

April 5, 2024

GENERAL LETTER NO. 7-M-11

ISSUED BY: Bureau of Financial, Food, and Work Supports
Division of Community Access

SUBJECT: Employees' Manual, Title 7, Chapter M, **SNAP Employment and Training Program**,
Contents I, I-8, revised; 9, new.

Summary

This chapter is revised to

- Update guidance for completing SNAP E&T referral.
- Update language for coding in ABC.
- Update E&T provider list.

Effective Date

Upon receipt.

Material Superseded

Remove the following pages from Employees' Manual, Title 7, Chapter M, and destroy them:

<u>Page</u>	<u>Date</u>
Contents I	September 15, 2023
I-8	September 15, 2023

Additional Information

Refer questions about this general letter to your area income maintenance administrator.

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Overview

Legal reference: 7 CFR 273.7(e), 273.7 B(1) and (2); 441 IAC 65.28(7) and (8)

The Iowa SNAP Employment and Training (E&T) Program provides education and employment training, as well as assistance with job search and job retention services to SNAP recipients at no cost to them. The program is designed to assist SNAP recipients who:

- Are at least 18 (16-17 if the recipient has a high school diploma or is working toward an equivalent).
- Need additional skills to reenter the workplace.
- Need to regain certification or licensure or upskill in an area in which they are already trained.
- Are able-bodied adults without dependents (ABAWD) and wish to meet work requirements through involvement in the E&T Program.

EXCEPTION: Federal law prohibits recipients of Family Investment Program (FIP) benefits from participating in any SNAP employment and training service.

While the E&T Program is voluntary, income maintenance workers must screen for eligibility and provide information to eligible participants. All SNAP applicants and recipients who meet the criteria listed above must be screened and their referral status documented, regardless of their MWR/ABAWD status.

EXCEPTION: Screening and referrals for persons over the age of 67 will be completed by the E&T Eligibility Specialist (E&T ES) upon request from an E&T provider.

NOTE: The state's share of employment and training funding is based on the work registration status of all SNAP recipients as entered in the Automated Benefit Calculation system on the TD03 screen WR field.

Iowa's SNAP E&T Program is a combined effort between HHS, Iowa Workforce Development (IWD), and community partners. IWD is the Intermediary Administrator for the program.

Employment and Training Providers

The following E&T Providers provide employment and training services to SNAP recipients in the provider's service area. A complete list of services provided by each provider and their service areas can be found at <https://workforce.iowa.gov/jobs/worker-programs/snap/provider-list>.

- Kirkwood Community College (KCC)
- Des Moines Area Community College (DMACC)
- Des Moines Council of the Saint Vincent de Paul Society (SVdP)
- Goodwill of the Heartland (GWH)
- Hawkeye Community College (HCC)
- Iowa Western Community College (IWCC)
- Project Iowa (PI)
- Southeastern Community College (SCC)
- Central Iowa Shelter and Services (CISS)

- IWD American Job Centers (AJC)
 - Dubuque Office
 - Ottumwa Office
 - Sioux City Office
 - Fort Dodge Office

Referrals

IM must screen and refer all applicants and recipients who meet the criteria in the [Overview](#) section who are between the ages of 18-67. To complete the E&T referral, use the E&T Referral link in WISE and then access the E&T Referral Verbal Script link to view needed information to discuss in the interview.

Review the information for each person listed to determine which household members will be referred to E&T and click the check box for those individuals. Answer the initial screening questions using the “yes” or “no” selection fields. Depending on the answers provided, more questions may appear. Answer all questions. If the final screening question is available to complete using the text box and the household member has expressed interest in hearing from an E&T provider, IM will type either “Job Search” or “Education” depending on the answer from the household member.

IM then must click the button to Save & Send Email to submit the referral. **Referral will not be completed until Save & Send Email is clicked.**

1. IM is interviewing Adam, who has an E&T Referral link in WISE. IM clicks through and begins the referral process by asking the first questions available. Adam says he’s interested in training to get a better job and thinks he would be able to work within the next year. IM answers “yes” to the first two questions, and three more questions pop up.

IM continues with screening and asks about interest in virtual services and also in an E&T referral. Adam says no to virtual services but would like an E&T referral. IM answers “no” and “yes”, and then asks Adam if he’d like a referral for education or job search help.

Adam chooses job search, so IM enters the words “job search” in the available text box for question 5 and clicks Save & Send.
2. IM is interviewing Brenna, who has an E&T Referral link in WISE. IM clicks through and asks Brenna the screening questions. She tells the IM she doesn’t want any help with education or training, and she’s not able to work within the next year due to her disability.

IM answers “no” to the first two questions and clicks Save & Send to document the referral.

Participants are eligible for the E&T program if they have a pending SNAP application or are receiving SNAP benefits and:

- Are 18 and older (special consideration given to 16 or 17 year-olds with an HS diploma or are working toward an HS diploma or equivalent),
- Are not receiving FIP assistance or other cash assistance under Title IV, such as Tribal TANF,
- Reside in an E&T Service Area, and
- Will be able and ready to work within one year of education/training completion.

The E&T Referral link will not populate in WISE for applicants or participants who do not meet all of the first three criteria listed above.

See [Participant Eligibility and Tracking](#) for additional information on eligibility.

Employment and Training Components

Legal reference: 7 CFR 273.7(e)(1); 44I IAC 65.28(8)

The E&T Program offers a range of services from basic skills to advanced training to accommodate persons with various levels of need and abilities.

The E&T Providers are responsible for ensuring the policies applicable to the employment and training components are appropriately applied. The E&T Providers may require a participant to engage in vocational testing activities when deemed necessary to determine if a component is appropriate for improving the participant's opportunity for employment.

The E&T Program has multiple components for participants. These include:

- **Supervised Job Search** program requires development and tracking of a Job Search Plan (JSP) identifying job search activities fulfilling the minimum requirements of weekly communication that occur at State approved locations. This component does not meet the requirements of a qualifying ABAWD activity.
- **Integrated Education and Training** provides education and literacy programs to participants while working or participating in an on-the-job training activity. Participants complete both education and employment during the week, with rotating daily schedules. This component may be a qualifying ABAWD activity while the participant is actively participating.
- **Education services:**
 - **Basic educational services** are general education development, adult basic education, and English as a second language. ABAWDs actively participating in this component may be considered an eligible student or considered to be meeting work requirements. This component may be a qualifying ABAWD activity while the participant is actively participating.
 - **Expanded educational services** are vocational training and education up to completion of a two-year Associate of Arts degree. Already possessing a degree does not preclude a person from participating in employment and training. This component may be a qualifying ABAWD activity while the participant is actively participating.
- **Job Retention Services** provide support to participants who have secured employment, after or while participation in E&T, including but not limited to guidance, coaching, clothing/equipment, and other job-required fees, and registered apprenticeship and other on the job training supports. Only participants who anticipate participating in JRS services for at least 30 days are enrolled in this component. JRS is offered for a maximum of 90 days. JRS does not require active SNAP benefits while the participant is actively participating.
- **Work Readiness** participants may receive skill and interest assessment and educational remediation services to prepare the participant for the workforce. Work readiness activities may focus on fundamental cognitive skills or non-cognitive, behavioral skills, and soft skills. Fundamental cognitive skills may

include but are not limited to literacy, basic math, problem solving and critical thinking. Behavioral skills may include, but are not limited to workplace relationships, communication, integrity, personal presentation, work ethic. This component may be a qualifying ABAWD activity while the participant is actively participating.

- **On-the-Job Training** program is work placement made through a contract with an employer or registered apprenticeship program sponsor in the public, private non-profit, or private sector. The contract must be limited to a specific period required for a participant to become proficient in the specific occupation. The provider and employer determine specific education and on-the-job training provided.
- **Internship** is a planned, structured learning experience that takes place in a workplace, and the contract must be limited to a specific period of time required for a participant to become proficient in a specific occupation. The term of the training period should consider the skill requirements for the occupation, academic and occupation skill level of the participant, prior work experience, and the participant's employability plan (20 CFR 680.700). Depending on the provider and employer an internship may be paid or unpaid work experience.

Participation Allowances

Legal reference: 7 CFR 273.7(4); 44I IAC 65.28(7)

Participants enrolled in the E&T Program may be eligible for supportive services such as:

- Tuition, books, fees, and training manuals
- Equipment or tools of the trade
- Background checks, fingerprinting, and drug testing when necessary for employment
- Dental work (limited to minor work, not to exceed \$500 annually)
- Uniforms or other special clothing
- Test fees, certification fees, licensing, or bonding
- Safety equipment items
- Items all students enrolled in a specific training or course of study are required to have (For example: Nursing students are required to undergo a tuberculosis test as a condition of participating in the course of study. This would only be covered if no other health care coverage is available.)
- National Career Readiness Certificate (NCRC)
- Industry-specific workplace skills credentialing or training
- Housing assistance, after all other potential resources have been exhausted.
- Utility assistance, after all other potential resources have been exhausted.
- Transportation costs related to E&T participation
- Child/dependent care (in specific situations)
- Other items as approved by the HHS E&T Program Managers

The E&T Providers provide the supportive services directly to the participant. The Department will reimburse the provider a portion of these costs, but E&T participants do not receive supportive services directly from the Department.

Participant Eligibility and Tracking

Legal reference: 7 CFR 273.24(a)

The E&T Eligibility Specialist (E&T ES) will track referrals, eligibility, and participation in SNAP E&T. A notation is made in the participant's narrative in WISE when they enroll in and exit the E&T Program. The notation will include an entrance and exit date and dates of component.

ABAWDs participating in SNAP E&T may meet their work requirement through participation. Contact etverification@dhs.state.ia.us to inquire about a person's employment and training status if you believe their WR code should be changed.

ABAWDs may also be participating in non-SNAP employment and training programs through Iowa Workforce Development or other agencies. Verification of participation through these programs must be verified with the applicable agency and not the SNAP E&T ES.

The following information is provided for general knowledge but is the responsibility of the E&T ES.

Policy: SNAP applicants are eligible for E&T from the date of application through the SNAP E&T screening and referral process, or until a SNAP eligibility determination is made.

EXCEPTION: Persons receiving FIP are not eligible for SNAP E&T. See [FIP](#) further in this chapter.

- IM role: Determine SNAP eligibility, complete, and document the E&T screening and referral process.
- E&T ES role: Determine E&T eligibility dates by monitoring SNAP and FIP eligibility.

Effective Date of E&T Eligibility

A SNAP applicant is eligible for E&T prior to a SNAP eligibility determination. Actions taken by the E&T ES are dependent upon if an E&T referral is documented in WISE.

Application Is Pending Without an E&T Referral Documented

If an interview hasn't been completed, an E&T referral won't be documented in WISE for a SNAP applicant. When this happens, the E&T ES must review E&T eligibility twice:

1. after the interview, and
2. again when an eligibility determination is made.

Once the interview is held, if the IM has documented a referral to E&T:

- Is appropriate, see [When an Application Is Pending With an E&T Referral Documented In WISE](#).
- Is not appropriate, the E&T ES must contact the applicant to ensure they understand they aren't eligible for E&T services.

If the applicant is still not an appropriate E&T referral, E&T eligibility ends as of the date of interview.

1. A SNAP application and an E&T referral are submitted on April 3rd. The E&T ES verifies HHS received the SNAP application, approves E&T, and narrates in WISE.

The SNAP interview is held on April 10 and the applicant indicates during the screening and referral process that they aren't interested in E&T services.

The E&T ES reviews the case and sees the applicant isn't eligible for E&T. The E&T ES contacts the client to clarify the discrepancy. The applicant indicates they want to work with the third-party provider but aren't planning to work within the next 12 months. The E&T ES notifies the provider that the applicant's eligibility is limited to April 3 – 10th.
2. Same situation as example 1, but the applicant indicates during the call with the E&T ES that they misunderstood the question, and are interested in E&T. The E&T ES updates the referral information in WISE, and E&T remains active, at least through the eligibility determination

When an Application Is Pending With an E&T Referral Documented In WISE

- If the SNAP application is approved, the only action needed is the monthly eligibility review completed by the E&T ES.
- If the SNAP application is denied, E&T eligibility is limited to the application date through the *Notice of Decision (NOD)* date that denies the application.

SNAP Eligibility Denial

When a SNAP application is denied for failing to provide information, E&T eligibility must be re-evaluated if the requested information is returned within 60 days of the application date:

- If information is returned within the first 30 days of the application date – no break in E&T eligibility.
- If information is returned in the second 30 days of the application date, E&T eligibility begins with the effective date of SNAP eligibility.

SNAP application filed March 6, and application denied March 23 for failing to provide information .

- If information is returned prior to April 5, and the client is determined eligible, there is no break in E&T eligibility.
- If information is returned April 25 and the client is determined eligible, E&T eligibility periods are:
 - March 6 - 23
 - April 25 – through the end of SNAP eligibility.

A RRED submitted after the end of the certification period is treated as an application.

SNAP Ongoing Client

A person who receives SNAP is eligible for E&T from the date of their E&T application when an E&T referral is documented in WISE.

When a request for E&T is submitted by the E&T provider during the certification period, SNAP eligibility has already been determined, and E&T eligibility is approved.

Clients who have a RRED due may have a disruption in their E&T eligibility, depending on when the RRED is received and processed. E&T providers will be notified when a RRED is due for the client to assist in ensuring there is no break in assistance.

1. Client is receiving SNAP effective January – June. A request for E&T is submitted by the provider and received March 20. E&T should be approved with a March 20 effective date if there is an E&T referral in WISE. During the monthly eligibility check in May, the provider should be notified that the HH will receive a RRED in June so they can provide any assistance necessary to complete.
2. Client is receiving SNAP effective January – June. A request for E&T is submitted by the provider on June 25th. The RRED has been received but has not been processed. E&T eligibility is approved effective June 25. The provider is notified that July eligibility has not yet been established and is pending.
 - a. The RRED is processed with an eligibility date of July 1 (including the E&T screening and referral completed). The provider is notified that the client is now eligible for July, with no break in eligibility.
 - b. The RRED is processed (including the E&T screening and referral completed) with an eligibility date of July 15. The provider is notified that the client is eligible for July effective the 15th. There is no E&T eligibility between July 1-14.

See [7-B](#) and [7-G](#) for more information on SNAP eligibility dates when there is a delay in processing.

FIP

A client who is **receiving** FIP is not eligible to receive E&T services. Their employment & training services are provided by the PROMISE JOBS program.

When a FIP application is **pending**, the applicant is eligible for SNAP E&T (assuming they otherwise meet SNAP E&T requirements) at least while the FIP application is pending:

- If the FIP application is approved, the E&T provider must be notified that SNAP E&T eligibility has ended as of the date on the FIP NOD.
- If the FIP application is denied, the only action needed is the monthly eligibility review completed by the E&T ES.

FIP/SNAP application is filed and an E&T referral is received on March 2. E&T is approved effective March 2, with a notification to the provider that a FIP application is pending. A decision is made on FIP eligibility with a March 23 NOD date.

- If FIP is approved, SNAP E&T eligibility is limited to March 2 – March 22, and the E&T provider is notified the applicant's E&T eligibility ends on March 22.
- If FIP is denied, SNAP E&T eligibility remains, and the only action needed is the monthly eligibility review completed by the E&T ES.

NOTE: If the SNAP application is denied, handle as determined under “application” above.

FIP applications denied for failing to provide information must be monitored through the end of the grace period. If FIP is subsequently approved, SNAP E&T must be cancelled effective with the immediately preceding date shown on the FIP NOD approval date. There is no recoupment for SNAP E&T services provided in this situation.

See [4-B. Grace Period Following Denial of an Application](#), for more information about the FIP grace period.

Discretionary Exemptions

Legal reference: 7 CFR 273.24(g)

Federal law allows states to exempt ABAWDs by applying what is called a discretionary exemption. Iowa uses these exemptions for some participants enrolled in employment and training who would otherwise be ABAWD.

Only Central Office can apply the discretionary exemption to eligible participants. ABAWDs exempt for this reason will have a notation in WISE and have an WR code of “F” for the applicable months.

Substitution of FIP Work Rules

Legal reference: 7 CFR 273.25

The USDA Food and Nutrition Service gives states the option to operate a mini-simplified SNAP program. This option allows the state to replace SNAP work rules with Family Investment Program (FIP) work rules for some households.

Iowa has chosen to operate a mini-simplified SNAP program for FIP households in which the parent is exempt from SNAP mandatory work registration due to caring for a child under age six. Because FIP parents included in the program are exempt from work registration, they are not subject to SNAP disqualification for failure to comply with work requirements. Inclusion of a household in the program has no effect on how SNAP eligibility and benefits are determined.

Under the mini-simplified SNAP program, the monthly SNAP and FIP benefits are combined to determine the maximum number of hours the parent may participate in an unpaid work activity subject to the federal Fair Labor Standards Act under FIP.

Maximum hours for a month are determined by dividing the total amount of benefits by the state or federal minimum wage (whichever is higher). If the FIP parent works the maximum number of hours and still falls short of the hours needed to meet the FIP work obligation, the FIP parent is deemed to meet the FIP work obligation.

Including the SNAP benefit amount in determining the maximum number of work hours provides the parent an opportunity to increase job skills and improve employability. It also helps Iowa meet FIP work participation rate requirements.