

Supplemental Nutrition Assistance Program
Employment and Training
Third-Party Partnership
Guide

Texas Workforce Commission

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Introduction

The US Department of Agriculture's (USDA) Food and Nutrition Service (FNS) permits states to use 50 Percent Federal Reimbursement Funds (50-50 Funds) to create partnerships with local entities and provide Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T) services to SNAP recipients. Through these third-party reimbursement (TPR) partnerships, third-party partners (TPPs), such as community colleges, local governments, private-sector entities, and community-based organizations, supply funding for the provision of SNAP E&T services and are reimbursed up to 50 cents per dollar expended.

TPP service models present Local Workforce Development Boards (Boards) with opportunities to expand services to SNAP recipients who may not currently receive them due to funding limitations. The TPP service model allows local entities to recoup up to half of their service costs, which creates incentive to provide services that help SNAP recipients.

In 2024, the Texas Health and Human Services Commission (HHSC) and the Texas Workforce Commission (TWC) began working on a joint initiative, the Third-Party Partnership Program pilot, to increase participation in SNAP E&T activities and services. For this third-party partnership initiative, Boards partner with TPPs to provide services and get reimbursed for 50 percent of their allowable expenditures.

The pilot is a five-year demonstration beginning in Federal Fiscal Year 2025 (FFY'25), with the goal of all 28 Boards using the TPP service model by FFY'29.

The purpose of this guide is to provide information about:

- SNAP E&T policies and procedures related to the TPP service model; and
- how to implement a third-party partnership initiative under the SNAP E&T program.

Purpose of SNAP E&T

The purpose of the SNAP E&T program is to help low-income individuals obtain employment and increase their earnings, thus reducing their dependency on public assistance. Third-party partnership initiatives must be designed to promote the purpose of SNAP E&T.

Expected Outcomes

The expected outcome for a SNAP recipient in a third-party partnership initiative is full-time unsubsidized employment. Education, training, work experience, or other allowable activities may be provided to a SNAP recipient before they search for work.

SNAP E&T customers served under a third-party partnership initiative are included in federal outcome measures and participant reporting.

Eligible SNAP E&T Populations for Third-Party Partnership Initiatives

Exempt SNAP recipients and mandatory work registrants may participate in E&T services under a TPP service model. Boards have the flexibility to choose the population of SNAP recipients that will be best served by third-party partnership initiatives.

Boards may consider serving SNAP recipients who are:

- federally exempt from work registration;
- residents of minimum-service counties;
- mandatory General Population E&T participants; and
- mandatory Able-Bodied Adults Without Dependents (ABAWDs) E&T participants.

Mandatory work registrants appear in the WorkInTexas.com outreach pool nightly. Boards should use the outreach pool as appropriate.

Eligibility Considerations for Third-Party Partnership Initiatives

Boards that choose to serve exempt individuals must carefully consider the circumstances of each exempt individual to determine whether the individual is a good candidate for participation in a third-party partnership initiative.

Careful consideration must also be given when outreaching ABAWDs because their SNAP benefits are time limited. To receive SNAP benefits for more than three months in a three-year period, ABAWDs are required to meet the federal ABAWD work requirement. A 10-day outreach requirement applies to all ABAWDs participating under a TPP model in full-service counties.

Under federal law, TANF recipients are not permitted to receive SNAP E&T services.

Reverse Referrals from TPPs

If the TPP screens for SNAP eligibility or if a customer of the TPP self-attests to receiving SNAP benefits, the TPP will refer the customer to the Board for verification of benefits or to HHSC for enrollment in SNAP.

Participant does not receive SNAP benefits

TPP refers participant to HHSC for SNAP eligibility determination and certification.

Refer to the [Your Texas Benefits](#) website.

Participant's eligibility is questionable

If there are questions about potential eligibility, the TPP is advised to refer the SNAP recipient to HHSC.

TPP may still serve the individual but may not be reimbursed for services provided to an individual not receiving SNAP benefits.

Once the participant is confirmed to be receiving SNAP benefits, the Board refers SNAP recipient for enrollment in TPP's program.

Participant is already receiving SNAP benefits

The TPP refers the potential participant to local Workforce Solutions Office for confirmation of SNAP benefits.

See the [Workforce Solutions Office Finder](#) link.

Third-Party Partnership Initiative Implementation Steps

TWC works with the Board to accomplish the following:

- Board agrees to participate in the initiative.
- TWC trains the Board on the program.
- TWC and the Board engage in strategic conversations about the program.
- TWC establishes a recurring meeting schedule to guide the Board through the process of implementing the third-party partnership initiative.

The Board:

- finds potential TPPs (either the Board approaches TPPs, or TPPs approach the Board);
- assesses each potential TPP (including vetting);
- begins discussions with the TPP about service provision;
- trains the TPP on program requirements, including case management;
- negotiates with the TPP on budget;
- sets up a contract with the TPP; and
- provides contract information to TWC.

TWC:

- includes Board third-party partnership initiative information in the SNAP E&T State Plan;
- sends the SNAP E&T State Plan through appropriate channels for approval; and
- submits the SNAP E&T State Plan to HHSC.

HHSC:

- submits the SNAP E&T State Plan to FNS for approval; and
- is available for technical assistance, as needed.

FNS approves the Board's third-party partnership initiative.

TPP begins service delivery.

Supplanting and Cost Parity Requirements

In accordance with 7 CFR §273.7(d)(1)(ii)(C), federal SNAP E&T funds used for activities within the education component must not supplant nonfederal funds for existing educational services, and the costs charged to E&T must not exceed the costs charged for non-E&T participants.

An agency must charge the federal government consistently with how other participants and local, state, or federal grants are charged. If a service is offered at no cost to non-E&T

participants and it is not allocated to any other grant, a TPP may not charge the SNAP E&T cost category.

SNAP E&T may not be charged for the difference between the actual costs of instruction and tuition and fees that are charged to the public. For example, if a subsidy is available to all students at no cost but charged to SNAP E&T, SNAP recipients are not receiving the same benefits as other students, and, in so doing, state funds are supplanted.

Other Requirements

For general programmatic and operational guidance on SNAP E&T, Boards may refer to the [SNAP E&T Guide](#).

Boards must ensure the following statement appears in materials, including those created by TPPs, intended to inform the public about the SNAP E&T program:

In accordance with Federal law and U.S. Department of Agriculture (USDA) policy, this institution is prohibited from discriminating on the basis of race, color, national origin, sex, age, religion, political beliefs, or disability. To file a complaint of discrimination, write USDA, Director, Office of Civil Rights, 1400 Independence Avenue, S.W., Washington, D.C. 20250-9410 or call (800) 795-3272 (voice) or (202) 720-6382 (TTY). USDA is an equal opportunity provider and employer.

Allowable Costs

Allowable Costs for third-party partnerships—SNAP E&T allowable activities and support service expenses must be reasonable, necessary, and directly related to allowable SNAP E&T activities.

Reasonable Costs—A cost is reasonable if the amount does not exceed that which a prudent individual would pay under the circumstances prevailing at the time the decision was made to incur this cost.

Necessary Costs—Necessary costs are incurred to carry out essential functions that cannot be avoided without adversely affecting program operations.

Case Management Information for Boards in Third-Party Partnership Initiatives

Case management is the organization and coordination of a network of formal and informal activities, services, and support designed to help Supplemental Nutrition Assistance Program (SNAP) recipients participating in SNAP Employment and Training (E&T) become employed and self-sufficient through participation in work programs and education and/or training activities.

Case management:

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- must be provided for each SNAP E&T component;
- is designed to move SNAP recipients toward employment and self-sufficiency, independent of public assistance;
- requires engagement with a skilled staff member who has the knowledge and skills to guide and support the SNAP recipient's participation in E&T; and
- is an ongoing process that will occur throughout the SNAP recipient's participation.

It is the responsibility of case management staff to verify and appropriately document time spent on SNAP E&T activities in the designated case management information system.

Boards will contract with TPPs to provide SNAP E&T services to eligible SNAP recipients. The contracts developed with TPPs should consider and define various case management responsibilities.

TPP potential responsibilities include:

- referrals to HHSC for determination of eligibility for SNAP for those who are not currently SNAP customers;
- job referrals;
- career counseling;
- case management (which includes):
 - monitoring the participant's progress toward goals;
 - assisting the participant in overcoming barriers that are keeping the participant from reaching goals;
 - offering support services and additional case management during the job retention phase after the participant becomes employed; and
 - monitoring and tracking participant progress—providing appropriate documentation to Boards to input into WorkInTexas.com; and
- provision of support services (ensure that Board limits are not exceeded in the provision of support services)

Board responsibilities include:

- outreach to SNAP customers referred by HHSC;
- verifying and documenting eligibility;

Note: To ensure that SNAP E&T funds are not used for individuals who are not receiving SNAP benefits, initial and monthly SNAP eligibility verification is required.
- obtaining verification documentation from TPP for SNAP E&T activities;
- documenting time spent on SNAP E&T activities, services, and support services in WorkInTexas.com appropriately;
- performing employment planning and assessment, including:
 - developing and updating the employment plan; and
 - setting goals and making an action plan together with the participant;
- documenting and tracking for all services provided for the case, including support services; and
- providing child care assistance (when necessary).

Employment Planning

During the employment planning meeting, the case manager provides the SNAP recipient with an overview of SNAP E&T, which includes:

- an explanation of SNAP E&T activities;
- participation requirements;
- an explanation of the appeals process (including that SNAP recipients have a right to appeal, the materials and handouts with information on the right to appeal, and where to file an appeal); and
- setting goals and making an action plan with the participant.

When developing the employment plan, the case manager completes the Job Seeker Registration information in WorkInTexas.com to identify occupational choices for which the SNAP recipient qualifies and is interested.

Case managers are responsible for helping the SNAP recipient understand how to use WorkInTexas.com and the circumstances under which the SNAP recipient should change or update their registration information.

When developing the employment plan, case managers and the SNAP recipient must also decide on the SNAP E&T activities in which the SNAP recipient will participate. During development of the employment plan, case managers and the SNAP recipient must consider appropriate activities that provide the SNAP recipient with the education and training necessary to improve their employment outcome, and case managers must make every effort to provide SNAP recipients with appropriate training opportunities. Activities assigned must help the SNAP recipient obtain sustainable employment as quickly as possible.

Assessment

Case managers conduct initial and ongoing assessments throughout the participant's SNAP E&T enrollment to:

- gather and analyze information to assist the participant in setting career and educational goals; and
- identify a SNAP recipient's strengths and barriers to employment.

An initial assessment is completed during the employment planning meeting or shortly thereafter, which includes the following topics:

- Current skills, including the following:
 - Education/basic skills (to determine if the customer needs Adult Education and Literacy [AEL], High School Equivalency [HSE], or English as a Second Language [ESL] classes or literacy/numeracy remediation)
 - Job readiness, including employment history, reasons for gaps in employment, and employment goals
 - Skills the participant wants to develop
 - Trainings that interest the participant
- Barriers, including the following:
 - Expired certifications
 - Involvement in the justice system

- Disabilities
- Pregnancy, parenting, or caretaking
- Mental health issues
- Former foster youth
- Substance abuse
- Family violence
- Homelessness
- Participant needs, including the following:
 - Support services
 - Soft skills training
 - Digital skills training
 - Help with interviewing
 - Financial literacy training
 - Clothing, uniforms, and/or tools
- Involvement with other agencies, including the following:
 - Child Protective Services (CPS)
 - Office of the Attorney General (OAG)
 - Other

Job Referrals

Case-managed job search may occur either remotely or in person and does not need to occur in the same place or at the same time, but it should occur at least weekly. To provide job referrals, case managers may:

- utilize multiple online job posting boards, such as WorkInTexas.com, [Indeed](#), and [LinkedIn](#); or
- utilize community job posting boards and look for help wanted signs.

Job Readiness

Job readiness is a short-term structured activity that increases the job seeker’s employability and prepares a job seeker for employment. Job readiness includes:

- job search training;
- employability assessments;
 - Note:** Employability assessments identify general skills that are necessary for success in the labor market at all employment levels and in all sectors. Employability assessments should help identify barriers to work and determine an individual’s readiness for employment, which includes:
 - job skills;
 - Note:** A job skills assessment may be one piece of an employability assessment that determines whether an individual has the skills appropriate for a specific job.
 - applied academic skills;
 - interpersonal skills;
 - critical thinking skills; and

- communication skills.
- training in techniques for employability;
- job placement services;
- interviewing skills and practice interviews;
- assistance with applications and résumés; and
- financial literacy training.

Vocational Training

Vocational training is a SNAP E&T activity that improves the employability of SNAP recipients by providing training in a skill or trade. This allows SNAP recipients to move directly into employment. Vocational training incorporates:

- occupational assessment and remedial and entry-level job-skills training;
- short-term, prevocational, entrepreneurial training;
- customized training;
- institutional skills training;
- upgrade training; and
- vocational education.

Vocational training must be:

- related to the types of jobs available in the labor market;
- consistent with employment goals identified in the SNAP recipient's employment plan, when possible; and
- provided in either a classroom or work-based setting.

Nonvocational Education

Nonvocational education is a nonwork SNAP E&T activity that provides educational programs or activities to improve basic skills or employability. It incorporates the following:

- Adult basic education
- Basic skills and literacy
- HSE and high school instruction
- ESL
- Postsecondary education that does not result in a baccalaureate or advanced degree
- Work readiness training

In addition to basic skills and literacy, workforce development services must include financial literacy training. Boards providing financial literacy training can use the [Money Smart](#) resource available in English and Spanish through the Federal Deposit Insurance Corporation (FDIC) website.

Only educational activities (including postsecondary education) that directly enhance the employability of the SNAP recipient are allowable. A direct link between the educational activity and work readiness must be established before the SNAP recipient begins the activity.

Career Counseling

To help the participant attain a self-sufficient wage, the skilled case manager will link the participant's knowledge, skills, and work history to:

- current, in-demand occupations;
- job openings; and
- relevant skills gap training available.

The case manager and the participant will have transparent discussions regarding the participant's path toward a self-sufficient wage. The discussions should include information about training opportunities, job readiness workshops, and skills-gap training to ensure that the participant is made aware of all available resources. These discussions will be documented in the participant's employment plan and in case management notes.

Progress Monitoring and Tracking

Progress monitoring and tracking holds the participant accountable to the goals they set for themselves.

The case manager and the participant will review progress toward goals outlined in the participant's employment plan at their weekly meeting (in-person or virtual).

This ensures that the participant is progressing toward self-sufficiency and independence from public assistance.

Documentation

The case manager documents all events that impact SNAP E&T services.

The following must be documented:

- Eligibility
- Assessment
- Participation in activities
- Closure
- Records retention

The time spent in case management must count toward time engaged in E&T. The time a participant spends involved in case management activities with a skilled staff member must be tracked in WorkInTexas.com because that time is considered a job search activity. It is each Board's decision whether to set a specific amount of time for appointments.

Allowable Activities

In Texas, ABAWDs and the SNAP E&T General Population may participate in any of the following allowable SNAP E&T activities:

- Case-managed job search (General Population only)
- ABAWD job search, as part of workfare (ABAWDs only)
- Job readiness
- Job retention services
- Vocational training
- Nonvocational education, including driver education

- Work experience
- Workfare (ABAWDs only)
- Workforce Innovation and Opportunity Act (WIOA) work programs
- Trade Adjustment Assistance (TAA) work programs
- Unsubsidized employment (allowable only if enrolled in other SNAP E&T activities)
Note: The USDA FNS does not recognize unsubsidized employment as an allowable category of service for SNAP E&T. Therefore, employed SNAP recipients (ABAWDs or SNAP E&T General Population) also must participate in other allowable SNAP E&T activities in addition to unsubsidized employment.

Allowable Support Services

Boards must provide support services to mandatory work registrants and exempt recipients who voluntarily participate in SNAP E&T activities if the support services are reasonable, necessary, and directly related to participation in SNAP E&T or to the recipient's employment. Support services can include the following:

- Transportation assistance, such as:
 - bus tokens;
 - gas vouchers;
 - prepaid gas cards;
 - automobile repairs;
 - car pools;
 - mileage reimbursement (personal vehicles only);
 - taxicab or rideshare services (Uber, Lyft, Curb);
 - contracts with private entities, such as transit providers who provide shuttle or van services;
 - purchase of tires or automobile batteries; and
 - driver license fees (includes renewals).
- Training-or education-related expenses, such as:
 - uniforms;
 - personal safety items; and
 - other necessary equipment, including books or training manuals.
- Housing assistance, such as rent or utility payments, may be provided if the assistance is:
 - reasonable, necessary, and directly related to participation in SNAP E&T activities or retaining employment;
 - paid for based on methods and amounts established in the Board's local policies and procedures;
 - provided for no more than two months in a calendar year for SNAP recipients participating in regular SNAP E&T activities;
 - provided for no more than two occurrences in a 90-day period after a SNAP recipient has entered full-time employment; and
 - based on funding availability.
- Child care assistance

Note: Boards must ensure that child care services are provided to the SNAP E&T General Population (mandatory or exempt) if needed.

- Work-related expenses, such as:
 - uniforms;
 - equipment;
 - clothing (for a job interview);
 - union dues;
 - relocation expenses; and
 - tools.
- General education development test payments
Note: The SNAP E&T General Population and ABAWDs can study for an HSE credential while in an education or training component. If they identify themselves as ready to begin the test series for an HSE credential, the HSE testing facilitator can help pay for testing. This removes an obstacle to the SNAP recipient's progress and enhances the benefits of participation in SNAP E&T.

Third-Party Partnership Financial Management and Tracking

To qualify for reimbursement under the TPP model, expenditures must meet the following criteria:

- Not used to match other federal funds
- Not federal funds
- For the provision of allowable SNAP E&T services to SNAP recipients participating in the third-party partnership initiative
- Certified by both the TPP and the Board

1. Consistent Cost Allocation

If the TPP allocates costs to other federal, state, and local grants for non-SNAP recipients, the TPP must charge consistently with how other participants and local, state, or federal grants are charged, and in accordance with federal grant laws.

2. Staff Time

The TPP must track and invoice for staff time spent on SNAP E&T services and must keep time records to bill for its staff.

3. Third-Party Partnership Funding Agreement

Once the contract with a TPP is executed, Boards must complete the [SNAP E&T Third-Party Partnership Funding Agreement Form](#) and submit the form to TWC.

4. Certification of TPR Expenditures

Boards must use the [Third-Party Partnership Certification of Expenditures Form](#) (certification form) to submit certifications of expenditures to TWC.

To ensure accountability of certified expenditures from TPPs, TWC will not accept certified expenditures without a certification form. Boards must ensure that the certification form is complete and that it lists the TPP contributing the funds.

Third-Party Partnership Resources for Boards

The [Information for Potential Third-Party Partners](#) document is an educational tool that Boards may share with interested providers of allowable SNAP E&T services.

The [SNAP E&T—Potential Third-Party Partner Assessment](#) document is a tool that Boards may use to determine if a provider of allowable SNAP E&T services is a good fit for a third-party partnership.

The [Checklist for Contracts with Third-Party Partners](#) document may be used by Boards when developing a contract with a TPP.

The [SNAP E&T State Plan Third-Party Partnership Section Information Tool](#) and [Intermediary Subcontracts Information Collection Tool](#) documents are used by Boards for submission to TWC of required information for inclusion in the SNAP E&T State Plan.