

Supplemental Nutrition Assistance Program: Employment and Training Program
Provisions of the Monitoring, Oversight and Reporting Measures Final Rule
Questions and Answers

A. Employment and Training (E&T) Annual Report Submission (7 CFR 273.7(c)(17))

1. What is the due date for the Federal Fiscal Year (FFY) 2025 E&T Annual Report?

The final rule became effective on January 17, 2025, with an implementation date of October 1, 2025. As a result, the FFY 2025 report will be due on April 15, 2026.

2. Which measures should States report on for the FFY 2025 E&T Annual Report?

For FFY 2025, State agencies are only required to submit a "partial" report that includes the following reporting requirements under the interim final rule:

- E&T participant characteristics,
- State component measures, and
- Able-bodied adults without dependents (ABAWD) Pledge State Reporting (if applicable).

States will not be required to report the employment and earnings measures and the associated disaggregated characteristics. This ensures that all States are on track for reporting the expected four (4) quarters for these measures under the final rule for the FFY 2026 report. Additionally, with the replacement of the completion of educational, training, work experience and on-the-job training measure with educational measures, States are not required to report this measure for FFY 2025 so that they may concentrate efforts toward making any changes necessary for the collection of the new educational measures.

3. Is the E&T Annual Report template changing, and if so, when will it be available?

Yes, the E&T Annual Report template is changing. The new E&T Annual Report will be submitted in our new web-based data collection system, *Data Analysis and Tracking Application for SNAP Employment and Training (DATASET)*.

While State agencies will submit the report in DATASET and not by paper copy, a template is provided, which provides the reporting requirements under 7 CFR 273.7(c)(17) for the E&T Annual Report and instructions for each section of the report as it will appear in DATASET. We will also provide another version of the template without instructions that State agencies can use to compile the information needed to complete the E&T Annual Report in DATASET.

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4. What are the cohort dates for the E&T Annual Report for FFY2026?

Each section of the E&T Annual Report will consist of data from distinct time periods. For example, the employment and quarterly earnings measures in the second quarter after completion of participation of E&T will consist of data from the third quarter of the preceding FFY to the 2nd quarter of the reporting FFY (i.e. for FFY 2026 report, April 2025 to March 2026). Below is a chart that provides the various time periods that should be reported for each section of the E&T Annual Report.

Table 1. Reporting time periods for the E&T Annual Report

E&T Annual Report Section and Measure	Time Period to Report
A. Employment, Earnings and Educational Measures	
Employment and Earnings Measures for all E&T Participants; and Employment and Earnings Measures by Participant Characteristics	
I) Unsubsidized employment during the second quarter after completion of participation in E&T II) Median quarterly earnings of E&T participants in unsubsidized employment during the second quarter after completion of participation in E&T	April of preceding FFY to March of reporting FFY (<i>e.g. FFY 2026 report: April 2025 to March 2026</i>)
III) Unsubsidized employment in the fourth quarter after completion of participation in E&T	October to September of preceding FFY (<i>e.g. FFY 2026 Report: October 2024 to September 2025</i>)
Educational Measures for all E&T Participants; and Educational Measures by Participant Characteristics IV) Attainment of a credential or certificate V) Measurable skill gains B. Participant Characteristics VI.a) Mandatory E&T Program Reporting VI.b) SNAP E&T Participant Characteristics C. ABAWD Pledge State Reporting	October to September of reporting FFY (<i>e.g. FFY 2026 Report: October 2025 to September 2026</i>)
D. State Component Measures	Based on the State agency's reporting methodology for each component

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B. Definitions (7 CFR 271.2)

- 5. Completion of participation in E&T means that an E&T participant has not received any E&T services for at least 90 days and no future services are planned. Does this mean disenrollment from SNAP E&T cannot occur until those 90 days are met, or can a participant be disenrolled as deemed by the E&T service provider?**

The completion of participation in E&T definition does not affect the ability of a State agency or of their E&T providers to determine when to remove an E&T participant from E&T services. The definition of a “completion of participation in E&T” has been in use under the interim final rule and was codified in the final rule. The purpose of establishing a waiting period of 90 days after a participant last received E&T services before collecting employment and earnings information is to align with the practice for Workforce Innovation and Opportunity Act (WIOA) programs. Under WIOA, the exit date is the last date of service. And the last date of service cannot be determined until at least 90 days have elapsed since the participant last received services. This 90-day waiting period is to ensure that a participant is truly no longer engaged in the program and allows time if an individual decides to return for additional services.

- 6. Regarding the definition of a former E&T participant: in a State operating a voluntary E&T program, E&T participants may disenroll from the E&T program for a variety of reasons, not necessarily because they lost SNAP benefits. Would a State agency report on those E&T participants in the employment and earnings measures?**

The term “former E&T participant” was included in the interim final rule to capture E&T participants who may no longer be participating in the E&T program because they lost their SNAP benefits due to a SNAP eligibility action, such as failure to recertify. The intent was to ensure that those participants were included in outcomes, specifically employment and earnings measures. Whether a State is operating a mandatory or voluntary E&T program, or whether an E&T participant disenrolls from E&T, has no impact on including these former participants in these measures. Regardless of whether an E&T participant lost their SNAP benefits, if an E&T participant has not received any E&T services for 90 days, they should be considered as having completed participation in E&T and their attainment of employment and earnings should be tracked and reported.

- 7. Our State’s contracted E&T service providers note in the system of record when an E&T participant completes a component. When tracking for the employment and earnings measures, we use both the date of component completion recorded in the system as well as the 90-day look back period cited in the new definition for completion of participation in E&T. Is this acceptable to use both types of completion?**

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Yes, it is acceptable. At a minimum, a State agency needs to have the ability to determine when an E&T participant has completed participation in E&T, meaning the E&T participant has not received any E&T services for 90 days and no future services are planned.

While FNS does not require State agencies to capture completion dates for component participation, FNS recommends this as a best practice as the State agency considers system development or modifications to their processes for tracking SNAP E&T participation.

8. Our State agency's eligibility system automatically end dates the E&T component and E&T program based on the last day of eligibility when an individual is discontinued from SNAP benefits. Based on the definition of "former E&T participant" is this functionality accurate and can we determine when an individual is discontinued from SNAP that no future E&T service is planned?

Yes, when an E&T participant has been discontinued from SNAP benefits, the State agency can consider that as having no future E&T services planned. The definition for completion of participation in E&T is intended to align with the definition of "exit" in WIOA programs, including the provision for no future E&T services. This provision is also intended to address those instances where an E&T participant may be waiting to start a component, such as a training or educational program.

9. If an individual is discontinued from SNAP benefits, but regains eligibility and continues with E&T services within 90 days, should the individual be counted as a "new" participant for the employment and earnings measures, or is this considered a single E&T participation event?

No, if 90 days has not elapsed from when the participant was discontinued from SNAP, then the individual would not be treated as a new participant upon regaining eligibility. They would continue with the prior period of participation, and the State would not include that participant in their employment or earnings measures in the reporting FFY. If there is 90 days or more since the participant completed participation in E&T, then the State would count that individual as starting a new period of participation in E&T.

10. A State agency's current policy is to disenroll a participant within 60 days of no activity, does the State agency need to update the policy to 90 days with no activity?

No, the State agency does not need to modify their practice to disenroll a participant from E&T after 60 days with no activity. However, the State agency would wait an additional 30 days before they would begin to track and report the employment and earnings for those participants. Regardless of the reason that an E&T participant leaves the E&T program, whether due to loss of SNAP benefits, having completed a component or choosing to stop participating in the E&T

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program, a State agency should wait 90 days from the date of the last E&T service before they begin to track employment and earnings measures for the E&T participant.

C. Employment and Earnings Measures (7 CFR 273.7(c)(17)(i))

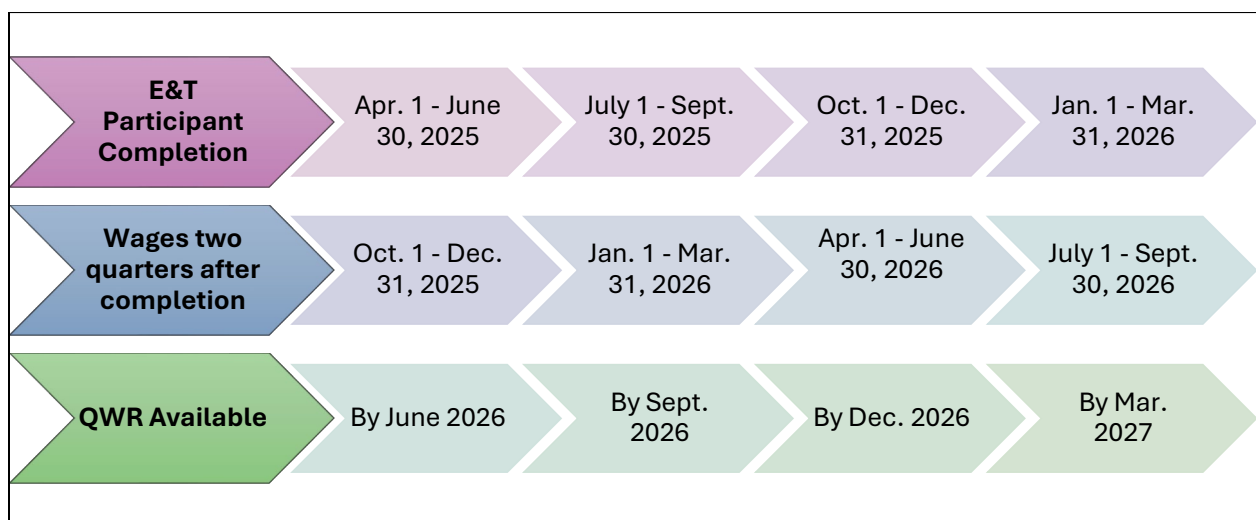
11. What is the impact of the new E&T Annual Report due date on those States that receive unemployment insurance (UI) wage data on a six-month delay?

FNS recognizes that there is typically a six-month lag time before quarterly wage records (QWR) are available through States' (UI) agencies. Changing the due date of the E&T Annual Report to April 15 (from January 1) will ensure that all State SNAP agencies can report the same four quarters of data for the employment and earnings measures.

The two figures below demonstrate how availability of QWR aligns with the new due date of the E&T Annual Report (using the FFY 2026 E&T Annual Report, due April 15, 2027, as an example).

- Figure 1 represents data availability for the employment and earnings measures in the second quarter for an individual completing E&T participation between April 2025 to March 2026.
- Figure 2 represents the data for the employment measure in the fourth quarter after completion of participation in E&T for E&T participants completing E&T participation between October 2024 to September 2025.

Figure 1. Availability of quarterly wage records for second quarter employment/earnings measures (Example: FFY 2026 E&T Annual Report)



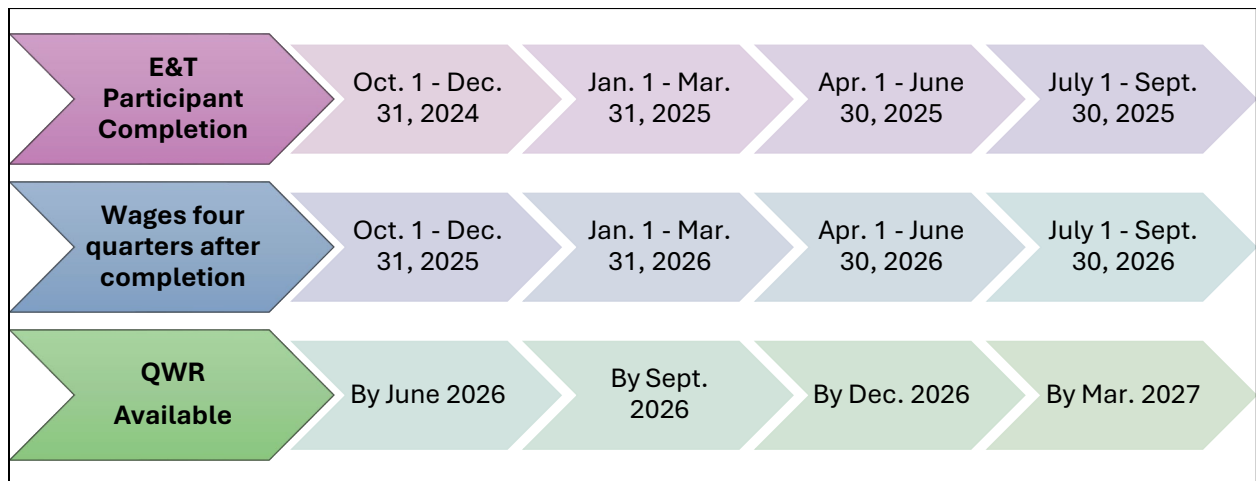
- The first row represents the dates E&T participants have completed participation in E&T.
- The second row contains the dates that should be matched for employment for those E&T participants.

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- The last row is when the QWR should be available from the State UI agency.

For example, for the second quarter employment/earnings measure: a participant who completed participation in April 2025, the State agency would be looking for wages two quarters (i.e. six months) afterwards—October 2025. The UI Quarterly wage records should be available for matching by June 2026.

Figure 2. Availability of quarterly wage records for fourth quarter employment measure (Example: FFY 2026 E&T Annual Report)



D. Educational Measures (7 CFR 273.7(c)(17)(ii))

12. The regulations for the educational reporting measures indicate that State agencies will report on the number and percentage of E&T participants enrolled in education or training programs. Please clarify which components are included in each of the educational measures?

The regulations under 7 CFR 273.7(c)(17)(ii) refer to E&T participants enrolled in education or training programs. To clarify, training programs include the sub-components of work-based learning programs under work experience. The components to be reported for each of the educational reporting measures are shown in the table below.

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Table 2. Components included in Educational Reporting Measures

Component	Attainment of Credential/Certificate	Measurable Skill Gains
Education		
Basic Education or Foundational Skills Instruction	Yes	Yes
Integrated Education and Training/Bridge Program	Yes	Yes
Work Readiness Training	Yes	Yes
English Language Acquisition	Yes	Yes
Career/Technical Education Programs or other Vocational Training	Yes	Yes
Work Experience/Work -Based Learning		
Internships	Yes	Yes
Pre-Apprenticeships	Yes	Yes
Apprenticeships	Yes	Yes
Incumbent Worker Training	Yes	Yes
On-the-Job Training (OJT)	No	Yes
Customized Training	No	Yes
Transitional Jobs	No	Yes

13. Are State agencies required to report on both educational measures of attainment of credential/certificate and measurable skill gains?

Yes, State agencies should report on both educational measures. While both measures contain similar attributes, such as attainment of a secondary school diploma or recognized equivalent, each measure serves a different purpose. Attainment of a credential or certificate is an outcome measure, while the measurable skill gains is an interim measure to gauge progress.

14. For individuals who obtain their secondary school diploma or equivalency, are these individuals counted in the “Attainment of Credential/Certificate” measure, or in the “Measurable Skill Gains” measure, or both?

Yes, in this scenario, a State agency should report on an E&T participant who obtains a secondary school diploma or its equivalency in both the attainment of a credential or certificate measure and the measurable skill gains measure.

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15. Are there targets for credential attainment and measurable skill gain? Is there an expectation that a certain percentage of participants will achieve these outcomes?

No.

16. Are the two educational measures a duplicated count if the individual participated in more than one educational program or work-based learning (WBL) component?

Yes, if a participant was enrolled in multiple different educational or WBL components during a FFY, they would be counted in each component.

For example: In May, Jane was enrolled in a basic education component that led to a certificate. Jane completed that program and in July was enrolled in a WBL component that led to a credential. Jane would be counted twice in the denominator in both of the educational measures. Additionally, if she obtained a certificate or credential, she would be counted twice in the numerator for both measures.

17. What is customized training?

Customized training is a type of a work-based learning program that meets the following criteria:

- that is designed to meet the special requirements of an employer, including a group of employers;
- is conducted with a commitment by the employer to employ an individual upon successful completion of the training; and
- for which the employer pays a significant cost of the training, as determined by the State SNAP agency taking in such factors as the size of the employer, the number of individuals participating in the training, the wage and benefit level of those individuals during the training and anticipated upon completion of the training, and other employer-provided training and advancement opportunities with the employer for individuals upon successful completion of the training.

This definition differs slightly from the definition for Workforce and Innovation Opportunity Act (WIOA) programs. However, the definitions in both programs are consistent with one another. State agencies should consult with their State workforce development agencies when considering allowing customized training in E&T.

18. What is incumbent worker training?

Incumbent worker training is typically associated with WIOA programs under Title I, specifically the adult and dislocated worker programs. The broad definition of incumbent worker training is work-based training and upskilling to help current employees acquire the skills necessary to retain their jobs or advance within their company. It is designed to meet the special requirements of an employer, including a group of employers, to retain a skilled workforce or to avert the need to

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layoff employees by assisting workers in obtaining the skills necessary to retain employment. It is conducted with a commitment by the employer to retain or avert the layoffs of the incumbent workers trained.

E. Educational Measures: Attainment of a Credential or Certificate (7 CFR 273.7(c)(17)(ii)(A))

19. Should the date an E&T participant obtains a credential or certificate fall in the current FFY reported?

Yes, the attainment of a credential or a certificate should fall within the FFY that is being reported. However, the participant does not need to have started participation in that reporting FFY. For example, if an E&T participant was enrolled or was participating in an educational or work-based learning component in a FFY and they obtained a credential or certificate in that same FFY, they would be included in both the denominator and numerator for that FFY. For the attainment of a credential or certificate measure specifically if an E&T participant was enrolled in the preceding FFY but continued participating in the educational or work-based learning component in the subsequent next FFY, they would be included in the measure for the reporting FFY. The table below provides different scenarios for an E&T participant's inclusion in the educational measures.

Table 3. E&T Participant Inclusion in Attainment of Credential or Certificate Educational Measure (Various Scenarios)

If Reporting FFY is...	When E&T Participant was enrolled or participating in Educational or WBL component...	And When E&T Participant obtained credential or certificate...	How E&T Participant is Included in E&T Annual Report
FFY 2026	Enrolled in FFY 2025 and still participating during FFY 2026	Obtained a credential between in FFY 2026	Included in both denominator and numerator
FFY 2026	Enrolled in FFY 2026	Obtained a credential in FFY 2026	Included in both denominator and numerator
FFY 2026	Enrolled in FFY 2026		Include in denominator only
FFY 2027	Enrolled in FFY 2026 and still participating during FFY 2027	Obtained a credential in FFY 2027	Included in both denominator and numerator

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20. How would an E&T participant be counted in the attainment of a credential or certificate measure if they participate in FFY 2026 and FY2027 but only receive a credential in FFY2027? Should they be counted in the denominator in both FFYs, or just FFY 2027?

If a participant is enrolled in an educational or work-based learning component in one FFY and is still participating in that component in the subsequent FFY, they would be included in the denominator for both FFYs. The participant would only be included in the numerator in the reporting FFY in which they obtain the certificate or credential.

For example, Jane was enrolled in a career and technical education program in January 2026 (FFY 2026) and was still participating in that program in November 2026 (FFY 2027) when she obtained the certificate or credential. Jane would only be counted in the denominator in the FFY 2026 E&T Annual report but would be counted in both the denominator and the numerator for the FFY 2027 E&T Annual Report. See table 3 for different scenarios.

21. Is an E&T provider required to obtain a copy of the credential or certificate? Can E&T participants self-report the attainment of a credential or certificate?

FNS recommends that State agencies have some documented evidence of an E&T participant's attainment of a credential or certificate to validate the reporting measure. Suggested source documents State agencies could consider include data match with postsecondary data system or k-12 system; copy of enrollment record; case notes; school records or verification of enrollment; and transcript or report card. These suggested source documentations are consistent with the requirement in the WIOA programs for this same measure.

An E&T participant's self-reported attainment of the credential or certificate, documented in the case manager's case notes, could be considered as evidence to validate the reporting measure.

22. Should a State agency work toward utilizing the Eligible Training Provider List (ETPL) that is used by Workforce Innovation and Opportunity Act (WIOA) programs?

No, there is no requirement for a State agency to utilize the ETPL.

F. Educational Measures: Measurable Skill Gains (7 CFR 273.7(c)(17)(ii)(B))

23. What is the purpose of a measurable skill gains measure?

The measurable skill gains measure is used to gauge the interim progress of participants who are enrolled in education or training services during a FFY. This may be particularly critical for education or training services that are designed as part of a pathway to a longer-term program or credential.

24. What are the types of measurable skill gains that count in this measure?

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States have discretion to determine the types of information that they will collect to report on measurable skill gains. Examples of measurable skill gains include the following:

- Documented achievement of at least one educational functioning level;
- Documented attainment of a secondary school diploma or recognized equivalency;
- Secondary or postsecondary transcript or report card for sufficient number of credit hours that shows a participant is meeting the State's academic standards;
- Satisfactory or better progress toward established milestones from a training provider who is providing training; or
- Successful passage of an exam that is required for particular occupation or progress in attaining technical or occupational skills as evidenced by trade-related benchmarks.

25. What if an E&T participant participated in one component but was able to achieve two skills gains in the same year? Would they be counted twice because they achieved two gains?

For the measurable skill gains measure, the denominator consists of the participants who, at any point in the reporting fiscal year, were in an education or work-based learning component that leads to a recognized postsecondary credential or employment. Participants should be counted only once. However, if the participant was enrolled in more than one education or work-based learning component during the reporting FFY, they would be counted in each component. The numerator contains those participants who achieved at least one type of gain during the reporting FFY. A participant may have achieved more than one type of gain in a reporting FFY however, only one gain per participant may be reported for each component. If the participant was enrolled in more than one education or work-based learning component and achieved a measurable skill gain in each of the enrolled components then they would be counted in the numerator and denominator for each enrolled component.

26. What is the definition of achievement of at least one educational functioning level?

The achievement of at least one educational functioning level particularly applies to those E&T participants receiving instruction below the postsecondary level, such as those participating in Basic Education or Foundational skills instruction (e.g. adult basic education, high school equivalency programs). Aligning with the practice for WIOA programs, there are a few ways that a State may measure educational functioning level, such as:

- compare the participant's initial educational functioning level, as measured by a pre-test, with the participant's educational functional level, as measure by a post-test.
- adult high school programs that lead to a secondary school diploma or equivalent may measure and report educational gain through the awarding of credits or Carnegie units (i.e. credit hours); or

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- report a gain for a participant who completes a program that was below the postsecondary level and was enrolled in a postsecondary education and training after completion during the year.

FNS recommends that State agencies consult with their State agencies responsible for postsecondary education or secondary education when considering methods for measuring educational functioning level.

27. What are some examples of documentation for measurable skills gains?

States are encouraged to develop consistent policies on the types of documentation they will collect to report on measurable skill gains and align their practices with WIOA. Below are examples of documentation, listed by category, that State agencies may consider as they develop policies and procedures. These examples are drawn from the documentation that is utilized for WIOA programs.

- *Documented attainment of a secondary school diploma or its recognized equivalent.* Examples include:
 - participant obtains certification of attaining passing scores on all parts of a State-recognized high school equivalency test; or
 - participant obtains a diploma or State-recognized equivalent documenting satisfactory completion of secondary studies, including a high school or adult secondary school diploma.
- *Secondary or postsecondary transcript or report card of a sufficient number of credit hours that shows a participant is meeting the State unit's academic standards.* Examples include:
 - For secondary education, this gain may be documented through receipt of a secondary transcript or report card for one semester showing that the participant is achieving the State unit's policies for academic standards.
 - For postsecondary education, this gain should demonstrate enough credit hours, typically at least 12 hours per semester, that shows a participant is achieving the State unit's academic standards, or the equivalent for non- credit hour programs.
- *Satisfactory or better progress report, toward established milestones from a training provider who is providing the training, such as:*
 - training reports on milestones completed as the individual masters the required skills, or steps to complete programs, such as on-the-job training or apprenticeship programs. Milestones should be established in advance of the education or training and should be documented in the participant's case file.

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- *Successful passage of an exam that is required for a particular occupation or progress in attaining technical or occupational skills as evidenced by trade-related benchmarks, such as knowledge-based exams.* Examples of documentation:
 - passage of a component exam in a Registered Apprenticeship program;
 - employer-required knowledge based exam;
 - satisfactory attainment of an element on an industry or occupational competency-based assessment; or
 - other completion tests necessary to obtain a credential.

28. Where are the State's academic standards located? Is this within the purview of the State's Department of Education?

Within each State there is an administrative agency that provides authorization to postsecondary institutions, such as setting postsecondary education standards. These agencies are often called State Boards of Higher Education.

For secondary education, every State has a State Educational agency, that establishes the educational standards for secondary education within the State.

G. Employment, Earnings and Educational Measures by Participant Characteristics (7 CFR 273.7(c)(17)(iii))

29. For the participant characteristic under 7 CFR 273.7(c)(17)(iii) of mandatory E&T

participants deemed ineligible due to failure to comply with mandatory E&T, is FNS asking for the number of unduplicated individuals who were removed from SNAP due to non-compliance in E&T?

State agencies operating a mandatory E&T program should report an unduplicated count of E&T participants who were deemed ineligible for SNAP due to failure to comply with E&T requirements. For the employment, earnings and educational measure for this characteristic, the denominator will include SNAP participants required to participate in E&T who were referred to E&T and were deemed ineligible for SNAP due to a failure to comply with E&T requirements. The numerator would include the mandatory E&T participants who were deemed ineligible due to failure to comply with E&T requirements and who, for example, had wages in the second quarter after the date of ineligibility.

H. Mandatory E&T Program Reporting (7 CFR 273.7(c)(17)(iv))

30. Do the "certification or recertification" rules in the instructions for line 9 of the FNS-583 report for the number of individuals required to participate in E&T apply to the unduplicated number of SNAP participants who are required to participate in E&T for the E&T Annual Report?

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While the mandatory E&T program reporting measures under 7 CFR 273.7(c)(17)(iv) are similar to the elements being reported through the Quarterly E&T Program Activity Report (FNS-583), the methodology for the measures are different. For the E&T Annual Report, State agencies operating a mandatory E&T program will report an unduplicated count for each of the measures. For example, for the unduplicated number of SNAP participants who were required to participate in E&T State agencies will count everyone only one time if the individual was required to participate in E&T at any time during the reporting FFY, even if they were required to participate more than one time in the reporting FFY.

31. If someone is terminated during the FFY twice because of failure to comply with E&T requirements, will they only be counted once for the count of SNAP participants that were deemed ineligible for failure to comply with E&T requirements?

Yes, they would only be counted once. Individuals should only be counted once during a reporting period, regardless of the number of times they are sanctioned during the reporting period.

I. E&T Participant Characteristics (7 CFR 273.7(c)(17)(v))

32. The term "participant characteristics" is now used in two different sections of the E&T Annual Report—E&T participation for the FFY and in the Employment, Earnings and Educational Measures. Are the time periods used for reporting the same for each section?

No, the time periods are different. To understand the effectiveness of an E&T program and its impact on the individuals being served, it is important to capture both the characteristics of the E&T participants receiving E&T services as well as the outcomes, such as the employment measure for unsubsidized employment in the second quarter after completion of E&T participation, disaggregated by certain participant characteristics.

- For the E&T Participant Characteristics, State agencies will report on the participant characteristics of the E&T participants served during the reporting FFY (e.g. October 1, 2025, to September 30, 2026, for FFY 2026).
- For the Employment, Earnings and Educational measures by Participant Characteristics, State agencies will report on the same time as the applicable measure. See table 1 for more information on the reporting time periods. For ease of reference, table 6 below provides a list of the participant characteristics to be reported in the two sections of the E&T Annual Report.

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Table 4. Participant Characteristics Reported in each Section of the E&T Annual Report

Participant Characteristic	Included in Employment, Earnings and Educational Measures	Included in E&T Participant Characteristic
Voluntary E&T Participant	Yes	Yes
Mandatory E&T Participant	Yes	Yes
Have received a high school diploma or equivalency prior to referral to E&T services	Yes	Yes
ABAWDs	Yes	Yes
English Language Learners	No	Yes
Sex (Female, Male, Not reported by participant)	No	Yes
Age ranges (16-17; 18-35; 36-49; 50-59; 60 or older)	No	Yes
Race and/or Ethnicity	Yes	Yes
Mandatory E&T Participants deemed ineligible due to failure to comply with E&T requirements	Yes	No

K. State Component Measures (7 CFR 273.7(c)(17)(vi))

33. Will States be required to include credential attainment as a State specific component measure for certain components (e.g. Career/Technical Education) that are projected to serve 100 participants or more?

The final rule did not modify the regulation under 7 CFR 273.7(c)(6)(xviii) that requires State agencies to identify in their annual E&T State Plan a reporting measure for any component that is expected to include at least 100 participants. The Food and Nutrition Act of 2008, as amended, provides States with the flexibility to determine component measures.

FNS notes that the Act specifies that measures should be appropriate to the component with the goal of identifying improvements in the skills, training, education or work experience of E&T participants. While the attainment of a credential or certificate or measurable skill gains are not required as a State component measure, FNS would encourage the use of these measures, particularly for educational or work-based learning components. When determining a State component measure, States should ensure that it's a measure that can be collected by the State agency, that it's relevant or appropriate to the component and that it's timely to the receipt of E&T services.

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34. Should States try to align their measures with the FFY if they are now measuring periods that cross years due to data collection limitations?

State agencies have the flexibility to determine an appropriate component measure. While it is a best practice to have a measure that is timed closely to the receipt of E&T services under a particular component, it is not required by FNS. SNAP regulations at 7 CFR 273.7(c)(6)(xviii) provide several examples of measures that State agencies may consider proposing in their annual E&T State Plans. State agencies should be aware that the component measure included in an approved E&T State Plan in DATASET will be the measure that will be pre-loaded in DATASET for the E&T Annual Report for the reporting FFY.

35. If a State does not expect to have 100 participants in a component, does the component measure need to be included in the State Plan?

If a State agency does not indicate in their E&T State Plan that they expect to serve at least 100 participants in a particular component, the State is not required to establish a component measure. For the E&T State Plan in DATASET the State agency will only see the questions regarding a State component measure only if they have indicated a given component is expected to serve at least 100 participants in that FFY.

36. If a State intended to serve 100 participants and included a component measure in the State Plan, will they be required to report on that measure in the E&T Annual Report?

Yes. If a State intended to serve 100 participants in a FFY and included a reporting measure for that component in the E&T State Plan, they would be expected to report on that measure in the E&T Annual Report, even if they served fewer than the expected 100 participants.

L. Assessing the Effectiveness of E&T Programs (7 CFR 273.7(c)(16))

37. What specific measures will be considered in determining whether a program is effective or efficient? For example, will FNS look at specific percentages that need to be met in terms of certificate completion, etc.?

The reporting measures in the E&T Annual Report are just one tool that FNS will use to assess the effectiveness of a State's E&T program. Other information that FNS will consider includes, but is not limited to, the State's E&T State Plan, the E&T Program Activity Reports (FNS-583) and management evaluations. Because State agencies have great flexibility in the design of their E&T program, FNS is not establishing benchmarks or a threshold for inadequate performance. FNS will assess and evaluate each State agency based on the attributes of a State's E&T program.

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M. Miscellaneous or Other Categories

38. With the E&T Annual Report due April 15, is it correct that certain line items must continue to match between the 4th Quarter FNS-583 and E&T Annual Report, such as the number of individuals served in E&T in line 8 of the FNS-583 and the E&T participant characteristics of the E&T Annual Report?

With the implementation of FNS' new web-based system, DATASET, some information and data will be pre-populated in the system for the E&T Annual Report. The components that were expected to serve at least 100 and the corresponding reporting measure will be pre-populated based on the approved E&T State Plan for the reporting year. In addition, the number of E&T participants reported on line 8 in the FNS-583 4th quarter report will be pre-populated in the participant characteristics section of the E&T Annual Report. State agencies will then only enter the number of E&T participants with a particular characteristic, such as voluntary E&T participants.

39. What tools/materials can FNS provide to support training E&T staff at the State or county level?

Several training tools have been provided by FNS, including the following:

- a reporting template that provides details for each reporting line as reflected in DATASET;
- a methodology chart for each section of the report; and
- various tip sheets, such as the components that count (or do not count) for the educational measures.

FNS welcomes State agencies' input about other documents or tools that would be helpful in meeting reporting obligations.

40. Can States receive an extension of the implementation date of October 1, 2025?

FNS will work with State agencies to ensure that they are prepared to submit the FFY 2026 report on April 15, 2027. The employment and earnings measures did not change, except for reporting those measures by certain participant characteristics. FNS understands that the addition of the educational measures, for example, may require either process or system changes to States' Management Information Systems (MIS), and that changes to States' MIS may be delayed due to either operational or funding implications. FNS will work with States on a case-by-case basis to address those elements of the E&T Annual Report that may be impacted by such a delay.

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