

**STATE OF TEXAS
SUPPLEMENTAL NUTRITION
ASSISTANCE PROGRAM EMPLOYMENT
AND TRAINING
FEDERAL FISCAL YEAR 2016
STATE PLAN OF OPERATIONS**

PART I

SUMMARY OF TEXAS' SNAP EMPLOYMENT AND TRAINING PROGRAM

A. ABSTRACT OF TEXAS' SNAP EMPLOYMENT AND TRAINING SERVICES

The Supplemental Nutrition Assistance Program (SNAP) Employment and Training (SNAP E&T) program assists SNAP recipients by improving their ability to obtain regular employment, increase earnings, and reduce their dependency on public assistance.

The Texas Health and Human Services Commission (HHSC) is the federally recognized administering agency for SNAP in Texas. HHSC determines eligibility and mandatory or exempt status then electronically transmits this information to the Texas Workforce Commission (TWC).

TWC, by state statute, is the state level administering agency for integrated workforce services, which includes the SNAP E&T program. TWC is part of a local/state network dedicated to developing the workforce system in Texas and operates five of the six core programs for the Workforce Investment and Opportunity Act (WIOA). The Texas workforce network is composed of the statewide efforts of TWC coupled with planning and service provision on a regional level by 28 Local Workforce Development Boards (Boards) and their contracted one-stop providers.

Boards provide oversight and planning for integrated workforce services, which are delivered through contracted one-stop providers. One-stop providers operate a variety of SNAP E&T components. Comprehensive services—including job search, training, workfare (i.e., community service), work experience, vocational and basic education components, and support services—are provided to SNAP recipients, who are classified in Texas as:

- Able-Bodied Adults Without Dependents (ABAWDs); or
- General Population (i.e., non-ABAWDs or those SNAP recipients with families).

Integrated services, including those under WIOA; Choices, the Temporary Assistance for Needy Families (TANF) employment program; and others provide job seekers (including those receiving SNAP benefits) with a variety of work activities that lead to permanent, unsubsidized employment. This plan addresses the work activities, support services, and coordination procedures for SNAP E&T and includes a flowchart that displays the complete service delivery process from point of certification for SNAP benefits to obtaining full-time employment.

1. Program Changes

Third-Party Reimbursement Initiative

In Federal Fiscal Year 2016 (FFY'16), TWC will pilot a Third-Party Reimbursement (TPR) initiative with the Capital Area Workforce Development Board (Capital Area) in Austin, Texas. Capital Area will partner with the City of Austin and Travis County to leverage 50 percent federal SNAP E&T funds to cover the costs of providing SNAP E&T services to exempt and mandatory SNAP recipients not currently served due to funding limitations.

The City of Austin and Travis County will supply nonfederal funding for the provision of allowable activities and support services to SNAP recipients participating in the pilot. In return, the city and county will be reimbursed a percentage of the total cost incurred for serving SNAP recipients.

Allowable SNAP E&T activities provided to SNAP recipients participating in the TPR pilot include the following:

- Job search/job readiness
- Educational activities
- Training
- Work experience (paid and unpaid)
- Job retention services (up to 90 days)

Allowable SNAP E&T support services provided to SNAP recipients participating in TPR allowable activities include the following:

- Transportation
- Work-related expenses
- Training or education-related expenses, such as GED test payments, uniforms, personal safety items or other necessary equipment, and books or training materials
- Clothing suitable for job interviews or employment
- Licensing and bonding fees
- Vision needs (such as eyeglasses and eye exams)
- Housing assistance
- Child care

Capital Area Workforce Solutions Office staff will be responsible for the following:

- Outreach
- Eligibility verification before an individual is placed in an allowable SNAP E&T activity and each subsequent month the SNAP recipient is participating in the pilot
- Case management
- Employment planning and assessment activities
- Tracking and monitoring participation in SNAP E&T TPR activities

- Data entry in The Workforce Information System of Texas (TWIST)

It is difficult to estimate the numbers to be served through this initiative. However, during the first year, we will be able to track and report on the number of individuals served. Regarding performance outcomes, in a similar initiative focusing on a population with barriers to employment, Capital Area has proven successful. Over 76 percent have completed training, over 80 percent were employed within three months, employment retention exceeded 76 percent, and average wages exceeded \$14 per hour.

Partnerships with Local Food Banks in Texas

One of TWC's goals for FFY'16 is to build stronger partnerships with local communities and private nonprofit sectors. In FFY'16, TWC will use SNAP E&T administrative funds to implement an initiative to:

- strengthen partnerships with Boards and local food banks in the state's 28 local workforce development areas (workforce areas); and
- market the SNAP E&T program to SNAP E&T volunteers (i.e., exempt recipients) who visit food bank facilities.

To maximize SNAP E&T funding, funds will be dedicated to building capacity for local food bank staff and volunteers to become familiar with workforce services, including those through the SNAP E&T program, as well as those available through the integrated workforce system, available in the local Workforce Solutions Offices. Workforce Solutions Office staff may be stationed at one or more food bank locations in Texas or Boards may train food bank staff to provide any of the following:

- Information about SNAP E&T and other workforce services, including labor market information and educational workshops focusing on topics such as résumé writing, interview skills, and other workforce-focused topics;
- Use of online workforce services such as the state's job matching system, WorkInTexas.com; and
- Scheduling appointments or making referrals for SNAP E&T services and other workforce services.

There are a number of food banks in Texas that partner with Boards for ABAWDs' workfare assignments. Expanding the Board and food bank partnerships to promote SNAP E&T services will enable SNAP recipients to gain immediate access to services, quick exposure to the local labor market, and will assist them with entering into permanent full-time employment.

Request for Additional SNAP E&T 100 Percent Funding

On May 28, 2015, Texas received notification from the U.S. Department of Agriculture Food and Nutrition Service (FNS) of each state's FFY'16 preliminary 100 percent grant allocation. Texas' share of the grant for FFY'16 is less than its FFY'15 allocation. As such, TWC anticipates requesting additional 100 percent

federal funding after October 1, 2015. The additional funding will ensure continuation of SNAP E&T services to mandatory work registrants who are part of the SNAP E&T General Population, as well as volunteer SNAP recipients. TWC will submit the request to the FNS Southwest Regional Administrator.

Able-Bodied Adults Without Dependents Waiver Counties

Texas will not designate any counties to be covered by an ABAWDs time-limited benefits waiver for FFY'16. Texas will continue to use its 15 percent exemption allowance for ABAWDs living in minimum-service counties. See information below on minimum-service counties and page 25 for information on Texas' 15 percent exemption allowance.

In FFY'16, Texas will continue applying the full- and minimum-service county designations. The current full- and minimum-service county criteria are as follows:

Full-Service Counties:

- Boards are required to outreach all ABAWDs in full-service counties within 10 days of receipt of an automated referral from HHSC.
- Boards may, as funding allows, outreach SNAP E&T General Population work registrants.
- All mandatory work registrants (i.e., ABAWDs and General Population) have access to all services and support services. Mandatory work registrants are sanctioned (i.e., SNAP benefits will be denied) for failure to comply with SNAP E&T program requirements.
- Exempt SNAP recipients can volunteer to participate in SNAP E&T.
- Exempt recipients have access to all services and support services.
- Exempt recipients are not sanctioned for failure to comply with SNAP E&T program requirements.
- Exempt recipients' hours of participation will not exceed the hours required of mandatory work registrants.

Minimum-Service Counties:

- All SNAP recipients can volunteer to participate in SNAP E&T and will have access to all services and support services, at Board discretion.
- Outreach is not conducted in these counties.
- SNAP recipients are not sanctioned for failure to comply with SNAP E&T program requirements.
- Hours of participation for recipients residing in these counties will not exceed the hours required of mandatory work registrants residing in full-service counties.

Boards are not required to serve ABAWDs in the minimum-service counties. Texas will continue to use the state's 15 percent ABAWD exemption allowance. Boards may serve all SNAP recipients (mandatory work registrants and exempt recipients) who reside in one of the minimum-service counties if the recipients volunteer to participate in SNAP E&T.

Before services are provided to SNAP recipients in minimum-service counties, Boards must determine (through an analysis of their expenditures) whether they are able to serve individuals who volunteer to participate in SNAP E&T services. If Boards determine that funds are sufficient to serve individuals who volunteer, then the SNAP recipients will have access to all services and support services offered. If there is insufficient SNAP funding, a Board must use other resources such as WIOA services to assist these individuals.

Note: SNAP recipients who are also receiving TANF and are subject to and comply with their TANF work requirements (under Title IV-A of the Social Security Act) cannot volunteer to participate in SNAP E&T. These individuals will continue to participate in and comply with TANF employment program work requirements. While the same program components and services are offered to both TANF and SNAP recipients, TANF funds are used to provide services to individuals participating in the TANF work program. SNAP funds are not used.

2. ABAWD Population

In Texas, ABAWDs continue to be subject to a limitation on the receipt of SNAP benefits for three months out of 36 months if the individual does not work or participate in employment and training activities.

ABAWDs are limited to receiving SNAP for three months out of 36 months unless they:

- are employed at least 20 hours per week or
- are participating in and complying with SNAP E&T requirements or other specified work programs for at least 20 hours or more per week, as determined by TWC.

Note: Federal law establishes requirements for the number of hours an ABAWD must work to be considered exempt, and the number of hours that an ABAWD must participate in SNAP E&T activities. Specifically, 7 USC §2015(o)(2), regarding work requirements, states:

No individual shall be eligible to participate in the SNAP Program as a member of any household if, during the preceding 36-month period, the individual received SNAP benefits for not less than 3 months during which the individual did not—

- (A) work 20 hours or more per week, averaged monthly;
- (B) participate in and comply with the requirement of a work program for 20 hours or more per week, as determined by the State agency.

TWC's work participation requirement for ABAWDs conforms to 7 USC §2015(o)(2)(B), which states that ABAWDs shall participate and comply with the

requirements of a work program for 20 or more hours per week, as determined by the state agency. The work participation requirement in Texas for FFY'16 is 30 hours per week.

Texas does not require ABAWDs who have fulfilled the work requirement through 20 hours of employment to participate and comply with SNAP E&T ABAWD work requirements. ABAWDs employed at least 20 hours per week when certified for food stamps are not referred to TWC from HHSC for SNAP E&T services. However, they may voluntarily participate in SNAP E&T.

Based on information from HHSC, TWC estimates there will be 148,947 ABAWDs in Texas in FFY'16.

Additional Allocation for “Pledge” States

The Food and Nutrition Act of 2008 provides for an additional allocation of up to \$20 million each fiscal year to be used to reimburse eligible state agencies for costs incurred in serving ABAWDs. Eligible state agencies are ones that commit to offer a qualifying activity to every ABAWD applicant or recipient (not waived or exempted) who is in the last month of the three-month period of eligibility. For FFY'16 the State of Texas will comply with the commitment, allowing the state to receive a portion of the \$20 million used to reimburse state agencies for costs incurred in serving ABAWDs.

TWC offers ABAWDs who reside in full-service counties (not waived or exempted), a qualifying activity within 10 days of receiving the HHSC referral to prevent ABAWDs from losing their benefits before the three months of the 36-month expiration period. TWC monitors the SNAP E&T program monthly to ensure that Texas complies with its commitment.

It is very common for participants to be enrolled simultaneously in more than one activity and to participate for more than one month. Transportation and other reasonable and related support services are provided to ABAWDs every month that they are enrolled in a component activity. ABAWDs participate in all program components.

Based on historical data analysis, Texas estimates spending approximately \$317 monthly for each ABAWD (in full-service counties) to ensure that qualifying work activities are offered.

TWC has a nightly automated interface with HHSC and receives a list of all individuals certified to receive SNAP benefits. ABAWDs residing in full-service SNAP E&T counties must be served, and they are placed in an “outreach pool” in TWIST. TWC requires that all ABAWDs be outreached within 10 days of referral from HHSC. This ensures that at-risk ABAWDs are provided an opportunity to participate in SNAP E&T services.

3. SNAP E&T General Population

In addition to serving ABAWDs ages 18-49, SNAP E&T services are provided to other mandatory work registrants ages 16–59, and to exempt SNAP recipients who voluntarily participate in SNAP E&T services. These work registrants and volunteers are expected to participate in all SNAP E&T activities for a minimum of 30 hours per week. The 30 hours must be spent in SNAP E&T program components.

4. Program Components

Boards may deliver any of the SNAP E&T components.

The following components will be available, based on Board determinations, to ABAWDs and the SNAP E&T General Population in FFY' 16:

- Job Search
- Vocational Training
- Education
- Work Experience
- Workfare (ABAWDs only)

As allowed by 7 CFR §273.7 and §273.24, services from other sources will count toward SNAP E&T work requirements. Other sources include:

- work services under WIOA; and
- work services under Trade Adjustment Assistance (TAA).

5. Sequencing of Components

Upon entering the program, the SNAP E&T participant and the Board's contractor assess the participant's strengths and employment goals then jointly develop an employment plan based on the participant's needs and the available community resources. The agreed-upon plan is required for all SNAP recipients who participate in SNAP E&T. While the plan is required for every individual participating in SNAP E&T, the plan can be modified when a participant's needs or circumstances change. Boards have the flexibility to decide the sequence of service components for individuals participating in SNAP E&T.

6. Other Employment Programs

TWC coordinates the delivery of employment programs and has facilitated the development of a more comprehensive, integrated service network that is locally managed, market driven, and high performing. Through an integrated workforce system, TWC administers WIOA Title I, TAA, Employment Service (ES), child care, employment programs under Title IV-A of the Social Security Act (i.e., Choices, the TANF employment program), and Adult Education and Literacy under WIOA Title

II. These programs offer Texas job seekers employment and training services and necessary support services to help them gain employment and attain self-sufficiency. Cooperative agreements with agencies administering other programs, including HHSC, the Texas Education Agency (TEA), the Texas Veterans Commission (TVC), and the Texas Department of Assistive and Rehabilitative Services (effective September 1, 2016, TWC will administer Title III Vocational Rehabilitation Services), are initiated through the development of memoranda of understanding.

TWC has sought all opportunities to create consistency between Choices and SNAP E&T. The law supports these endeavors. Specifically, 7 USC §2015(E) states that each state agency shall establish requirements for SNAP E&T participation by individuals who are not exempt under subparagraph (D) in one or more employment and training programs, including the extent to which any individual is required to participate. Such requirements may vary among participants. Further, 7 USC §2015(d)(4)(J) states that the Secretary shall promulgate guidelines that enable state agencies, to the maximum extent practical, to design and operate an employment and training program that is compatible and consistent with similar programs operated within the state.

7 CFR §273.7(c)(2) indicates that the state agency may, with FNS approval, use intake and sanction systems that are compatible with its Title IV-A work program. Such systems must be proposed and explained in the state agency's E&T plan. Workforce Solutions Offices operate Choices and the SNAP E&T program under the following compatible work requirements:

- TWC has created compatible and consistent requirements for individuals participating in Choices and SNAP E&T. Individuals may participate in job search, work experience, education and training, and community service (i.e., workfare for SNAP E&T ABAWDs), as offered by Boards.
- Individuals may attend the same employment planning sessions, and may attend the same group job search seminars.
- Individuals may receive similar support services to assist them in participating in work activities.
- Individuals who are unable to comply with their Choices or SNAP E&T work requirements may receive a good cause exception for circumstances beyond the individual's control. The Choices and SNAP E&T good cause criteria are the same.

TWC continues to abide by federal law that prohibits the use of SNAP E&T funds for TANF recipients. Based upon this, Boards are prohibited from using their SNAP E&T funds to pay for Choices services.

7. Simplified SNAP

Texas will continue operating a mini-simplified SNAP for FFY'16. This will allow TANF recipients participating in TANF work experience or community service

programs to have the value of their SNAP benefits combined with the value of their TANF benefits. The policy allows TWC to deem a family as meeting its participation requirement based on the maximum hours allowed under the minimum wage requirements of the Fair Labor Standards Act.

8. Workforce Development System

The Texas workforce system is composed of many workforce partnerships and business operations including Boards, contracted service providers, and others in workforce development. Boards, using a competitive procurement process, contract with public or private companies, or nonprofit organizations, to operate Workforce Solutions Offices throughout the state. The Workforce Solutions Offices, which are overseen by the Boards, provide access to multiple services—including SNAP E&T—at one site and offer services to employers and job seekers that are tailored to meet the needs of the local workforce development area (workforce area).

9. Outcome Data

TWC will continue to use the U.S. Department of Labor’s (DOL) Common Measures framework, an integrated method for evaluating performance outcomes, which was derived as a way to develop standard performance measures for programs with similar goals. TWC uses Common Measures to measure performance for all workforce programs.

Key Common Measures for SNAP E&T and other workforce programs in Texas include:

- Entered Employment;
- Employment Retention; and
- Earnings Increase.

Note: While Texas will track job retention and earnings increase data, TWC will ensure that SNAP E&T funds are not expended beyond the 90-day job retention period.

B. PROGRAM COMPONENTS

Component Definitions/Explanations:

1. Job Search—A nonwork component that requires participants to make a predetermined number of inquiries to prospective employers over a specified period of time. Upon initial certification of SNAP benefits, each SNAP E&T General Population work registrant outreach must enter the job search component.

Job search incorporates job readiness, job search training, directed job search, or group job search assistance. The SNAP E&T General Population and exempt recipients may receive job search services that include one or more of the following:

- Job skills assessment
- Job placement services
- Training in techniques for employability
- Counseling
- Job search skills training
- Information on available jobs
- Occupational exploration, including information on local emerging and demand occupations
- Interviewing skills and practice interviews
- Assistance with applications and résumés
- Job fairs
- Life skills
- Guidance and motivation for development of positive work behaviors necessary for the labor market

The number of weeks of job search is as follows:

- ABAWDs must not be enrolled in job search for more than four weeks, and the job search activity shall be provided in conjunction with the workfare activity.
- The SNAP E&T General Population mandatory work registrants and exempt recipients who voluntarily participate in SNAP E&T services must not be enrolled for more than four weeks of consecutive activity and for more than six weeks of total job search activities.

In order to meet the weekly participation requirement, each participant may engage in any allowable job search activity, including in-person job search contacts, résumé writing, interviewing skills classes, counseling, occupational exploration, training in techniques for employment, and other activities to help SNAP recipients become job ready. To be counted toward SNAP E&T participation, a job search contact must be made in person with the employer's representative. When possible, the contact should include completion of a job application.

In areas in which the labor market does not support multiple job search contacts, individuals participate in other allowable job search activities to meet SNAP E&T participation requirements.

The Boards have many resources at their disposal to assist individuals secure employment. In Texas market-driven and high-performing workforce system, Boards and their partners focus on meeting the workforce needs of local employers through appropriate job referrals. Boards are cautioned against making inappropriate referrals to employers. Each Board takes an individualized approach to assisting SNAP recipients with finding employment. Prior to initiating job search, the recipient's work history, training, or vocational experience and education is assessed to determine the jobs that best fit the recipient's needs. This process ensures that employers' needs are being met with quality job seekers.

Job seekers are linked with appropriate employment through the creation of an individualized employment plan. In addition, staff identifies appropriate employment opportunities through WorkInTexas.com, TWC's job-matching system. WorkInTexas.com provides extensive job opportunities for SNAP E&T job seekers.

The following describes specific elements for this component:

- **Geographic areas covered and variations among workforce areas:** Job search will be conducted in all full-service SNAP E&T counties in the state. Job search will be conducted in minimum-service counties if SNAP recipients volunteer for SNAP E&T services.
- **Anticipated number of ABAWDs who will begin the component:** None. ABAWDs will participate in job search activities in conjunction with the workfare component listed on page 16.
- **Anticipated number of non-ABAWD participants, both mandatory and volunteer, who will begin the component:** 24,054
- **Level of participant effort, or number of hours of participation, in the component and duration:** Participants may engage in a variety of job search activities to meet their 30-hour job search requirements. Participants who live in areas that do not support multiple job search contacts may engage in other job search activities such as résumé writing and assistance with interviewing skills.
- **Targeted Population:** Services for this component will be targeted to work registrants whose education or work experience match the needs of employers in the local labor markets.
- **Organizational responsibilities:** TWC contracts with Boards that in turn contract with service providers to provide job search activities.
- **Number of participants expected to receive reimbursement:** 12,819
- **Per participant cost of participant reimbursement:** The SNAP E&T General Population participating in directed job search will be reimbursed an estimated \$77.46 for transportation and other expenses. SNAP E&T funds will not be used for child care reimbursement.
- **Total cost of the component:** \$9,812,639 (excluding reimbursements) or \$10,805,654 (including reimbursements).

2. Vocational Training—A nonwork component that includes occupational assessment, remedial and entry-level job skills training, customized training, institutional skills training, and upgrade training. Services are provided through the Boards, and DARS.

All vocational training provided by employment and training programs, including those operated under WIOA, are driven by the skill needs of local employers, the population, and the labor market. Boards determine the length of vocational training required to promote successful outcomes. Courses may lead to a degree or certificate awarded by a training facility, career school courses, or other educational institution classes that prepare individuals for employment in current or emerging occupations not requiring baccalaureate or advanced degrees. Training normally lasts one to six months. Participation in the component is at least 30 hours per week.

The following describes specific elements for this component:

- **Geographic areas covered and variations among workforce areas:** Vocational training may be conducted in all full-service SNAP E&T counties in the state and in minimum-service counties if SNAP recipients volunteer for services, and the Board determines that there are funds available.
- **Anticipated number of ABAWDs who will begin the component: 57**
- **Anticipated number of non-ABAWD participants, both mandatory and volunteer, who will begin the component: 91**
- **Level of effort, or number of hours of participation, in the component and duration:** Vocational training provided by employment and training programs, including those operated under WIOA or by DARS, are driven by the needs of local employers, the population, and the labor market. Boards determine the length of vocational training required to promote successful outcomes. Training normally lasts one to six months. Participation in this component will be at least 30 hours per week.
- **Targeted Population:** This component will serve all ABAWDs and SNAP E&T General Population participants for whom vocational training is appropriate.
- **Organizational responsibilities:** Following an employability assessment, SNAP E&T participants will be referred by the Board's contractor to appropriate training services including WIOA or DARS services. The service provider will confirm participation status.
- **Number of participants expected to receive reimbursement: 108**
- **Per participant cost of participant reimbursement:** All work registrants' (ABAWDs and SNAP E&T General Population) participating in vocational training will be reimbursed an estimated \$77.46 for transportation and other expenses. SNAP funds will not be used for dependent care reimbursement.

- **Total cost of the component: \$60,375** (excluding reimbursements) or **\$68,742** (including reimbursements).

3. Education—SNAP E&T participants are referred to existing educational entities based on individual need and assessment. Education is a nonwork component designed to increase employability by providing remedial education as well as postsecondary education leading to a degree or certification. Assessment, literacy training, high school courses, General Educational Development (GED), remedial education, alternative education, English-as-a-Second Language (ESL), and postsecondary education are included in the education component. Courses may lead to a degree or certificate awarded by a training facility, career school courses, or other educational institution classes that prepare individuals for employment in current or emerging occupations not requiring baccalaureate or advanced degrees. Services designed to meet the needs of individual geographic areas may be provided through WIOA, or community-based programs. GED tests and certificates may be paid for with SNAP E&T funds. Individuals participating in an education component must participate for at least 30 hours per week.

The following describes specific elements for this component:

- **Geographic area covered and variations among workforce areas:** Education will be conducted in all full-service SNAP E&T counties in the state and in minimum-service counties if SNAP recipients volunteer, and the Board determines that there are available funds.
- **Anticipated number of ABAWDs who will begin the component: 14**
- **Anticipated number of non-ABAWD participants, both mandatory and volunteer, who will begin the component: 17**
- **Level of effort, or number hours of participation, in the component and duration:** This component encompasses education activities that include GED preparation. Services are based on the needs of the individual and will directly enhance the employability of the participants. A direct link between education and job readiness must be established. Education services generally will be provided on a short-term basis of six months or less. The duration is determined by Boards to ensure successful outcomes and will be based upon an individual employment plan. Participation in this component will be at least 30 hours per week.
- **Targeted population:** This component will serve all ABAWDs and SNAP General Population participants for whom education is appropriate.
- **Organizational responsibilities:** Following an employment plan, the Board's contractor will refer work registrants to the appropriate education program. Education service providers will confirm participation status.

- **Number of participants expected to receive reimbursement: 22**
- **Per participant cost of participant reimbursement:** All work registrants' (ABAWDs and the SNAP General Population) participation in education activities will be reimbursed an estimated **\$77.46** for transportation and other expenses. SNAP E&T funds will not be used to reimburse dependent care costs.
- **Total cost of the component: \$17,646** (excluding reimbursements) or **\$19,350** (including reimbursements).

4. Work Experience—Work experience is defined in WIOA (identified in §680.170 of the WIOA notice of proposed rulemaking) as planned, structured learning experiences that take place in a workplace for a limited period of time. The work experience may be paid or unpaid, and may occur in either the private for-profit or the public sectors. SNAP E&T funds will not be used to reimburse dependent care costs.

The following describes specific elements for this component:

- **Geographic areas covered and variations among workforce areas:** Work experience will be conducted in all full-service SNAP E&T counties in the state and in minimum-service counties if SNAP recipients volunteer, and the Board determines that there are available funds.
- **Anticipated number of ABAWDs who will begin the component: 61**
- **Anticipated number of non-ABAWD participants, both mandatory and volunteer, who will begin the component: 115**
- **Level of effort, or number hours of participation, in the component and duration:** This component complies with federal regulations set forth by DOL. Boards determine the length of training required to promote successful outcomes.
- **Targeted population:** This component will serve all ABAWDs and SNAP E&T General Population participants for whom work experience is appropriate.
- **Organizational responsibilities:** Following an employment plan, work registrants may be referred for work experience. The Board will confirm participation status.
- **Number of participants expected to receive reimbursement: 117**
- **Per participant cost of participant reimbursement:** All participants including ABAWDs and the SNAP E&T General Population will be reimbursed an estimated **\$77.46** for transportation and other support service-related costs.

- **Total cost of the component: \$71,798** (excluding reimbursements) or **\$80,861** (including reimbursements).

5. Workfare—A work component in which nonexempt ABAWDs are required to perform work in a public service or private nonprofit capacity as a condition of eligibility for SNAP benefits.

All ABAWD work registrants must enroll in job search upon initial certification and must participate in job search for a maximum of four weeks before entering the workfare component. ABAWDs may also receive job search training, directed job search, or group job search assistance during the job search period.

ABAWDs not employed at the end of the four-week job search period will be offered workfare placements with public or private nonprofit entities. Public entities are city, county, state, and federal agencies. Private nonprofit entities include, but are not limited to, community-based organizations. Job sites can be created for ABAWDs through Workforce Solutions Offices regardless of the Workforce Solutions Office's profit or nonprofit status because the Boards, which are nonprofit entities, oversee each Workforce Solutions Office.

Based on HHSC's SNAP allotment information, ABAWDs are assigned to workfare job sites for the number of hours per month equal to their household SNAP allotment amount, divided by the number of ABAWDs in the household, and then divided by the federal minimum wage.

Workfare participation is scheduled for each week in a month and is based on employer needs, administrative efficiency, and the needs of the program participants.

The following describes specific elements for this component:

- **Geographic areas covered and variations among workforce areas:** Workfare will be conducted in full-service SNAP E&T counties in the state.
- **Anticipated number of ABAWDs who will begin the component:** 30,814
- **Anticipated number of non-ABAWD participants, both mandatory and volunteer, who will begin the component:** None.
- **Level of effort, or number of hours of participation, in the component and duration:** The level of effort of this component complies with federal regulations set forth by the USDA. Services for work registrants 18-49 are based on employer need and require an assigned number of hours equal to the SNAP allotment divided by the federal minimum wage.
- **Targeted population:** This component will serve ABAWD participants for whom workfare is appropriate.

- **Organizational responsibilities:** Following an employment plan, ABAWDs will be enrolled in an up-front four weeks of job search, and assigned to workfare. Employers of developed sites will confirm participation.
- **Number of participants expected to receive reimbursement: 15,639**
- **Per participant cost of participant reimbursement:** All ABAWDs participating in workfare will be reimbursed an estimated **\$77.46** for transportation and other expenses.
- **Total cost of the component: \$12,570,328** (excluding reimbursements) or **\$13,781,792** (including reimbursements).

6. Work Programs under WIOA—WIOA provides workforce development activities that enhance the employability, occupational attainment, retention, and earnings of job seekers, while matching employers with skilled workers.

WIOA establishes two levels of employment and training services for adults and dislocated workers: career services and training services. Work registrants may explore education or training through career and training services authorized under WIOA, in order to prepare SNAP E&T work registrants with the skills necessary to meet the current and emerging demands of local businesses.

7. TAA—TAA provides job search, relocation allowances, training, and income support to SNAP recipients who lose their jobs in the manufacturing or service industry or whose work hours or wages are reduced because of foreign imports and who are certified as trade affected by DOL. Most TAA participants will become exempt from SNAP E&T before a referral for services is made from HHSC because of an application for or a receipt of Unemployment Insurance benefits.

8. Unsubsidized Employment—Unsubsidized employment serves as a component if the SNAP recipient is participating in SNAP E&T education or training activities while employed. Unsubsidized employment is full- or part-time employment with wages paid in full by an employer. SNAP recipients who are employed less than 30 hours per week may enter into an education or training activity that will increase the total number of hours of participation to 30 hours per week. SNAP E&T funds are not used to pay the wages of any SNAP recipient who is employed.

TWC will provide Boards the flexibility to use SNAP E&T funds for awarding bonuses to contractors for placing SNAP E&T participants in full- or part-time employment.

Job Retention

TWC implemented job retention services and support services September 1, 2009, in accordance with §4108 of the Food Conservation and Energy Act (FCEA) of 2008 and 7 USC §2015(d)(4)(B)(vii). TWC will continue the provision of these services in FFY'16.

Individuals residing in full-or minimum-service counties in Texas may receive job retention services, support services, or both, if requested for up to 90 days, if funding is available.

In FFY'16, TWC will use the following funds for job retention services and support services:

- 100 percent federal grant funds to administer job retention services; and
- 50 percent state and federal matching funds to administer job retention services and provide participant reimbursements or support services.

SNAP E&T 100 percent and 50 percent state and federal matching funds will be used to provide:

- job retention services for up to 90 days for SNAP recipients who gain full-time employment during or after participation in SNAP E&T; and
- support services for up to 90 days for SNAP recipients who gain full- or part-time employment during or after participation in SNAP E&T.

Note: SNAP recipients employed part time must successfully participate in SNAP E&T activities before job retention support services are provided. Successful participation means that the SNAP recipient's part-time employment coupled with SNAP E&T activities total 30 hours per week.

Allowable job retention activities provided during the 90-day period for SNAP recipients who gain full-time employment are limited to the following:

- **Job search**—SNAP recipients volunteer to participate in activities that will increase their employability and assist them with obtaining better jobs to progress up a career ladder. This includes job skills assessments, job finding clubs, training in techniques for employability, and educational programs to expand their job search abilities or employability.
- **Education**—SNAP recipients volunteer to participate in activities to improve basic skills or improve employability, activities that include a direct link between the education and job readiness of the individual.
- **Training**—SNAP recipients volunteer to participate in job retention training services that will increase their skills.

Allowable job retention support services provided during the 90-day period for SNAP recipients who gain full- or part-time employment include, but are not limited to, the following:

- clothing required for the job;
- equipment or tools required for the job;
- test fees;

- union dues;
- relocation expenses;
- tools;
- licensing and bonding fees;
- vision needs;
- transportation;
- housing; and
- child care.

Before providing job retention support services, Boards must determine whether the request for support services is reasonable, necessary, and directly related to SNAP E&T.

Note: Transportation assistance is detailed on pages 20 and 21. Housing assistance is limited to no more than two occurrences during the 90-day period. Child care services that will assist SNAP recipients in retaining employment are funded by CCDF funds. All support services, which are intended to assist SNAP recipients in retaining employment, are limited to 90 days.

Geographic areas covered and variations among local areas: Job retention services are available in full- and minimum-service counties as funding permits. SNAP recipients who gain full-time employment during or after participation in SNAP E&T may volunteer for job retention services.

Anticipated number of ABAWDs who will begin the job retention components:
19

Anticipated number of non-ABAWD participants, both mandatory and volunteer, who will begin the job retention components: 2

Level of participant effort, or number of hours of participation, in the component and duration: Before allowable job retention activities outlined on page 18 are provided to SNAP recipients who gain employment of at least 30 hours per week, Boards must ensure that:

- an assessment of the SNAP recipient’s skills, strengths, and weaknesses is conducted to determine which activities will best help the individual retain employment and advance a career path;
- the number of hours of participation and all activities assigned are mutually agreed upon by the SNAP recipient and Workforce Solutions Office staff; and
- the activities are completed by the end of the 90-day job retention period.

Targeted Population: SNAP recipients who gain full-time employment during or after participation in SNAP E&T may receive job retention job search, education, or training services for up to 90 days.

Organizational responsibilities: TWC contracts with Boards that, in turn, contract with service providers to provide job retention activities.

Number of participants expected to receive reimbursement: 573

Per participant cost of participant reimbursement: Employed SNAP recipients will be reimbursed an estimated **\$77.46** for transportation or other expenses needed during the 90-day job retention period. SNAP E&T funds cannot be used for child care reimbursement.

Total cost of the component: TWC estimates that the total cost of the job retention component: **\$8,567** (excluding reimbursements), or **\$52,954** (including reimbursements).

Additionally, TWC will continue implementing the 120-hour work limitation policy on October 1, 2011, in accordance with §4108 of the FCEA. SNAP recipients who are employed or self-employed at least 30 hours per week can volunteer and participate in SNAP E&T services. Mandatory work registrants who voluntarily participate in additional hours of SNAP E&T activities will not be sanctioned at 120 hours.

Participant Reimbursement (Support Services):

Participant reimbursement or support is given in accordance with 7 CFR §273.7(d)(4) and guidance from FNS entitled: “Q&A Package on E&T Financial Policy” dated May 2006. Reimbursement or support will be provided to SNAP recipients who request assistance with obtaining or retaining employment. Reimbursement or support for job retention will be provided for up to 90 days.

- Texas provides reimbursement for expenses incurred, or in advance as payment for anticipated expenses in the coming month, that are reasonably necessary and directly related to participation in SNAP E&T for both ABAWDs and the SNAP E&T General Population and may include: Transportation such as:
 - bus tokens;
 - gas vouchers;
 - prepaid gas cards;
 - automobile repairs;
 - Toll road charges;
 - Car Pools;
 - Mileage reimbursement (personal vehicles only);
 - Taxicab services;
 - Contracts with private entities, such as transit providers who provide shuttle or van services;
 - Job Access and Reverse Commute (JARC) projects;
 - Purchase of tires or automobile batteries (applicable to SNAP E&T mandatory customers only);

- driver license fees (includes renewals);
- vehicle inspection fees; and
- car insurance;
- other work, training, or education-related expenses such as GED test payments, uniforms, personal safety items or other necessary equipment, and books or training manuals;
- suitable clothing for job interviews;
- licensing and bonding fees for a work experience or workfare placement;
- vision needs (such as eyeglasses, eye exam); and
- housing assistance.*

*Housing assistance is provided based on methods and amounts established in Boards' local policies and procedures. Housing assistance is limited to no more than two months in a 12 calendar-month period.

Boards may provide support services to SNAP recipients to support the recipients' participation in the following allowable activities:

- Job search
- Vocational training
- Nonvocational education
- Work experience
- Workfare (ABAWDs only)

Failure to Comply with SNAP E&T Requirements:

When an individual fails to comply with SNAP E&T requirements, the primary wage earner (i.e., head of household) or disqualified household member is sanctioned as follows:

- One month for the first noncompliance or until the individual agrees to comply, whichever is longer
- Three months for the second noncompliance or until the individual agrees to comply, whichever is longer
- Six months for a third or subsequent noncompliance or until the individual agrees to comply, whichever is longer

Failure to Comply with the Work Requirement under Title IV of the Social Security Act, or an Unemployment Compensation Work Requirement:

An individual exempt from SNAP E&T work requirements, because he or she is subject to work requirements under TANF or unemployment compensation, who fails to comply

with TANF or unemployment compensation work requirements will be treated as though he or she failed to comply with the SNAP E&T work requirements.

HHSC is the federally recognized agency responsible for imposing a SNAP sanction when an individual fails to comply with TANF or unemployment compensation work requirements.

The primary wage earner (i.e., head of household) or disqualified household member is sanctioned as follows:

- One month for the first noncompliance or until the individual agrees to comply, whichever is longer
- Three months for the second noncompliance or until the individual agrees to comply, whichever is longer
- Six months for a third or subsequent noncompliance or until the individual agrees to comply, whichever is longer

SNAP E&T funds are not used to process any sanction actions related to failure to comply with TANF or unemployment compensation work requirements.

Geographic Coverage FFY'16

SNAP E&T services will be delivered in the following 166 full-service counties:

Anderson	Delta	Howard	Morris	Val Verde
Angelina	Denton	Hunt	Nacogdoches	Van Zandt

Archer	DeWitt	Irion	Navarro	Victoria
Atascosa	Dimmitt	Jack	Nolan	Walker
Austin	Eastland	Jackson	Nueces	Waller
Bastrop	Ector	Jasper	Orange	Ward
Baylor	Edwards	Jefferson	Palo Pinto	Washington
Bee	Ellis	Jim Wells	Panola	Webb
Bell	El Paso	Johnson	Parker	Wharton
Bexar	Erath	Jones	Pecos	Wichita
Blanco	Falls	Kaufman	Polk	Wilbarger
Bowie	Fannin	Kerr	Potter	Willacy
Brazoria	Fayette	Kimble	Rains	Williamson
Brazos	Foard	Kinney	Randall	Wilson
Brown	Fort Bend	Kleberg	Reagan	Wise
Burleson	Franklin	Lamb	Real	Wood
Burnet	Freestone	Lamar	Red River	Young
Caldwell	Frio	LaSalle	Reeves	Zavala
Calhoun	Galveston	Lavaca	Robertson	
Cameron	Goliad	Lee	Rockwall	
Camp	Gonzales	Leon	Rusk	
Chambers	Grayson	Liberty	San Patricio	
Cherokee	Gregg	Limestone	Schleicher	
Clay	Grimes	Llano	Shelby	
Coke	Guadalupe	Lubbock	Smith	
Coleman	Hale	Madison	Somervell	
Collin	Hardeman	Marion	Starr	
Colorado	Harris	Mason	Sterling	
Comal	Harrison	Matagorda	Sutton	
Comanche	Hays	Maverick	Tarrant	
Concho	Henderson	McCulloch	Taylor	
Cooke	Hidalgo	McLennan	Terry	
Coryell	Hill	Menard	Titus	
Cottle	Hockley	Midland	Tom Green	
Crockett	Hood	Mitchell	Travis	
Dallas	Hopkins	Montgomery	Upshur	
Dawson	Houston	Montague	Uvalde	

PART II PROGRAM PARTICIPATION AND EXEMPTIONS

A. WORK REGISTRANT POPULATION

- 1. Number of Work Registrants.** The projected SNAP E&T state work registrant data for FFY'16 is as follows:
 - a) **309,370** work registrants are expected to be in the state on October 1 of the fiscal year.
 - b) **377,986** new work registrants are expected to be added between October 1 and September 30 of the fiscal year.
 - c) **687,356** work registrants are expected to be in Texas between October 1 and September 30 of the fiscal year.
- 2. Unduplicated Work Registrant Count.** At the beginning of the fiscal year, participant records are flagged at the September cutoff to identify those included in the initial count of work registrants. The count of new work registrants excludes those individuals whose records were flagged at the September cutoff, resulting in an unduplicated count of individuals during the fiscal year.
- 3. Characteristics of SNAP registrants.** Characteristics of SNAP work registrants are summarized on the chart, "SNAP E&T Characteristics of Work Registrants Statewide" on page 29.

B. EXEMPTION POLICY

Boards in geographically exempted minimum-service counties will allow exempt individuals and mandatory work registrants who reside in these geographic areas to volunteer to participate in SNAP E&T.

1. Fifteen Percent Exemption

In FFY'16, Texas will use its 15 percent exemption in minimum-service counties. ABAWDs living in minimum-service counties covered under the 15 percent exemption will not be subject to the three out of 36-month time limit, but may volunteer to participate in SNAP services. ABAWDs who volunteer will not be sanctioned if they fail to participate.

2. Good Cause

In accordance with 7 CFR §273.7(i)(1), Texas will authorize good cause in FFY'16 for mandatory work registrants who are unable to participate for the following reasons:

- Temporary illness or incapacitation
- Court appearance
- Caring for a physically or mentally disabled household member who requires the recipient's presence in the home
- No available transportation (customer must provide documentation that there is no available public transportation service) and the distance prohibits walking; or no available job within reasonable commuting distance, as defined by the Board
- The distance from the registrant's home to the Workforce Solutions Office or employment services provider requires commuting time of more than two hours a day (not including taking a child to and from a child care facility), the distance prohibits walking, and there is no available transportation
- An inability to obtain needed child care, as defined by the Board and based on the following reasons:
 - Informal child care by a relative or child care provider under other arrangements is unavailable or unsuitable based on, where applicable, Board policy regarding child care. Informal child care may also be determined unsuitable by the parent.
 - Eligible formal child care providers, as defined in TWC's child care rules relating to Child Care Services, are unavailable.
 - Affordable formal child care arrangements within maximum reimbursement rates established by the Board are unavailable.
 - Formal or informal child care within a reasonable distance from home or the work site is unavailable.
- An absence of other support services necessary for participation
- Receipt of job referral that results in an offer below the federal minimum wage, except when a lower wage is permissible under federal minimum wage law
- An individual or family crisis or a family circumstance that may preclude participation, including substance abuse, and mental health and disability-related issues
- The individual is a victim of family violence

NUMBER OF WORK REGISTRANTS EXEMPT FROM THE SNAP E&T PROGRAM. See Table 1: “Estimated Participant Levels Fiscal Year 2016” on page 30.

B. PLANNED SNAP E&T PROGRAM PARTICIPATION. See Table 2: “Estimated SNAP E&T Placements Fiscal Year 2016” on page 31.

C. PLANNED SNAP E&T PROGRAM PARTICIPATION. See Table 2: “Estimated Individual Participation Fiscal Year 2016” on page 31.

**COUNTIES COVERED BY THE STATE'S 15 PERCENT
EXEMPTION ALLOWANCE (Minimum-Service Counties)**

Andrews	Deaf Smith	Jim Hogg	Oldham	Wheeler
Aransas	Dickens	Karnes	Parmer	Winkler
Armstrong	Donley	Kendall	Presidio	Yoakum
Bailey	Duval	Kenedy	Refugio	Zapata
Bandera	Fisher	Kent	Roberts	
Borden	Floyd	King	Runnels	
Bosque	Gaines	Knox	Sabine	
Brewster	Garza	Lampasas	San Augustine	
Briscoe	Gillespie	Lipscomb	San Jacinto	
Brooks	Glasscock	Live Oak	San Saba	
Callahan	Gray	Loving	Scurry	
Carson	Hall	Lynn	Shackelford	
Cass	Hamilton	Martin	Sherman	
Castro	Hansford	McMullen	Stephens	
Childress	Hardin	Medina	Stonewall	
Cochran	Hartley	Milam	Swisher	
Collingsworth	Haskell	Mills	Terrell	
Crane	Hemphill	Moore	Throckmorton	
Crosby	Hudspeth	Motley	Trinity	
Culberson	Hutchinson	Newton	Tyler	
Dallam	Jeff Davis	Ochiltree	Upton	

FY 2016 Characteristics of Work Registrants

Gender	ABAWD	ABAWD %	NONABAW D	NONABAW D %	Volunteer	Volunteer %
Male	9,475	55.64%	3,820	22.32%	50	29.94%
Female	7,550	44.33%	13,293	77.67%	117	70.06%
Declined to state	5	0.03%	1	0.01%	0	0.00%
Total	17,030	100.00%	17,114	100.00%	167	100.00%

Ethnicity	ABAWD	ABAWD %	NONABAW D	NONABAW D %	Volunteer	Volunteer %
White	4,349	25.54%	4,609	26.93%	57	34.13%
Black	5,837	34.27%	4,532	26.48%	55	32.93%
Hispanic	2,185	12.83%	2,831	16.54%	13	7.78%
Native American	42	0.25%	20	0.12%	0	0.00%
Asian	93	0.55%	76	0.44%	1	0.60%
Multi-ethnic	4,411	25.90%	4,996	29.19%	40	23.95%
Not Listed	113	0.66%	50	0.29%	1	0.60%
Total	17,030	100.00%	17,114	100.00%	167	100.00%
Female	7,550	44.33%	13,293	77.67%	117	70.06%
Declined to state	5	0.03%	1	0.01%	0	0.00%
Total	17,030	100.00%	17,114	100.00%	167	100.00%

Age Group	ABAWD	ABAWD %	NONABAW D	NONABAW D %	Volunteer	Volunteer %
Under 24	2,721	15.98%	275	1.61%	16	9.58%
24 - 30	3,585	21.05%	995	5.81%	43	25.75%
31 - 37	3,042	17.86%	4,756	27.79%	30	17.96%
38 - 44	3,517	20.65%	4,129	24.13%	32	19.16%
45 - 51	3,854	22.63%	2,733	15.97%	41	24.55%
52 - 54	119	0.70%	1,734	10.13%	0	0.00%
55 - 59	173	1.02%	2,283	13.34%	1	0.60%
60 And Older	19	0.11%	209	1.22%	4	2.40%
(Missing Birthdate)	0	0.00%	0	0.00%	0	0.00%
Total	17,030	100.00%	17,114	100.00%	167	100.00%

Household Number	ABAWD	ABAWD %	NONABAW D	NONABAW D %	Volunteer	Volunteer %
0	10,144	59.57%	8,304	48.52%	65	38.92%
1	4,525	26.57%	1,347	7.87%	32	19.16%
2	1,064	6.25%	1,768	10.33%	29	17.37%
3	637	3.74%	2,141	12.51%	13	7.78%
4	360	2.11%	1,846	10.79%	16	9.58%
5	185	1.09%	1,001	5.85%	7	4.19%
6+	115	0.68%	707	4.13%	5	2.99%
Total	17,030	100.00%	17,114	100.00%	167	100.00%

Education	ABAWD	ABAWD %	NONABAW D	NONABAW D %	Volunteer	Volunteer %
No Formal Education	885	5.20%	677	3.96%	5	2.99%
1st to 6th grade	152	0.89%	448	2.62%	1	0.60%
7th to 9th grade	1,050	6.17%	1,707	9.97%	4	2.40%
10th to 11th grade	2,192	12.87%	2,674	15.62%	22	13.17%
High School Graduate/GED	8,285	48.65%	7,558	44.16%	77	46.11%
Some College	3,481	20.44%	3,467	20.26%	42	25.15%
College Graduate	895	5.26%	509	2.97%	15	8.98%
12th Grade (No Diploma or GED)	44	0.26%	31	0.18%	1	0.60%
4th Year of College (No Degree)	6	0.04%	4	0.02%	0	0.00%
Other Credential (Degree, Certificate, etc.)	23	0.14%	23	0.13%	0	0.00%
Post-Secondary (No HS Diploma or GED)	0	0.00%	1	0.09%	0	0.00%
Post-Secondary Vocational/Skills Credential	17	0.10%	15	0.09%	0	0.00%
ESL Completion	0	0.00%	0	0.00%	0	0.00%
Total	17,030	100.00%	17,114	99.99%	167	100.00%

TABLE 1
ESTIMATED PARTICIPANT LEVELS
FISCAL YEAR 2016

A. Anticipated number of work registrants in the state during the fiscal year:	687,356
B. List planned exemption categories and the number of work registrants expected to be included in each during the fiscal year:	0
C. Percent of all work registrants exempt from SNAP E&T:	0
D. Number of SNAP E&T mandatory participants:	687,356
E. Anticipated number of ABAWDs in the state during the fiscal year:	148,947
F. Anticipated number of ABAWDs in waived areas of the state during the fiscal year:	0
G. Anticipated number of ABAWDs to be exempted under the state's 15 percent exemption allowance during the fiscal year:	38,340
H. Number of at-risk ABAWDs expected in the state during the fiscal year:	110,607

TABLE 2

**(1). ESTIMATED E&T PLACEMENTS
FISCAL YEAR 2016**

1.	Number of ABAWD applicants and recipients expected to participate in a qualifying ABAWD component each month.	2,425
2.	Number of all other applicants and recipients (including ABAWDs involved in nonqualifying activities) expected to participate in a component each month.	1,994
3.	Total number of applicants and recipients the state agency expects to participate in a component each month during the fiscal year.	4,419

**(2). ESTIMATED INDIVIDUAL PARTICIPATION
FISCAL YEAR 2016**

Number of individuals expected to participate in the E&T program during the fiscal year **29,794 (unduplicated), 53,030 (duplicated)**

1. TWC estimated the numbers of individuals who will participate in components each month and totaled them on line 3. This information represents a duplicate count of participants over the course of the fiscal year and corresponds to lines 3 and 4 on the FFY'16 FNS-583, E&T Program Activity Report.

2. TWC estimated the unduplicated and duplicated numbers of all individuals (ABAWDs and the General Population) who will participate during the fiscal year.

PART III PROGRAM COORDINATION

A. PROGRAM COORDINATION

As previously stated, HHSC is the administering agency for the SNAP Program in Texas. HHSC determines eligibility and mandatory or exempt status, and electronically transmits this information to TWC.

1. Narrative Coordination Statement. HHSC Texas Works Advisors are responsible for all areas related to SNAP recipients' benefits, including:

- intake and eligibility;
- certification;
- recertification;
- mandatory and exempt status for SNAP E&T participation;
- providing SNAP allotment amount for calculation of number of workfare hours ABAWDs must complete;
- preparation of Notice of Adverse Action; and
- sanctions resulting from noncompliance with SNAP E&T requirements.

ABAWD recipients are directly referred to the Board's contractor for SNAP E&T services. The Board's contractor enrolls work registrants in appropriate SNAP E&T activities based on assessment and employment planning. The Board's contractors are also responsible for:

- conducting employability assessments of individual registrants;
- assigning SNAP E&T program components;
- validating educational attainment and work experience;
- providing counseling and direction to individual work registrants;
- making referrals to other agencies and programs, as appropriate;
- developing jobs;
- providing job readiness services to enhance employability;
- monitoring compliance with component requirements;
- determining good cause for noncompliance;
- maintaining participant records;
- reporting all significant data to certification staff (e.g., noncompliance or employment);
- disbursing participant expense reimbursements; and
- referring SNAP E&T General Population participants to the child care contractor when appropriate.

Boards will also be responsible for planning, including:

- negotiating contracts and interagency agreements;
- coordinating service delivery;
- identifying policies and procedures negatively impacting the program;
- analyzing performance and demographic data; and
- developing program enhancements.

- 2. Information Coordination.** Information systems developed in prior operating years will be continued. These include:
- maintaining automated records of participation in SNAP E&T services;
 - initiating determination of good cause and determining when noncompliance has occurred;
 - reporting noncompliance to HHSC; and
 - developing procedures to ensure that noncompliance reports are processed as mandated by regulation.

In addition, when a mandatory work registrant fails to comply with SNAP E&T requirements, the Board notifies HHSC through an automated system. The notice of the noncompliance request is transferred to an HHSC eligibility worker for action.

- 3. Coordination Time Frames.** An automated interface between TWC and HHSC occurs nightly to allow ABAWDs and the SNAP E&T General Population to be outreached for services through TWIST. Boards send notices offering qualifying work, education, or training opportunities to all ABAWDs in full-service SNAP E&T counties within 10 days of the individual's name and Social Security number appearing in TWIST.

The automated interface between TWC and HHSC also transmits eligibility data for SNAP E&T General Population customers who are eligible to receive SNAP E&T services. SNAP E&T General Population customers are outreached through TWIST as funding permits.

All reports of noncompliance (both ABAWDs and the SNAP E&T General Population) will be entered into TWIST within three working days and then forwarded to HHSC eligibility staff at the time of the weekly data transfer.

HHSC will provide to the noncomplying household a Notice of Adverse Action for noncompliance without good cause notification. The denial/disqualification will be imposed within the first month following the expiration of the Notice of Adverse Action unless a fair hearing is requested.

B. INTERAGENCY COORDINATION

Areas of Coordination. Texas operates a fully integrated workforce system in which Boards provide seamless service delivery through the administration of multiple funding sources, including:

- ES;
- WIOA;
- TANF;
- TAA; and
- Child care.

In 2006 and 2007, veterans' employment services programs were funded under Title 38 USC, Chapters 41 and 42, and staff was transferred from TWC to the Texas Veterans Commission (TVC). However, TVC staff remains co-located and provides services in Workforce Solutions Offices.

TWC remains committed to providing opportunities for all veterans and recently formed the Texas Veterans Leadership Program, a resource and referral network that connects returning veterans of Iraq and Afghanistan with the resources and tools they need to lead productive lives and enjoy the full benefits of the society they have willingly served. TWC is also continually seeking opportunities to improve workforce services to veterans and military spouses in Texas.

Methods of Coordination. As previously described in the plan, Texas' fully integrated workforce system promotes the delivery of comprehensive services through Workforce Solutions Offices. Local partnerships required by state law bring together businesses, educational entities, social service agencies, community- and faith-based organizations, and labor entities and representatives in order to create viable workforce solutions at the local level.

Boards oversee the delivery of coordination services through the procurement of one-stop service delivery partners—that is, Workforce Solutions Offices. The Workforce Solutions Offices coordinate with other local partners through the establishment of memorandums of understanding, contracts, and interagency meetings.

PART IV PROGRAM COSTS AND FINANCIAL MANAGEMENT

A. PLANNED COSTS OF THE STATE SNAP E&T PROGRAM

1. **Operating Budget.** See Table 4: “Operating Budget Fiscal Year 2016” on page 39.
2. **Sources of SNAP E&T Funds.** See Table 5: “Planned Fiscal Year Costs of the State E&T Program by Category of Funding Fiscal Year 2016” on page 40.
3. **Justification of Education Costs.** TWC remains committed to complying with the requirements at 7 CFR §273.7. The Hunger Prevention Act of 1988 prohibits state agencies from using SNAP E&T funds to supplant nonfederal funds for existing educational programs. This statement serves as TWC’s assurance that such supplantation has not and will not occur.

B. CONTRACTS

TWC will contract the provision of SNAP E&T services to Boards, including assessment, determination of good cause, etc. The contractual agreement between TWC and Boards is maintained by TWC in accordance with 7 CFR §272.1(f) and is available upon request.

C. PARTICIPANT REIMBURSEMENT

Method of Reimbursement. Individuals receiving SNAP E&T services will receive payments for transportation and other work, training, or education-related expenses as determined by each Board. SNAP E&T participants will be issued payments or be reimbursed for expenses based on planned or actual activities. Participants in need of child care services may receive dependent child care from Boards. If child care services are needed, CCDF funds are used and the provision of child care services is arranged and provided through the Board’s child care contractors.

Procedure for Reimbursement. Boards reimburse transportation and other work, training, or education-related expenses to individuals when participation is initiated and payments are recorded in an automated system. Participants may receive dependent child care for children who are 12 years of age or younger. Child care services for SNAP E&T participants are funded with CCDF funds.

TWC has in place a more flexible system for purchasing child care to accommodate the needs of SNAP E&T participants. The system consists of a network of Board child care contractors who are responsible for a broad spectrum of functions and activities, including those commonly performed by child care brokers, vendors, and resource and referral agencies.

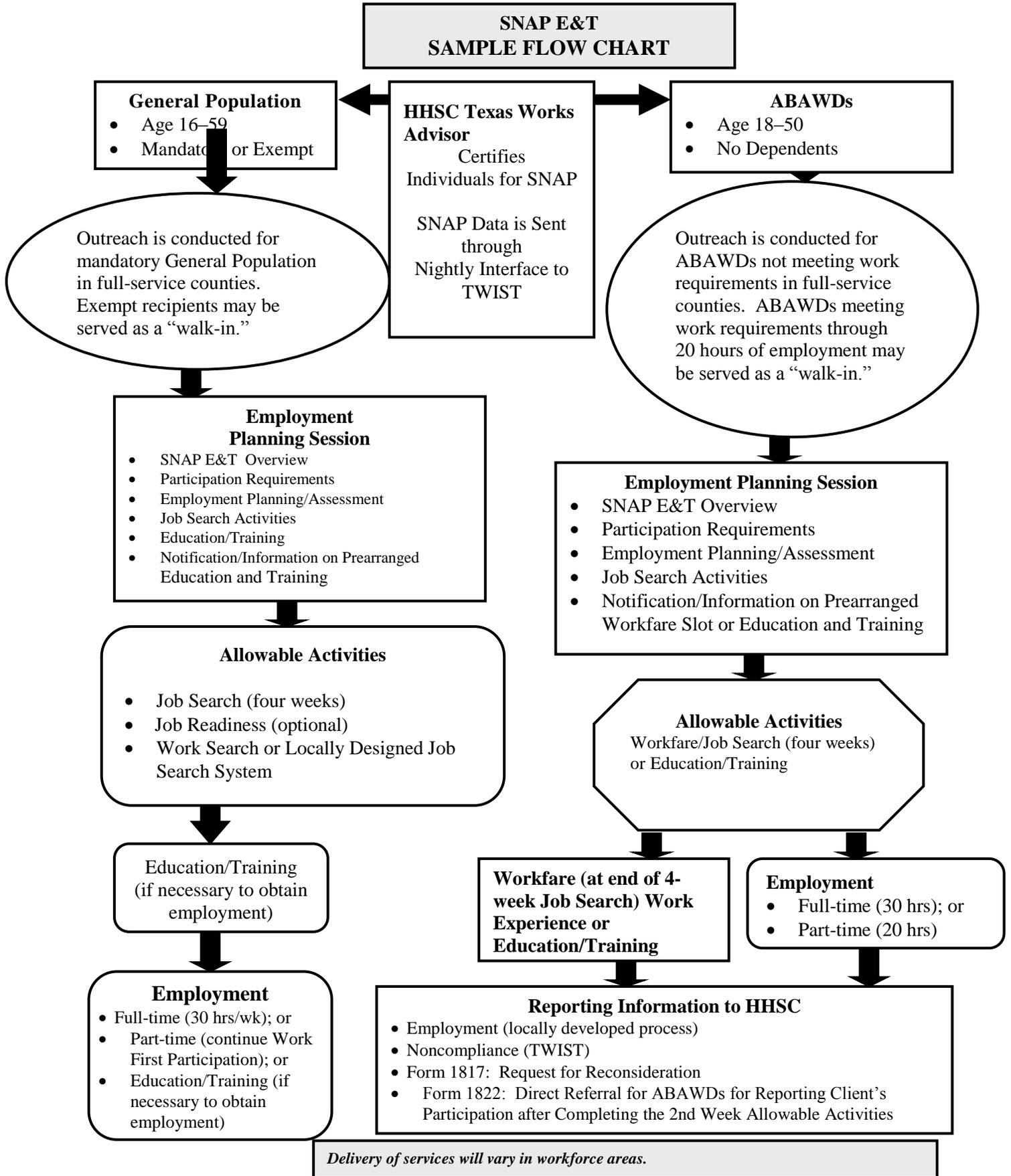
SNAP E&T contractors refer participants to the Board child care contractors for assessment and coordination of child care services. Continuity of child care based on employment is essential. Therefore, a participant is eligible for continuing child care services when the participant becomes employed and exits SNAP E&T services.

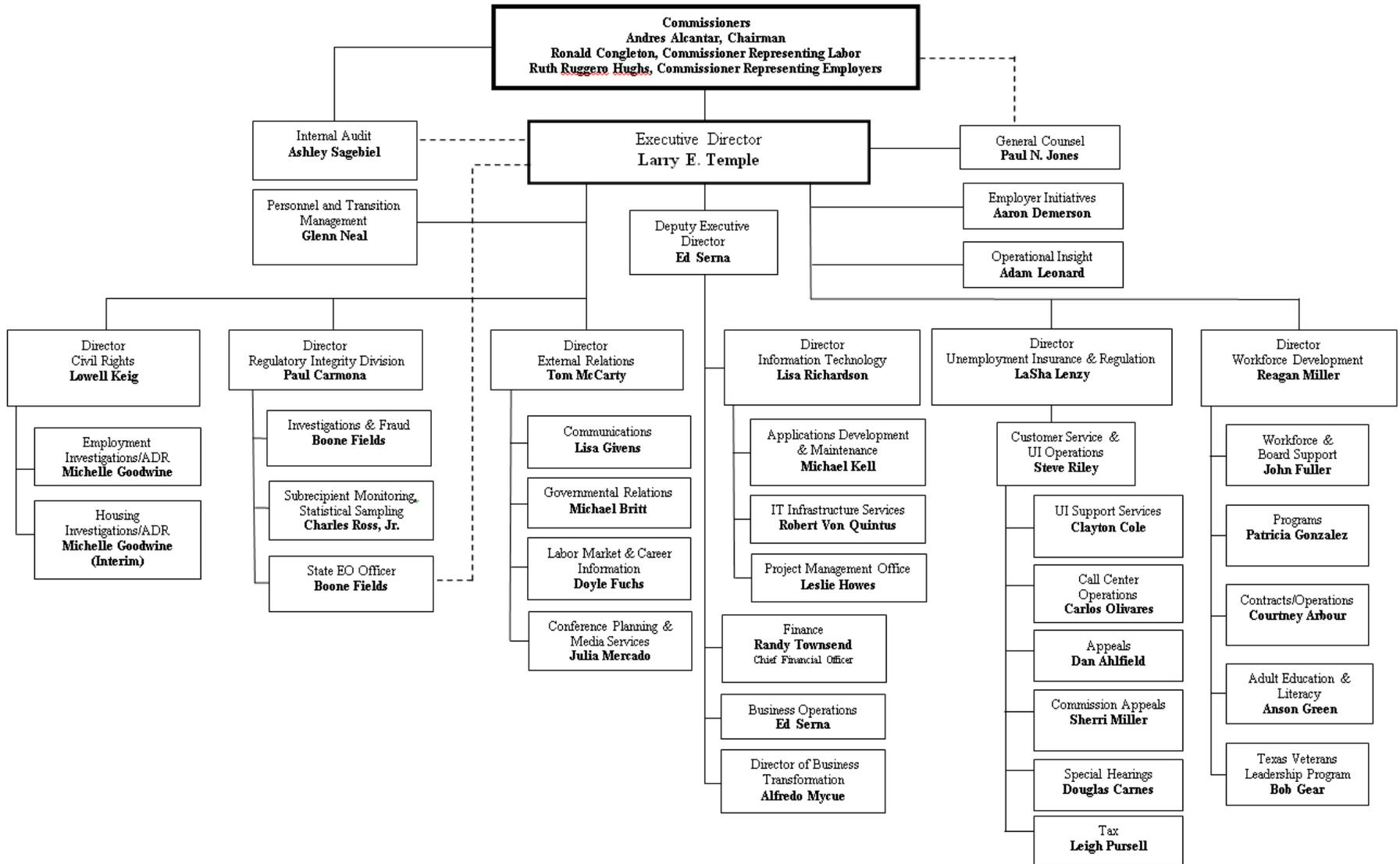
D. COST ALLOCATION

Boards are required to comply with TWC's policy for contracts and grants, which covers cost allocation and includes:

- definitions relating to cost allocation;
- the fundamental basis for cost allocation; and
- essential elements of a cost allocation plan.

**SNAP E&T
SAMPLE FLOW CHART**





**TABLE 4
OPERATING BUDGET
FISCAL YEAR 2016**

Components	State Agency Costs		Contractual Costs	Participant Reimbursement (State plus Federal)		State Agency Cost for Dependent Care	Total
	Salary & Benefits	Other Costs		Dependent Care	Transportation & Other Costs		
Directed Job Search			\$9,812,639		\$993,015		\$10,805,654
Vocational Training			\$60,375		\$8,366		\$68,742
Education		\$5,000	\$12,646		\$1,704		\$19,350
Work Experience			\$71,798		\$9,063		\$80,861
Workfare			\$12,570,328		\$1,211,464		\$13,781,792
Job Retention			\$8,567		\$44,387		\$52,954
Total Component Costs							24,809,353
Overall State Agency E&T Operational Costs							1,917,920
Total State E&T Costs							26,727,273

**TABLE 5:
PLANNED FISCAL YEAR COSTS OF THE STATE E&T PROGRAM BY CATEGORY OF FUNDING
FISCAL YEAR 2015**

Funding Category	Fiscal Year 2015	Fiscal Year 2016
1. 100 Percent Federal E&T Grant:	\$6,547,308	\$4,719,779
2. Texas' Share of Additional \$20 Million in 100 Percent Federal Funds	\$9,694,915	\$8,992,806
3. Additional E&T Expenditures	\$7,580,696	\$10,746,688
A. 50% Federal	\$3,790,348	\$5,373,344
B. 50% State	\$3,790,348	\$5,373,344
4. Participant Expenses Reimbursed	\$2,200,000	\$2,268,000
A. Transportation and Other Costs:		
50% Federal	\$1,100,000	\$1,134,000
50% State	\$1,100,000	\$1,134,000
B. Up to Statewide limit per month per dependent for dependent care costs:		
50% Federal	\$0	\$0
50% State	\$0	\$0
C. Above \$25 per month for transportation and other costs	n/a	n/a
D. Above Statewide limit per dependent per month for dependent care costs (Optional) 100% State	\$0	\$0
Total E&T Program costs	\$26,022,919	\$26,727,273

