

**Supplemental Nutrition Assistance Program**

**Employment and Training (E&T)**

**Florida State Plan**

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**FEDERAL FISCAL YEAR 2014**

**October 1, 2013 through September 30, 2014**

**Submitted By:**

**The Department of Economic Opportunity**

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## **PART 1 – Summary of Florida’s Supplemental Nutrition Assistance Program (SNAP) Employment and Training (E&T)**

### **A. Abstract of Florida’s SNAP E&T Program**

1. On July 1, 2009, Florida implemented a voluntary supplemental nutrition assistance employment and training program under provisions of federal regulations at 7 CFR 273.24(f)(2), allowing a State to qualify for a statewide Able Bodied Adults Without Dependents (ABAWD) waiver if the Department of Labor's (DOL) Unemployment Insurance (UI) Service determines it meets the criteria for Extended Benefits (EB). Under longstanding guidance, States that meet the EB criteria can qualify for a 12-month statewide waiver, up to 12 months after the trigger date. The Food and Nutrition Services (FNS) can approve a waiver if the State's unemployment triggers the criteria for Extended Benefits (EB), regardless of whether the State has elected the option to offer EB itself. Florida is one of 42 states that met the EB criteria under DOL Trigger Notice 2012-47, effective December 9, 2012. Under this Trigger Notice, nearly all States may continue to suspend the three month time limits through September 30, 2014 because they qualify for a waiver from the time limit under Supplemental Nutrition Assistance Program (SNAP) rules. The Department of Children and Families (DCF) has informed the FNS regional office of Florida’s decision to adopt this waiver. Therefore, the State of Florida will continue to operate a volunteer Employment and Training (E&T) program in Federal Fiscal Year (FFY) 2014.
2. Florida’s SNAP E&T program is an integrated part of the workforce system established in Florida Statutes, Chapter 445 and implemented locally by the State’s 24 Regional Workforce Boards (RWBs).
  - Employers and emerging businesses offer individuals the opportunity to work, earn and engage in the economic well-being of the State.
  - Job seekers, whether employed, underemployed or unemployed, have specific skills to meet the needs of employers. Some skills are directly related to the opportunities available in the workforce while other skills are transferrable. Job seekers may also need to develop skills that employers are looking for.
  - The RWBs bring employers and job seekers together. The RWBs will:
    - Reach out to employers to identify jobs that are available in the community, as well as employment opportunities that are becoming available in emerging occupations;
    - Identify training providers and connect job seekers to training/skill development activities designed to help individuals obtain employment;
    - Work with job seekers to identify goals, skills and services to overcome/manage barriers to employment; and
    - Connect job seekers and employers to strengthen Florida’s families and Florida’s economy.
3. Many individuals who are receiving food assistance benefits are also looking for employment through:

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- Employ Florida Marketplace (EFM), Florida's on-line system designed to connect employers and job seekers, and
- The resource centers located in more than 90 career centers operated by the RWBs throughout the State of Florida.

Food assistance benefits recipients also participate in other activities implemented locally through the career centers which include:

- Assessments;
  - Career planning;
  - Employability workshops;
  - Resume development;
  - Education and training programs, such as:
    - Adult Basic Education (ABE);
    - English for Speakers of Other Languages (ESOL);
    - General Equivalency Diploma (GED);
    - Customized training for employers; and
    - Computer training.
  - Job development activities (assessment information is compared to job orders and individuals are referred to employers based on the skills the employer is looking for);
  - Workforce Investment Act (WIA) programs;
  - Trade Adjustment Assistance (TAA) programs;
  - Welfare Transition (WT) programs; and
  - Youth programs.
4. The Department of Children and Families (DCF) determines food assistance benefits recipients' eligibility for benefits. Florida Statutes, Chapters 414 and 445, gave DCF the authority to refer food assistance benefits recipients who meet eligibility requirements for the SNAP E&T program to the Department of Economic Opportunity (DEO) for engagement. The SNAP E&T program activities and services are outlined in this plan and are administered through the statewide workforce development system.

### **B. Program Changes**

#### **1. Overview**

The State will continue to offer volunteer services as described in this SNAP E&T State Plan.

#### **2. Able Bodied Adults Without Dependents (ABAWD) Population**

### ***I. Overview of the population being served***

Because Florida is operating a volunteer-based E&T program for food assistance benefits recipients, ABAWDs ages 16-39 will be served as a volunteer, but will not be subject to time limits.

The SNAP E&T program will be a volunteer-based program. Food assistance benefits recipients engaged in the Temporary Assistance for Needy Families (TANF) work program or the Welfare Transition (WT) program will not be able to participate in the SNAP E&T program. Because the number of individuals receiving food assistance benefits is so large, workforce system partners have identified a subset of that population that will be mailed an “Outreach Letter” by DEO.

- For food assistance benefits recipients, age 16-39, who are coded as work registrants or Reemployment Assistance recipients a case will be built in the One-Stop Service Tracking (OSST) system. The case will be created when the data is received from the Florida On-line Recipient Integrated Data Access (FLORIDA) system through a nightly interface with workforce’s data entry system, the OSST system. Work registrants are food assistance benefits recipients ages 16 through 59 who do not meet one of the following conditions:
  - A person who is 16 to 18 who is not the head of the food assistance household or who is in school or enrolled in an employment and training program, on at least a half-time bases, per 7 CFR 273.7(b)(1)(i);
  - A person who does not meet work registrant requirements based on education exclusions;
  - A person determined by DCF to be physically or mentally unfit for employment;
  - A participant in the WT program;
  - A parent or other household member responsible for the care of a dependent child under six;
  - A food assistance benefits recipient caring for a disabled individual;
  - A person who reports that he or she is involved in a substance abuse/mental health treatment program on a regular basis that interferes with employment opportunities. This does not include individuals who participate in Alcoholics Anonymous (AA) or Narcotics Anonymous (NA);
  - An individual who is working 30 hours a week or more; or
  - An individual who is earning the equivalent of working 30 hours a week or more based on minimum wage provisions.
- Food assistance benefits recipients who are receiving Reemployment Assistance are not coded as “work registrants.” Typically, food assistance benefits recipients who are receiving Reemployment Assistance would not be referred to the workforce system via the FLORIDA to OSST interface because they are not “work registrants.” Because Florida qualified for a waiver under a DOL Trigger Notice, the decision was made to provide

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services to food assistance benefits recipients who are receiving Reemployment Assistance last Federal Fiscal Year (FFY). Since Florida continues to qualify for a waiver under a DOL Trigger Notice, Reemployment Assistance recipients will continue to be served under the voluntary E&T program.

- DCF identifies recipients in certain benefits categories with a specific code received during the FLORIDA to OSST interface allowing workforce to offer intensive services, including reemployment services.
- ***The data used in the SNAP E&T State Plan is based on actual program participation data from the voluntary program for the period of July 1, 2012 through June 30, 2013. This data was annualized and used to make projections or estimates of the anticipated number of food assistance benefits recipients who will be engaged in activities in FFY 2014.***

### II. Areas of Service Delivery

#### 1) Areas offering a volunteer-based program

The following 44 counties will offer services to food assistance benefits recipients who opt to volunteer in the E&T program in FFY 2014. Any modifications to areas of operation will be submitted prior to the effective date of the change.

|           |              |          |            |
|-----------|--------------|----------|------------|
| Alachua   | Duval        | Lee      | Polk       |
| Baker     | Escambia     | Leon     | Putnam     |
| Bay       | Flagler      | Liberty  | Santa Rosa |
| Bradford  | Franklin     | Manatee  | Sarasota   |
| Brevard   | Gadsden      | Monroe   | Seminole   |
| Broward   | Gulf         | Nassau   | St. Johns  |
| Calhoun   | Hernando     | Okaloosa | Sumter     |
| Charlotte | Hillsborough | Orange   | Volusia    |
| Clay      | Holmes       | Osceola  | Wakulla    |
| Collier   | Jackson      | Pasco    | Walton     |
| Dade      | Lake         | Pinellas | Washington |

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### 2) *Areas not offering a volunteer-based program*

The chart below provides a list of the 23 counties that will not offer services to food assistance benefits recipients effective October 1, 2013. If the counties offering services should change during the FFY, a modification to the plan will be submitted.

|            |           |           |              |
|------------|-----------|-----------|--------------|
| Columbia   | Glades    | Jefferson | Palm Beach   |
| Citrus     | Hamilton  | Lafayette | Suwannee     |
| Dixie      | Hardee    | Levy      | Taylor       |
| DeSoto     | Hendry    | Madison   | Union        |
| Okeechobee | Martin    | St. Lucie | Indian River |
| Gilchrist  | Highlands | Marion    |              |

### III. *Additional Allocations for Pledge States*

#### 1) *The State's Pledge*

Florida will not be operating under a pledge state status.

#### 2) *Estimated Cost of Fulfilling the Pledge*

N/A

#### 3) *A Description of Management Controls in Place to Meet Pledge Requirements*

N/A

#### 4) *A Discussion of Florida's Capacity and Ability to Serve At-Risk ABAWDs*

N/A

#### 5) *Information about the size and special needs of its ABAWD population*

N/A

#### 6) *Information about the Education, Training, and Workfare Components Florida is offering*

N/A

### IV. *Program Components*

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According to both federal law and the [Handbook](#) issued by the United States Department of Agriculture (USDA), program components must be meaningful and enhance the employability of individual food assistance benefits recipients. Florida has an integrated workforce system designed to engage job seekers, including food assistance benefits recipients, in activities geared towards helping individuals gain skills, gain employability, and connect them to employment opportunities.

The RWBs are responsible for engaging food assistance benefits recipients at the local level and will continue to offer employment services through the integrated workforce system. This includes food assistance benefits recipients who:

- Respond to the Outreach Letter,
- Learn about workforce programs from community partners;
- Learn about workforce programs from the Internet;
- Learn about workforce programs by word of mouth; and,
- Learn about workforce programs from regional outreach by the RWBs.

The RWBs will engage food assistance benefits recipients in one or more of the following components:

- Job search;
- Job search training;
- Vocational training;
- Education;
- WIA activities (including TAA activities);
- Self-initiated work experience;
- Work experience; and
- Employment Retention Services (ERS).

#### **Orientation and Assessment**

Although they are not components, Orientation and Assessment are other activities in which all program participants may be engaged. Orientation is a required activity for new or reopened referrals if the participant has not attended Orientation within the last 12 months. Orientation is required if there have been significant program changes since the participant last attended, regardless of the time frame. Assessment is required prior to placement into a component. Orientation and assessment are not stand-alone components; however, they are qualifying activities that are considered part of the component to which the participant is initially assigned.

Volunteers may participate in Orientation in one of three ways:

- The volunteer may attend a live orientation session to learn what the workforce system and the SNAP E&T program have to offer; or

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- The volunteer may log onto the OSST system to attend an on-line orientation; or,
- The volunteer may attend an on-line orientation session, as well as receive assistance with the on-line process at designated service centers and community partners.
- Volunteers attending live orientation sessions must be provided with a grievance and complaint/EEO form. The form must be signed, dated, and retained in the volunteer's case file. Volunteers completing the orientation and assessment online must be provided with a grievance/EEO form at the first appointment with a case manager. The form must be signed, dated, and retained in the volunteer's case file.

#### Employment Retention Services (ERS)

The Farm Bill of 2008 gave states the flexibility to offer SNAP participants who were given a service through the E&T program and subsequently employed, retention services for up to 90 days of securing employment. This includes authorization to spend 100 percent funds on job retention case management activities.

Effective October 1, 2013, Florida will continue to pilot ERS through September 30, 2014. If this pilot continues to be successful and funding is available, ERS may be provided in all RWB areas that operate an E&T program effective October 1, 2014. The employment retention services listed below can be provided. One of the services, bonding, will be funded through the [Federal Bonding Program \(FBP\)](#).

- Clothing for a job;
- Equipment for a job;
- Tools for a job;
- Test fees for work;
- Relocation expenses;
- Licensing for a job;
- Bonding;
- Transportation; and,
- Childcare

Florida will not use funds for the above services unless the individual was enrolled in SNAP, provided an E&T service/engagement in an activity and subsequently secured employment and the services are being offered as a part of the 90-day retention services.

Engagement in activities and services may be limited based on funding availability. Each RWB will document the components that will be available in their area through their local operating procedures. Potential volunteers can learn about the SNAP E&T program through:

- Outreach Letters;

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- Local outreach efforts;
- Participating in other workforce programs;
- Information provided by DCF;
- By going to his or her local career center to apply for a job;
- Word of mouth; and,
- Local outreach or other local marketing efforts.

A case is built or reopened if the food assistance benefits recipient is coded by DCF as a work registrant or a Reemployment Assistance recipient. Letters mailed to recipients will include an overview of the E&T program. This letter will outline services available to those recipients who choose to volunteer in the SNAP E&T program.

A food assistance benefits recipient who learns about the SNAP E&T program through other forms of communication, such as those described above, may choose to participate in the E&T program as long as he/she is not engaged in the WT program as a mandatory cash assistance recipient. The ability to engage food assistance benefits recipients who opt to volunteer is based on funding availability and is outlined in local operating procedures in each region.

#### ***V. Sequence of Components***

The E&T program is a part of Florida's workforce system. The workforce system provides opportunities to food assistance benefits recipients to help them gain skills, gain employability, and connect them with employers. Florida emphasizes the importance of helping job seekers access services based on their goals, work history, skills, needs and barriers to employment, which is particularly critical in this economy. E&T participants will be able to work with workforce system staff to progress through activities based on their:

- Goals;
- Ability to participate;
- Barriers to employment;
- Employability level;
- Skills; and
- Work history.

The RWBs have the ability to outline the process of engagement, including a specific sequence of components, in their local operating procedures.

#### ***VI. Other Employment Programs***

The WT program, as previously stated, is Florida's work program designed to engage work-eligible TANF funded cash assistance recipients (under Title IV-A of the Social Security Act) in a plan that moves the family from welfare to work. In 2000, Senate Bill 2050 combined the workforce and the Work and Gain Economic Self-Sufficiency (WAGES) Boards to effectively engage all job seekers under one employment service umbrella, the workforce system. The WT and E&T programs are a part of the same administrative structure and

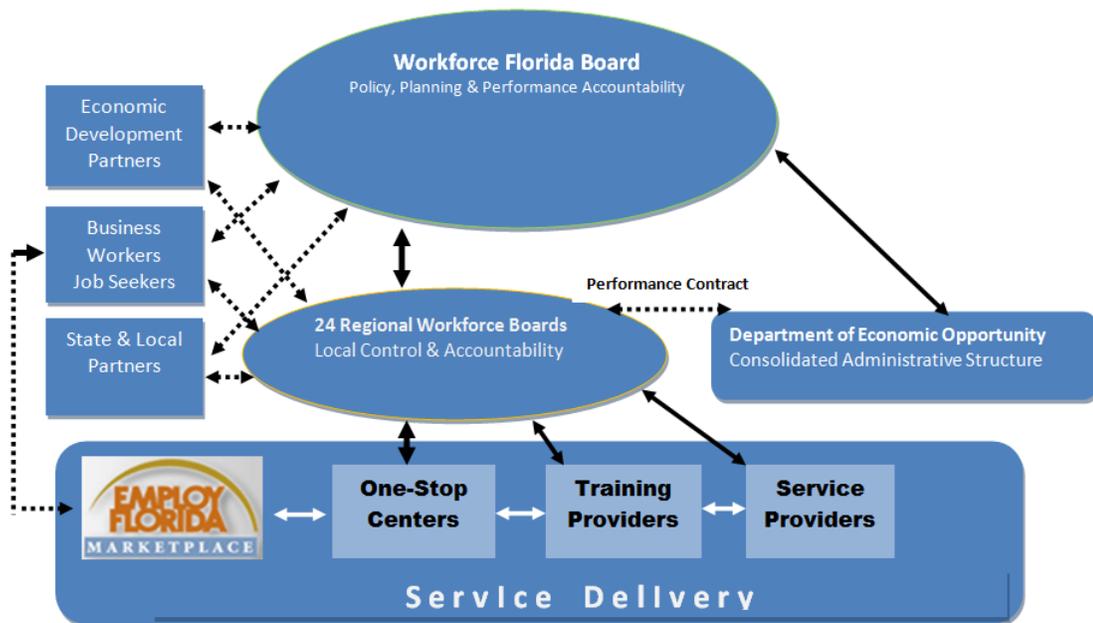
share resources, including access to employer services, job seeker services and the OSST system.

**VII. Workforce Development System**

The following information is located on the Workforce Florida, Inc. (WFI) website. The information was designed to explain how the workforce system (in its current structure) was created and how the system currently operates.

*Workforce Florida, Inc. (WFI) was created by Governor Jeb Bush and the Florida Legislature with the passage of the Workforce Innovation Act of 2000, Chapter 445, Florida Statutes. A 45-member board appointed by the Governor oversees and monitors the administration of the state's workforce policy, programs and services carried out by the 24 business-led RWBs and DEO. Direct services are provided at over 90 career centers. This innovative approach to workforce development in Florida is illustrated in the model below.*

**FLORIDA'S WORKFORCE SYSTEM**



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*While WFI provides policy, planning and oversight at the State level, the 24 RWBs are responsible for implementing programs in their communities. Each RWB has performance measures and contracts to provide accountability; however, the choice of initiatives and programs it implements are under the local board's control unless the program is required by Federal/State law. This allows programs to reflect the economic development, business and workforce needs of each particular region of the State.*

#### **Career Centers**

*Workforce development services in Florida are available primarily through a system of career centers designed to provide easy access to diverse services including job placement and training, temporary cash assistance and special support services such as subsidized childcare and transportation.*

*Florida's career center network was established to bring workforce and welfare transition programs together under one physical or "virtual" roof to simplify and improve access for employers seeking qualified workers or training programs for their existing employees and job seekers.*

*Currently, there are career centers across Florida managed at the local level by regional workforce boards. Some are full-service centers providing direct access to a comprehensive array of programs at a single location, while others are satellite facilities capable of providing referrals or electronic access. Florida's career centers are affiliated statewide through the Employ Florida brand.*

According to Florida Statutes, Chapter 445, the E&T program activities are a required part of the workforce system. The WFI,

*...is the principal workforce policy organization for the state. The purpose of WFI is to design and implement strategies that help Floridians enter, remain in, and advance in the workplace, becoming more highly skilled and successful, benefiting Floridians, Florida businesses, and the entire state... (445.004, F.S.)*

WFI provides oversight and policy direction to ensure that workforce programs, including the SNAP E&T program, are administered by DEO in compliance with approved plans and implemented locally by the RWBs and other designated providers.

#### **VIII. Outcome Data**

Florida collects programmatic data of the engagement in activities and services provided by program staff through automation and information entered into the OSST system. Florida also collects participation and outcome data and reports this information to the USDA in the required FNS 583 report.

### **C. Program Components**

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This section of the plan includes a description of each component as required in the guidance handbook issued by the USDA.

### 1. Job Search

- **Description of Component:** Participants search for work each month by applying for jobs. This includes:
  - a. Completing applications;
  - b. Submitting resumes;
  - c. Meeting with job developers for referrals to employers;
  - d. Contacting employers about job opportunities;
  - e. Attending interviews;
  - f. Going to job fairs; and
  - g. Other activities directly related to securing employment, such as searching for jobs using the internet.

Job searches may be conducted independently or in a group setting. Job searches will be recorded on a job search report form or in the EFM system. The data from the EFM system may be used to verify the number of job search contacts that were made or the time spent in job search activities for the time period in question.

According to 7 CFR 273.7,

*The State agency should not establish a continuous, year-round job search requirement. If a reasonable period of job search does not result in employment, placing the individual in a training or education component to improve job skills will likely be more productive.*

To meet this requirement, job search as an activity will not be a “year round” activity. The RWBs will address in their local operating procedures:

- The local time limits associated with job search as an activity;
- How the participant will be assessed for engagement in an activity if employment is not secured; and
- When the participant will be assessed for engagement in an activity if employment is not secured.

The job search activities in the career centers or satellite offices are an integrated part of the workforce system. There are many tools available to individuals who are looking for work, even if they cannot go to a physical office site.

- In Florida, employers are able to post jobs on EFM and look for job seekers with skills that fit the job profile by reviewing resumes posted in the EFM system.
- Job seekers can look for jobs on any computer with Internet access using EFM. Job seekers needing access to a computer can go to the

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career centers, as well as community partners to conduct their job search activity. At the career centers, staff members are available to offer personal assistance. Job seekers can:

- Look for jobs;
  - Apply for jobs;
  - Develop a resume;
  - Update a resume; and
  - Post a resume in the EFM system.
- Job seekers can look up information about the labor market in EFM. This information includes emerging occupations, high demand jobs, the type of education and skills required for specific occupations, etc. Job seekers also have the ability to begin the career planning process using tools in the EFM system.
  - Employment service staff works with employers to ensure job information is timely posted in EFM and also help organize job fairs providing job seekers the ability to directly interface with employers. Staff at the career centers engage job seekers, including food assistance benefits recipients directly by:
    - Finding jobs that are closely aligned with participants skills and goals;
    - Developing resumes;
    - Applying for work; and
    - Referring participants to employers so they can apply for an interview for jobs.
- **Type of Component:** This is a non-work component.
  - **Geographic areas covered:** Each RWB with an active SNAP E&T program will establish local operating procedures if the activity will be offered as a component in their region.
  - **Anticipated number of ABAWDs who will begin the activity:** 0
  - **Anticipated number of non-ABAWDs who will enter the activity:** 0
  - **Anticipated number of volunteer participants who will enter the activity:** 7,239
  - **Level of participant effort:** Participants will be asked to participate in at least 10 hours of job search activities each month. Hours will be recorded on a time sheet, job search report form or electronically (which can be verified by staff). All participation hours will be captured in OSST on the Job Participation Rate (JPR) screen.
1. **How will submitting an application with an employer count?** One job search record equals one hour of participation unless the individual lives in

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a rural area. Individuals who live in rural areas will receive two hours of participation for one job search record. Hours of participation will be entered on the JPR screen.

2. **What if a participant cannot complete all of the 10 hours due to a limitation?** If an individual can participate in some part of the 10 hours but is limited due to transportation (the SNAP E&T participant can only receive up to \$25 during the month), the participant can be considered to have met the level of effort. For example, the individual spends the entire \$25 applying for work on-site with employers or attending activities (job fairs, interviews, etc.) and proof of both engagement and transportation expenses are secured, the participant may be considered “participating.” Other limitations may include medical issues, limited childcare, etc. Through case notes, program staff can document limitations that led to reduced hours of participation.

- **Organizational responsibilities:** The RWBs implement the SNAP E&T program locally through the career centers, satellite offices and community partners. Regional Workforce Boards are locally organized to ensure that the needs of the community, job seekers and employers are met. The RWBs will engage program participants based on their local structure. Job search activities may include a variety of job seeker to employer engagement.
- **Estimated participant cost of reimbursement for transportation and other expenses except dependent care:** \$485,090
- **Estimated participant cost of reimbursement for dependent care:** 0
- **Annual cost of the activity not including reimbursements:** \$4,213,133
- **Cost of the activity per placement not including reimbursements:** \$582 (average)
- **Total cost of activity:** \$4,698,224

### 2. Job Search Training

- **Description of Component:** According to 273.7(e)(1)(ii), the job search training program has to provide meaningful assistance to the job seeker, helping improve his or her ability to get a job or employability. Job search training activities are conducted locally based on availability of resources and designed to meet the needs of both employers and job seekers. Job search training may include (but is not limited to) workshops, sessions or job clubs that address:
  - Employability skills;
  - Life skills (Research shows that basic communication and issues with managing barriers to employment are major issues that prevent individuals from getting and keeping jobs.)
  - Interpersonal skills;

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- Time management;
  - Decision making skills;
  - Basic job seeking skills (e.g., how to complete a paper application, how to complete an Internet-based application, how to approach managers, how to fax a resume, etc.);
  - Job retention skills;
  - Interviewing skills;
  - Resume development;
  - Appropriate dress;
  - Career assessments; and
  - Career planning.
- **Type of Component:** This is a non-work component.
  - **Geographic areas covered:** Each RWB with an active SNAP E&T program will establish local operating procedures, if the activity will be offered as a component in their region.
  - **Anticipated number of ABAWDs who will begin the activity:** 0
  - **Anticipated number of non-ABAWDs who will enter the activity:** 0
  - **Anticipated number of volunteer participants who will enter the activity:** 5,633
  - **Level of participant effort:** Participants may be given a set schedule to participate in job club activities; this could include a schedule of workshops, classes, or information about on-line classes or computer-based sessions that meet these definitions. Participants may be engaged directly by staff in activities that meet these definitions. Participants may attend classes associated with employability that are available in the community, at educational institutions, etc. Participants may also develop and update resumes using the EFM system and will be expected to participate in activities for at least 10 hours a month.
  - **Documentation:** Documentation in the form of a timesheet or job search report form will be acceptable and/or from an electronic system, such as the EFM system. Hours of participation may be secured from a provider electronically, such as by email from a designated party as well.
1. **What if a participant cannot complete all of the 10 hours due to a limitation?** If an individual can participate in some part of the 10 hours but is limited due to transportation (the SNAP E&T participant can only receive up to \$25 during the month), the participant can be considered to have met the level of effort. For example, if the individual spends the entire \$25 attending workshops, classes, etc. and proof of both engagement and transportation expenses are secured, the participant may be considered “participating.” Other limitations may include medical issues, limited childcare, etc.

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- **Organizational responsibilities:** The RWBs implement the SNAP E&T program locally through the career centers, satellite offices and community partners. The RWBs are locally organized to ensure that the needs of the community, job seekers and employers are met. The RWBs will engage program participants based on their local structure. Job search training activities may be offered through community based organizations, contracted providers, partner programs, partner agencies, educational institutions or directly by the RWBs.
- **Estimated participant cost of reimbursement for transportation and other expenses except dependent care:** \$377,471
- **Estimated participant cost of reimbursement for dependent care:** 0
- **Annual cost of the activity not including reimbursements:** \$3,278,434
- **Cost of the activity per placement not including reimbursements:** \$582 (average)
- **Total cost of activity:** \$3,655,905

### 3. Vocational Training

- **Description of Component:** Vocational training is training that improves the employability of participants by providing training in a skill or trade. Vocational training allows the participant to move directly into employment<sup>1</sup> and is offered in the career centers, in the community through community partners or partner agencies, as well as by training providers. Training providers are approved by the RWBs and/or WFI and posted on an Eligible Training Provider List (ETPL).

In Florida, secondary and post-secondary education programs are not automatically covered with State or federal funds. One-hundred percent SNAP funds may be used:

- To cover the costs of vocational training;
- To develop a program component; and
- To pay for costs associated with vocational training through an educational provider on the ETPL.

Federal funds are spent with the understanding that one-hundred percent E&T funds cannot take the place of nonfederal funds for existing educational services.

Federal financial participation for operating vocational training components may not be authorized for costs that exceed the normal costs of services provided to

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<sup>1</sup> State E&T Handbook by the United States Department of Agriculture

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persons not participating in E&T programs. One-hundred percent funds will be expended only if the following conditions are met:

- Federal funds are not used to supplant other funding sources.
- If the individual is attending vocational training through a provider on the ETPL, the individual has attempted to secure federal financial aid (not including loans), such as the Pell Grant, and funds are either not available or the individual was not eligible for the funds.
- The costs are associated with the SNAP E&T program engagement.
- The payment is made directly to the provider and not as a reimbursement to the program participant.

If the RWBs pay a vendor directly for vocational training, books, uniforms, or other required elements using one-hundred percent funds, the program file must document the following:

- The items required as a part of the training program or by the training provider for all students in the course or program;
- The payment was not made as a reimbursement for a cost already covered by the program participant; and
- The payment was made directly to the training related vendor for the product required by the training program.

The law expressly states that one-hundred percent funds may be used to develop a component if SNAP funds are not provided as reimbursements for costs already paid by the program participant or supplant federal funds.

- **Type of Component:** This is a non-work component.
- **Geographic areas covered:** Each RWB with an active SNAP E&T program will establish local operating procedures to outline this component if the activity will be offered as a component in the region.
- **Anticipated number of ABAWDs who will begin the activity:** 0
- **Anticipated number of non-ABAWDs who will enter the activity:** 0
- **Anticipated number of volunteer participants who will enter the activity:** 379

**Level of participant effort:** Florida is operating a volunteer program. Program participants may be enrolled in a vocational training program and then enroll in the SNAP E&T program. Individuals may initiate enrollment in vocational or educational programs.

1. Participants who self-enroll in a vocational training program prior to enrollment in the SNAP E&T program will be able to participate in the program, but costs associated with the vocational activity (such as tuition, books, uniforms, tools, etc.) cannot be covered using E&T funds. If these

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individuals want to continue in the vocational training program after enrolling in the SNAP E&T program, staff should verify their enrollment status with the training institution and then enter the appropriate activity code in the OSST system. After these actions have been performed and staff continue to document that they are enrolled in the training program, reimbursements associated with transportation to encourage continual participation in the activity may be covered with 50/50 funds.

2. Other program participants may enroll as a volunteer in the SNAP E&T program and then be enrolled in a vocational training program via the workforce system or through self-enrollment.

To be considered “participating,” the individual must participate in vocational training activities on an average of eight hours a week (32 hours a month). **Hours will be documented by:**

- a timesheet signed by the class instructor;
  - a timesheet signed by a Teacher’s Assistant (TA);
  - a timesheet signed by a lab instructor;
  - a timesheet signed by a lab assistant;
  - a timesheet signed by a clinical supervisor;
  - a designated party at the school submitting hours on behalf of the institution;
  - a progress report from the instructor;
  - a progress report from the TA;
  - a progress report from a designated party on behalf of the institution;
  - a document verifying hours of participation from an on-line or Internet based institution;
  - a progress report from an on-line or Internet-based institution; or
  - other documentation signed (including electronically signed) by a designated party as outlined in the RWB’s local operating procedures.
- **What if a participant cannot complete all of the 32 hours due to a limitation?** If an individual can participate for less than 32 hours during the month because of a transportation issue (the SNAP E&T participant can only receive up to \$25 during the month), the participant can be considered to have met the level of effort. For example, the individual spends the entire \$25 going to classes (labs, tutoring sessions, etc.) and proof of both engagement and transportation expenses are secured, the participant may be considered “participating.” Other limitations may include medical issues, limited childcare, etc.
  - **Organizational responsibilities:** The RWBs implement the SNAP E&T program locally through the career centers, satellite offices and community partners. Regional Workforce Boards are locally organized to ensure that the needs of the community, job seekers and employers are met. The RWB will engage program participants based on their local operating procedures. Vocational training may be offered in the career centers, at a community site, at a partner agency and/or through a training provider on the ETPL.

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- **Estimated participant cost of reimbursement for transportation and other expenses except dependent care:** \$25,397
- **Estimated participant cost of reimbursement for dependent care:** 0
- **Annual cost of the activity not including reimbursements:** \$220,580
- **Cost of the activity per placement not including reimbursements:** \$582 (average)
- **Total cost of activity:** \$245,977

#### **4. Education**

- **Description of Component:** Education provides SNAP E&T participants with the opportunity to improve:
  - basic skills through Adult Basic Education (ABE);
  - basic skills through General Equivalency Diploma (GED) activities;
  - basic literacy;
  - the ability to speak and read English via English for Speakers of Other Languages (ESOL) programs;
  - the ability to speak other languages that are required for employment;
  - the ability to use computers;
  - skills required by employers;
  - skills required by an occupation; and
  - skills required by an industry.

In Florida, secondary and post-secondary education programs are not automatically covered with State or federal funds. One-hundred percent SNAP funds may be used:

- To cover the costs of education;
- To develop a program component; and,
- To pay for costs associated with an education program through a provider on the ETPL.

Federal funds are spent with the understanding that one-hundred percent E&T funds cannot take the place of nonfederal funds for existing educational services.

Federal financial participation for operating educational components may not be authorized for costs that exceed the normal costs of services provided to persons not participating in E&T programs. One-hundred percent funds will be expended only if the following conditions are met:

- Federal funds are not used to supplant other funding.

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- If the individual is attending an educational program through a provider on the ETPL, the individual has attempted to secure federal assistance (not including loans), such as the Pell Grant, and the funds are either not available or the individual was not eligible for the funds.
- The costs are associated with the SNAP E&T program engagement.
- The payment is made directly to the provider and not as a reimbursement to the program participant.

If the RWB pays a vendor directly for enrollment in the education class/program, books, uniforms, or other required elements using one-hundred percent funds, the program file must document the following:

- The item was required as a part of the educational program or by the training provider for all students in the course/program;
- The payment was not made as a reimbursement for a cost already covered by the program participant; and
- The payment was made directly to the related vendor for the product required by the program.

The law expressly states that one-hundred percent funds may be used to develop a component if SNAP funds are not provided as reimbursements for costs already paid by the program participant or supplant federal funds.

- **Type of Component:** This is a non-work component.
  - **Geographic areas covered:** Each RWB with an active SNAP E&T program will establish local operating procedures to outline this component if the activity will be offered as a component in the region.
  - **Anticipated number of ABAWDs who will begin the activity:** 0
  - **Anticipated number of non-ABAWDs who will enter the activity:** 0
  - **Anticipated number of volunteer participants who will enter the activity:** 879
  - **Level of participant effort:** Florida is operating a volunteer program. Program participants may be enrolled in an educational class/program and then enroll in the SNAP E&T program. Individuals may initiate enrollment in vocational or educational programs.
1. Participants who self-enroll in an educational class/program prior to enrollment in the SNAP E&T program will be able to participate in the program, but costs associated with the activity (such as tuition, books, uniforms, tools, etc.) cannot be covered using E&T funds. If these individuals want to continue in the educational class/program after enrolling in the SNAP E&T program, staff should verify their enrollment status with the training institution and then enter the appropriate activity code in the OSST system. After these actions have been performed and staff continue

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to document that they are enrolled in the educational class/program, reimbursements associated with transportation to encourage continual participation in the activity may be covered with 50/50 funds.

2. Other program participants may enroll as a volunteer in the SNAP E&T program and then be enrolled in an educational class/program through the workforce system or through self-enrollment.

To be considered “participating,” the individual must participate in educational activities an average of eight hours a week (32 hours a month). **Hours will be documented by:**

- a timesheet signed by the class instructor;
- a timesheet signed by a Teacher’s Assistant (TA);
- a timesheet signed by a lab instructor;
- a timesheet signed by a lab assistant;
- a timesheet signed by a clinical supervisor;
- a designated party at the school submitting hours on behalf of the institution;
- a progress report from the instructor;
- a progress report from the TA;
- a progress report from a designated party on behalf of the institution;
- a document verifying hours of participation from an on-line or Internet based institution;
- a progress report from an on-line or Internet-based institution; or
- Other documentation signed (including electronically signed) by a designated party as outlined in the RWB’s local operating procedures.

**What if a participant cannot complete all of the monthly hours described due to a limitation?** If an individual cannot participate at least 32 hours due to a limitation, such as transportation (the SNAP E&T participant can only receive up to \$25 during the month), the participant can be considered to have met the level of effort. For example, the individual spends the entire \$25 going to classes, labs, tutoring sessions, etc. and proof of both engagement and transportation expenses are secured, the participant may be considered “participating.” Other limitations may include medical issues, limited childcare, etc.

- **Organizational responsibilities:** The RWBs implement the SNAP E&T program locally through the career centers, satellite offices and community partners. Regional Workforce Boards are locally organized to ensure that the needs of the community, job seekers and employers are met. The RWBs will engage program participants based on their local operating procedures. Education may be offered in the career centers, at a community site, at a partner agency and/or through a training provider on the ETPL.
- **Estimated participant cost of reimbursement for transportation and other expenses except dependent care:** \$58,902

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- **Estimated participant cost of reimbursement for dependent care:** 0
  - **Annual cost of the activity not including reimbursements:** \$511,582
  - **Cost of the activity per placement not including reimbursements:** \$582 (average)
  - **Total cost of activity:** \$570,485
- 5. Workforce Investment Act (WIA) program, including Trade Adjustment Assistance (TAA) program**
- **Description of Component:** The participant is engaged in WIA and/or TAA program activities. The SNAP participant may be enrolled in the WIA and/or TAA program while receiving food assistance benefits. This means the individual may be enrolled in WIA/TAA-funded training, On-the-Job Training (OJT), subsidized employment, paid work experience, unpaid work experience, as well as other activities funded by the WIA program - operated under Public Law 105-220- and/or the TAA program – operated under section 236 of the Trade Act of 1974 (19 U.S.C. 2296).
  - **Type of Component:** This is a non-work activity.
  - **Geographic areas covered:** Each RWB with an active SNAP E&T program will establish local operating procedures to outline this component if the activity will be offered as a component in their region.
  - **Anticipated number of ABAWDs who will begin the activity:** 0
  - **Anticipated number of non-ABAWDs who will enter the activity:** 0
  - **Anticipated number of volunteer participants who will enter the activity:** 402
  - **Level of participant effort:** The individual is required to participate in his or her self-sufficiency plan according to the WIA/TAA program requirements outlined in the WIA State Plan and the WIA/TAA local plans.
  - **Organizational responsibilities:** The WIA program is a part of the workforce system. Individuals are engaged in the WIA program according to local operating procedures. Program staff associated with workforce monitors engagement and enters participation in the workforce data entry systems. To decrease the data entry and paper-work burden of the RWBs, staff may enter data associated with program engagement for an E&T volunteer who is also enrolled in the WIA and/or TAA program in the EFM system and/or independent TAA system. The SNAP participant will still be determined eligible and enrolled as a volunteer in the E&T program. Data associated with the E&T population will be compiled and compared against the EFM system for engagement by WIA/TAA during the report quarter.

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- **Estimated participant cost of reimbursement for transportation and other expenses except dependent care:** \$26,938
- **Estimated participant cost of reimbursement for dependent care:** 0
- **Annual cost of the activity not including reimbursements:** \$233,966
- **Cost of the activity per placement not including reimbursements:** \$582 (average)
- **Total cost of activity:** \$260,904

#### **6. Work Experience**

- **Description of Component:** Program participants who are receiving food assistance benefits are connected with an employer to build employability skills or job related skills through actual work experience or training at a worksite. The goal is to help the participant move into employment.
  - Participants are engaged in a Work Experience component based on their benefit calculation. An individual cannot be mandated to do more hours at a worksite during the month of participation than the benefit calculation allows. The benefit calculation is the amount of an individual's food assistance benefits divided by the higher of the Federal or State minimum wage, divided by the number of individuals in the food assistance benefits group, not to exceed 120 hours total for any household member individually in any month.
  - Participants complete their assigned hours or complete hours based on their ability to participate. The program will encourage participants to complete all of their hours; however, staff will work with participants based on their ability to participate. An individual may complete less than the calculation for several reasons:
    - The participant has limited transportation funds;
    - The participant has a health limitation;
    - The participant has a hidden disability;
    - The participant is complying with a treatment program;
    - The participant is engaged in multiple activities; or
    - Any other good cause reason that limits program participation.

Program participants who cannot complete their hours of participation because of a limitation may still receive a transportation reimbursement if they provide documentation to support their hours of participation and documentation to support the cost associated with going to and from the activity.

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- **Type of Component:** This is a work component. Participants are engaged with an employer to gain employability or job skills through direct work experience or training at the worksite. This is not a paid activity (through the employer or subsidy). The individual cannot be requested by the RWB or program provider to participate in more hours during the month than the benefit calculation allows. The benefit calculation (for maximum monthly hours at a worksite requested or assigned by staff) is food assistance benefits for the month in question divided by the higher of the Federal or State minimum wage divided by the number of individuals in the food assistance benefits group.
- **NOTE:** If the individual opts to volunteer with the entity for more hours than the benefit calculation allows, the participant will be considered a community volunteer and WILL NOT be covered under Workers' Compensation. These hours will not be associated with participation under this program and should not be recorded on the JPR screen, but documented in the case notes.

*According to Question and Answer 4108-6 in the August 8, 2008 Questions and Answers from the USDA, "The total amount of time spent each month by a voluntary participant in an E&T work program, combined with hours worked in a workfare program, and hours worked for compensation is unlimited. The total amount of hours that can be mandated by the State agency (120 hours) is unchanged. Also, a mandatory participant may now volunteer for an unlimited amount of additional hours.*

- **Geographic areas covered:** Each RWB with an active SNAP E&T program will establish a local operating procedure to outline this component if the activity will be offered as a component in their region.
- **Anticipated number of ABAWDs who will begin the activity:** 0
- **Anticipated number of non-ABAWDs who will enter the activity:** 0
- **Anticipated number of volunteer participants who will enter the activity:** 136
- **Level of participant effort:** Participants are engaged in a Work Experience component based on their benefit calculation. An individual cannot be required to do more hours at a worksite during the month than their food assistance benefits for the month of participation divided by the higher of the Federal or State minimum wage, divided by the number of individuals in the food assistance benefits group, not to exceed 120 hours total for any household member individually in any month.
- If the participants do not complete their assigned hours based on their ability, the participant may still be considered participating in the program as a volunteer. The program will encourage participants to complete all of their hours; however, staff will work with participants based on their ability

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to participate. An individual may comply less than the calculation for several reasons:

- The participant has limited transportation funds;
- The participant has a health limitation;
- The participant has a hidden disability;
- The participant is complying with a treatment program;
- The participant is engaged in multiple activities; or
- Any other good cause reason that limits participation.

Program participants who cannot complete all of the calculated hours of participation because of a limitation may still receive a transportation reimbursement if they provide documentation to support their hours of participation and documentation to support the cost associated with going to and from the activity. The participant can only receive up to \$25 during the month in which the hours were completed. The participant will be considered meeting their level of effort if any identified limitation has been noted in their case record.

- **Organizational responsibilities:** The RWBs implement the SNAP E&T program locally through the career centers, satellite offices and/or community partners. Regional Workforce Boards are locally organized to ensure that the needs of the community, job seekers and employers are met. The RWB establishes the worksite with a for profit or not-for-profit employer for the participant.
  1. The participant is assessed to find a worksite associated with the individual's employability level, skills and goals.
    - Work experience may be used in a progressive manner.
    - The individual may first be connected with an employer to build employability skills prior to being placed with an employer directly related to their job goals.
    - Once the individual has demonstrated that the basic employability skills are met, the participant may be placed with an employer directly related to his/her career goals.
  2. A worksite agreement and job description should be secured between the worksite and the RWB prior to the participants' engagement to ensure the employer understands the basic requirements associated with the program and engagement.
  3. The participant is asked to complete no more than a certain number of hours each month based on his or her ability to participate and the benefit calculation. Timesheets from the worksite signed by the employer are submitted to the RWB.
  4. The RWB collects hours of participation each month and enters the information in the data entry system.

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- **Estimated participant cost of reimbursement for transportation and other expenses except dependent care:** \$9,113
- **Estimated participant cost of reimbursement for dependent care:** 0
- **Annual cost of the activity not including reimbursements:** \$79,153
- **Cost of the activity per placement not including reimbursements:** \$582 (average)
- **Total cost of activity:** \$88,266

#### **7. Self-initiated Work Experience**

- **Description of Component:** Program participants who are receiving food assistance benefits can connect directly with an employer to gain employability skills or job related skills through actual work experience or training at a worksite. This is not a paid work opportunity.
  - Many individuals know employers or community-based agencies and can begin volunteering with the entity on their own.
  - To encourage program participants to continue volunteering or reaching out to employers of interest, this component is being included in the plan. Often, self-initiated outreach to employers and volunteer experiences lead to employment because the employer sees the individual as motivated and hard-working.
  - If a participant indicates that he or she is already volunteering with a for profit or not-for-profit entity, the individual will be informed that such volunteering may be considered a part of this program. Participants will be able to volunteer, but will not be asked by the RWB or program staff to complete more hours during the month than their food assistance benefits for the month of participation divided by the higher of the Federal/State minimum wage divided by the number of individuals in the food assistance benefits group.

Participants complete their hours assigned or complete hours based on their ability to participate. The program will encourage participants to complete all of their hours; however, staff will work with participants based on their ability to participate. An individual may complete less than the calculation for several reasons:

- The participant has limited transportation funds;
- The participant has a health limitation;
- The participant has a hidden disability;
- The participant is complying with a treatment program;
- The participant is engaged in multiple activities; or
- Any other good cause reason that limits participation.

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Program participants who cannot complete the hours of participation because of a limitation may still receive a transportation reimbursement if they provide documentation to support their hours of participation and documentation to support the cost associated with going to and from the activity.

- **Type of Component:** This is a work component. Participants are self-directed. This is not a paid activity (via the employer or subsidy). The individual cannot be requested by the RWB or program provider to participate more hours during the month than the benefit calculation allows. The benefit calculation (for maximum monthly hours at a worksite requested/assigned by staff) is food assistance benefits for the month in question divided by the higher of the Federal/State minimum wage divided by the number of individuals in the food assistance benefits group.
- **Geographic areas covered:** Each RWB with an active SNAP E&T program will establish if the activity will be offered as a component in their local operating procedures.
- **Anticipated number of ABAWDs who will begin the activity:** 0
- **Anticipated number of non-ABAWDs who will enter the activity:** 0
- **Anticipated number of volunteer participants who will enter the activity:** 112
- **Level of participant effort:** Participants are engaged in a Self-Initiated Work Experience component based on their benefit calculation. An individual cannot be requested to do more hours at a worksite during the month than their food assistance benefits for the month of participation divided by the higher of the Federal or State minimum wage divided by the number of individuals in the food assistance benefits group. If the participants do not complete their assigned hours based on their ability, the participant may still be considered participating in the program as a volunteer. The program will encourage participants to complete all of their hours; however, staff will work with participants based on their ability to participate. An individual may complete less than the calculation for several reasons:
  - The participant has limited transportation funds;
  - The participant has a health limitation;
  - The participant has a hidden disability;
  - The participant is complying with a treatment program;
  - The participant is engaged in multiple activities; or
  - Any other good cause reason that limits participation.
- Program participants who cannot complete the hours of participation because of a limitation may still receive a transportation reimbursement if they provide documentation to support their hours of participation and documentation to support the cost associated with going to and from the activity. The participant

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can only receive up to \$25 during the month in which hours were completed. The participant will be considered meeting the level of effort if any identified limitation has been noted on the case.

- **NOTE:** If the individual opts to volunteer with the entity for more hours than the benefit calculation allows, the participant will be considered a community volunteer and WILL NOT be covered under Workers' Compensation. These hours will not be associated with participation under this program and should not be recorded on the JPR screen, but documented in the case notes.
- **Organizational responsibilities:** The RWBs implement the SNAP E&T program locally through the career centers and satellite offices. Regional Workforce Boards are locally organized to ensure that the needs of the community, job seekers and employers are met. This activity allows food assistance benefits recipients who are already volunteering at a for profit or not-for-profit agency to continue volunteering as a part of their volunteer hours. If a SNAP volunteer finds a for profit or not-for-profit agency where he or she wants to volunteer, the SNAP volunteer may be able to use this agency as a part of their engagement in the SNAP E&T program.
  1. A worksite agreement and job description should be secured between the worksite and the RWB prior to the participants' engagement to ensure the employer understands the basic requirements associated with the program and engagement.
  2. The participant is asked to complete no more than a certain number of hours each month based on his or her ability to participate and the benefit calculation. Timesheets from the worksite signed by the employer are submitted to the RWB.
  3. The RWB collects hours of participation each month and enters the information in the data entry system.
- **Estimated participant cost of reimbursement for transportation and other expenses except dependent care:** \$7,505
- **Estimated participant cost of reimbursement for dependent care:** 0
- **Annual cost of the activity not including reimbursements:** \$65,185
- **Cost of the activity per placement not including reimbursements:** \$582 m(average)
- **Total cost of activity:** \$72,690

#### 8. Employment Retention Services (ERS)

- **Description of Component:** An E&T program participant who may be engaged in retention services is an active participant in the E&T program, has

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secured employment, has provided documentation, and may or may not be eligible to continue to receive food assistance benefits. The participant also must have participated in program activities other than Orientation and Assessment before getting the job.

Effective October 1, 2013, Florida will continue to pilot ERS through September 30, 2014. The Employment Retention Services listed below can be provided.

- Clothing required for a job;
- Equipment required for a job;
- Tools required for a job;
- Test fees for work;
- Relocation expenses;
- Licensing fees for a job;
- Bonding\*;
- Transportation; and,
- Childcare.

**\*NOTE:** Although bonding will be provided as an ERS, there will be no reimbursements for it through this program. Bonding will be funded through the [Federal Bonding Program](#) (FBP) because through the FBP, coverage is for a 6-month period with no deductible amount (employer gets 100% insurance coverage). The bond insurance issued ranges from \$5,000 to \$25,000 (depending on extenuating circumstances). When this bond coverage expires, continued bond coverage can be purchased from TRAVELERS by the employer if the worker demonstrated job honesty under coverage provided by the FBP.

The pilot RWBs are given an allocation specifically to use for ERS. They are to maintain copies of receipts and checks or vouchers used to reimburse participants. The current OSST system, with minor modifications, is used to track the ERS provided to the participants. System-generated case notes are available. Staff will also include other pertinent notes related to any of the above reimbursements in the case notes in the OSST system. The One-Stop Management Information System (OSMIS) will be used to track disbursement of funds to the piloted RWBs.

Participants who are eligible may receive retention services for up to 90 days of the job tracking start date. This is not “employment” as an activity; although, the employment will be entered on the system and tracked for data purposes.

- **Type of Component:** Employment is a paid activity (through the employer or non-SNAP funded subsidy), but the retention services will be paid from SNAP 50/50 funds, except for bonding, which will be paid through the FBP. There is not a set dollar limit on each ERS per participant at the state level, but the RWB may set limits locally.
- **Geographic areas covered:** The ERS is piloted in selected regions.

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- **Anticipated number of ABAWDs who will begin the activity:** 0
- **Anticipated number of non-ABAWDs who will enter the activity:** 0
- **Anticipated number of volunteer participants who will enter the activity:** 143
- **Level of participant effort:** Food assistance benefits recipients, who choose to volunteer in the program and are engaged in a SNAP E&T component, can be offered this service through the SNAP E&T program after employment has been secured and documented. The E&T participant is able to work and continue participating in the SNAP E&T program for up to 90 days. This includes individuals whose food assistance benefits terminate due to earnings. This is based on flexible provisions in the 2008 Farm Bill and the [Q&A](#) distributed by the USDA.

An individual who continues to receive food assistance benefits and participates in a component other than employment may continue to be engaged after the 90-day period based on the engagement in the non-“employment” component. For example, the individual is working, receiving food assistance benefits and job searching. The individual may receive services for both employment and job searching for up to 90 days after employment is secured. After the 90-day period, the E&T participant may receive services as a program participant if he or she continues to job search or participate in another component included in the SNAP E&T State Plan.

- **Organizational responsibilities:** The RWBs implement the SNAP E&T program locally through the career centers and satellite offices. Regional Workforce Boards are locally organized to ensure that the needs of the community, job seekers and employers are met. The RWBs may offer a variety of retention services designed to help the participant keep a job and improve employability. This may include case management services. The RWB will ensure:
  1. The individual is enrolled in an E&T component prior to employment;
  2. The individual’s engagement in a component ended no more than 30 days before employment began;
  3. The individual secures and documents employment;
  4. Documentation is retained in the case file;
  5. The employment is entered in the data entry system;
  6. Services associated with retention of employment are entered in the data entry system;
  7. The participant continues to document employment while receiving services associated with retention of employment; and
  8. Services are offered only for up to 90 days after the job tracking start date.
- **Estimated participant cost of reimbursement for transportation and other expenses except dependent care:** \$9,583

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- **Estimated participant cost of reimbursement for dependent care:** 0
- **Annual cost of the activity not including reimbursements:** \$83,227
- **Cost of activity per placement not including reimbursements:** \$582 (average)
- **Total cost of activity:** \$92,809

## **PART 2 – Program Participation**

### ***A. Work Registrant Population***

Under this section, the State of Florida is required to provide information on the number of individuals that will be served from the pool of work registrants. A food assistance benefits recipient not engaged in the WT program can be engaged as a volunteer in the SNAP E&T program. DEO will receive “work registrants” referred by DCF through the interface between the eligibility and workforce data entry systems.

Florida can provide unduplicated counts of food assistance benefits recipients, work registrants, food assistance benefits recipients who receive Reemployment Assistance, as well as SNAP participants served both by month and by quarter. Engagement data (the number of individuals expected to be engaged in activities) is based on an unduplicated number of work registrants.

#### **1. Number of Work Registrants**

- a. The number of Work Registrants expected to be in Florida as of October 1, 2013 is 948,165.
- b. The anticipated number of new Work Registrants to be added between October 1, 2013 and September 30, 2014 is 717,717.
  - DEO anticipates reaching out to over 700,000 food assistance benefits recipients coded as Work Registrants and/or Reemployment Assistance recipients between October 1, 2013 and September 30, 2014, if funding permits. Thus far, DEO is mailing over 5,100 Outreach Letters per day (per average). This is because the system receives both work registrant and Reemployment Assistance cases via the Internet.
- c. The total number of Work Registrants anticipated in Florida between October 1, 2013 and September 30, 2014 is (a+b=c) 1,665,882.

#### **2. Unduplicated Work Registrant Count**

Florida anticipates the number of unduplicated work registrants in the State of Florida for October 1, 2013 to September 30, 2014 to be 1,665,882.

#### **3. Characteristics of Work Registrants**

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DCF submitted data to DEO for data comparisons and careful review of the population that may be served using SNAP funds for the period of October 1, 2013 through September 30, 2014. DCF also posts reports associated with the number of food assistance benefits recipients/clients by month. The number of food assistance benefits recipients for the period of May 2012 through April 2013 was 42,653,599. The average number of recipients each month for this same period was 3,554,466. Statewide, the total number of work registrants for this period was 10,984,607, while the total number of work registrants age 16-39 was 5,768,527. The average number of all work registrants each month for this period was 915,384, while the average number of work registrants age 16-39 each month was 480,710.

The number of food assistance benefits recipients not being served through the WT program each month was astronomical. The population that would be referred to the workforce system by DCF had to be manageable, as well as easily identifiable using codes that already existed in the FLORIDA system. Although any food assistance benefits recipient not engaged in the WT program can be engaged in the SNAP E&T program as a volunteer (if funding permits), the State of Florida had to limit the number of letters being mailed due to limited funding.

#### **B. Exemption Policy**

Florida is one of 42 states that met the EB criteria under DOL Trigger Notice 2012-47, effective December 9, 2012. Under this Trigger Notice, nearly all States may continue to suspend the three month time limits through September 30, 2014 because they qualify for a waiver from the time limit under SNAP program rules. Therefore, Florida will continue to operate a volunteer E&T program in FFY 2014.

#### **C. Number of Work Registrants Exempt from the E&T Program**

In FFY 2014, Florida will be operating under DOL Trigger Notice 2012-47. As a result, no exemptions will be utilized to excuse time-limited work registrants from mandatory requirements.

#### **D. Planned E&T Program Participation**

- Florida is operating under DOL Trigger Notice 2012-47. As a result, there will not be any time-limited ABAWDs because according to the letter transmitting the information about the Trigger Notice, Florida and the other states or geographic areas may suspend the time limits on ABAWDs through at least September 30, 2014. In addition, State agencies that appear on a subsequent DOL Trigger Notice would also qualify for an ABAWD waiver through at least September 30, 2014.
- The SNAP E&T program, regardless of mandatory/volunteer engagement, is a program that assists food assistance benefits recipients each month. This type of engagement uses resources monthly.

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- The engagement data provided represents “monthly” engagement. Program participants are engaged each month, which requires both infrastructure and resources. The monthly data is compiled with the assumption that at least 10 percent of the work registrants will be enrolled in the volunteer program. Of that ten percent, only a small portion of participants is anticipated to be engaged in activities.
- Actual program participation data was used for the twelve month - period of July 1, 2012 to June 30, 2013, projections of anticipated participation were then made for FFY 2014.

#### ***Anticipated Placement Levels – Unduplicated from October 1, 2013 through September 30, 2014 (based on the historical data for July 1, 2012 through June 30, 2013, annualized)***

- Florida anticipates 31,472 work registrants to start orientation and assessment during the year (unduplicated).
- Florida anticipates 7,239 work registrants to start job searching during the year (unduplicated).
- Florida anticipates 5,633 work registrants to start job search training during the year (unduplicated).
- Florida anticipates 379 work registrants to start attending a vocational training program or classes during the year (unduplicated).
- Florida anticipates 879 work registrants to start an education program or education classes during the year (unduplicated).
- Florida anticipates 402 work registrants to start participating in WIA/TAA as a part of their SNAP E&T program engagement during the year (unduplicated).
- Florida anticipates 136 work registrants to start participating in work experience during the year (unduplicated).
- Florida anticipates 112 work registrants to start participating in self-initiated work experience during the year (unduplicated).
- Florida anticipates 143 work registrants to secure employment during the year (unduplicated). We estimate that approximately 40 percent of them will receive employment retention services.

As the year progresses, if Florida is exceeding these engagement numbers and additional funding is needed, updated information/data along with a funding request will be submitted.

#### **E. ABAWD Information**

The Handbook issued by the USDA requires specific data associated with the engagement of time-limited food assistance benefits recipients. However, Florida will not have time-limited food assistance benefits recipients during the 2013-2014 Fiscal Year. Data associated with engagement is to be used in Table 2. Each point is addressed below.

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1. ***The number of ABAWDs expected to be in the State during the fiscal year.*** Florida will be operating under a DOL Trigger Notice. Therefore, individuals will not be subject to time limits.
2. ***The number of ABAWDs expected to be in waived areas of the State during the fiscal year.*** Florida will be operating under a DOL Trigger Notice. Therefore, individuals will not be subject to time limits.
3. ***The number of ABAWDs included in the State agency's fifteen percent exemption allowance during the fiscal year.*** Florida will be operating under a DOL Trigger Notice. Therefore, the State of Florida will not be utilizing any fifteen percent exemptions.
4. ***The number of ABAWDs to be placed into workfare components during the fiscal year.*** Florida will be operating under a DOL Trigger Notice. Therefore, individuals will not be subject to time limits.
5. ***The number of ABAWDs to be placed in qualifying education and training components.*** Florida will be operating under a DOL Trigger Notice. Therefore, individuals will not be subject to time limits.

## **PART 3 - Program Coordination**

In Part, 3 of this SNAP E&T State Plan, Florida is required to describe coordination within the State food assistance benefits program, including interagency coordination.

### **A. Program Coordination**

#### **1. Narrative Coordination Statement**

The State of Florida works with several entities responsible for the coordination and implementation of the food assistance benefits program.

- a. DCF is responsible for the application and eligibility process. DCF is the entity that approves or denies food assistance benefits and is responsible for:
  - Intake;
  - Application;
  - Recertification;
  - Work registration;
  - Preparation of adverse action; and,
  - Implementation of adverse action.

Although Florida is operating a volunteer program under a DOL Trigger Notice/waiver, DCF will continue to code individuals for E&T engagement as “able-bodied adults” so that if the State is required to provide a mandatory program, only the code for those vulnerable ABAWDs who will be required to participate in the program will have to be added. In addition, DCF does determine if a food assistance benefits recipient is a work registrant or a Reemployment Assistance recipient. If the individual meets the referral criteria, a code is placed on the data entry system. This information is picked up in the interface between the eligibility system and the workforce data entry system. **NOTE: Engagement is based on both food assistance benefits eligibility and funding availability.**

- b. Based on funding availability, DEO receives information associated with the food assistance case and -
  - Builds a case or reopens the case in the workforce data entry system if the food assistance benefits recipient is coded by DCF as a work registrant or a Reemployment Assistance recipient;
  - Mails an Outreach Letter if the individual is 16 through 39 years of age;
  - Maintains the automated elements associated with individual engagement in the workforce data entry system; and,
  - Submits the FSR request to DCF for application to the Electronic Benefit Transfer (EBT) card if the RWB requests such a reimbursement in the data entry system.
- c. The workforce system, based on funding availability,

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- Assesses program participants, or refers the individual if necessary, for appropriate assessment related to engagement in the program;
- Engages food assistance benefits recipients who want to volunteer in activities, including components described in the State Plan;
- Collects documentation to demonstrate participation or documents participation through another workforce data entry system; and,
- Requests a FSR if the individual participates in the component, documents such participation, submits documentation of participation and submits information to support the cost related to transportation spent on participation.

### **2. Information Coordination**

DCF and the workforce system coordinate through a system interface. The FLORIDA system provides information daily to the workforce data entry system, OSST. The file includes information associated with the client records, including:

- Cases receiving food assistance benefits;
- Work registrants receiving food assistance benefits;
- Reemployment Assistance recipients receiving food assistance benefits;
- Demographic information; and
- Employment information.

Individuals will be able to receive food assistance benefits if a SNAP sanction exists on the case and the penalty period has been served. The participant will not be required to comply to lift the sanction. DCF will be able to lift the sanction during the eligibility process. The sanction lift will be submitted to workforce when the case is referred to the program for possible engagement. Otherwise, the case will be processed by DCF appropriately.

The workforce system automatically reviews the information received in the interface (automated process) and OSST performs one of the following appropriate actions:

- Builds the case;
- Reopens the case;
- Moves the case;
- Changes the case status; or
- Closes the case.

If workforce receives information associated with employment (the participant secured or lost a job), the OSST system builds an alert notifying program staff so that he or she can review the case and take the appropriate action.

Because the participation of the individuals engaged in the SNAP E&T program is not “mandatory,” the workforce system will not be requiring individuals to provide good cause to avoid a sanction. The OSST system will be treating each individual

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volunteering to participate in the program as a “volunteer.” The workforce staff will not be able to request a sanction on a volunteer case.

If the individual secures a job while participating in the SNAP E&T program, the participant is required to submit documentation prior to the data being entered in the OSST system. Once documentation is submitted to workforce staff, the data is entered in the OSST system then submitted to DCF through the interface. The data includes the required elements associated with employment so DCF can take action. Employment information entered by workforce staff is monitored by DEO. Workforce staff ***will not*** enter employment data for individuals who have not volunteered to participate in the E & T program. Data is reviewed in the system and retained in a file for quality assurance purposes.

DCF and DEO meet on a regular basis to discuss coordination of services and program delivery. During the planning process for operating under a waiver, DCF and DEO met to discuss how the interface will continue to receive and provide data to the reciprocating agency/entity; the population that can volunteer to participate in the E&T program; the population that will be engaged through an *Outreach Letter* using data that already exists in the interface; coordination of the transition process from a mandatory program to a volunteer program; the continuation of the FSR process; and other related program issues.

SNAP E&T staff at the local and state level meets with DCF staff on a regular basis to share information and coordinate program procedures. Federal reports are prepared jointly by staff from both agencies at the state level.

### **3. Coordination Time Frames**

The interface runs daily, Monday through Friday. Information received from DCF is processed to determine if a case will be built or reopened in the OSST system. The data is also processed to determine if the individual will be mailed an *Outreach Letter* using the data received from the FLORIDA system. DCF also receives information from the workforce system and processes this information daily.

### **B. Interagency Coordination**

As stated in the Handbook, the SNAP E&T program should be coordinated very closely with relevant programs and agencies to maximize the use of all resources to assist food assistance benefits recipients. The goal is to improve their employability and self-sufficiency. In the State of Florida, workforce programs are operated through the integrated workforce system with the goal of maximizing resources. Participants are offered services as appropriate. This may include engagement in job seeker services, enrollment in the WIA or TAA program, training, etc.

Applicants receiving food assistance benefits are engaged by DCF. DCF completes the work registration process. Individuals interested in looking for employment are able to use the EFM system to search for work, apply for a job, create a resume, and post a resume. The SNAP E&T program is an integrated part of the workforce system.

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Individuals who are eligible and appropriate candidates for engagement in WIA, WP, TANF (such as a non-custodial parent employment program), and TAA program may be engaged in program activities designed to help the participant move forward. This may include dual enrollment in workforce programs.

For Areas and Methods of Coordination, please see Part 1 A 7 (Workforce Development System (WDS)) and Table 3, which address the areas of coordination. Workforce programs link to a variety of entities, which may include but are not limited to:

- education programs at cost to the State or communities managed by the local colleges or local boards of education;
- education programs that are managed at cost to the customer by educational institutions; and
- other programs designed to help program participants gain employability, secure employment, retain employment and advance up the career ladder.

The TANF work program, the WT program, is a mandatory partner in the workforce system based on Florida Statutes, chapter 445. Other social service agencies have relationships developed based on community needs and the direct engagement between the social service agency and the RWB. Some regions have social service agency staff, such as childcare services or counseling, in the workforce center. The WIA, TAA, and WP services are offered through the integrated workforce system as described in Part 1 A 7 (WDS).

#### **C. Contractual Arrangements**

DEO receives E&T funds directly but does not provide any direct employment and training services. All E&T services, as well as other workforce programs, are delivered through the RWBs. The RWBs may offer services directly or through service providers.

**Program monitoring:** The RWBs are responsible for performing compliance monitoring at the local level. State level program compliance monitoring of the SNAP E&T program is conducted annually for a majority of the service delivery areas. The monitoring review consists of reviewing the methods for notification of program responsibilities, assignment to program activities and documentation of completion of program activities, and issuance of the Food Stamp Reimbursements.

The monitoring reports provide an assessment of the local RWB and individual service providers' compliance with the SNAP E&T program requirements. In the event the report includes negative findings, the RWB is required to submit a Corrective Action Plan (CAP). Technical assistance is provided by DEO to assist the RWB in its CAP process until all negative findings have been addressed to the satisfaction of DEO. Copies of all state and regional monitoring reports, schedules, and corrective action plans are maintained at the DEO headquarters. A copy of monitoring reports is provided to DCF.

**Fiscal monitoring:** Monitoring is provided through DEO for all funds passed through to the local RWBs, including SNAP. Annual visits are performed on site according to

an established schedule. The areas monitored include cost allocation plans, fiscal reporting, cash management, sub-recipient monitoring, and various compliance issues as required by federal Office of Management and Budget circulars and regulations.

## **PART 4 - Program Costs and Financial Management**

### **A. Planned Costs of the State E&T Program**

- 1. Operating Budget – See Table 4**
- 2. Sources of E&T Funds – See Table 5**
- 3. Justification of Education Costs**

According to the Food and Nutrition Act of 2008 (formerly known as the Food Stamp Act of 1977), the purpose of the E&T program is to assist members of households receiving food assistance benefits in gaining skills, training, work or experience that will help them become both employable and employed.

The goal of the program is to provide activities and services up to the point of employment. Section 6(d)(4)(B)(v) of the Food Stamp Act of 1977 and 7 CFR 273.7(e)(1)(iv) identify education and training as allowable components. This includes programs that improve basic skills and literacy or that improve employability. This includes programs that help the participant to job search in a more productive manner.

In Florida, educational costs are met through other existing education programs when they are available. If funds are not available through other programs, SNAP (100 percent) funds may be used to pay the educational institution directly for costs associated with participation in this component. This is supported by federal law:

- The product or service must directly relate to an approved E&T program component;
- The product or service must be reasonable;
- The product or service must be necessary;
- The product or service cannot be tied to “barrier removal” activities that will exempt or excuse the participant from engagement in the program;
- The product or service is not available through another government program;
- The product or service is not available at no cost to the participant in the community that meets the needs of the participant; and,
- The participant of an E&T program cannot be treated any differently than others participating in the program. If attendees of an activity would get a subsidy or the costs covered, additional fees applied to E&T participants cannot be covered with SNAP funds because they are being treated differently than all the other individuals. However, if the cost associated with the component is the same for all individuals, and all individuals must cover specific costs, the SNAP funds may be used to cover the difference as stated in 7 CFR 273.7.

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SNAP 100 percent funds cannot be used to pay the participant directly for costs incurred. However, the costs of the component itself paid directly to the vendor may be covered using 100 percent funds. Florida is including education, training, job search training and vocational training as components for E&T participant engagement. Florida anticipates that regions will engage program participants in these activities and will need to use 100 percent funds to cover costs associated with component participation. This may include, but is not limited to:

- Tuition;
- The cost of creating an education, training, job search training and/or vocational education program activity that meets the definition of the component (for example, a computer course that is created and hosted in the career center);
- Books; and,
- Course supplies.

Course supplies are those that are required by the program and costs are paid directly to the vendor, not to the participant. These are not “reimbursements” to the participant, they are costs associated with the component.

#### 4. **Contracts**

##### I. **Planned costs of the State E&T program**

- 1) **Operating Budget:** See Table 4, Operating Budget.
- 2) **Sources of Employment and Training funds:** See Table 5, Planned Fiscal Year Costs of the State Employment and Training Program by Category of Funding.
- 3) **Justification of Education Costs:** In Florida, educational costs are met through other existing education programs when they are available. If funds are not available through other programs, SNAP (100 percent) funds may be used to pay the educational institution directly for costs associated with participation in this component. Funds cannot be used to pay the participant directly for costs incurred.

##### II. **Contracts**

Since DEO receives the funding for the SNAP E&T program directly from the USDA, there is no longer a need for an interagency agreement for financial purposes.

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### III. Participant Reimbursements

#### 1) Reimbursements: (Table 4)

|                                |                    |
|--------------------------------|--------------------|
| Work Experience                | \$ 9,113           |
| Self-Initiated Work Experience | \$ 7,505           |
| Vocational Training            | \$ 25,397          |
| Education and Training         | \$ 58,902          |
| Job Search                     | \$ 485,090         |
| Job Search Training            | \$ 377,471         |
| WIA/TAA Engagement             | \$ 26,938          |
| Employment Retention Services  | \$ 9,583           |
| <b>Total:</b>                  | <b>\$1,000,000</b> |

#### 2) Dependent Care Reimbursements

|                                |            |
|--------------------------------|------------|
| Work Experience                | \$0        |
| Self-Initiated Work Experience | \$0        |
| Vocational Training            | \$0        |
| Education and Training         | \$0        |
| Job Search                     | \$0        |
| Job Search Training            | \$0        |
| WIA/TAA Engagement             | \$0        |
| Employment                     | \$0        |
| <b>Total:</b>                  | <b>\$0</b> |

General revenue funds are available for use for the state's 50 percent matching funds. Participant expenses for transportation and costs other than dependent care will be reimbursed by DEO using 50/50 funds for up to the actual cost of the participant expenses or the state agency's maximum reimbursement rate, whichever is lowest. These payments may be provided as reimbursement for expenses or in advance as payment for anticipated expenses in the coming month. Fifty/fifty funds may be used to allow RWBs to hire staff and/or provide additional participant reimbursements directly, but this is based on funding availability, as well as other factors associated with program management.

Funds passed through to the RWBs, including 100 percent funds, may be used to pay for fingerprinting, drug tests and background checks when needed to participate in SNAP components or within 90 days of securing a job after receiving an E&T service/activity engagement as described in the Q&A published by the USDA subsequent to the enactment of the 2008 Farm Bill.

#### 3) Method of Reimbursement

Individuals who are enrolled and participate in E&T program activities will be eligible to receive the FSR based on a demonstrated need for the reimbursement up to the State maximum. The activities are described as components in **Part 1-C**. Participants may also receive a FSR for attending or traveling to complete an orientation and assessment.

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- If the individual is enrolled in the SNAP E&T program and travels to complete orientation and the initial assessment process, she or he may be reimbursed up to \$12.50 in transportation expenses.
- If the participant travels to complete only orientation on one day and assessment on a different day, she or he may be reimbursed up to \$12.50 in transportation expenses for each day.
- If the individual is enrolled in the SNAP E&T program and participates in a component during the month, she or he may be reimbursed up to \$25 in transportation expenses.
- If the participant travels to attend orientation and assessment and also participates in a program component during the same month, she or he may be reimbursed up to \$25 in transportation expenses for the month.

Reimbursements should not exceed \$25 in one “earned” month. The earned month is the calendar month in which the activity hours were completed and documented.

Participants must provide:

- Documentation verifying participation in program components.
- Documentation that they incurred a transportation cost while participating in an activity. Acceptable forms of documentation include:
  - **Gas Receipts**  
Case managers must review gas receipts closely to ensure that:
    - They are requesting the correct reimbursement amount
    - They are requesting the reimbursement for gas only
    - The date on the receipt coincides with the date(s) the volunteer participated in the component
  - **Bus Pass Receipts**
    - Volunteers must provide proof that they purchased the bus pass, such as a receipt. The bus pass itself is not sufficient as proof of purchase.
  - **Self Attestation Form**  
Self attestation forms are allowable and must include:
    - Dollar amount spent on transportation to participate in program components
    - The month the reimbursement was earned
    - The qualifying component
    - Participant’s signature, case manager’s signature and the date.

A self-attestation form template has been developed for regions that wish to use it or as a guide to create such a form locally.

**NOTE:** Prior to being placed in a component, participants receive written notification of the opportunity to claim actual expenses up to

the maximum levels for each component with documentation proving the expense occurred.

**NOTE: In some cases, the RWB can provide reimbursement for transportation at a cost less than what it costs the state agency. In those cases, the state will provide the RWB with a portion of the 50/50 funds budgeted for transportation reimbursement to pay for the reduced cost of that reimbursement**

#### 4) Procedure for Reimbursement

Reimbursements will be authorized by the RWB and may include transportation or other costs such as, but not limited to, automobile gas, taxi, tools, clothing and resume writing or printing. Usually, reimbursements are made specifically for transportation. The use of FSR for costs other than transportation is based on funding availability.

The reimbursement requests are entered directly into the OSST system by way of the FSR Requests Screen. Usually, participants receive the Food Stamp Reimbursements on their EBT card.

Reimbursements may also be provided by local RWBs that enter into an agreement with the State to receive match funds to provide reimbursements at the local level. The RWB will outline its process for ensuring that the reimbursement does not exceed the State allowed maximum per month and follow the State guidelines. The RWB will also be responsible for tracking the service in the OSST system.

DEO reserves the right to recoup FSR funds that were erroneously added to an individual's EBT card. DEO may also withhold an individual's future reimbursements as necessary to make up for erroneous payments. If FSR benefits are withheld, the individual will be notified of this action in writing.

#### 5) Cost Allocation

**State level:** DEO staff devoted full-time to Florida's SNAP E&T program is direct charged. Costs of staff who work on other program activities are allocated based on methodologies in the state's cost allocation plan. Computer charges, including EBT and automation project fees, expenses to support statewide quality assurance, training and technical assistance, monitoring, indirect costs and SNAP participant reimbursements for transportation are maintained at the state level. These costs are developed prior to the state fiscal year and revenue from state appropriation and federal 50 percent match and 100 percent SNAP funds are used to support these costs. Annual costs for the different categories of expenditures are as follows:

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|                                    |              |
|------------------------------------|--------------|
| DEO Administrative Costs           | \$ 1,002,353 |
| Indirect                           | \$ 38,713    |
| WFI Costs                          | \$ 63,327    |
| OSMIS/Legacy and Geo Sol Job Bank  | \$ 184,313   |
| Contractual Services:              |              |
| Fiscal Monitoring Contract         | \$ 6,350     |
| SNAP E&T Participant Reimbursement |              |
| Transportation and Other Costs     | \$ 1,000,000 |
| EBT Fees                           |              |
| Automation Project                 | \$ 422,000   |
|                                    | \$ 160,951   |

**Local level:** The SNAP E&T service delivery and participant case management costs are incurred by the local RWBs. The amount of funds available to each RWB is a determined based on several variables.

1. The amount of funds provided by the USDA;
2. The amount of holdback necessary to support systems, WFI activities, job bank costs, program operations and state level administration. These costs are developed prior to the state fiscal year and agreed upon each year by the State Workforce Board. Such costs may be amended if funding from the USDA changes. The remaining dollars are distributed to the RWBs operating SNAP E&T programs.
3. The counties that are offering an E&T program; and
4. The number of work registrants by county. This will determine the workload in each SNAP county.

The amount of funds available to RWBs is allocated to each SNAP county based on its share of the workload. All the funds allocated to each SNAP county are then added together by the RWB to arrive at the RWB regional allocation.

## PART 5 – Program Performance

### Caseload Requirement

The USDA reported that 7 CFR 273.7 (c) (6) (ii) requires State agencies to submit a budget for activities and costs for which federal funds will be claimed, including the cost of case management. For the cost of case management to be claimed, the State Agency must ensure that the volume of work being produced justifies the federally-funded position.

In compliance with the USDA's requirement, a standard of 50 participants for a full-time employee or equivalent has been established by DEO for the RWBs.

## **PART 6 - Program Reporting and Data Management**

### **A. Method for obtaining counts of work registrants**

**Requirement:** The regulations require an initial count of the total number of work registrants in the State agency on the first day of each Federal fiscal year. This count is included in the first quarter FNS-583 report. State agencies also report on a quarterly basis all participants who are newly work registered each month beginning in October. It is essential that State agencies accurately report these data elements so an actual count of work registrants for the year may be compiled. The State E&T Plan must contain a **detailed** description of exactly how the State agency arrives at the number of work registrants in the State on the first day of each fiscal year.

**Response:** The number of work registrants on the first day of the fiscal year is based on data extracted from DCF's automated information system, the FLORIDA system. The system records the number of new participants each month and is programmed with the capability to identify the number of food assistance benefits recipients that are currently work registered in a given month.

### **B. Method for ensuring an unduplicated work registrant count**

**Requirement:** The State agency addressed whether the number of work registrants reported on Form FNS-583 is based on a duplicated or unduplicated count of individuals. By unduplicated, we mean that: Individuals included in the work registrant count as of October 31 are not included in any subsequent count of work registrants for the remaining months of the year; **and** individuals certified or registered more than once in a 12-month period are only reported as a work registrant once during that 12-month period.

**Response:** The FLORIDA System counts work registrants only at initial program registration. The work registrants are tracked by their social security number. The management information system used by DEO receives referrals directly from the FLORIDA System.

### **C. Methods of meeting on-going federal reporting requirement**

Florida has automated data collection in systems that provide information required on federal reports. This includes the DCF FLORIDA system and the workforce system.

#### **1. Management Information System (MIS) Method**

- a. Type of MIS information is provided by a combination of automated reports.
- b. Local reporting requirements

- 1) Will local agencies and service providers be required to submit regular reports? No, local agencies and service providers do not submit regular reports because data is entered in a statewide system used by all SNAP E&T program providers. The data is compiled from these systems directly.

## ***Department of Economic Opportunity***

### ***Supplemental Nutrition Assistance Program Employment and Training State Plan***

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- 2) What information must local agencies and service providers report? E&T providers are required to record participant engagement in the DEO OSST system unless the data is compiled in another workforce system, such as EFM. To reduce duplication of data entry, engagement information placed in EFM may be used to determine participation in activities, such as job search, job search training, etc. Information entered in the data entry systems include, but is not limited to:
  - a. Activities to which participants are assigned;
  - b. Participation in activities;
  - c. Outcome of participation in activities;
  - d. Participant eligibility for the Food Stamp Reimbursement; and
  - e. Participant entry into employment.
- 3) How frequently must local agencies and service providers report? The RWBs enter data in the systems regularly. Data is compiled both monthly and quarterly to review E&T engagement and program participation.
2. Organizational responsibility for E&T reporting: Describe where responsibility for E&T reporting is organizationally located at the State level. Include the name of the persons, department, agency and phone number for the persons responsible for each of the subcategories below.

- a. Responsibility for nonfinancial E&T reporting:

Department of Children and Families  
Office of Economic Self-Sufficiency  
Building J, Room 407A  
1317 Winewood Boulevard  
Tallahassee, FL 32399-0700

Department of Economic Opportunity  
One-Stop and Program Support  
107 East Madison Street  
Caldwell Building  
Tallahassee, FL 32399-4134

- b. Responsibility for financial E&T reporting:

Department of Economic Opportunity  
One-Stop and Program Support  
107 East Madison Street  
Caldwell Building  
Tallahassee, FL 32399-4134

**PART 7 - TABLES**

This section provides tables required for inclusion in the State Plan.

**Table 1**

**Estimated Participant Levels  
Fiscal Year 2014**

|    |   |                                 |
|----|---|---------------------------------|
| A. | Anticipated Number of work registrants in the State during the fiscal year.   | <b>1,665,882</b>                |
| B. | List planned exemption categories and the number of work registrants expected to be included in each during the fiscal year.                    |                                 |
|    | <b>1. ABAWDs who are in Labor Surplus Areas (LSAs)</b>  | <b>0</b>                        |
|    | <b>2. All SNAP Mandatory Non-ABAWDs</b>   | <b>0</b>                        |
|    | <b>Comments: The State will be operating under a DOL Trigger Notice/waiver. There will not be any time limited or “mandatory” participants.</b> |                                 |
|    | <b>Total Exemptions</b>   | <b>0</b>                        |
| C. | Percent of all work registrants exempt from E&T.  | <b>Operating under a waiver</b> |
| D. | Number of E&T mandatory participants (A-B).   | <b>0</b>                        |
| E. | Anticipated number of ABAWDs in the State during the fiscal year.   | <b>0</b>                        |
| F. | Anticipated number of ABAWDS in waived areas in the State during the fiscal year.   | <b>0</b>                        |
| G. | Anticipated number of ABAWDs to be exempted under the State’s 15 percent exemption allowance during the fiscal year.                            | <b>0</b>                        |
| H. | Number of at-risk ABAWDs expected in the State during the fiscal year.  | <b>0</b>                        |

**Table 2**

**Estimated E&T Placements  
Fiscal Year 2014**

|    |   |               |
|----|---|---------------|
| 1. | Number of ABAWD applicants and recipients expected to <b>begin</b> a qualifying ABAWD component during the federal fiscal year, unduplicated.   | <b>0</b>      |
|    | <b>Comments: The State of Florida is operating under a DOL Trigger Notice/waiver.</b>   |               |
| 2. | Number of all other applicants and recipients (including ABAWDs involved in non-qualifying activities) expected to <b>begin</b> a component during the federal fiscal year, unduplicated. | <b>18,051</b> |
| 3. | Total number of applicants and recipients the State agency expects to <b>begin</b> a component during the federal fiscal year, unduplicated.  | <b>18,051</b> |

**Estimated Individual Participation  
Fiscal Year 2014**

|    |   |               |
|----|---|---------------|
| 1. | Number of individuals expected to participate in the E&T program during the federal fiscal year, unduplicated.  | <b>83,294</b> |
|    | <b>Comments: DCF estimates 1,665,882 individuals (distinct count for the year) will receive food assistance benefits and meet the work registrant criteria. Five percent of this number was used to estimate the number of individuals who will volunteer to participate in the SNAP E&amp;T program.</b> |               |

**Estimated ABAWD Activity  
Fiscal Year 2014**

|    |  |          |
|----|--|----------|
| 1. | Number of workfare slots expected to be filled by ABAWDS.                      | <b>0</b> |
| 2. | Number of education and training slots to be filled by ABAWDS.                 | <b>0</b> |
|    | <b>Comments: The State of Florida is operating under a DOL Trigger Notice.</b> |          |

**Table 3**

**Summary of Interagency Coordination for the E&T Program in Fiscal Year 2014**

| <b>Areas of Coordination</b>  | <b>Agencies: list all agencies involved</b>  | <b>Number of Placements Expected</b> | <b>Methods of Coordination</b>  |
|---|--|--------------------------------------|---|
| <b>1. Delivers an E&amp;T component</b>   | DEO does not provide direct customer services but participates in the development of program elements. The RWBs, RWB designated providers, educational institutions, employers, businesses and community agencies offer services directly to program participants. | 18,051                               | Statewide and local interagency agreements and memorandums of understanding (MOU) |
| <b>2. The E&amp;T program delivers a service for another agency or program.</b>         | N/A  | N/A                                  | N/A   |
| <b>3. Joint component of the E&amp;T program and another agency or program</b>          | N/A  | N/A                                  | N/A   |
| <b>4. Referral of individuals from the E&amp;T program to another program or agency</b> | <b>WIA and TAA programs</b>  | 402                                  | Local agreements, as well as local operating procedures                           |
| <b>5. Other forms of coordination (be specific)</b>                                     | N/A  | N/A                                  | N/A   |

**Table 4**  
**Operating Budget Fiscal Year 2014**

| Components                                    | Regional Workforce Board Pass Through Budget (E&T 100%) | State Agency Administrative and Program Support Costs (E&T 100%) | State Agency Administrative and Program Support Costs (50/50 funds) | Participant Reimbursement Transportation and Other Costs (50/50 funds) | Total E&T 100% and 50/50 Funds |
|---|---|--|---|--|--------------------------------|
| Work Experience<br>0.91 %                     | \$62,038  | \$17,115   | \$  | \$9,113  | \$88,266                       |
| Self-Initiated Work Experience<br>0.75 %      | \$51,090  | \$14,095   | \$  | \$7,505  | \$72,690                       |
| Employment Retention Services (ERS)<br>0.96 % | \$65,231  | \$17,996   | \$  | \$9,583  | \$92,809                       |
| Education<br>5.89 %                           | \$400,963   | \$110,619  | \$  | \$58,902   | \$570,485                      |
| Job Search<br>48.51 %                         | \$3,302,131   | \$911,003  | \$  | \$485,090  | \$4,698,224                    |
| Job Search Training<br>37.75 %                | \$2,569,540   | \$708,893  | \$  | \$377,471  | \$3,655,905                    |
| Vocational Training<br>2.54 %                 | \$172,884   | \$47,696   | \$  | \$25,397   | \$245,977                      |
| WIA (Including TAA) Activities<br>2.69 %      | \$183,376   | \$50,590   | \$  | \$26,938   | \$260,904                      |
| <b>Total</b>                                  | <b>\$6,807,252</b>                                      | <b>\$1,878,007</b>   | <b>\$</b>   | <b>\$1,000,000</b>   | <b>\$9,685,259</b>             |
|   |   |  |   | <b>Total Component Costs</b>   | <b>\$9,685,259</b>             |
|   |   |  |   | <b>Total State SNAP Costs</b>  | <b>\$9,685,259</b>             |
| <b>100.00%</b>                                | <b>\$6,807,252</b>                                      | <b>\$1,878,007</b>   | <b>\$</b>   | <b>\$1,000,000</b>   | <b>\$9,685,259</b>             |

**Table 5**

**Planned Fiscal Year Costs of the State E&T Program by Category of Funding  
Fiscal Year 2014**

| <b>Funding Category</b>  | <b>Approved FY 2013 Budget</b> | <b>Federal Fiscal Year 2014</b> |
|--|--------------------------------|---------------------------------|
| 1. 100 Percent Federal SNAP Grant:   | <b>\$9,938,285</b>             | <b>\$8,685,259</b>              |
| 2. Share of \$20 Million ABAWD Grant (if applicable)                                 | <b>\$0</b>                     | <b>\$0</b>                      |
| 3. Additional SNAP Administrative Expenditures                                       |                                |                                 |
| 50% Federal  | <b>\$0</b>                     | <b>\$0</b>                      |
| 50% State  | <b>\$0</b>                     | <b>\$0</b>                      |
| 4. Participant Expenses:   |                                |                                 |
| a. Transportation/Other  |                                |                                 |
| 50% Federal  | <b>\$500,000</b>               | <b>\$500,000</b>                |
| 50% State  | <b>\$500,000</b>               | <b>\$500,000</b>                |
| b. Dependent Care  |                                |                                 |
| 50% Federal  | <b>\$0</b>                     | <b>\$0</b>                      |
| 50% State  | <b>\$0</b>                     | <b>\$0</b>                      |
| 5. Total SNAP E&T program Costs (1+2+3a+3b+4a+4b =5)                                 | <b>\$10,938,285</b>            | <b>\$9,685,259</b>              |
| 6. 100% State Agency Cost for Dependent Care Services                                | <b>\$0</b>                     | <b>\$0</b>                      |
| <b>7. Total Planned Fiscal Year Costs (Must agree with Table 4-Operating Budget)</b> |                                | <b>\$9,685,259</b>              |

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**Table 6**  
**E&T Program Flow Chart**

