, and reimbursement, and possibly an automated process for determining participant eligibility for SNAP E&T.

Larger organizations with stable, diversified funding streams and prior experience with managing federal grants and contracts may be better suited to act as SNAP E&T third-party providers.

The USDA Food and Nutrition Service offers some state-by-state information on SNAP E&T programs [here](#).

#2: Assess Your Capacity: Delivering employment services using SNAP E&T 50/50 funds places significant demands on a CBO's financial, operational, and administrative capacity. For this reason, larger organizations with stable, diversified funding streams and prior experience with managing federal grants and contracts may be better suited to act as SNAP E&T third-party providers. Before pursuing E&T funding, perform an honest self-assessment of your organization's capacity along these dimensions:

Capacity to deliver evidence-based, job-driven employment services: Programs interested in accessing SNAP E&T 50/50 funds should assess their current range of employment services to ensure that they are evidence-based, appropriate and effective for their target population, and align with the [requirements and priorities](#) of the USDA/FNS. An analysis of [best practices](#) for SNAP E&T participants commissioned by the USDA identifies the characteristics of employment and training programs that are associated with increases in participant employment and income, and recommends that "programs:

- *are based on an individualized assessment of the workforce-related strengths and weaknesses of SNAP clients;*
- *comprehensively address an individual's need for skills training, basic skills education, and overcoming barriers to employment;*
- *help participants earn credentials valued by employers in their chosen industry or sector; and*
- *develop skills that are closely linked to labor market demands in the local area."*³

National Initiatives on Poverty & Economic Opportunity also offers a [guide to providing employment services to SNAP ABAWDs](#) facing multiple barriers to employment. In addition, organizations providing employment services for homeless jobseekers should assess their

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It's essential to assess the employment interests of homeless jobseekers and their housing situation alongside the structure and quality of jobs being offered.

CBOs that currently provide employment services to people experiencing homelessness are most likely to benefit from E&T partnership through “reverse referrals,” in which an organization seeks to enroll its current service population in SNAP and then determine their eligibility for E&T reimbursement.

program components and service delivery principles relative to the National Center on Employment and Homelessness' recommendations in the [Working to End Homelessness Toolkit](#), including:

- Implementation of an evidence-based employment program model such as Transitional Jobs (TJ) or Supported employment/ Individualized Placement and Support (IPS);
- Integration of clinical concepts and techniques that are evidence-based in the context of employment services, such as Motivational Interviewing, trauma-informed care, Stages of Change, harm reduction, and cognitive-behavioral therapy; and
- Taking a strengths-based, “employment first” approach to employment that assumes the employability of people experiencing homelessness and responds to consumer choice with regard to when, where, and how an individual seeks work.

CBOs may also want to specifically consider their ability to **deliver employment-focused case management and support services**. E&T funding may be especially useful to community-based employment service providers due to its ability to reimburse for a wide range of employment-related support services that can otherwise be challenging to fund. These include dependent care and transportation, training and educational needs such as books and equipment, and other supports. E&T funds can also support program staff case management functions, notably **Employment Navigator** positions to help jobseekers experiencing homelessness access the services to which they are entitled through various public systems. The [Housing and Employment Navigator model](#) is an [evidence-based approach](#) to helping people experiencing homelessness navigate multiple systems to access the services necessary to become both employed and stably housed. SNAP E&T 50/50 funds may be used to support Navigator positions to coordinate appropriate employment support services for homeless jobseekers.

Administrative capacity to identify and enroll eligible jobseekers:

In order to be reimbursed through SNAP E&T for employment services, providers must first ensure that program participants are enrolled in SNAP and have been deemed eligible by the state SNAP administration to receive E&T services. In some cases, providers may make arrangements to have SNAP recipients referred to their services by the state administration; however CBOs that currently provide employment services to people experiencing homelessness are most likely to benefit from E&T partnership through “**reverse referrals.**” In a reverse referral, rather than seeking participant referrals through the state SNAP agency from among the existing pool of eligible SNAP recipients, an organization will seek to enroll its current service population in SNAP and then determine their eligibility for E&T reimbursement.

The participants your program serves using E&T should meet income requirements for SNAP eligibility and not be receiving cash assistance

through Temporary Assistance to Needy Families (TANF). Providers that primarily serve families experiencing homelessness who are eligible for TANF cash assistance may find that their efforts to stabilize participants through TANF enrollment will render many of their participants ineligible for E&T services or reimbursement (recipients of other TANF benefits besides cash assistance may still be eligible). On the other hand, programs serving single adults, particularly ABAWDs, are likely to find that most of their participants are E&T eligible. Enrolling eligible participants in SNAP is beneficial to them whether they qualify for E&T services or not, so identifying and enrolling all eligible participants benefits the overall wellbeing of your service population.

Because SNAP E&T does not provide any funding prior to delivering services, CBOs seeking 50/50 E&T funding should have adequate cash reserves and diversified, stable, and sustainable funding sources so they can cover programmatic expenses.

Some state SNAP agencies operate a Management Information System (MIS) that can automatically determine eligibility for E&T on behalf of third-party employment and training providers. However, in most states, providers that reverse-refer participants for E&T must manually submit participant names and information to the state SNAP agency and await confirmation of eligibility. This process can be time-consuming, so CBOs pursuing E&T partnership should ensure that they have adequate staffing and capacity to manage this process. Some E&T third-party provider organizations have found that their participation in E&T has helped them build their overall capacity and competency with regard to determining participant benefits eligibility.

Financial capacity to deliver and pay for services upfront: SNAP E&T does not provide any funding prior to delivering services; instead, providers must deliver services and seek reimbursement after the fact. Moreover, if a participant's SNAP eligibility changes during the course of programming, services rendered may not be reimbursable. CBOs seeking 50/50 E&T funding should have adequate cash reserves and diversified, stable, and sustainable funding sources so they can cover all programmatic expenses without financial stress to the organization's operating budget before receiving SNAP E&T reimbursements.

Capacity to secure, sustain, and document non-federal match funding: In order to access reimbursements successfully through SNAP E&T, CBOs will need to cultivate and document sustainable sources of cash non-federal funding. Organizations that are already stably funded through non-federal sources to deliver employment services to people experiencing homelessness or living in poverty make the best candidates for E&T partnerships, and approaching your state SNAP agency with 50/50 match funding already in place will likely increase your chances of initiating a successful partnership.

Enrolling eligible participants in SNAP is beneficial to them whether they qualify for E&T services or not, so identifying and enrolling all eligible participants benefits the overall wellbeing of your service population.

Approaching your state SNAP agency with 50/50 match funding already in place will likely increase your chances of initiating a successful partnership.

Allowable sources of funding to consider include:

- *Public funding from state, county, or city governments that do not originate with the federal government:* just make sure that the originating public entity is not already claiming those funds toward another federal match (if in doubt ask the public entity in question for assurances);
- *Community Development Block Grants:* CDBG is the only federal source of funding that is allowable for E&T reimbursement;
- *Funding from philanthropic foundations and individual donors:* private donors, whether institutions or individuals, may be interested in the value of leveraging their grants and donations with matching reimbursements; and
- *Social enterprise revenue:* social enterprises are revenue-generating businesses that typically operate within nonprofit CBOs and can serve as both a source of funding for program operations and as a venue for participants to earn income and build workplace skills. The revenue generated by a social enterprise is unrestricted and can be used toward E&T match reimbursement.

A successful third-party E&T provider will have the data management capacity to track services, report outcomes, and invoice the state SNAP agency.

Administrative capacity to gather, manage, and report accurate data: Data management capacity is essential for successful third-party E&T providers. This is one way in which an organization's prior experience in managing federal grants or contracts would be extremely helpful. Critical data-related functions for E&T providers include:

- *Tracking services:* third-party providers need to accurately track and document the services they deliver to E&T participants and ensure that they are all allowable E&T components;
- *Reporting outcomes:* FNS require that state SNAP E&T programs report employment-related outcomes data, similar to those required for TANF or under the Workforce Innovation and Opportunity Act (WIOA). Third-party providers will need to assist their state in reporting employment outcomes for participants, such as the number of participants employed, the number of participants retaining employment for four quarters, and the number of participants completing a training program; and
- *Invoicing the state SNAP agency:* CBOs receiving reimbursements through E&T will need to accurately invoice the state agency, ensuring that all expenditures are for allowable activities to eligible participants using allowable non-federal funding sources.

Not every state SNAP agency is currently inclined, equipped, and ready to partner with employment service providers on E&T services. As a result, your organization may have to begin with an advocacy agenda.

#3: Advocate on Behalf of Your Program and Your Jobseekers:

Not every state SNAP agency is currently inclined, equipped, and ready to partner with employment service providers on E&T services. Some state SNAP agencies view the process of partnering with third-party providers to access 50/50 reimbursement funds as too complex or too risky to undertake. However, these states are “leaving money on the table” by not leveraging these funds and would potentially benefit from the input and guidance of motivated community-based providers in their state. If your state SNAP administration doesn’t currently have processes and infrastructure in place to reimburse providers through SNAP E&T, or is not prioritizing evidence-based services for jobseekers facing barriers to employment, your organization will have to begin with an advocacy agenda. Opportunities for advocacy and education with decision makers in your state may include:

Advocate with decision makers regarding why people experiencing homelessness should be a priority for your state’s SNAP E&T programming: Most state governments are serious about taking steps to end homelessness, and there is a growing recognition that employment and earned income are a critical part of preventing and ending homelessness. Because SNAP E&T represents a flexible, uncapped source of funding for employment services for people experiencing homelessness, and many SNAP recipients and SNAP-eligible individuals are homeless or unstably housed, you can make the case that homeless jobseekers should be a focus of your state’s SNAP E&T investments in order to achieve multiple goals within one initiative.

Leveraging SNAP E&T 50/50 Funds on Behalf of Jobseekers Experiencing Homelessness: Central City Concern

Portland, OR — Central City Concern (CCC) has been using SNAP E&T 50/50 match funds to provide employment services to people experiencing homelessness since 2014. CCC is a provider of Individual Placement & Support (IPS), an evidence-based employment model that focuses on making rapid, highly-individualized placements in competitive employment while simultaneously offering individualized wrap-around support services to workers. CCC also operates a range of social enterprises, including street cleaning and furniture manufacturing, which provide a source of revenue to support programming. CCC is able to use enterprise revenue and donations as its non-federal match funds for SNAP E&T, and uses those reimbursement funds to support 50 percent of the salary of eight staff members.

The work to secure SNAP E&T 50/50 in Oregon took some advocacy and exploration of how other communities around the country had used these funds. CCC was aided by a case study that provided contacts to King County in Seattle back in 2009 and it took some time to get state of Oregon officials comfortable with drawing down these funds for the services offered by CCC. Since the successful application of these funds for those exiting homelessness using IPS, USDA has used CCC as a model for what other communities can do to use this federal funding.

Learn more about Central City Concern [here](#).

Decision makers should understand that most people experiencing homelessness want to work, that employment is a critical factor in preventing and exiting homelessness for many people, and that with the right services and supports, virtually any person who wants to work can be successful in employment.

Educate decision makers on the prevalence, characteristics, and needs of homeless jobseekers: As a provider of employment services to people experiencing homelessness, your organization possesses specialized knowledge and expertise regarding the prevalence, special needs, and other characteristics of homeless jobseekers (your local homeless Continuum of Care may also be an important data source to help make your case). Decision makers may want to know approximately how many homeless jobseekers there are in your state, the portion of SNAP ABAWDs who are homeless or unstably housed, and how the capacity of current programs and systems falls short of the need for employment services for homeless jobseekers. In addition, decision makers should understand that most people experiencing homelessness want to work, that employment is a critical factor in preventing and exiting homelessness for many people, and that with the right services and supports, virtually any person who wants to work can be successful in employment. Finally, decision makers can also benefit from understanding which employment interventions for people experiencing homelessness are effective and evidence-based, in order to fund and support appropriate services for homeless jobseekers.

Advocate that your state include homeless-serving CBOs as third-party providers in its SNAP E&T plan: If state SNAP E&T programs want to take advantage of 50/50 match funds to expand services and grow capacity, then partnering with third-party providers to draw down funds is essential—a state’s allocation of “100 percent” SNAP E&T formula funds is inadequate and not designed to support comprehensive, effective services on a large scale.⁴ State SNAP agencies need to indicate in their E&T plans that they will work with third-party providers to offer services using 50/50 reimbursement funds and have that plan approved by FNS.

Voluntary E&T programs that serve all interested SNAP recipients with evidence-based, job-driven services can offer the flexibility and comprehensiveness to impact employment outcomes.

Advocate that your state operate a voluntary E&T program: If your state currently operates a mandatory E&T program, it can be more difficult to allocate E&T funds where they would have the greatest impact. Mandatory E&T programs tend to expend significant resources on ensuring the compliance of mandated work registrants, and have no measurable effects on employment and earnings outcomes.⁵ Conversely, voluntary E&T programs that serve all interested SNAP recipients with evidence-based, job-driven services delivered by expert third-party providers can offer the flexibility and comprehensiveness to impact employment outcomes for jobseekers facing barriers to employment. If it is not politically feasible in the near term to change a state’s status from mandatory to voluntary, it may be possible to ensure that people experiencing homelessness are exempted from the state’s mandated E&T participation. This change could allow providers that serve homeless jobseekers to focus on serving voluntary participants through a reverse-referral enrollment process.

CBOs can maximize their advocacy efforts by working in coalition with other organizations that share their policy goals.

#4: Additional Tips for E&T Advocacy: Interviews with employment service providers and advocates from across the country revealed some additional tips for CBOs seeking to advocate for improved or expanded SNAP E&T funding through partnership and 50/50 funds:

- *Be persistent:* sometimes efforts can take years to reach fruition and require dogged persistence in response to unpersuaded or unresponsive decision makers;
- *Know the rules:* advocates and providers benefit from a deep knowledge of the laws and regulations regarding SNAP E&T funding and operations, which can be particularly useful if decision makers are less familiar with the rules;
- *Have examples:* be able to identify other states that successfully draw down E&T 50/50 funds through third-party partnerships, in order to address concerns about feasibility;
- *Leverage influence by working in coalition:* working with a coalition of like-minded CBOs that shared your policy goals around SNAP E&T will maximize your advocacy efforts; and
- *Bring match funds to the table:* it is easier to persuade state agencies to participate in E&T 50/50 reimbursement if organizations have already identified funding sources that can be used as match funds.

Flexible funding for intensive employment services is scarce. SNAP E&T should be a key part in supporting economic advancement for homeless jobseekers.

More advice on advocating for SNAP E&T can be found in the Seattle Jobs Initiative's SNAP E&T [Advocate's Guide](#).

Conclusion:

SNAP E&T, particularly 50/50 funds, can be a significant and flexible source of funding for employment services for people experiencing homelessness as well as jobseekers facing other barriers to employment. Although the process of accessing funding can seem complex for community-based organizations (CBOs) and state governments alike, navigating this process successfully is worth the effort and states are leaving money on the table by not taking part. CBOs with expertise in serving jobseekers experiencing homelessness have an important role to play in helping states maximize this resource through advocacy, education, and the delivery of evidence-based services. In an environment in which flexible funding for intensive, appropriate employment services is scarce and becoming scarcer, SNAP E&T should be a key part in supporting employment outcomes and economic advancement for the people who need it most.

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33 W. Grand Avenue, Suite 500, Chicago, IL 60654 | 312.870.4949 | ni@heartlandalliance.org
www.heartlandalliance.org/nationalinitiatives | [@NIheartland](https://twitter.com/NIheartland) | <http://bit.ly/NIFacebook>



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