

# SNAP E&T – Frequently Asked Questions

Updated October 17, 2016

-  1. When attempting to transfer a case to another unit, we are unable to do so because the “Select an Action” option is grayed out on the *Case at a Glance* screen.

**Response:** This option is grayed out if staff do not have access/permission to the unit. If it’s a transfer from one SNAP unit to another or a transfer from a TANF unit to a SNAP unit, please request assistance from your program manager.

-  2. What is the appropriate process for a case transfer due to an ABAWD relocating or requesting for convenience?

**Response:** For ABAWDs who have moved from one local area to another and DCF has updated their address, there are two options:

- The local area can transfer the case to the new area, or
- If the case is closed in the old local area, the new area can use the “work register” link in OSST to pull the case to their area.

For customers who want their case transferred for convenience/proximity, the receiving local area can decide on a case-by-case basis to transfer and/or receive a case, based on the customer’s request. We encourage LWDBs to work together when such requests are made.

NOTE: The LWDB’s LOPs should outline the local process to transfer and receive ABAWD cases.

-  3. If a case manager fails to end the automated process by ending the OSST code (599), how do staff notify DCF that a sanction was requested in error?

**Response:** Case managers must request a sanction lift with an outcome of “Entered in error by DEO-99.” DCF will remove the sanction and the penalty will be removed.

-  4. Is the refugee population required to complete the same number of participation hours as other ABAWDs? If a refugee does not have a work permit, can they participate in the work experience component?

**Response:** Yes, the same number of participation hours are required for any ABAWD referred to the SNAP E&T program. However, we have received additional guidance from FNS and policy clarification from DCF regarding this population. Please refer to the Refugee Policy on our *Resources* page at <http://www.floridajobs.org/local-workforce-development-board-resources/programs-and-resources/program-resources>.

-  5. When a refugee arrives in the resettlement area, they have many barriers. The resettlement agency is working with them to obtain their Social Security Card and Identification Card. Barriers faced by this group include, language barriers, lack of knowledge about the area, and transportation. These barriers make it difficult for the refugee to participate in these types of programs. Is the expectation that refugees

will be able to find employment and meet the participation requirements with these types of barriers?  
Will they be required to complete orientation and assessment in OSST?

**Response:** Yes. Each LWDB should have procedures in place to assist these individuals in meeting their work requirements. Additionally, they are required to complete Orientation and Assessment.

Updated

6. Are there any special considerations/exemption periods for this population?

**Response:** Please refer to the Refugee Policy on our *Resources* page at <http://www.floridajobs.org/local-workforce-development-board-resources/programs-and-resources/program-resources> to learn more about Refugee exemptions from work requirements.

Updated

7. What options will be available in OSST when the case manager is ending a sanction/request (good cause, complied, not imposed etc.)?

**Response:** OSST has been updated with the following sanction outcomes:

- Complied(After Serving Sanction) - (46)
- Complied(Before Sanction Effective Date) - (48)
- Manual Exception FLORIDA Screen - (96)
- Manual Exemption FLORIDA Screen - (97)
- Entered in error by DCF - (98)
- Entered in error by DEO - (99)
- Hurricane Hermine Auto Sanction Rollback only – (71)

A definition for each outcome is available by clicking “View Outcome/Comply definitions.” Additionally, when using sanction outcome codes 99 and 71, staff must enter a case note on the CLRC screen in the FLORIDA system to indicate the error. The case note entered must be “**sanction requested in error**” not “good cause.”

Updated

8. Will DCF automatically impose a sanction for an ABAWD’s failure to complete the orientation and assessment by the given deadline?

**Response:** No. DEO’s OSST system will automatically request a sanction when an ABAWD fails to complete Orientation and Assessment within 10 days of being referred to SNAP E&T by DCF.

Updated

9. Once a sanction has been requested, is the ABAWD required to serve the entire penalty period if they start complying with the career center?

**Response:** If the sanction has been requested, but is not yet effective, the ABAWD will need to comply by completing the LWDB compliance activity described in the LWDB local operating procedures. Once the compliance activity is completed, LWDB staff should request a sanction lift and the ABAWD should continue participating by being enrolled in a qualifying activity.

Updated

10. What is the process for establishing good cause?

**Response:** If the participant feels they have good cause for not complying, he/she must report it to DCF, as DCF is responsible for determining good cause. Good cause can only be established if the ABAWD has

been actively engaged in an activity(ies), which means they must have at least completed the orientation and assessment before they can report good cause to DCF.

- Updated 11. When a case manager requests a sanction and DCF determines that good cause **does** exist, what process or data entry should occur?

**Response:** Staff are not responsible for making any data entries. Through the FLORIDA system interface, DCF will send back a good cause record to OSST, and OSST will automatically update the sanction outcome with “good cause.”

- Updated 12. If DCF imposes a sanction and the participant serves the penalty period, will DCF be required to send a new referral if the participant wants to start participating in the program after the penalty period?

**Response:** No. The participant must first comply with workforce in order to satisfy the sanction. DCF will instruct the participant to comply. Once the participant has complied, the case manager will enter a sanction lift request in OSST with “*Complied (After Serving Sanction)-(46).*” The participant will start the application process over again. If they are eligible for food assistance, DCF will refer them back (interface) to the E&T program for program participation/engagement.

- Updated 13. Does the participant have the option to request an FSR during the online Orientation/Assessment?

**Response:** Yes.

- Updated 14. What steps should the LWDB take to re-engage a customer who has received a Notice of Adverse Action (NOAA) where the customer wants to comply **before** the sanction effective date?

**Response:** LWDB staff should enter code 594 (Staff Initiated Online Authorization) to allow the customer to comply before the sanction effective date, if the customer has not previously completed the required automated activities. If the customer has previously completed the automated activities, LWDB staff should engage the customer according to local operating procedures.

In the event the 594 code does not re-start automation, the local area may do the following to allow the ABAWD to comply:

1. LWDBs should access the orientation material used in the automated system and hold a session to allow the customer to view the orientation
  - a. Enter a manual orientation in the system (500)
2. Administer an assessment to the customer
  - a. Enter a manual assessment in the system (575)
3. Assign to job search or job search training
  - a. Enter a job search (505) or job search training (511) code in the system

An ABAWD should not be allowed to participate in program compliance activities while serving the penalty period. LWDB staff should wait until the penalty period has ended to enter the 594 code allowing the ABAWD to comply with the program, if these activities have not been previously completed.

Once the ABAWD has completed the required compliance activity(ies), the sanction should be ended with “*Complied (After Serving Sanction)-46*” and the ABAWD must re-apply for food assistance benefits

through DCF. In these cases, the ABAWD is not expected to participate in program activities until they have been referred back to the E&T program for participation/engagement through the FLORIDA to OSST interface. If the ABAWD is referred back, they will either be required to complete the initial engagement steps again or be assigned to program components. If the ABAWD is required to complete the initial engagement steps again, DEO will mail out a *Notice of Mandatory Participation (NOMP)*.

15. How do we request a FSR for employed participants?

**Response:** Currently, the option to request a FSR for an employed participant is not available in OSST. To request a FSR for employed participants, staff will need to send an email to [OSSTTechnical@deo.myflorida.com](mailto:OSSTTechnical@deo.myflorida.com) with the participant's OSST ID and the reimbursement amount for processing.

16. When a customer calls or comes into the career center and states that they heard about the program and want to participate/enroll, should we place a 594 on the case to give the customer access to the online requirements?

**Response:** No. Staff must first confirm that the individual was referred as a mandatory ABAWD by DCF. To confirm a participant is a mandatory ABAWD, staff should review OSST to see if the individual has an open case by looking for the 599 code (Participation Activity Notice) on the Skill Development screen. If a 599 does not appear, then the case has not been referred to participate in the program and a 594 should **not** be entered on the case. If a 599 appears on the case and the ABAWD is not currently serving a penalty period, then a 594 can be entered on these cases.

17. Is a background screening an allowable expense with SNAP funds?

**Response:** In accordance with federal regulations, background checks are an allowable expense if the employer requires the screening as a condition of employment. SNAP funds should not be used to fund background checks for all SNAP E&T participants, but should be expended with discretion.

18. When a participant has served their penalty period and becomes compliant again, must we open the case in OSST in order to lift the sanction with *complied*?

**Response:** No, as long as the compliance activity is not Orientation, Assessment and Workfare. For example, if the participant attends a workshop as their compliance activity, you will request a sanction lift by entering *complied* without opening the case. If the compliance activity will be to complete Orientation, Assessment and Workfare, you must open the case and enter code 594. When the ABAWD completes the required activities, staff will request a sanction lift by entering *complied* and close the case. As a reminder, participants must reapply for benefits with DCF and be referred back to the E&T program, if eligible.

19. When entering the 594, after receiving a case that has been transferred into our unit, how do we determine the anticipated end date?

**Response:** The anticipated end date on the 594 will be the same anticipated end date that appears on the 599.

20. We were attempting to enter hours for employment for a few of our SNAP participants but are unable to do so. A pop-up appears that says "This screen does not accept any hours, because JPRs are not generated for SNAP E&T client Job Tracking".

**Response:** Currently, the system does not allow entry of these hours, but we are working on making this feature available soon. In the meantime, please have staff case note the hours and continue to collect supporting documentation.

21. How do we handle all the alerts we receive?

**Response:** We have drafted a guide on our *Resources* page on how to handle alerts. Please click on the link below to access the document. As we continue to work through the alerts, language updates, and clean up, this resource will be updated accordingly.

<http://www.floridajobs.org/local-workforce-development-board-resources/programs-and-resources/program-resources>

22. We have participants who completed Orientation, Assessment and the Workfare activity on time, but another 599 has appeared on the case. What do we do?

**Response:** We are aware that this has happened on some cases. If the participant has completed all initial requirements, please close/end the duplicate 599.

23. When a customer was mailed an NOMP/599 letter to one address, then the LWDB receives an alert to transfer the case to another unit, we close the case and transfer it to the new unit. Will OSST generate another NOMP? What should we do on our end?

**Response:** No. OSST will not generate another NOMP. When a case is transferred, LWDB staff will need to manage the case by following the steps outlined below:

- Close the original 599 with an outcome of "transferred"
- Close the OSST case
- Transfer the case to the correct unit
- Open the case
- Enter the 594 to re-start automation allowing the customer to access orientation, assessment and on-line modules

Once staff has entered the 594, the customer will be allowed to follow the instructions outlined in the original NOMP to comply with the program requirements.

24. Once the 599 is completed, customers can not log back in to the system to access MyTess or review the orientation/assessment information they completed. When will they be able to get back in to the system?

**Response:** We have resolved the issue and customers should now be able to access MyTess.

25. Customers cannot request an FSR when they complete their on-line requirements. When will this option be available?

**Response:** The OSST FSR issues have been resolved. Customers are now being prompted to answer the required questions to screen for FSR eligibility. The customer will be asked if they had to travel at two points during the automated process. They will be asked if they had to travel after they have completed the orientation (598) and assessment (597). Customers will also be asked if they had to travel to complete the online job search training (592), once they have completed it.

26. When DCF determines good cause **does not** exist, will we receive a closure alert with sanction imposed? If so, do we need to manually end the noncompliance request with a sanctioned imposed?

**Response:** Yes. We will receive a sanction imposed and case closure alert. If the case is in the auto process, the case will be automatically closed. If a case manager sends the noncompliance record manually and DCF imposes the sanction, the system updates the sanction with "imposed", but the case manager will have to close the case.

27. If a participant begins complying with the career center before a requested sanction is imposed, what action do we take in OSST to alert DCF that they are complying (even though it could come back as a sanction imposed if DCF determines good cause doesn't exist)?

**Response:** If the participant complies before the sanction penalty period starts, the case manager should request a sanction lift. DCF will remove the sanction and no penalty will be assessed to the participant.

28. Will ABAWDs who choose the email opt-in be allowed to change back to receiving regular mail and vice versa?

**Response:** Yes. Participants will have the choice to opt-in for the online communication. They will also have the ability to opt-out.

29. When an ABAWD uploads documentation through MyTESS, will they be required to turn in originals to case manager as well?

**Response:** No. Participants will not be required to submit the original document. However, the ABAWD will be asked to retain the original until the next meeting with their case manager just in case there was an error with the upload or the document wasn't legible.

30. If an ABAWD uploads documentation through MyTESS and the documentation is incomplete (ex: timesheet not signed), how should this be handled? Should it be rejected/not accepted?

**Response:** If a document is unacceptable, the LWDB will need to request either the hard copy and/or make contact with the participant and have them resubmit the completed timesheet with dates, times and appropriate signatures.

31. If MyTESS is used to upload documentation, will the case managers be required to print and maintain a hard copy in the case file?

**Response:** MyTESS is for the participant. Case managers should pull the document and use the local documentation retention process established in their area (hard case file, scan, etc.).

32. How will the participant know they have a message in MyTESS from case manager?

**Response:** The participant will receive an email notification that they have a message waiting for them in their online account.

33. How will the LDWBs handle participants who are required to do online orientation, assessment and workfare, but cannot read or write?

**Response:** The orientation and online job search training modules are voiced. Also, online does not mean they cannot go to the career center or call. Participants who need help with the assessment can request assistance at the career center. In addition, if the participant has a major barrier, the LWDB may consider removing the participant out of the automated process and complete an in-person orientation and assessment (500/575 codes) and then assigned the participant to an activity.

34. For NOMP letters that come back as returned mail to the career centers, will the centers be required to mail out those letters upon learning the participant's correct address?

**Response:** No. It is the participant's responsibility to provide the correct address. The participation requirements will still remain in effect and the automated processes will continue. If the participant provided the correct address and DCF failed to act on it, the participant will have good cause for any failures that took place as a result.

35. Can OSST send an alert with the sanction request that indicates the specific reason for the request/failure?

**Response:** The auto alerts are coded to include that language.

36. Will case managers be allowed to provide ABAWDs with a "window of opportunity?" In other words, can case managers give ABAWDs a 24 - 48 hour time frame to turn in documentation before requesting a sanction, considering that the sanction must be requested immediately or on the very day of the failure?

**Response:** If a participant is noncompliant or failed to turn in a document, they can be given the option to turn it in within a reasonable period. **Note:** The LWDB must define reasonable in their LOPs.

37. Will study time count towards Education hours (1 to 1)?

**Response:** No, it does not. We are not currently granting study time hours for participants.

38. Will the job search rule (A State agency should not establish a continuous year-round job search requirement) still apply when serving ABAWDs? I understand that job search will never be stand-alone when mandatory (except for the first 30 days upon initial referral). Local areas want to know because most of their participants will have to be in multiple activities to meet 80-hour requirement. Therefore, if an ABAWD cannot be assigned to job search for 365 days consecutively, this could pose problems. Is it allowable for an ABAWD to be assigned to job search for 365 days if job search is combined with other activities?

**Response:** Federal law still applies in which the participant cannot be engaged in year round job search activity.

39. If the participant is referred to the LWDB in the middle of the month, will they be required to complete 80 hours? For example, John was referred to the LWDA on Feb. 15. John completed his orientation, assessment and the initial workfare activity within the first 30 days. On March 16, John was assigned to his next qualifying component. Will John be required to complete 80 hours for the period of March 16-April 16?

**Response:** No. The State of Florida will be operating on a calendar month, which means the participant will be required to satisfy the 20 hours per week (80 hours per month) requirement during the first full month after the referral from DCF. John's first full month will begin on March 1<sup>st</sup>. John will be required to complete 80 hours during the month of March.

**NOTE:** Each participant will automatically be credited hours for completing the orientation, the assessment and on-line job search training course. Each participant will receive 4 hours credit for completing the orientation and assessment and 20 hours credit for completing the on-line job search training course. The earned credit hours will be applied on the date the participant completes each of these requirements. If John completes the orientation, assessment and on-line job training course on March 15th, then he will be credited 24 hours and will be required to complete the remaining 56 hours by March 31st.

40. An ABAWD in school on at least a half-time basis is one of the exemption reasons granted by DCF. If the ABAWD is not in school when they are referred to us, but they choose to attend school after being referred and the case manager assigns them in the Education and Training component, will the ABAWD then become exempt, if they attend on at least a half-time basis (post-secondary or vocational)?

**Response:** The ABAWD will need to report the change in status in their DCF MyACCESS account and contact DCF. The LWDB will need to document the information reported by the ABAWD in the case notes on OSST. DCF will review the information submitted and determine if the individual meets the exemption criteria. Until the participant is determined to be exempt by DCF, they must continue to comply with SNAP E&T program requirements.

41. How does the local area engage an ABAWD that provides documentation showing that they are legally not allowed to use or access the internet due to a past criminal offense?

**Response:** The local area should make available a representative that can go through the online orientation/assessment for the participant (case note the assistance in OSST). Once through the automated orientation and assessment, the case manager should end the automation by ending code 599 in OSST. The case manager will then assign the participant to a physical job search training/work readiness course (if available), assign to physical job search (not online), or assign the participant to an appropriate activity based on assessment responses and communication with the customer.

42. The LWDB career centers are receiving returned "NOMP" letters. Do we send these back to DEO?

**Response:** No. The returned NOMP letters should be kept at the local career center. The LWDA staff should enter a case note indicating the NOMP was not delivered to the ABAWD and returned to the career center. The NOMP is documentation that an attempt to notify the ABAWD of the SNAP E&T program requirements occurred and indicates that there is some type of issue with the address of record in the DCF system.

43. The NOMP letter provides information to the customer on how to go the OSST website and set up an online account. For those individuals who have attempted to do this, OSST is asking for their “Date of Application”. Is the Date of Application something that can be added to the NOMP?

**Response:** The date of application is not a required field. Therefore, if the participant does not know the date of application, they will still be able to complete the account set-up process without entering any information in this field.

44. As a condition of eligibility for food assistance, an individual must accept any offer of suitable employment and remain employed without reducing hours or quitting unless there is a good reason. Who determines whether an offer of employment is reasonable and suitable? Who looks at the reason for quitting and the documentation and what constitutes the documentation?

**Response:** In accordance with, 7 CFR 237.7 (e) (7)(h) Employment will be considered suitable unless:

- The wage offered is less than the highest of the applicable Federal minimum wage, the applicable State minimum wage, or eighty percent (80%) of the Federal minimum wage if neither the Federal nor State minimum wage is applicable.
- The employment offered is on a piece-rate basis and the average hourly yield the employee can reasonably be expected to earn is less than the applicable hourly wages specified under paragraph (h)(1)(i) of this section.
- The household member, as a condition of employment or continuing employment, is required to join, resign from, or refrain from joining any legitimate labor organization.
- The work offered is at a site subject to a strike or lockout at the time of the offer unless the strike has been enjoined under section 208 of the Labor-Management Relations Act (29 U.S.C. 78) (commonly known as the Taft-Hartley Act), or unless an injunction has been issued under section 10 of the Railway Labor Act (45 U.S.C. 160).
- It fails to meet additional suitability criteria established by State agencies.

The LWDB will consider the conditions outlined in the federal law above, when determining if an offer of employment is reasonable and suitable. If it is determined that an employment offer is reasonable and suitable and the ABAWD refuses the employment, DCF should be notified of the ABAWD’s noncompliance.

DCF has a “Voluntary Quit” policy and will determine if an ABAWD’s reason for quitting is acceptable. Therefore, an ABAWD who voluntarily quits a job will need to be instructed to report this event to DCF through their MYAccess account.

45. When a participant has served their penalty period and wants to be compliant again, who determines what compliance is?

**Response:** The LWDB will determine what actions constitute program compliance. Each LWDB’s compliance criteria must be included in the Local Operating Procedures.

46. Is an ABAWD allowed to complete 39 hours of Job Search and 39 hours of Job Search Training to meet the 80 hour per month requirement?

**Response:** No. After the initial 30 days, job search and job search training hours must be combined with other allowable program components and comprise less than half of the required hours for the month.

The participant may be assigned to 39 hours of job search or 39 hour of job search training or 39 hours of a combination of job search *and* job search training.

47. If a LWDB dual enrolls a SNAP participant in WIOA under Career Services, are we allowed to code them as assigned to WIOA in OSST and have them complete the hours remaining after the work experience in a job search/job search training activity to reach the required 80 hours?

**Response:** Yes. Job search activities that are included in WIOA or Trade Act programs are allowable. However, as with any participant, SNAP participants assigned to your local WIOA program will impact the LWDB's WIOA program performance.

**NOTE:** 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 may not be a "year round" activity.

48. Is it possible for the LWDBs to get a copy of the DEO SNAP Orientation to provide a local orientation to those SNAP customers that are not included in the NOMP online activities?

**Response:** Yes. The presentation is available on our website at: <http://www.floridajobs.org/workforce-board-resources/programs-and-resources/program-resources>.

49. Where can I access information about the grievance process and fair hearings?

**Response:** You may access information about the grievance and fair hearings process on our website at: <http://www.floridajobs.org/workforce-board-resources/programs-and-resources/program-resources>.

50. What should a case manager do if an ABAWD comes to the career center to participate in the program and a "SNAP E&T Participation Notice Activity - 599 code" has not been generated on the case?

**Response:** If a case does not have a 599 code entered in the OSST system, then this means that a Notice of Mandatory Participation (NOMP) has not been mailed to the participant. When the OSST system mails the participant the NOMP, the 599 will appear on the case and the participant can follow the instructions provided in the notice to begin to comply with the program requirements.

Therefore, case managers should not enter a 594 code on cases that do not have a 599 code entry. Entering the 594 on cases without a 599 will not start automation nor will it allow the customer to begin participation. The LWDB staff should inform the customer that they must wait until they receive the NOMP to begin complying with the program requirements.

51. Why do some of my cases still have an open 599 after the customer has completed all of the automated steps (orientation, assessment, and job search or job search training) within the first 30 days?

**Response:** If a case has an open 599, after the initial 30 days from referral, and the ABAWD has completed all of the initial steps, this indicates the 599 activity was not ended by staff as completed and the case was not removed from automation.

When a case is still in automation beyond the 30-day date with an open 599, a noncompliance record (sanction request) will ***automatically*** be generated on the case. DCF will receive a sanction request and send the ABAWD a Notice of Adverse Action/Notice of Case Action with a sanction effective date.

Case managers should be mindful that if they do not end the 599 in OSST, either once the ABAWD has completed or before the initial 30 days, OSST will send a noncompliance record on the case. Therefore, if an ABAWD has completed all of the required steps in the first 30 days, the 599 activity code must be ended with completed by staff then the case will be removed from automation.