



SNAP Employment and Training (SNAP E&T)

Recommendations for Reauthorization

November 2017

The Supplemental Nutrition Assistance Program (SNAP, formerly known as “food stamps”) is one of the nation’s most important safety net programs, providing targeted aid to more than 40 million Americans each month to feed their families. While the amount of SNAP benefits for families is generally small — the average household receives about \$250 per month in nutrition assistance — it is a critical support for those who struggle to put food on the table.¹

The majority of SNAP participants are children, seniors, individuals with disabilities, and those caring for young children or disabled family members and as such are not expected to work.² In SNAP households with working-age adults without disabilities, many

people work. Sixty percent of these households work while receiving SNAP benefits, but don’t earn enough to make ends meet.³ Others are unable to find adequate and sustainable employment. Low levels of education make it difficult for those who don’t have jobs, as well as the working poor, to move off of SNAP and into family sustaining careers. In an economy where as many as 80 percent of all jobs require at least some form of education or training beyond high school — and as many as half of all long-term SNAP recipients have less than a high school diploma⁴ — this means that many SNAP participants, even when they find work, are trapped in low-paying jobs and unable to advance.

1 <https://www.fns.usda.gov/sites/default/files/pd/34SNAPmonthly.pdf>

2 <https://www.cbpp.org/research/food-assistance/chart-book-snap-helps-struggling-families-put-food-on-the-table#part5>

3 <https://www.cbpp.org/research/food-assistance/chart-book-snap-helps-struggling-families-put-food-on-the-table#part5>

4 https://fns-prod.azureedge.net/sites/default/files/snap/S2SBrief1_NowIsTheTimeforBuildingSNAPETPrograms.pdf

SNAP requires that people between the ages of eighteen and fifty-nine register for work as a condition of receiving benefits, although people can be exempted from these requirements if they meet certain conditions.⁵ Those who are not exempt must register for work, accept any suitable job offers, and cannot voluntarily quit a job or reduce their hours. States must also offer a SNAP Employment and Training (SNAP E&T) program and can choose whether to require all or some work registrants to participate as a condition of receiving benefits, or whether to offer the program on a voluntary basis. Historically, many state SNAP E&T programs have focused on providing job search assistance even when most SNAP participants need additional education and training to start a family supporting career in today's skilled labor market.

Congress has recognized that SNAP E&T can play a bigger part in helping participants build the skills required by today's labor market. In 2014 Congress expanded the program, restoring formula funds available to states to \$90 million per year, and providing \$200 million in new funding for competitive grants to support the development and implementation of innovative workforce development projects in ten states. At the same time, the U.S. Department of Agriculture's Food and Nutrition Services (FNS) has increased its capacity to help states develop SNAP E&T programs that utilize partnerships with community colleges, community-based organizations, employers, and others so that participants can earn postsecondary credentials with value in the labor market.

These "skills-based" SNAP E&T programs have key advantages over programs with a "work-first" orientation. For one, they take advantage of existing workforce development programs that have a proven track record of training low-income people for in-demand

jobs rather than re-creating the wheel. They also align resources so that federal dollars leverage state, local, and private funds to cover training costs. Finally, they combine job training with critical support services like transportation, books, and work supplies that make it possible for people on a budget to complete training and move into family supporting work.

Despite its advantages and efforts by Congress and FNS to expand skills-based SNAP E&T programs, this approach is now under threat, as is the larger SNAP program, which plays a vital role in helping workers weather periods of under- or unemployment. There have been a range of proposals in Congress and from the current administration that would significantly reduce access to SNAP benefits, including proposals to convert the current funding structure into a "block grant" that would cap federal support for the program over time, or to require states to provide matching funds.⁶ There have also been proposals to impose stricter work requirements on SNAP participants, beyond what is already required, despite strong evidence that mandatory work requirements do little to support long-term employment or poverty reduction.⁷ Currently, states have the flexibility to choose whether to require SNAP work registrants to enroll in an E&T program in exchange for food assistance. If Congress were to require states to make E&T participation mandatory for all SNAP work registrants, it would place substantial unfunded administrative burdens on states and organizations providing E&T services, while doing little to address the education and training needs of workers and businesses, especially at a time when employers are desperately seeking skilled workers to take advantage of emerging economic opportunities.

In fact, requiring mandatory participation in SNAP E&T makes it harder for states to implement a skills-

5 Working-age adults can be exempt due to a disability, caretaking responsibilities for a child under age six, because they are already working at least thirty hours a week, because they are complying with work requirements under another program such as Temporary Assistance for Needy Families, among other reasons.

6 <http://www.nationalskillscoalition.org/news/blog/trump-fy-2018-budget-slashes-funding-for-key-workforce-education-human-services-programs>

7 <https://www.cbpp.org/research/poverty-and-inequality/work-requirements-dont-cut-poverty-evidence-shows>

based program since program staff spend their scarce time and resources on monitoring and enforcing compliance instead of on developing and expanding training partnerships that can meet the skill needs of workers and employers. It also incentivizes states to prioritize low-cost options like job search over training because states must use limited dollars to provide as many slots as possible, as means of ensuring that work registrants have the opportunity to comply with mandatory participation requirements. Finally, mandatory program participation doesn't give all SNAP participants a fair shot at building skills required by today's economy. It focuses limited program slots, often for work-first services, on work registrants who must participate in exchange for benefits instead of making job training available to any SNAP participant who wants to build skills to improve their economic situation. A 2016 study commissioned by FNS concluded that state SNAP E&T programs serving large numbers of mandatory E&T work registrants or focused on job search are less likely to help SNAP participants achieve self-sufficiency than those focused on postsecondary training for in-demand jobs.⁸

As Congress prepares to reauthorize the SNAP program in 2018 as part of the Farm Bill, lawmakers have an opportunity to reject outdated "work-first" approaches that have had limited success in helping low-income people, and instead focus on making sure that SNAP E&T operates as a real springboard into well-paying jobs and careers that allow workers to permanently transition off public assistance. Congress should consider:

Reforming the SNAP E&T Program Grants ("100 percent" grants).

Current law requires that each state operate a SNAP E&T program, and the federal government provides \$90 million in annual formula funding to support state administration of these programs. However, these resources are well below the levels needed to provide

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meaningful, skills-based training programs: in FY 2015, more than half of these dollars went to just six states, and twenty-one states got less than \$1 million to support SNAP E&T activities, including ten states who received less than \$300,000. This lack of funding is exacerbated in states that opt for "mandatory" participation in E&T activities for some or all SNAP work registrants because in those states the level of funding is generally insufficient to provide meaningful services to all participants. Indeed, in mandatory states many individuals receive only light-touch job search activities, which are insufficient for participants with skills or other barriers.

To address these problems, Congress should increase the SNAP E&T program grants to \$200 million per year. Doing so will help state SNAP agencies have more resources to meet the upskilling needs of all SNAP participants and help states transition to skills-based programs.

- **Provide \$180 million in formula funding so that states can meet the upskilling needs of SNAP E&T participants.** To receive funds, states should have to demonstrate a plan to deliver high-quality skills training and support services in partnership with workforce development agencies, community colleges, community-based organizations, or other

⁸ <https://fns-prod.azureedge.net/sites/default/files/ops/SNAPeandT-BestPractices.pdf>

training providers. States should also be able to use these funds to cover the costs of critical support services that participants need in order to succeed in skills-based SNAP E&T programs. These include dependent care costs, transportation expenses, books or training manuals, uniforms, and supplies. Currently, the SNAP E&T program only reimburses states for 50 percent of these costs despite the fact that they are often essential to participation. States should also be able to use this funding to develop new service delivery strategies for specific populations who face barriers to training and employment, such as people with criminal records, no high school diploma, limited English proficiency, limited work experience, and unstable housing situations.

States should be strongly encouraged to ensure that every SNAP participant who might benefit from training or related services has meaningful and sustained access to such programs. Congress should enact safeguards to ensure that states do not reduce SNAP caseloads through punitive sanctions, but rather by helping individuals transition into stable, well-paying jobs along defined career pathways.

- **Provide \$20 million to FNS to provide technical assistance to help states transition to skills-based SNAP E&T programs.** In 2016, FNS launched its SNAP to Skills project to provide technical assistance, tools, and resources to states looking to use their SNAP E&T programs to train participants for in-demand jobs. This technical assistance is critical to helping states develop the programmatic and administrative capacity necessary to transition from a program focused on job search assistance to one focused on pathways to postsecondary credentials and careers. Congress should reauthorize and expand this technical assistance so that more states can implement skills-based programs.

To make sure that states are providing a broad range of training and support services for low-income workers and businesses, Congress should consider strengthening coordination between SNAP E&T and other federal and non-federal workforce programs.

Maintaining and improving the 50 percent reimbursement program.

In addition to the 100 percent formula grants, state agencies can also draw down reimbursements for 50 percent of certain costs that exceed the state's funding under the E&T formula grant, including education and training costs, and for E&T participant expenses directly related to participation in the program such as dependent care costs, transportation, safety equipment, and supplies and books. To date, these "50-50" funds have played an important role in the expansion of high quality SNAP E&T programs across the country, particularly because the cost reimbursements are being used to leverage non-federal investments in skills training — including funding from state and local governments, philanthropic sources, and private sector investments — making federal dollars more impactful.

Congress should maintain the current 50-50 model, and should increase the reimbursement rate for particular funding sources — for example, providing a 75 percent reimbursement for employer contributions for work-based learning programs, which would provide an incentive for more businesses to make skill-building investments, and would support better connections between SNAP E&T programs and businesses seeking skilled workers. Congress should also consider increasing the reimbursement rate for programs that are specifically focused on serving people with barriers to employment to address the higher costs associated with providing effective services to such populations.

Eliminating the separate Able Bodied Adults Without Dependents (ABAWDs) definition.

Under current law, non-disabled, childless adults are subject to strict work requirements in order to retain benefit eligibility. ABAWDs must participate in at least eighty hours of work per month, eighty hours of certain education or training per month, or otherwise comply with requirements of a “workfare” program in order to receive benefits for more than three months in any 36-month period. While this ABAWD “time limit” is intended to encourage work, it does not reflect the changing nature of today’s economy, where 80 percent of all jobs require education or training beyond the high school level; the simple reality is that in a skills-based labor market, simply being “able-bodied” is insufficient to sustain long term employment at family supporting wages.

During the Great Recession, many states received waivers from the ABAWD time limits given the lack of employment opportunities available. However, now that waivers on the ABAWD time limits are expiring in many states, the number of individuals subject to these time limits has grown dramatically – one estimate suggests that as many as 500,000 individuals may have lost nutrition assistance in 2016 due to the ABAWD restrictions,⁹ and it is likely that millions more will lose eligibility in coming years due to these draconian rules.

There has been little evidence that ABAWD time limits lead to increased employment for those who lose access to SNAP benefits, suggesting that these limits are not particularly effective in encouraging work.¹⁰ Congress should recognize that strict work requirements and time limits are not an effective means for moving people out of poverty, and instead focus efforts on helping all SNAP participants access the skills and credentials necessary to move into

sustainable careers. If Congress elects to maintain these time limits, it should also maintain and strengthen existing waivers to time limits for areas experiencing high unemployment to ensure that states can continue to meet participant needs during economic downturns.

Coordinating SNAP E&T state plans with Workforce Innovation and Opportunity Act (WIOA) state plans.

Current law requires states to submit an annual plan to the Department of Agriculture outlining their planned uses of SNAP E&T funds. While the state plans are generally required to provide detailed descriptions of the types of individuals and services that will be covered under the state’s E&T program, there is relatively little emphasis on ensuring coordination with other federally-funded workforce and education programs that can help SNAP recipients gain skills and credentials with value in the labor market.

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⁹ <https://www.cbpp.org/research/food-assistance/snap-case-load-and-spending-declines-accelerated-in-2016>

¹⁰ <https://www.cbpp.org/research/food-assistance/snap-reports-present-misleading-findings-on-impact-of-three-month-time>

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other federal and non-federal workforce programs as part of the state planning process. One way to achieve this would be to encourage states to include their annual SNAP E&T plans as part of a combined plan authorized under section 103 of WIOA. The combined plan model under WIOA provides states with an opportunity to outline programmatic and operational elements – including common intake and assessment strategies, shared case management across programs, career pathways development, and combined data reporting – that can leverage existing resources more effectively, while also streamlining planning efforts at the state and local level.

States would continue submitting their SNAP E&T plans separately from their WIOA plans, but would be required to describe in their E&T plans how the state will coordinate among other employment, training, education, and human services programs, including those funded under WIOA, and how the state will align activities with the strategic planning elements developed by the State Workforce Development Board.

Maintaining and strengthening recently established SNAP E&T reporting measures.

One of the key innovations under the 2014 SNAP reauthorization was the adoption of new reporting measures that allow states to track employment and earnings, and program completion rates for those who

have participated in a SNAP E&T activity. With some minor adjustments, these new measures could be consistent with metrics for employment and training programs under WIOA. While states are not currently required to meet specific performance targets, the new measures are a valuable tool to help states and other stakeholders evaluate the effectiveness of SNAP E&T programs and adjust investments as appropriate.

Congress should maintain and strengthen these reporting measures as part of any SNAP reauthorization. This would include counting all people assigned to SNAP E&T instead of just those who participate in an E&T activity, requiring reporting measures for each type of E&T activity, and reporting outcome measures for sub-populations.¹¹

Strengthen connections with employers through work-based learning.

One of the most effective models for equipping workers to build in-demand skills is through apprenticeship and other work-based learning strategies that combine paid on-the-job experience with classroom instruction. In recent years, Congress has placed increased emphasis on these strategies as part of other federal workforce policies, most notably through changes under WIOA that called for the automatic designation of registered apprenticeship programs as eligible training providers, and the requirement that a minimum percentage of local youth training dollars be used for providing paid work experience. Both the Obama and Trump administrations have encouraged apprenticeship as well: the Obama administration invested nearly \$300 million in apprenticeship expansion as part of their American Apprenticeship Initiative, and the Trump administration released an executive order in June 2017 calling for new efforts to make apprenticeship available for a range of industries and workers.

¹¹ For more on these improvements, see <https://www.nationalskills-coalition.org/resources/publications/file/NSC-Comments-on-FSN-2011-0026.pdf>

While participation in apprenticeship and similar work-based learning models are allowable activities under SNAP E&T, there are relatively few incentives for states or their employer partners to invest the time and resources necessary to take these strategies to scale. Congress could encourage greater use of these effective approaches by:

- specifically identifying apprenticeship and work-based learning as eligible activities under SNAP E&T;
- providing increased reimbursements for employer contributions under the 50-50 program;
- providing tax incentives to employers to hire and train SNAP recipients;
- authorizing SNAP E&T funds to be used to support a percentage of wages paid during participation in a work-based learning program; and
- establishing a Work-Based Learning Support Fund¹² that would provide funding for wraparound services for SNAP recipients participating in these programs.

To ensure that SNAP participants remain eligible for SNAP and in turn, SNAP E&T, while participating in a work-based learning program, Congress should exempt any wages earned by SNAP participants through a work-based learning program from being counted as “earned income” for the purposes of benefit eligibility.

¹² <https://www.nationalskillscoalition.org/resources/publications/file/Skills-for-Good-Jobs-Agenda.pdf>

National Skills Coalition organizes broad-based coalitions seeking to raise the skills of America's workers across a range of industries. We advocate for public policies that invest in what works, as informed by our members' real-world expertise. And we communicate these goals to an American public seeking a vision for a strong U.S. economy that allows everyone to be part of its success.

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