Prospective Provider Packet SNAP Employment and Training Program

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Definitions

Business Associate Agreement (BAA) – A written arrangement that specifies each party's responsibilities when it comes to PHI.

- Protected Health Information (PHI) Under HIPAA Rules, past, current, and future health information about medical conditions or physical and mental health related to the provision of care or payment for care. PHI is health information in any form, including physical records, electronic records, or spoken information.
- Qualified Service Organization (QSO) Under HIPAA Rules if information is shared related to substance abuse, the organization is determined as a QSO.

Case Management – The development, coordination, documentation, tracking, and reporting of all aspects of referral/enrollment, service provision and participation as required by the E&T program.

E&T requires that case management include of the following activities: comprehensive intake assessments, individualized service plans, progress monitoring, and/or coordination with other client service providers.

Community Based Organization (CBO) – A public or private nonprofit organization that provides educational or employment related services to eligible SNAP participants.

Component – As described in 7 CFR 273.7(e), a service, activity, or program designed to help SNAP recipients gain skills, training, or work experience that will increase their ability to obtain regular employment and achieve self–sufficiency.

Employment and Training (E&T) – lowa's federally mandated SNAP employment and training program.

Family Investment Program (FIP) – lowa's Temporary Assistance to Needy **Families** (TANF) program. FIP provides cash assistance to needy **families** as they become self-supporting so that children may be cared for in their own homes or in the homes of relatives.

Food and Nutrition Service (FNS) – A division of the United States Department of Agriculture (USDA). FNS is the federal agency responsible for administering the nation's domestic **nutrition** assistance programs.

HHS – Iowa Department of Health and Human Services. HHS holds the federal contract with FNS for the SNAP E&T program.

Invoice – Service Providers' claim for payment, using Agency approved billing workbook and submitted on General Accounting Expenditure (GAX) form.

IWD – Iowa Workforce Development. IWD is Iowa's Intermediary Administrator for the SNAP E&T program.

Participant – An individual enrolled in the E&T program.

Scope of Services – All services, goods, products, work, work product, data (including data collected on behalf of HHS and/or IWD), items, materials and property to be created, developed, produced, delivered, performed, or provided by or on behalf of, or made available through, the Service Provider, any agent of the Service Provider in connection with any Service Provider Agreement or Contract.

Service Provider – Means an entity that meets minimum requirements of the program and enters into Contract with IWD.

Supplemental Nutrition Assistance Program (SNAP) – Federally mandated program administered by the United States Department of Agriculture (USDA) - Food and Nutrition Services (FNS) division.

E&T Background

HHS administers the Supplemental Nutrition Assistance Program (SNAP) as authorized by the Food and Nutrition Act of 2008, as the SNAP Program. The program helps low-income individuals obtain a more nutritious diet by supplementing their income with SNAP benefits issued on an electronic benefits transfer (EBT) card.

Factoids on SNAP for SFY 23 (July 2022- June 2023):

- An average of 272,223 lowans in 135,529 cases received SNAP every month
- 56% of the people receiving SNAP were under the age of 18 or over the age of 59
- The average recipient is a 30-year-old Caucasian female

As a part of administering SNAP, states must design and operate an employment and training program. In Iowa, E&T is the SNAP corresponding employment and training program.

Currently, Iowa's E&T program is voluntary; there are no mandatory participation requirements.

The program has expanded from initial partnerships with three colleges in 2015 to current partnerships with five colleges, four community-based organizations, and four American Job Centers within Iowa Workforce Development. The expansion of the E&T Service Provider network will increase accessibility and availability of training, education, supports, and services to a larger segment of the population receiving SNAP benefits, which in turn will lead to improved outcomes for E&T participants by increasing their likelihood of achieving self-sufficiency.

In FFY 2023, Iowa HHS contracted with Iowa Workforce Development (IWD) to be the E&T program's Intermediary Administrator. With IWD administering the E&T program, Iowa gains stronger alignment of workforce services across the state.

HHS Mission and IWD Vision

The mission of the Iowa Department of Health and Human Services (HHS) is to provide high quality programs and services that protect and improve the health and resiliency of individuals, families, and communities. The vision of Iowa Workforce Development is to create, enable, and sustain the most future ready workforce in the nation.

E&T Purpose

The purpose of Employment and Training (E&T) is to help individuals receiving SNAP benefits obtain employment through voluntary participation in supervised job search, training, or education activities that promote self-sufficiency.

E&T Vision

Every person deserves a pathway to success. The program will expand opportunities for lowans and empower them to achieve sustainable wage employment through training, employment services, and job readiness activities in all 99 counties by December 31, 2025.

E&T Objectives

- 1. Provide a wide range of opportunity for SNAP recipients to have clear pathways to develop marketable and in-demand skills that increase employability resulting in career advancement and self-sufficiency.
- 2. Establish a collaborative and inclusive environment for participants, providers, and communities to share a common vision and achieve positive outcomes for the individual, organization, and community.
- 3. Strengthen fiscal capacity of network providers to expand essential supports and services by maximizing use of non-federal funding sources.
- 4. Demonstrate efficient, effective, and responsible practices that result in positive outcomes and contribute to economic growth.

Benefits of E&T

For Service Providers	For Participants	For State
Increase capacity of non-federal funding sources by 50% Increase staff capacity Increase number of individuals served Expand scope of services and/or programs offered	Increased opportunity for education & training programs Increased availability of supportive services while in training Gain skills needed for gainful employment Achieve economic self-sufficiency	Maximize use of State funding sources Increased accessibility and availability of training opportunities Build stronger, more skilled workforce Contribute to economic growth

Non-Discrimination Statement

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, religion, sex, gender identity (including gender expression), sexual orientation, disability, age, marital status, family/parental status, income derived from a public assistance program, political beliefs, or reprisal or retaliation for prior civil rights activity, in any program or activity conducted or funded by USDA (not all bases apply to all programs). Remedies and complaint filing deadlines vary by program or incident.

Persons with disabilities who require alternative means of communication for program information (e.g., Braille, large print, audiotape, American Sign Language, etc.) should contact the responsible Agency or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program discrimination complaint, complete the USDA Program Discrimination Complaint Form, AD-3027, found online at How to File a Program Discrimination Complaint and at any USDA office or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by: (1) mail: U.S. Department of Agriculture, Office of the Assistant Secretary for Civil Rights, 1400 Independence Avenue, SW, Washington, D.C. 20250-9410; (2) fax: (202) 690-7442; or (3) email: program.intake@usda.gov.

USDA is an equal opportunity provider, employer, and lender.

Non-Discrimination Statement | USDA

'Funding provided by U.S. Department of Agriculture'

Service Provider Requirements

Prospective E&T providers need to evaluate their programs to ensure they meet requirements prior to applying. Any questions about the requirements may be directed to IWD at snapet@iwd.iowa.gov.

All prospective E&T providers must:

- Have an existing client base which includes individuals receiving SNAP benefits.
- Be already involved in the delivery of employment and training services (on a broad basis).
- Provide programs or services that meet the purpose and parameters of E&T components for recognized industry credentialing, supervised job search activity, and supportive services necessary for participation in an E&T component in accordance with the most recently FNS approved State Plan and E&T Provider Handbook.

- Have a non-federal funding source to use as match for the E&T program's 50/50 reimbursement. Organizations must be able to "front" services for low-income individuals with non-federal funding sources such as:
 - State,
 - Local,
 - · Community organizations,
 - Foundations,
 - Social Enterprises, etc.

Furthermore, non-federal funds must also meet the following criteria:

- Originate from a non-federal source.
- Must not be committed as match for other federally funded programs.
- Available for entirety of the federal fiscal year (October 1 through September 30), unless otherwise specified in any Service Agreement.
- Must be able to cost allocate to ensure billing is limited to allowable reimbursements for E&T participants, including any administrative costs.
- Have the capacity to enter and collect individual demographic data, document and track service provision, allocate and track funding, and report outcomes using the state identified methodology and system.
- Have the experience or willingness to begin managing federal funds as required.
- Have audit capacity for examining program delivery and financial reporting procedures and agree to periodic audits of program operations conducted by the State or Federal administering agencies.
- Be included in an amended State E&T Plan, approved through FNS, and have an executed service contract with the state prior to providing services through the E&T program.
- Comply with all Federal, State, HHS, and IWD Civil Rights/Confidentiality Non-Disclosure requirements.
 - General terms of contracting **require** that confidential information collected, maintained, or used in the course of performance of the Contract shall only be used or disclosed by the Contractor as expressly authorized by law and only with the prior written consent of the IWD, either during the period of the Contract or thereafter. E&T allows reimbursement of some medical related supports. Information related to any medical supports provided must be documented to sufficiently support reimbursement payment but may not contain any specific medical Personal Health Information (PHI).-
- Acts as a Business Associate and Qualified Service Organization pursuant to the E&T Provider contract as related to information that is protected by Health Information and Portability Accountability Act of 1996 (HIPAA). Summary of the HIPA Privacy Rule | HHS.gov

Provide a Certificate of Coverage of insurance as shown in the table below.

Type of Insurance	Limit	Amount
General Liability (including contractual liability) written on occurrence basis	General Aggregate	\$2 Million
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	Operations Aggregate	
	Personal Injury	\$1 Million
	Each Occurrence	\$1 Million
Automobile Liability (including any auto, hired autos, and non-owned autos)	Combined Single Limit	\$1 Million
Excess Liability, Umbrella Form	Each Occurrence	\$1 Million
	Aggregate	\$1 Million
Workers' Compensation and Employer Liability	As required by Iowa law	As Required by lowa law
Property Damage	Each Occurrence	\$1 Million
	Aggregate	\$1 Million
Professional Liability	Each Occurrence	\$2 Million
	Aggregate	\$2 Million

Scope of Services

Case Management

Service Providers must ensure that the following case management services are provided for each E&T participant:

- Employability assessment, including:
 - Career interest assessment,
 - Skills assessment,
 - Career and job search readiness assessment, or
 - Assessment of essential tools needed for success in training and career.
- E&T Employability Plan (i.e. individualized service plan).
- Two-way contact with each participant and supporting documentation to monitor progress:
 - at least every 30 days, during any education/training or job retention component,
 - at least weekly to actively engage, direct or track activities during Supervised Job Search component.

- Referral to other public service agencies for additional services, if necessary (i.e. coordination with service providers).
- Career and job search coaching and support.

E&T Components

Offer at least one of the following E&T reimbursable components:

Educational Program Basic/Foundational Skills Instruction (EPB)

- Adult Basic Education (ABE) programs offer academic instruction and education services below the post-secondary level that increase an individual's basic literacy, math skills, and financial literacy skills necessary for the attainment of a secondary school diploma or its recognized equivalent.
- High School Equivalency Diploma (HSED)/Test (HiSET) prepares participants with basic skills needed to increase the likelihood of successfully participating in a HiSET course and testing. Participants enrolled in this component can be provided supportive services and testing fees to complete testing to obtain their HSED.

Education Program English Language Acquisition (EPEL)

Programs designed to help English language learners achieve competence in reading, writing, speaking, and comprehension of the English language; thereby, increasing employability and job-readiness.

Educational Program Career/Technical Education Programs or other Vocational Training (EPC)

Expanded Education (EE) – post-secondary programs that provide academic and/or technical knowledge and skills to develop necessary skills for education or careers in current or emerging employment sectors. Participants may enroll in short term certificate programs and credit degree programs towards an associate degree, all in identified in-demand industries. Participants may also enroll in vocation/occupational skills programs providing skills necessary to increase employability and ideally lead to an industry-recognized certificate or credential.

- Community Colleges (CC) provide post-secondary non-credit certificate programs and post-secondary credit programs leading to a diploma or associate degree.
- Community Based Organizations (CBO) provide occupational skills and vocational programs that lead to certificates or industry-recognized credentials.
- Training or educational activities must provide participants a direct link to jobs in their area of study that are available in the local job market.
- Education, training, industry-recognized credentials, certifications, diploma, and degree programs are limited to high demand occupations and hot jobs as defined by lowa's Labor Market Information (LMI) unit.
- Training programs will be short term in duration, up to 24 months.

Educational Program Integrated Education and Training/Bridge Programs (EPIE)

Integrated Education and Training (IET) – provides adult education and literacy activities concurrently and contextually with workforce preparation activities and workforce training for a specific occupation(s) for the purpose of educational and career advancement. In this component, participants may participate in both education and employment, or job training activities, during the week. This allows the participant to earn skills and wages, while completing required education. All wages earned are paid by the employer and are not reimbursable E&T expenses. The specific education and on-the-job training provided is determined by the Provider and employer.

Work Readiness (EPWRT)

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, 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.

Supervised Job Search (SJS)

Development of a Job Search Plan (JSP) identifying job search activities and supports. Provide weekly coaching, communication, and case management that occurs at State approved locations.

Job Retention Services (JRS)

Provides transitional supports including but not limited to, guidance, coaching, clothing/equipment, and other job-required fees, to participants who have secured employment, a registered apprenticeship or other on-the-job training to E&T participants who have completed or are participating in another E&T component. JRS must be offered for a minimum of 30 days up to a maximum of 90 days from the employment start date.

Entrepreneurship/Self-Employment Training (SET)

Supports participants to improve employability by providing training to set and operate a small business or other self-employment venture.

Work Component Internship (WBLI/SWBLI)

A planned, structured learning experience that takes place in a workplace, and the contract must be limited to a specific period 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). Internships may provide wages subsidized by the E&T program.

Work Component On-the-Job Training (WBLOJT)

A 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 time period required for a participant to become proficient in the specific occupation. The term of the training period should consider skill requirements for the occupation, academic and occupation skill level of the participant, prior work experience, and the participants' employability plan (20 CFR 680.700). The provider and employer determine specific education and on-the-job training provided. All wages are paid by the employer and not reimbursable E&T expenses.

Work Component Pre-Apprenticeship/Apprenticeship (WBLPA)

A combination of on-the-job training and related instruction in which workers learn the practical and theoretical aspects of a skilled occupation. Apprenticeship programs can be sponsored by individual employers, joint employer, and labor groups, and/or employer associations. Pre-Apprenticeship programs provide individuals with the basic and technical skills necessary to enter an apprenticeship program and should be directly linked to an apprenticeship program.

Supportive Services

FNS requires the provision of any services and supports that are reasonably necessary to successfully participate in the program. The intention of supportive services is to assist participants in acquiring fundamental skills and tools needed to increase employability and achieve self-sufficiency during the months a participant remains eligible for SNAP, training has commenced, and is active in an E&T component. Reimbursements occur only for those costs incurred after E&T enrollment.

Service Providers are not required to provide all allowable reimbursable supportive services, but Iowa has determined minimally required supports and services which must be offered and provided either directly or through referral.

Documentation, in a participant's E&T record, is required to provide evidence of participant refusal, lack of need, or provision of the following supports and services:

- Tuition/Program Costs: Industry specific workplace skills/credentialing/training, including but not limited to
 - Books/Class Fees
- Background checks/fingerprinting, when required for training or necessary for employment.
- Transportation Assistance: To/from education, training, interviews, work by any of the following:
 - Fuel cards,
 - Mileage,
 - Bus passes,
 - · Taxi or ride share service vouchers, or
 - Other as determined cost effective and suitable, with prior approval.
- Clothing/Uniforms Necessary and reasonable for education, training, interviewing, work

- Equipment/Tools Necessary and reasonable safety items and tools of the trade
- Technology necessary and reasonable to actively participate in E&T, including maintaining communication with E&T Case Manager and employers and access to online programs. Technology must be provided in the most cost-effective suitable option available.
 - Hotspots
 - Internet access
 - Cell Phone minutes or basic plan
 - Equipment is limited to pre-approved loaner program for laptops, tablets, or cell phone.
- Work and Training Fees Necessary and reasonable for education, training, or work
 - Testing,
 - Certifications.
 - Permits, or
 - Licensing, bond fees, or union dues.
- Reasonable accommodation supplies

Other Supports

- Dependent Care Assistance Historically, E&T program participants are enrolled in the state's Child Care Assistance (CCA) program or have alternative sources of child or dependent care. Most participants who need dependent care are anticipated to be able to access these services from other sources at no cost to the E&T program.
 - Available to participants who do not qualify for dependent care services from other programs. E&T may not cover additional childcare units above what CCA determines the participant is eligible to receive
- Medical Supports Limited to items necessary and required of all students enrolled in specific training or course of study. These supports are only eligible for reimbursement if no other health care coverage is available. Allowable services include, but are not limited to:
 - Tuberculosis (TB) Testing,
 - Immunizations,
 - DOT Physical,
 - Drug Screens, and/or
 - Dental Work minor and limited, annual total not to exceed \$500/\$250 reimbursed
- Housing Assistance Only after all other potential resources have been exhausted.
 - Housing assistance may include rental assistance when housing stability is reasonable and directly related to helping E&T participants prepare for self-sufficiency through training or other approved E&T activity.
 - Housing assistance is limited to one-time per E&T enrollment.
 - Assistance is limited to one month and the current month of the participant's monthly housing costs

- Utility Assistance Only after all other potential resources have been exhausted.
 - Utility assistance may be used to prevent the shut-off of essential housing utilities such as electricity, water and heating. Participants who are eligible for E&T services should also be eligible for Low Income Energy Assistance Program (LIHEAP).
 - Utility assistance is limited to one-time per E&T enrollment.
 - Assistance is limited to one period and the current period of the participant's monthly utility expense
- Vehicle Repair For participants enrolled in training, Supervised Job Search, or Job Retention activities in need of assistance with an emergency vehicle repair, to ensure retention of employment, completion of training, or support of self-sufficiency.
 - Limited to a one-time per participant enrollment assistance of \$1,000 (\$500 reimbursed), given the participant can produce a valid driver's license, valid insurance on the vehicle, and valid registration. An additional \$1,000 (\$500 reimbursed) may be provided during the participant's JRS enrollment.
 - Total repair estimates costing more than half of the Kelley Blue Book value of the car are not eligible.
- Other Any cost not listed, the E&T Coordinators determine if the reimbursement is allowable, reasonable, and necessary to allow for successful completion of the component.

E&T Enrollment/Exit

Potential applicants interested in the E&T program, both self and HHS referred, must be provided orientation and assessment before being enrolled in the program.

- Orientation: Will include an overview of program, including expectations. Orientation must occur and be documented during the intake and eligibility process. The Service Provider must complete intake and assessment of the individual to ensure they are a good fit for the program.
- Intake/Eligibility: Prior to determining SNAP eligibility, obtain signed consent forms allowing information to be shared with HHS from all individuals who are subject to the verification process, even if the individual does not ultimately enroll in E&T. If the participant prefers to communicate in a language other than English, all forms and services must be communicated and/or interpreted to the participant in their preferred language, according to each Provider's policy and procedure.

An individual is eligible to receive services if all the following are true:

- A SNAP recipient,
- Not receiving FIP assistance of other cash assistance, such as Tribal TANF, under Title IV,
- Age 18 or older (16-17 if enrolled or already obtained high school diploma),

- Physically and mentally able to work or will be able to work within the next one (1) year,
- Assessment: The Provider must complete an Employability Assessment with the participant to ensure they are a good fit for the program. During the assessment, an individual will be evaluated in the following areas:
 - Education level/literacy/academic skills/obstacles
 - Education restriction the person has less than a bachelor's degree unless any of the following apply:
 - The training requested is a progression in a specific career that moves a participant from entry-level positions to higher levels of pay, skill, responsibility, or authority
 - The previous training is in a field where current labor market information statistics or emerging business trends show little or no employment opportunity
 - Changes in the participant's physical or mental status make employment in the area in which the participant is currently trained no longer appropriate
 - The participant must provide supportive evidence from a qualified medical or mental health professional or Iowa Vocational Rehabilitation Services (IVRS)
- Enrollment: Within five business days of completed assessment, providers must complete
 the enrollment process. Enrollment may occur within the 30-day period prior to
 education/training start date.
- Authorization of Services: To remain enrolled in E&T, participant eligibility for SNAP must be verified monthly.
- Exit: When a participant has ended active participation in any E&T component, required contact has not been maintained, or SNAP eligibility is lost (except while active in JRS), the participant must exit from the E&T program. HHS must be notified of exit, including end component and result or reason of exit.
- Participant Reimbursement: Reimbursement requests may only be submitted for supportive services that are reasonable and necessary for the successful participation in the enrolled components, have been fully funded, and provided to the participant during month(s) in which the participant remains E&T eligible as an active recipient of SNAP benefits; with the exception of active participation in JRS.

Service Provider Responsibilities

- Service Provision: The Contractor shall provide at least one E&T component and ensure provision of Case Management services and required Supports.
 - Service Providers shall fund, at time of provision, the total cost of supportive services necessary to participate in the program component, on behalf of the participant.
 - Services Providers shall request reimbursement, on behalf of the participant, for expenses incurred only during months in which the participant is receiving SNAP or determined eligible for E&T.

- Annual Projections: Service Providers shall calculate annual enrollment and budget based on identified non-federal funding sources and current populations served receiving SNAP benefits. E&T projections shall be calculated and submitted using the IWD approved methodology to be discussed and provided during the applicant informational meeting.
 - Once the application and Prospective Provider Packet has been reviewed and prior to completing the projected enrollment and budgeting sections of the application, send a request to the email below to request a virtual applicant informational meeting: snapet@iwd.iowa.gov
- Billings & Obligation Tracking: Service Providers must submit requests for reimbursments as directed by IWD and maintain a tracking system to ensure financial obligations do not exceed approved funding.
- Information/Notification requests: Service Providers must provide information requested by IWD and HHS within three business days, unless otherwise specified.
- Records Retention: All records related to the application, enrollment, and participation in E&T must be created and stored within the SNAP module in the IowaWORKS system.
- Staff Development: Service Providers shall train staff and comply with all E&T policies and processes, the applicable Service Provider or Contractor handbook, and communicate updates as provided by IWD and HHS.
 - Service Providers are required to ensure that all staff; including frontline staff and
 volunteers, and their supervisors, are trained prior to the provision of any E&T Services
 and annually thereafter in IWD provided Civil Rights and Confidentiality policies in
 accordance with State and Federal requirements.
 - Service Providers are required to have at least one representative, actively involved in the E&T program, attend scheduled E&T provider trainings, calls, or meetings, unless excused by IWD.
- Systems: Service Providers will enter individual demographic data, document and track service provision, allocate and track funding, and report outcomes using IWD approved methodology and systems.
- Outcomes: Service Providers shall support participants in successfully completing the E&T program to attain programs goals set forth by IWD.
 - The number of participants who successfully complete each E&T component.
 - The number of participants who begin, but do not complete each E&T component and reason for component closure.
- Reporting: Service Providers shall ensure all enrollment, participation status and outcome information for each participant is up to date and available, as directed by IWD, to meet quarterly and end of year state and federal reporting requirements.
- Appeals: In the event of an appeal, Service Providers shall provide appropriate information and supporting documentation to HHS and IWD and shall participate in any meetings or hearings as needed. Appeal rules are found in 441 Iowa Administrative Code, Chapter 7.

- Communication: Service Providers must maintain or attempt communication when a loss of contact with a participant has occurred and track all direct HHS referrals. The following documentation for outcome information of attempted communication is required:
 - Method and date of contractor/sub-contractor contact. If unable to contact in-person, by phone or electronic means, at least two attempts must be documented.
 - Outcome of contact
 - Reason for denial when participant not referred to the E&T program
- Promotional Materials: Service Providers shall ensure IWD reviews and approves any of the following prior to release:
 - Flyers, brochures, posters,
 - Other published materials the Service Provider uses for the E&T program.
 - Websites or social media platforms posting about the E&T program, and
 - Training material for staff handling the E&T program.
- Media: The Service Provider shall refer all media requests about the E&T program to IWD. Service Providers will promote the E&T program as long as the information provided is that of the organization and does not reflect the official policy or position of HHS or IWD.

IWD Responsibilities

- IWD shall provide the Service Provider with a copy of the E&T State Plan, including any amendments.
- IWD shall respond to Service Provider requests to clarify and answer any questions about E&T policies within three business days.
- IWD shall review and approve any of the following prior to release:
 - Flyers, brochures, posters
 - Other published materials the Service Provider uses for the E&T program,
 - Websites or social media platforms posting about the E&T program,
 - Training material for staff handling the E&T program, and
 - Presentations regarding the E&T Program.
- IWD will handle media requests, including those referred by the Service Provider.
- IWD will provide required training and materials for:
 - Civil Rights Training,
 - · New Provider Training, and
 - Participant Orientation.

Resources

- Code of Federal Regulations 7 CFR 273.7(e), SNAP E&T: https://www.ecfr.gov/cgi-bin/text-idx?SID=fa6401d778445be1d299a418424d84dc&mc=true&node=se7.4.273 17&rgn=div8
- Food and Nutrition Service, U.S. Department of Agriculture, SNAP E&T: https://www.fns.usda.gov/snap/et

- Iowa Department of Health and Human Services, SNAP: https://hhs.iowa.gov/programs/food-assistance/snap
- lowa Workforce Development, SNAP E&T:
 https://workforce.iowa.gov/jobs/worker-programs/snap
- USDA SNAP to Skills: https://snaptoskills.fns.usda.gov/
- E&T Service Provider Readiness Roadmap Part 1 : <u>Provider Readiness Roadmap</u>

Attachment 1: Service Provider Self-Assessment

SNAP Employment and Training Program

Service Provider Self-Assessment

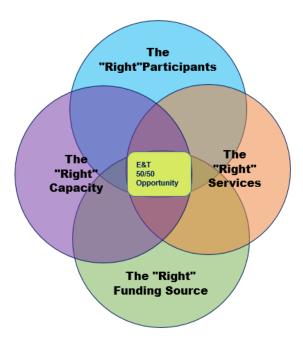
There are specific factors to consider when deciding if your organization aligns with Iowa's E&T program and is a good fit as a Service Provider.

Checklist of factors to consider include:

program AND receiving SNAP in Iowa.
The Right Services: Provider of education, training, job search or job retention activities that promote and provide a path to self-sufficiency.
The Right Funding Source(s): Non-Federal funding source(s) that is not used as a match in another federally funded program.
The Right Capacity: The administrative requirements of the E&T program are specific and

The Dight Derticipants, Individuals participating in an advection training or ich search

The Right Capacity: The administrative requirements of the E&T program are specific and can be rigorous. Appropriate staffing and financial capacity to assess and enroll participants, provide appropriate services and supports, track and record participant progress and outcomes, collect and report required data, track and appropriately bill program costs associated with a federally funded program are essential.



Participant & Service Capacity

- 1. Does your organization offer appropriate and allowable employment and training activities and related support services?
- 2. Is your organization able to recruit its own E&T participants and accept referrals?

- 3. Is your organization already serving a significant number of SNAP recipients or low-income individuals potentially eligible for SNAP?
- 4. Does your organization have staff to provide required assessment and employability plan development related to enrollment of E&T participants, monitor, track, document and report progress and outcomes?
- 5. Does your organization provide case management and reimbursable E&T supportive services in-house or work with community partners to provide those services?
- 6. Does your organization have the ability and intent to expand to additional service provision and/or data collection to meet E&T requirements?

Staff & Funding Capacity

- 1. Does your organization have up front funding available for 50/50 reimbursement of employment and training services which is:
 - a. Non-federal
 - b. Not committed as match for other federally funded programs
 - c. Available for entirety of entirety of the federal fiscal year (October 1 through September 30), unless otherwise specified in any Service Agreement
- 2. Will your organization be able to allocate and track federal funds and guarantee that the source of matching funds is non-federal and allowable?
- Does your organization have the capacity to allocate, track and invoice for staff time spent on the E&T program? Service Providers must keep time records in order to bill for staff time.
- 4. Does your organization have the capacity to prepare and submit monthly billing documents based on E&T participation and program expenditure data?
- 5. As all E&T funds are federal sub-recipient awards, and your organization would be a Service Provider, is your organization willing to participate in any required federal or state audits; or other mandated reporting requirements, and state monitoring at least annually and as determined necessary by IWD?
- 6. Has your organization been disqualified from receiving federal grants over the past five years?
- 7. Are there any current or pending lawsuits that would impact the organization's financial position and ability to fund E&T services and supports?
- 8. How does your organization anticipate utilizing the reimbursement funds to expand or enhance the E&T program?