



Food and  
Nutrition  
Service

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**DATE:** March 14, 2016

**SUBJECT:** Supplemental Nutrition Assistance Program Employment and Training  
WIOA Unified and Combined State Plans

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

This memorandum provides guidance to State agencies on the Supplemental Nutrition Assistance Program (SNAP) Employment and Training (E&T) requirements when opting to submit E&T plan components as part of the Workforce Innovation and Opportunity Act (WIOA) Combined State Plan.

***Background on WIOA and Combined State Plan Options***

WIOA was signed into law on July 22, 2014. WIOA is designed to help job seekers access employment, education, training, and support services to succeed in the labor market and to match employers with the skilled workers they need to compete in the global economy. WIOA places an emphasis on targeting low-income adults and youth with limited training and skills to help them overcome barriers to economic self-sufficiency. It also emphasizes sector-based training and career pathways that respond to in-demand and emerging jobs and industries.

Under WIOA, States must outline a four-year strategy for the State's workforce development system by developing a Unified State Plan that includes operational plans for the WIOA's core programs.<sup>1</sup> States have the option to submit a Combined State Plan that includes the core programs as well as additional Federal employment and training programs, including:

- Employment and Training Programs under the Supplemental Nutrition Assistance Program (Programs authorized under section 6(d)(4) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(d)(4)); and
- Work programs authorized under section 6(o) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(o))

With WIOA's emphasis on services to low-income adults and job-driven training as well as the option to include SNAP's employment, training, and work programs in the Combined State Plan, State agencies have an opportunity to advocate for the unique needs of SNAP clients in their State's workforce development system.

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<sup>1</sup> Core programs include the Adult Program (Title I), the Dislocated Worker Program (Title I), the Youth Program (Title I), the Adult Education and Family Literacy Act Program (Title II), the Wagner-Peyser Act Program (Wagner-Peyser Act, as amended by title III), and the Vocational Rehabilitation Program (Title I of the Rehabilitation Act of 1973, as amended by Title IV).

States choosing to submit a Combined State Plan are required to incorporate all of the common planning elements required in the Unified State Plan, as well as additional elements describing how the State will coordinate the optional programs with the core programs and elements required by the optional program(s) that are included in the Combined State Plan. States that include SNAP E&T or Optional Workfare in the Combined State Plan are not required to submit separate plans to the Food and Nutrition Service (FNS).

The major content areas of the Unified or Combined State Plan include strategic and operational planning elements. More information on the WIOA Unified and Combined State Plan requirements and process may be obtained through the Training and Employment Guidance Letter (TEGL) published by the Department of Labor entitled TEGL 14-15 – Workforce Innovation and Opportunity Act (WIOA) Requirements for Unified and Combined State Plans. This TEGL is available at [http://wdr.doleta.gov/directives/corr\\_doc.cfm?DOCN=3363](http://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=3363).

#### ***SNAP E&T plan requirements***

The SNAP E&T and Optional Workfare requirements included in the Information Collection Request (ICR) *Workforce Innovation and Opportunity Act (WIOA) Unified and Combined State Plan Requirements*, published under Office of Management and Budget (OMB) control number 1205-0522, are the requirements as specified for the SNAP E&T State Plan under 7 C.F.R. §273.7(c)(i) through 273.7(d)(vi) and §273.7(m). Because the WIOA Unified or Combined State Plan covers a four-year period, States that choose to include SNAP E&T or Optional Workfare in the Combined State Plan must provide details for each year covered by the Combined State Plan.

In order to ensure that sufficient information necessary for FNS to do a thorough and comprehensive review of the SNAP E&T requirements, States must provide a narrative response in the WIOA plan portal. In addition, State agencies must submit the tables described in Attachment 1 that provide the component details, participant levels, operating budget and fiscal year planned program costs to their FNS Regional Office. In the online WIOA plan portal, State agencies should indicate in their response that these elements have been transmitted to FNS.

Funds may not be available when SNAP E&T portions of a Combined State Plan under WIOA are approved. FNS's obligation after approving a SNAP E&T plan submitted as part of a Combined State Plan is contingent upon the availability of an appropriation from which payment can be made. Any FNS funding resulting from an approval of a SNAP E&T plan submitted as part of a Combined State Plan is subject to FNS receiving sufficient funds (in the Program Financial Control System for FNS) to fund this and all prior approved SNAP E&T plans submitted as part of a Combined State Plan in their entirety in the time and date order received. Federal reimbursement to States for 50

percent of State administrative expenditures and for participant reimbursements is subject to the above conditions.

***Instructions for Plan Submission***

For the initial four-year Unified and Combined State Plans (July 1, 2016-June 30, 2020), States must submit their plans by April 1, 2016 using the online submission portal hosted by the Rehabilitative Services Administration (RSA) servers. The portal allows the entire State Plan to be available concurrently to the Departments of Labor, Education, Agriculture and other Federal departments if their programs are included. The submission portal is available along with other State Plan resources at <https://rsa.ed.gov/login.cfm?mode=form&usp=Y#skipnav>. Instructions on how to request State user accounts are available on the web link provided. State SNAP agencies must designate a user to enter SNAP E&T requirements in the plan portal.

The portal will permit multiple users within a State to enter portions of the State's plan at the same time. This will allow program partners to enter content specific to their program directly, as well as collaboratively enter content that is common to all State plan partners. Once State users enter all data and text into the portal, they may review the plan in its entirety, make edits and updates where needed, and view progress in entering plan information across programs. While multiple individuals in the State may enter content into the portal, only one individual may submit the entire plan on behalf of all included programs through the portal for Federal review. The portal includes a certification that the official state "submitter" has the authority to do so.

***Initial State Combined Plan and Modifications***

States that include SNAP E&T in the Combined State Plan that is due on April 1, 2016, should include SNAP E&T information relating to activities, operating budget, planned costs, and anticipated participation for federal fiscal years (FFYs) 2017 through 2020 using FFY 2016 as a basis. Once FFY 2017 allocation information is available, States must submit modifications to the SNAP E&T portion of the Combined State Plan in order to access the full allocation amount. Such modifications will be submitted through the online WIOA State Plan portal and to the FNS Regional Office.

If you have any questions concerning this memorandum, please contact Loretta Robertson at [loretta.robertson@fns.usda.gov](mailto:loretta.robertson@fns.usda.gov) or (703) 605-3214.

*/s/ Original Signature on File*

Moirra Johnston  
Director  
SNAP Office of Employment and Training

Attachment

## Attachment 1

### SNAP Employment and Training programs section of WIOA Combined State Plan

#### a. General Requirements

1. The nature of the E&T components the State agency plans to offer and the reasons for such components, including cost information. The methodology for State agency reimbursement for education components must be specifically addressed.

States should provide component detail information in the following table format:

Non-education, non-work components:

Fiscal Year	Component	Description	Geographic Area	Target Audience (e.g., Homeless, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated Monthly cost*	Provider (Contracted, SNAP agency, or both)
FY 2017	<i>Job Search (EXAMPLE)</i>	<i>Independent job search</i>	<i>Newtown county</i>	<i>ABAWDs</i>	<i>50</i>	<i>\$1,000</i>	<i>In-house</i>
	<i>Job Search</i>						
	<i>Job Search Training</i>						
	<i>Job Retention</i>						
	<i>Insert more rows as needed.</i>						

Education components:

Fiscal Year	Component	Description & justification	Geographic Area	Target Audience (e.g. Homeless, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost*	Provider (Contracted, SNAP agency, or both)
	<i>Basic Education</i>						
	<i>Vocational Training</i>						
	<i>Insert more rows as needed.</i>						

Work components:

Fiscal Year	Component	Description	Geographic Area	Target Audience (e.g. Homeless, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost*	Provider (Contracted, SNAP agency, or both)
	<i>Workfare</i>						
	<i>Work Experience</i>						
	<i>Insert more rows as needed.</i>						

2. An operating budget for the Federal fiscal year with an estimate of the cost of operation for each Federal fiscal year covered by the Combined Plan.

States should utilize the following operating budget and planned federal fiscal year costs table formats:

Operating budget:

Budget Section	Subsection	FY20__	FY20__	FY20__	FY20__
I. Direct Costs: State	a) Salary/Wages - State				
I. Direct Costs: State	b) Fringe Benefits* Approved Fringe Benefit Rate Used ____% - State				
I. Direct Costs: State	c) Contractual Costs - State				
I. Direct Costs: State	d) Non-capital Equipment and Supplies - State				
I. Direct Costs: State	e) Materials - State				
I. Direct Costs: State	f) Travel - State				
I. Direct Costs: State	g) Building/Space - State				
I. Direct Costs: State	h) Equipment & Other Capital Expenditures - State				
I. Direct Costs: State	Total Direct Costs - State				
I. Direct Costs: Federal	a) Salary/Wages - Federal				
I. Direct Costs: Federal	b) Fringe Benefits* Approved Fringe Benefit Rate Used ____% - Federal				
I. Direct Costs: Federal	c) Contractual Costs - Federal				
I. Direct Costs: Federal	d) Non-capital Equipment and Supplies - Federal				
I. Direct Costs: Federal	e) Materials - Federal				
I. Direct Costs: Federal	f) Travel - Federal				
I. Direct Costs: Federal	g) Building/Space - Federal				
I. Direct Costs: Federal	h) Equipment & Other Capital Expenditures - Federal				
I. Direct Costs: Federal	Total Direct Costs - Federal				
I. Direct Costs: Total	a) Salary/Wages - Total				
I. Direct Costs: Total	b) Fringe Benefits* Approved Fringe Benefit Rate Used ____% - Total				
I. Direct Costs: Total	c) Contractual Costs - Total				
I. Direct Costs: Total	d) Non-capital Equipment and Supplies - Total				
I. Direct Costs: Total	e) Materials - Total				
I. Direct Costs: Total	f) Travel - Total				
I. Direct Costs: Total	g) Building/Space - Total				
I. Direct Costs: Total	h) Equipment & Other Capital Expenditures - Total				
I. Direct Costs: Total	Total Direct Costs				
II. Indirect Costs:	Indirect Costs* Approved Indirect Cost Rate Used: ____% - State				
II. Indirect Costs:	Indirect Costs* Approved Indirect Cost Rate Used: ____% - Federal				
II. Indirect Costs:	Indirect Costs* Approved Indirect Cost Rate Used: ____% - Total				
III. In-kind Contribution	State in-kind contribution - State				
III. In-kind Contribution	State in-kind contribution - Federal				
III. In-kind Contribution	State in-kind contribution - Total				
IV. Participant Reimbursement - State	a) Dependent Care				
IV. Participant Reimbursement - State	b) Transportation & Other Costs				
IV. Participant Reimbursement - State	c) State Agency Cost for Dependent Care Services				
IV. Participant Reimbursement - State	Total Participant Reimbursement - State				
IV. Participant Reimbursement - Federal	a) Dependent Care				
IV. Participant Reimbursement - Federal	b) Transportation & Other Costs				
IV. Participant Reimbursement - Federal	c) State Agency Cost for Dependent Care Services				
IV. Participant Reimbursement - Federal	Total Participant Reimbursement - Federal				
IV. Participant Reimbursement - Total	a) Dependent Care				
IV. Participant Reimbursement - Total	b) Transportation & Other Costs				
IV. Participant Reimbursement - Total	c) State Agency Cost for Dependent Care Services				
IV. Participant Reimbursement - Total	Total Participant Reimbursement - Total				
V. Total Costs	V. Total Costs - State				
V. Total Costs	V. Total Costs - Federal				
V. Total Costs	V. Total Costs - Total				

Guidance documents lack the force and effect of law, unless expressly authorized by statute or incorporated into a contract. USDA may not cite, use, or rely on any guidance that is not available through their guidance portal, except to establish historical facts.

Planned Federal Fiscal Year Costs:

Funding Category	Approved Prior FY Budget	Upcoming FY Budget (FY 2017)	FY 2018 Budget	FY 2019 Budget	FY 2020 Budget
1. 100 Percent Federal E&T Grant:					
2. Share of \$20 Million ABAWD Grant (if applicable)					
3. Additional E&T Administrative Expenditures					
a. 50% Federal					
b. 50% State					
4. Participant Expenses:					
a. Transportation/Other					
- 50% Federal					
- 50% State					
b. Dependent Care					
- 50% Federal					
- 50% State					
5. Total E&T Program Costs ( = 1+2+3a+3b+4a+4b)					
6. 100% State Agency Cost for Dependent Care Services					
7. Total Planned Fiscal Year Costs (Must agree with Operating Budget)					

3. The categories and types of individuals the State agency intends to exempt from E&T participation, the estimated percentage of work registrants the State agency plans to exempt, and the frequency with which the State agency plans to reevaluate the validity of its exemptions.

4. The characteristics of the population the State agency intends to place in E&T.

5. The estimated number of volunteers the State agency expects to place in E&T.

6. The geographic areas covered and not covered by the E&T Plan and why, and the type and location of services to be offered.

In response to requirements #3 through 6 above the State should utilize the following estimated participant level table format.

		FY 2017	FY 2018	FY 2019	FY 2020
A	Anticipated number of work registrants. Estimate the number of unduplicated work registrants during the FY by adding the two following numbers:				
A.1	1. The number of work registrants expected to be in the State on October 1 of the fiscal year.				
A.2	2. The anticipated number of new work registrants to be added between October 1 and September 30 of the fiscal year.				
B	Total number of planned State option exemptions from E&T Participation.				
B.1	List below planned State option exemption categories and the number of work registrants expected to be included in each during the fiscal year. (add additional rows if necessary) 1 -				
B.2	2 -				
B.3	3 -				
B.4	4 -				
B.5	5 -				
B.6	6 -				
B.7	7 -				
B.8	8 -				
B.9	9 -				
B.10	10 -				
C	Percent of all work registrants exempt from E&T. (Line B / Line A)				
D	Anticipated number of E&T mandatory participants. (Line A - B)				
E	Anticipated number of voluntary E&T participants.				
F	Anticipated number of ABAWDs in the State during the fiscal year.				
G	Anticipated number of ABAWDs in waived areas of the State during the fiscal year.				
H	Anticipated number of ABAWDs to be exempted under the State's 15 percent ABAWD exemption allowance during the year.				
I	Number of potential at-risk ABAWDs expected in the State during the fiscal year. (Line F - (G + H))				

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