

Supplemental Nutrition Assistance Program

Employment and Training

Florida State Plan

FEDERAL FISCAL YEAR 2016

October 1, 2015 through September 30, 2016

Submitted By:

The Department of Economic Opportunity



Summary: Over the past few years, Florida's economy has improved significantly, with unemployment down to 5.5 percent, 900,000 private-sector jobs created, and record levels of job openings. This improved economic climate provides more opportunities to ensure that all Floridians can get and keep gainful employment.

The federal Personal Responsibility and Work Opportunity Reconciliation Act of 1996 requires able-bodied adults without dependents (ABAWDs) to engage in work-related activities in order to receive Supplemental Nutrition Assistance Program (SNAP) benefits. During times of high unemployment, this federal requirement can be waived, as has been the case in Florida since 2009. As of 2016, however, Florida's improved economy will make it ineligible for the statewide ABAWD waiver from the federal government. According to the U.S. Department of Agriculture, the vast majority of states with statewide waivers will expire by early 2016. Additionally, during the 2015 session, the Florida Legislature enacted a bill that requires the state to obtain authorization from the Legislature before seeking to apply for any waiver of work requirements. Therefore, effective January 1, 2016, Florida will enforce time limits for ABAWDs and require that all ABAWDs participate in Florida's E&T program in all 67 counties.

The purpose of SNAP is to help families in need while transitioning individuals to self-sufficiency. The CareerSource Florida system is well-equipped to assist in this process, giving individuals the benefit of training and on-the-job experience. ABAWDs can meet work requirements in a variety of ways, including: working twenty hours or more on average per week; participating in job search in combination with other allowable activities, occupational skills training, on-the-job training, adult education and literacy, vocational or technical training, or other educational programs; participating in work experience programs at public and private sector employers; or volunteering.

Of the 3.7 million individuals currently receiving SNAP benefits in Florida, about 563,507 are classified as ABAWDs. The 3-month time limits does not apply to individuals who are: under 18 or 50 years of age or over, medically certified as physically or mentally unfit for employment, responsible for a dependent child or residing in a household where a household member is under age 18, exempt from SNAP work requirements or pregnant.

Part I – Summary of State Supplemental Nutrition Assistance Program (SNAP) Employment and Training (E&T) Program

A. Abstract of the State E&T Program

Florida's SNAP E&T Program is designed to help SNAP participants gain skills, training, and/or work experience that will increase their ability to move directly into employment. In July 2009, Florida implemented a voluntary SNAP E&T program and Nutrition Service (FNS). Volunteer participants are engaged in program components and are not subject to sanctions for not participating. Florida will continue to operate a voluntary E&T program for the first quarter of Federal Fiscal Year (FFY) 2016 (October 1, 2015 – December 31, 2015).

In the participating areas, Florida will continue to operate a voluntary E&T program until December 31, 2015. During that time, participants ages 16 – 39 will receive

a Notice of Voluntary Participation (NOVP) letter inviting them to participate in the E&T program

Effective January 1, 2016, Florida will offer E & T services to all ABAWDs who are required to meet the work requirements. All eligible ABAWDs will be referred to the DEO E & T program and will be required to participate in E & T qualifying components as a condition of receiving SNAP benefits.

1. Program Change

Effective January 1, 2016, Florida will begin to offer E & T qualifying components to all referred ABAWDs. The Department of Economic Opportunity (DEO) will send ABAWDs, ages 18 – 49, a Notice of Mandatory Participation (NOMP) with instructions on how to engage in the program as a condition of receiving SNAP benefits. If the participant does not respond to the NOMP within ten days, DEO will send the Department of Children and Families (DCF) a noncompliance record. DCF will inform participants, through a Notice of Adverse Action (NOAA), that they have a certain period of time to comply. The NOAA will contain information on how the ABAWD can comply. If the ABAWD fails to engage with the E & T program by a specific date, DCF will impose sanctions for failure to comply with program requirements.

Components offered in the voluntary SNAP E&T program through December 31, 2015, include Job Search, Job Search Training, Work Experience, Self-Initiated Work Experience, Education, Vocational Training, and services offered through the Workforce Innovation and Opportunity Act (WIOA) and Trade Adjustment Assistance (TAA) programs.

Components offered effective January 1, 2016 will include Workfare, Work Experience, Self-Initiated Work Experience, Education and Training, and services offered through the WIOA and TAA programs.

2. ABAWD Population

Effective January 1, 2016, nonexempt household members, defined in 7 CFR 273.7, will be required to register for work and only those meeting the ABAWD criteria will be required to participate in the SNAP E&T program. Of the 3.7 million individuals currently receiving SNAP benefits in Florida, about 7.8 percent are classified as ABAWDs. It is estimated that between January 1 and September 30, 2016, the State of Florida will make outreach efforts to approximately 563,507 ABAWDs.

Currently, Florida does not qualify for any fifteen percent ABAWD exemptions. Therefore, effective January 1, 2016 all 24 Local Workforce Development Areas (LWDBs), covering 67 counties, will be required to provide SNAP E&T services to ABAWDs. Further, in 2015, the Florida Legislature passed a law requiring legislative authorization to waive participation in the mandatory SNAP

E&T program. At this time, no such waiver has been authorized, therefore all LWDBs will offer the E&T program to all ABAWDs.



3. Additional Allocation for “Pledge States”

- The State’s Pledge
 Florida will not be operating under a pledge state status.
- Estimated Cost of Fulfilling the Pledge
 \$0
- A Description of Management Controls in Place to Meet Pledge Requirements
 N/A
- A Discussion of Florida’s Capacity and Ability to Serve At-Risk ABAWDs
 N/A
- Information about the size and special needs of its ABAWD population
 N/A

- Information about the Education, Training, and Workfare Components Florida is offering

N/A

4. Program Components

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 SNAP recipients. Florida's integrated workforce system is designed to engage job seekers, including ABAWDs, in activities that develop job skills, enhance employability, and connect them to employment opportunities.

LWDBs are responsible for delivery of SNAP E&T program services. Each LWDB will describe components available in the local workforce development area through local operating procedures. Components and services may be limited or vary by area based on funding availability; however, each area will offer program services that allow ABAWDs to satisfy their work requirements to maintain eligibility for food assistance. ABAWDs can meet the work requirement by working 20 hours per week, complying with a work program for 20 hours per week, or any combination of working and a work program for 20 hours per week, or by participating in workfare.

Voluntary Program Components (through December 31, 2015)

1. Job Search
2. Job Search Training
3. Work Experience
4. Self-Initiated Work Experience
5. Vocational Training
6. Education
7. Workforce Investment Opportunity Act/Trade Adjustment Act (WIOA/TAA)

Mandatory ABAWD Program Components (effective January 1, 2016)

1. Workfare
 - Job Search (not to exceed 30 days after initial referral)
 - Job Search Training (not to exceed 30 days after initial referral)
2. Work Experience
 - Work Experience combined with job search
 - Work Experience combined with job search training
 - Work Experience combined with education
 - Work Experience combined with training
 - Work Experience combined with WIOA/TAA activities

3. Self-Initiated Work Experience

- Self-initiated Work Experience combined with job search
- Self-initiated Work Experience combined with job search training
- Self-initiated Work Experience combined education
- Self-initiated Work Experience combined with training
- Self-initiated Work Experience combined with WIOA/TAA activities

4. Education and Training

Education

- Adult Basic Education
- Remedial education
- High school completion or General Education Development
- Post-secondary education
- Education combined with job search
- Education combined with job search training
- English for Speakers of Other Languages

Training

- Vocational training
- Training combined with job search
- Training combined with job search training
- Workforce Innovation Opportunity Act program
- Trade Adjustment Assistance program

Each LWDB will determine and document in its local plan components that will be available in the local area. DEO will ensure that each LWDB offers qualifying components to meet the needs of ABAWDs to satisfy the work requirements.

When operating a program serving ABAWDs, SNAP E&T will focus on assisting ABAWDs in meeting their work participation requirements in order to ensure continued program access for compliant individuals. Per 7 CFR 273.24, ABAWDs will meet the work requirements by:

- ✓ Working 20 hours per week*
- ✓ Participating in and complying with the requirements of a work program 20 hours per week
- ✓ Performing any combination of work and participation in a work program for a total of 20 hours per week
- ✓ Participating in and complying with a workfare program

* For purposes of this provision, 20 hours a week averaged monthly means 80 hours a month.

Employment by definition is not a component of the SNAP E&T program, but it is the desired outcome. When an employed participant is referred to the SNAP E&T Program or if he or she gains employment while in the program, the job is recorded in the One-Stop Service Tracking (OSST) system. If the individual is employed only part-time, an assessment is completed to identify the reason for part-time employment. Employed participants are assigned to activities, as appropriate, for a specified number of hours. If an employed participant is assigned to work experience or self-initiated work experience, those hours assigned for work experience or self-initiated work experience shall not exceed the result of the benefit calculation. The total required hours in employment and these components will not exceed 120 hours per month.

The calculation used to determine the required hours of participation is the household's SNAP allotment, divided by the state minimum wage. The result is further divided by the number of SNAP participants in the household. If an employed participant is assigned to education/training, the total hours assigned in this component plus those in employment must be a minimum of 80 hours per month and shall not exceed 120 hours per month.

SNAP staff will obtain and maintain verification of component participation, as well as employment verification, to ensure the participant is engaged in the appropriate number of hours in SNAP E&T components. DCF is responsible for identifying and tracking ABAWD time-limited months. The on-going participation verification conducted by LWDBs will not be used to identify time-limited months for ABAWDs when the program becomes mandatory on January 1, 2016.

5. Sequencing of Components

Orientation and Assessment

Each ABAWD will complete an online orientation and assessment. Orientation is an activity for new or reopened referrals. Orientation is required if there have been significant program changes since the participant last attended, regardless of the time frame.

The assessment will identify the participant's strengths and skills to assist in the development of employment goals. Based on the assessment results, OSST will recommend the most appropriate component/activity for the SNAP program participant. Participants may complete orientation and the assessment in one of three ways:

1. Online – by logging into the OSST system client or participant site to attend and complete a self-directed online session.
2. On-site – by attending is a live orientation session offered at the local career center.
3. Combination – by attending a live group session in which the attendees are walked through the steps of completing the online session at a local career center with a classroom proctor or live assistant.

Participants attending live orientation and combination sessions must be provided with a grievance and complaint/Equal Employment Opportunity (EEO) form. The form must be signed, dated, and retained in the participant's case file. Participants 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 case file.

ABAWDs

Effective January 1, 2016, upon completion of orientation and assessment, ABAWDs may be required to complete a job search training curriculum or job search as part of their workfare assignment. LWDBs will determine the delivery of these components within the first 30 days. ABAWDs will be required to complete this activity, along with orientation and assessment, within 30 days of initial referral from DCF. LWDBs have the ability to outline the process of engagement including a specific sequence of components in their local operating procedures.

6. Other Employment Programs

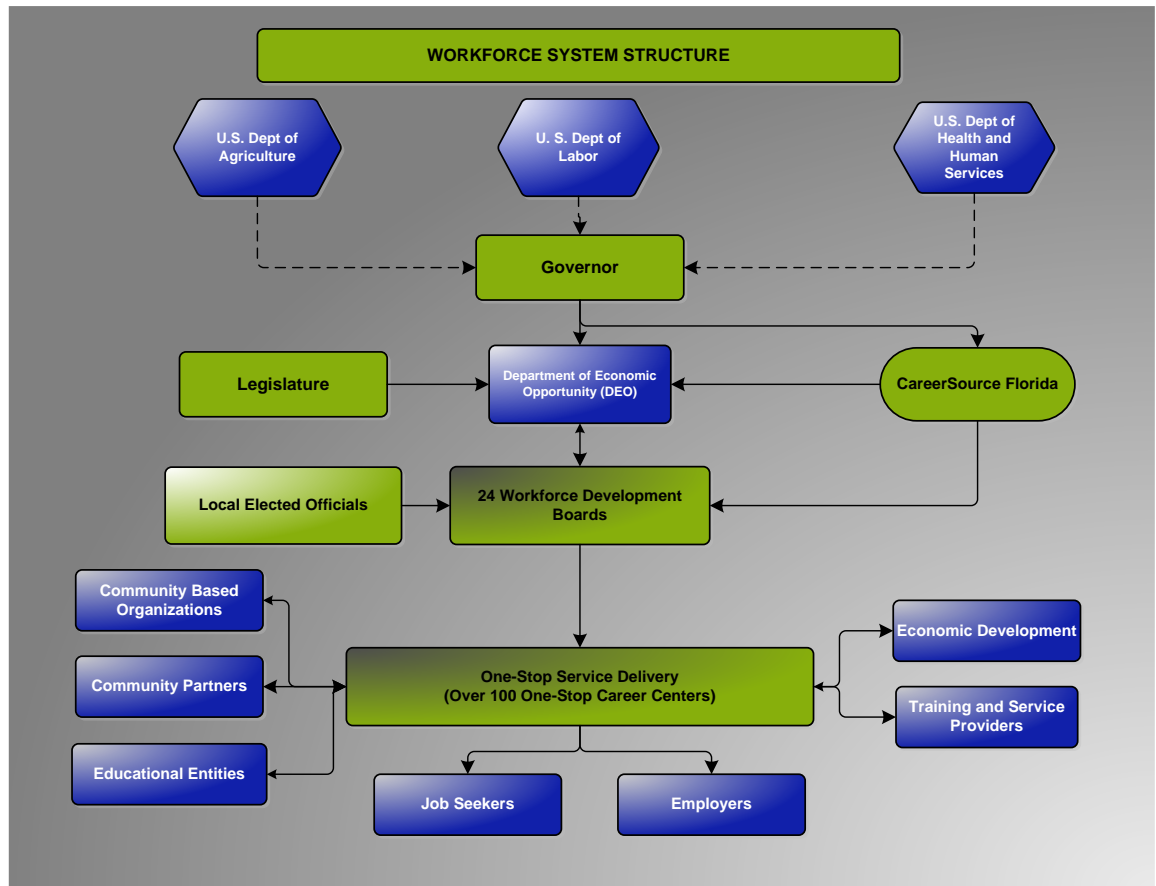
The Welfare Transition (WT) program is Florida's work program designed to engage work-eligible Temporary Assistance for Needy Families funded cash assistance recipients (under Title IV-A of the Social Security Act) in a plan that moves the family from welfare to work. The WT and SNAP E&T programs are operated under the same administrative structure and share resources, including access to employer services, job seeker services, and the OSST system.

7. Workforce Development System

The following information is located on the [CareerSource Florida](#) website. The information was designed to explain how Florida's workforce system was created and how the system currently operates.

CareerSource Florida (formerly Workforce Florida, Inc.) was created with the passage of the Workforce Innovation Act of 2000, Chapter 445, Florida Statutes (F.S.). 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 LWDBs and DEO. Services are

provided at nearly 100 career centers. This approach to workforce development in Florida is illustrated in the model below.



While CareerSource Florida provides policy, planning, and oversight at the state level, the 24 LWDBs are responsible for implementing programs in their communities. Each LWDB has performance measures and contracts to provide accountability; however, the choice of initiatives and programs are under the local board’s control unless the program is required by federal or state law. This allows programs to respond to the economic and business needs of each area of the state.

CareerSource Florida 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 and special support services.

Florida’s career center network was established to bring all workforce programs including 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 throughout Florida managed by local workforce development areas. 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 CareerSource Florida brand.

As specified in Chapter 445, F.S., E&T program activities are a required part of the workforce system. CareerSource Florida provides oversight and policy direction to ensure that workforce programs, including the SNAP E&T program. DEO provides administrative oversight for the workforce programs. Workforce programs including SNAP E&T are implemented locally by the LWDBs and other designated providers.

8. Outcome Data

Currently, Florida collects programmatic data on the engagement of participants in SNAP E&T 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 FNS 583 report. Florida DEO acknowledges that it will comply with the upcoming FNS requirement to collect and report on specific reporting measures as required.

B. Program Components

1. Component Description

- **Name of Component:** Workfare
- **Description of Component:** Workfare is a work component. Upon assignment to workfare, each participant may be required to complete a maximum of 30 days of upfront job search and/or job search training. Job search and job search training are stand-alone activities under the voluntary program. However, when serving ABAWDs, assignment to job search and job search training is limited to the first 30 days upon assignment to the workfare component. After the initial 30 days, job search and job search training may be combined with other allowable components but is limited to less than half of the required hours.

Job Search

Job searches may be conducted independently or in a group setting. 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. Job search activities include:

- Completing applications.
- Submitting resumes.
- Meeting with job developers for referrals to employers.
- Contacting employers about job opportunities.
- Attending interviews.
- Going to job fairs.
- Other activities directly related to securing employment, such as searching for jobs using the internet.

Job searches will be recorded on a job search report form or in Employ Florida Marketplace (EFM), which is Florida's labor exchange system. The data from EFM 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. Participants will be given credit on a one to one ratio for job search contacts. This means for every job search entry logged on a job search form or tracked using EFM will count for one hour of job search credit.

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. LWDBs will address in local operating procedures:

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

In Florida, employers may post jobs on EFM and look for job seekers with skills that fit a desired job profile by reviewing resumes posted in the EFM system. Job seekers can look for jobs in EFM on any computer or mobile device with internet access. Job seekers needing access to a computer can go to the 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.
- Post a resume in EFM.

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 EFM.

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 recipients directly by:

- Finding jobs that are closely aligned with participants' skills and goals.
- Developing resumes.
- Applying for work.
- Referring participants to employers so they can apply for an interview for jobs.

Job Search Training

According to 7 CFR 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. Under workfare, mandatory ABAWDs can participate in job search training for no more than 30 days. 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. They may also be engaged directly by staff in activities that meet these definitions. Participants may also attend classes associated with employability that are available in the community, at educational institutions, etc. 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 preventing individuals from getting and keeping jobs).
- Interpersonal skills.
- 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.
- Career planning.

- **Type of Component:** This is a work component.
- **Geographic areas covered and variations among local areas:** Each LWDB will establish local operating procedures if the activity will be offered as a component in their region. Depending on the area, hours in this activity may vary.
- **Anticipated number of ABAWDs who will begin the component:** 216,161
- **Anticipated number of non-ABAWD participants, both mandatory and volunteers, who will begin the component:** 2,288
- **Level of participant effort:** Because Florida will continue to operate a voluntary program through December 31, 2015, volunteers are expected to complete ten hours per month in job search. If a volunteer cannot complete all hours due to a limitation, the volunteer can be considered to have met the level of effort. Effective January 1, 2016, ABAWDs are expected to complete less than ten hours per week of job search. An ABAWD may be considered to have met the level of effort if they are unable to meet the required number of hours due to circumstances beyond the individual's control. Examples of these circumstances could include but are not limited to, medical emergencies, illness and natural disasters.
- **Organizational responsibilities:** LWDBs implement the SNAP E&T program locally through the career centers, satellite offices, and community partners. LWDBs are organized to ensure the needs of the community, job seekers, and employers are met. LWDBs will engage program participants based on their local structure. Job search activities may include a variety of job seeker to employer engagements.
- **Anticipated number of participants who will enter the activity:** 218,449
- **Cost of the activity per placement not including reimbursements:** \$19.82
- **Annual cost of the activity not including reimbursements:** \$4,330,620
- **Number of participants expected to receive a participant reimbursement and the estimated amount of the reimbursements to be paid:**
 - Number of participants: 110,476
 - Estimated amount of Reimbursements: \$2,378,257

- Transportation Reimbursement: \$2,378,257
- Dependent Child Care: \$0
- **Total Cost of the Component and Cost per participant:**
 - Total Cost of the Component: \$6,708,877
 - Cost per placement: \$30.71

Name of Component: Work Experience

- **Description of Component:** Work Experience is designed to connect program participants with employers to build employability skills or job related skills through actual work experience or training at a worksite. The goal is to help participants move into employment. ABAWDs will perform work as a condition of continued eligibility. In lieu of wages, work experience participants receive compensation in the form of their household's monthly food assistance allotment.
- **Type of Component:** Work experience is a work component. Work experience sites are developed by LWDBs through worksite agreements with employers and community-based organizations. Worksite agreements will include job descriptions and skills required to fill the worksite position. Worksite agreements and job descriptions must be secured between the worksite and the LWDB prior to the participant's engagement to ensure the employer understands the basic requirements associated with the program and engagement. The calculation used to determine the required hours of work experience participation is the household's food assistance allotment divided by the higher of the federal or state minimum wage. The result is further divided by the number of individuals in the food assistance group. An individual cannot be required to complete more hours at a worksite during the month of participation than the benefit calculation allows.

Work experience may count as a stand-alone component or may be combined with other program components in the described combinations:

- Work Experience combined with job search.
- Work Experience combined with job search training.
- Work Experience combined with education.
- Work Experience combined with training.
- Work Experience combined with WIOA/TAA activities.

NOTE: Hours assigned to work experience will not exceed the allowable hours as derived from the benefit calculation.

After the first 30 days, job search and job search training can be included in this activity, but must comprise less than half of the required

hours for the month. Work experience/job search or work experience/job search training will be used in OSST to identify individuals assigned to this activity.

- **Geographic areas covered:** Each LWDB will establish local operating procedures if the activity will be offered as a component in the local area. Depending on the area, hours in this activity may vary.
- **Anticipated number of ABAWDs who will begin the component:** 261,862
- **Anticipated number of non-ABAWD participants, both mandatory and volunteers, who will begin the component:** 51
- **Level of participant effort:** Because Florida will continue to operate a voluntary program through December 31, 2015, volunteers are expected to complete monthly hours based on the benefit calculation. If a volunteer cannot complete all hours due to a limitation, the volunteer can be considered to have met the level of effort. Effective January 1, 2016, ABAWDs are expected to complete monthly hours based on the benefit calculation. An ABAWD may be considered to have met the level of effort if they are unable to meet the required number of hours due to circumstances beyond the individual's control. Examples of these circumstances could include but are not limited to, medical emergencies, illness and natural disasters.
- **Organizational responsibilities:** For the period of October through December 2015, DCF will refer all food assistance recipients, including ABAWDs, to the SNAP E&T program. Effective January 1, 2016, DCF will refer only mandatory ABAWDs required to participate in the E&T program for program participation. LWDBs establish the worksite with a for profit or not-for-profit employer for the participant. SNAP program staff will track the hours of attendance, maintain documentation, and report on participant activities.
- **Anticipated number of participants who will enter the activity:** 261,913
- **Cost of the activity per placement not including reimbursements:** \$20.03
- **Annual cost of the activity not including reimbursements:** \$5,246,195
- **Number of participants expected to receive a participant reimbursement and the estimated amount of the reimbursements to be paid:**
 - Number of participants: 3,911

- Estimated amount of Reimbursements: \$2,881,067
 - Transportation Reimbursement: \$2,881,067
 - Dependent Child Care: \$0
- **Total Cost of the Component and Cost per participant:**
 - Total Cost of the Component: \$8,127,261
 - Cost per placement: \$31.03

Name of Component: Self-Initiated Work Experience

- **Description of Component:** Self-Initiated work experience is designed to connect program participants with employers to build employability skills or job related skills through actual work experience or training at a worksite. The goal is to help participants move into employment. ABAWDs will perform work as a condition of continued eligibility. In lieu of wages, work experience participants receive compensation in the form of their household's monthly SNAP benefits. In self-initiated work experience, the participant is either already volunteering at a worksite on his or her own and would like to use those hours as part of required participation in the SNAP E&T program or the participant has identified an employer or community-based organization in which he or she would like to participate. This is not a paid work opportunity.
- **Type of component:** Self-initiated work experience is a work component comparable to regular work experience. Although the participant initiates the work experience in this component, LWDBs are required to secure worksite agreements with the desired employer and/or community-based organization before the participant's hours can be used as part of program participation in SNAP E&T. Worksite agreements will include job descriptions and skills required to fill the worksite position. Worksite agreements and job descriptions must be secured between the worksite and the LWDB prior to the participant's engagement to ensure the employer understands the basic requirements associated with the program and engagement. Under the voluntary program, participants who are receiving SNAP 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. For mandatory ABAWDs, self-initiated work experience is designed to assist in fulfilling work requirement. ABAWDs find their own work experience job assignments. The required number of hours in this activity mirrors the calculation for work experience (household allotment of SNAP benefits, divided by the higher of the federal/state minimum wage, divided by the number of individuals in the food assistance group).

Self-initiated work experience may count as a stand-alone component or may be combined with other program components in the described combinations:

- Self-initiated Work Experience combined with job search.
- Self-initiated Work Experience combined with job search training.
- Self-initiated Work Experience combined education.
- Self-initiated Work Experience combined with training.
- Self-initiated Work Experience combined with TAA activities.

NOTE: Hours assigned to self-initiated work experience/job search or self-initiated work experience/job search training will not exceed the allowable hours as derived from benefit calculation.

After the first 30 days, job search and job search training can be included in this activity, but must comprise less than half of the required hours for the month. Self-initiated work experience/ job search/job search or self-initiated work experience/job search training will be used in OSST to identify individuals assigned to this activity.

- **Geographic Areas Covered:** Each LWDB with an active SNAP E&T program will establish local operating procedures if the activity will be offered as a component in their region. Depending on the area, hours in this activity may vary.
- **Anticipated number of ABAWDs who will begin the component:** 47,053
- **Anticipated number of Non-ABAWD participants, both mandatory and volunteers, who will begin the component:** 22
- **Level of participant effort:** Because Florida will continue to operate a voluntary program through December 31, 2015, volunteers are expected to complete monthly hours based on the benefit calculation. If a volunteer cannot complete all hours due to a limitation, the volunteer can be considered to have met the level of effort. Effective January 1, 2016, ABAWDs are expected to complete monthly hours based on the benefit calculation. An ABAWD may be considered to have met the level of effort if they are unable to meet the required number of hours due to circumstances beyond the individual's control. Examples of these circumstances could include but are not limited to, medical emergencies, illness and natural disasters.
- **Organizational responsibilities:** For the period of October through December 2015, DCF will refer all food assistance recipients, including ABAWDs, to the SNAP E&T program. Effective January 1, 2016, DCF will refer only mandatory ABAWDs required to participate in the E&T program for program participation. Individuals identify and establish

their own worksite with a for profit or not-for-profit employer. LWDBs secure worksite agreements with employers. SNAP program staff will track the hours of attendance, maintain documentation, and report on participant activities.

- **Anticipated number of participants who will enter the activity:**
47,075
- **Cost of the activity per placement not including reimbursements:** \$20.02
- **Annual cost of the activity not including reimbursements:** \$942,452
- **Number of participants expected to receive a participant reimbursement and the estimated amount of the reimbursements to be paid:**
 - Number of participants: 903
 - Estimated amount of Reimbursements: \$517,569
 - Transportation Reimbursement: \$517,569
 - Dependent Child Care: \$0
- **Total Cost of the Component and Cost per participant:**
 - Total Cost of the Component: \$1,460,022
 - Cost per placement: \$31.01

Name of Component: Education and Training

- **Description of Component:** This is a non-work component that provides education or training to improve basic skills or otherwise improve the SNAP participant's employability. Under the voluntary program, individuals are expected to participate in a total of 32 hours a month in Education or Training. Educational expenses will not be paid for training that is normally available to the public at no cost, will not be in excess of what the general public pays, and will be necessary and reasonable. Access to various types of education and training programs vary by county, as well as LWDB resources.

Florida has opted to combine all education and training activities into this component. Allowable education and training programs may include, but are not limited to the following:

Education

- Adult Basic Education

- Remedial education
- High school completion or General Education Development
- Post-secondary education
- Education combined with job search
- Education combined with job search training
- English for Speakers of Other Languages

Training

- Vocational training
- Training combined with job search
- Training combined with job search training
- Workforce Innovation Opportunity Act (WIOA) Program
- Trade Adjustment Assistance (TAA) Program

Participants who self-enroll in an education or vocational training program prior to being referred to the SNAP E&T program, may participate in the program, but costs associated with the education or vocational activity (such as tuition, books, uniforms, tools, etc.) cannot be covered using E&T funds. However, E&T funds may be used to pay for tuition for subsequent semesters if the participant has attempted to secure federal financial aid such as the Pell Grant, but is not eligible.

If the individual wants to continue in the education or vocational training program after enrolling in SNAP E&T, staff must verify their enrollment status with the training institution and enter the appropriate activity code in OSST. After these actions have been performed and staff continue to document 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.

Hours of attendance will be documented by:

- Timesheet signed by the class instructor.
- Timesheet signed by a Teacher's Assistant (TA).
- Timesheet signed by a lab instructor.
- Timesheet signed by a lab assistant.
- Timesheet signed by a clinical supervisor.
- Designated party at the school submitting hours on behalf of the institution.
- Progress report from the instructor.
- Progress report from the TA.
- Progress report from a designated party on behalf of the institution.
- Document verifying hours of participation from an on-line or internet based institution.
- Progress report from an on-line or Internet-based institution.
- Other documentation signed (including electronically signed) by a designated party as outlined in the LWDB's local operating procedures.

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

- Cover the costs of education.
- Develop a program component.
- Pay for costs associated with an education program, including providers on the Eligible Training Provider List (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/training 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.
- 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 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.

Under the WIOA and TAA programs, the participant is engaged in WIOA and/or TAA program activities. There is no restriction on the number of hours dedicated to job search for ABAWDs assigned to WIOA and TAA program activities. This means the individual may be enrolled in WIOA/TAA-funded training to include job search and job search training, on-the-job training (OJT), subsidized employment, paid work experience, unpaid work experience, as well as other activities funded by WIOA – 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).

Participants are required to participate in his or her individual employment plan according to the WIOA/TAA program requirements.

- **Geographic Areas Covered:** Each LWDB with an active SNAP E&T program will establish local operating procedures if the activity will be

offered as a component in their region. Depending on the area, hours in this activity may vary.

- **Anticipated number of ABAWDs who will begin the component:** 38,431
- **Anticipated number of Non-ABAWD participants, both mandatory and volunteers, who will begin the component:** 392
- **Level of participant effort:** Because Florida will continue to operate a voluntary program through December 31, 2015, volunteers are expected to complete 32 hours per month. If a volunteer cannot complete all hours due to a limitation, the volunteer can be considered to have met the level of effort. Effective January 1, 2016, ABAWDs are expected to complete 80 hours per month. An ABAWD may be considered to have met the level of effort if they are unable to meet the required number of hours due to circumstances beyond the individual's control. Examples of these circumstances could include but are not limited to, medical emergencies, illness and natural disasters.
- **Organizational responsibilities:** For the period of October through December 2015, DCF will refer all SNAP recipients, including ABAWDs, to the SNAP E&T program. Effective January 1, 2016, DCF will refer only mandatory ABAWDs required to participate in the E&T program for program participation. SNAP E&T program staff directs participants to the appropriate components. SNAP program staff will refer participants to appropriate schools or colleges and will follow up to determine if the participant is enrolled. The school or college will assist the participant to obtain financial aid, arrange classroom training, and determine classroom training and curriculum. SNAP program staff will track the hours of attendance, maintain documentation and report on participant activities.
- **Anticipated number of participants who will enter the activity:** 38,823
- **Cost of the activity per placement not including reimbursements:** \$19.85
- **Annual cost of the activity not including reimbursements:** \$770,445
- **Number of participants expected to receive a participant reimbursement and the estimated amount of the reimbursements to be paid:**
 - Number of participants: 1,291
 - Estimated amount of Reimbursements: \$423,107

- Transportation Reimbursement: \$423,107
- Dependent Child Care: \$0
- **Total Cost of the Component and Cost per participant:**
 - Total Cost of the Component: \$1,193,552
 - Cost per participant: \$31.06

1. Component Summaries

Workfare

Workfare is a work component. Upon assigned to workfare, each participant may be required to complete a maximum of 30 days of upfront job search and/or job search training. Job search and job search training are stand-alone activities under the voluntary program. However, when serving ABAWDS, assignment to job search and job search training is limited to the first 30 days upon assignment to the workfare component.

Job Search

In job search, volunteers and ABAWDS search for work each month by (but not limited to) applying for jobs, submitting resumes, attending interviews, and going to job fairs. Volunteers are expected to complete ten hours of job search activities per month. ABAWDS are expected to complete less than ten hours per week of job search activities. LWDBs 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 all service delivery areas. Program staff will verify job contacts through the Employ Florida Marketplace or by contacting the employer directly. Job searches will be recorded on a job search record form and recorded in the OSST system.

Job Search Training

Job search training is designed to provide meaningful assistance to volunteers and ABAWDS in gaining employability skills. Job search training activities include but are not limited to workshops, sessions, or job clubs that address (but are not limited to) employability skills, life skills, and interpersonal skills. Volunteers are expected to complete ten hours of job search training activities per month. ABAWDS are expected to complete less than ten hours per week of job search training activities.

Work Experience

Work Experience is designed to connect program participants with employers to build employability skills or job related skills through actual work experience or training at a worksite. Work experience sites are developed by LWDBs through worksite agreements with employers and community-based organizations. Volunteers are not required to conduct a

30-day job search prior to being engaged in the work experience Component. ABAWDS are required to conduct job search and/or job search training for the first 30 days upon initial referral from DCF. State level program compliance monitoring of the SNAP E&T program, including components, is conducted annually for all service delivery areas.

Comparable (self-initiated or voluntary) Workfare

Self-Initiated Work Experience

Self-initiated work experience is designed to connect program participants with employers to build employability skills or job related skills through actual work experience or training at a worksite. Self-initiated work experience is a work component, comparable to regular work experience. Although the participant initiates the work experience in this component, LWDBs are required to secure worksite agreements with the desired employer and/or community-based organization before the participant's hours can be used as part of program participation in SNAP E&T. The required number of hours in this activity equals to the household allotment of SNAP benefits, divided by the higher of the federal/state minimum wage, divided by the number of individuals in the food assistance group.

Education

This component provides education to improve basic skills or otherwise improve a participant's employability. Education activities include Adult Basic Education (ABE), remedial education, high school completion or General Education Development (GED), post-secondary education, education combined with job search, education combined with job search training and English for Speakers of Other Languages (ESOL). Volunteers are expected to participate eight hours per week (32 hours a month) in education. ABAWDs must participate 20 hours per week (80 hours a month) in order to meet ABAWD requirements. LWDBs will refer participants to appropriate schools or colleges and will follow up to determine enrollment. The school or college will assist the participant to obtain financial aid, arrange classroom training, and determine classroom training and curriculum. Federal financial participation for operating educational component may not be authorized for costs that exceed the normal costs of services provided to persons not participating in E&T programs. Educational expenses will not be paid for training that is normally available to the public at no cost, will not be in excess of what the general public pays, and will be necessary and reasonable. Participants enrolled in education prior to engagement in the E&T program cannot have educational costs paid for using E&T funds. However, E&T funds may be used to pay for such costs for subsequent semesters if the participant has attempted to secure federal financial aid such as the Pell Grant, but is not eligible.

Job Retention

Florida will not be offering retention services.

Part II – Program Participation and Exemptions

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. DEO will receive “work registrants” referred by DCF through the interface between the eligibility and workforce data entry systems.

1. Number of Work Registrants

- a. The number of work registrants anticipated to be in Florida as of October 1, 2015 is 891,256.
- b. The anticipated number of new work registrants anticipated to be added between October 1 and September 30 of the fiscal year is 626,389.
- c. The total number of work registrants anticipated in Florida between October 1 and September 30 of the fiscal year is 1,517,645.

2. Unduplicated Work Registrant Count

Florida anticipates the number of unduplicated work registrants in the State of Florida between October 1 and September 30 of the fiscal year is 1,517,645.

3. Characteristics of Work Registrants

DCF submits 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 – September 30. DCF also posts reports associated with the number of food assistance recipients/clients by month.

B. Exemption Policy

DCF staff will determine all exemptions. LWDBs may provide documentation to DCF as appropriate. DCF will assist in obtaining documentation for the participant if necessary.

Determination of good cause for failure to participate will be solely the responsibility of DCF, but may be partially or wholly based on information provided from SNAP program staff or other sources.

Exemptions:

- Under age 18 or 50 years of age or older.
- A person enrolled in school on at least a half-time basis.
- A person determined by DCF to be physically or mentally unfit for employment.
- A participant in the WT program.
- Meeting all requirements to receive Reemployment Assistance.

- A parent or other household member responsible for the care of a dependent child under six.
- A SNAP 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 per week or more.
- An individual who is earning the equivalent of working 30 hours per week or more based on federal minimum wage provisions.

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

For the period of October 1, 2015 – December 31, 2015, Florida will continue to operate a voluntary E & T program for SNAP recipients.

For the period of January 1, 2016 - September 30, 2016, 954,138 work registrants will be exempt from the E & T program.

D. Planned E&T Program Participation

See Table 2, Estimated Employment and Training Placement Levels.

E. ABAWD Information

For the first quarter of FFY 2016, Florida will be operating under a DOL Trigger Notice. Therefore, individuals will not be subject to time limits during this time.

During the last three quarters (January – September) of FFY 2016, see Table 1 for the estimated number of ABAWDs expected to be in the state during the fiscal year, the number of ABAWDs expected to be in waived areas of the state during the fiscal year, and the number ABAWDs included in the state agency's 15 percent ABAWD exemption allowance.

See Table 2 for the estimated number of ABAWDs to be placed into Workfare (Work Experience, Self-initiated work experience) and Education/Training activities.

F. Conciliation Process

DEO will notify DCF of an ABAWD's non-compliance. Upon learning of the non-compliance, DCF will send a Notice of Adverse Action (NOAA) letter, with compliance language, to the individual. DCF will outline the number of days an individual has to comply before the sanction is imposed and review the case for a good cause determination. "Good cause" is defined as circumstances beyond a registrant's control that prevent participation in assigned SNAP activities. A participant's engagement in E & T activities may resume prior to a good cause determination being finalized. Engagement in E & T activities during this review process does not impact the final result of a good cause determination. The

participant will be encouraged to contact DCF for the status of good cause reviews and determinations.

Part III – Program Coordination

A. Program Coordination

1. Narrative Coordination Statement

The State of Florida works with several entities responsible for the coordination and implementation of the SNAP program. DCF is responsible for the application and eligibility process. DCF is the entity that approves or denies SNAP benefits and is responsible for:

- Application.
- Recertification.
- Work registration.
- Preparation of adverse action.
- Implementation of adverse action.

DEO is responsible for state level oversight of SNAP program activities, including providing technical assistance, training and policy direction to LWDB staff, program reporting, and monitoring compliance with component requirements. Both DEO and DCF will jointly participate in federal audits and reviews and coordinate any required corrective actions or responses to the audit/reviews. DEO has established program performance indicators to ensure program quality and effectiveness. DEO receives information associated with the SNAP case and does the following:

- Builds a case or reopens the case in the workforce data entry system if the food assistance recipient is referred by DCF.
- Mails a *Notice of Voluntary Participation* letter (Voluntary).
- Mails a *Notice of Mandatory Participation* letter (ABAWDs).
- Maintains the automated elements associated with individual engagement in the workforce data entry system.
- Submits the FSR request to DCF for application to the Electronic Benefit Transfer (EBT) card if the LWDB requests such a reimbursement in the data entry system.

Based on funding availability, the workforce systems will:

- Assess program participants, or refer the individual if necessary, for appropriate assessment related to engagement in the program.
- Engage food assistance recipients in activities, including components described in the State Plan.
- Collect documentation to demonstrate participation or documents participation through another workforce data entry system.

- Request an 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 DEO coordinate through a system interface. The FLORIDA system provides information daily to the workforce data entry system, OSST. The OSST system automatically reviews the information received through the interface (automated process) and performs one of the following appropriate actions:

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

Through December 31, 2015, participation of the individuals engaged in the SNAP E&T program will not be mandatory. Therefore, individuals will not be required to provide good cause to avoid a sanction. Workforce staff will not be able to request a sanction on a volunteer case.

If the volunteer 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.

Effective January 1, 2016, the conciliation, good cause, and sanctioning procedures will be implemented and are described below.

ABAWDs who fail or refuse to comply with program requirements are subject to sanctioning.

Failure to Participate: Failure or refusal to comply occurs when an individual does not comply, or when the individual's inaction indicates failure or refusal to comply, with SNAP E&T program requirements.

Conciliation & Sanctioning: DEO will notify DCF of an ABAWDs non-compliance. Upon learning of the non-compliance, DCF will send a NOAA letter, with compliance language, to the individual. The DCF NOAA letter will communicate the number of days an individual has to comply before the

sanction is imposed. If good cause can be determined before the end of the non-compliance period, the sanction will not be imposed. However, once a sanction is imposed, the individual will need to contact DCF for good cause consideration.

Good Cause: DCF is responsible for determining good cause when an ABAWD has failed to comply with the program requirements. Good cause is defined as circumstances beyond a ABAWDs control that prevents participation in assigned SNAP activities. When an ABAWD is unable to participate, fails to participate, or refuses to comply with SNAP E&T requirements, DEO will notify DCF of an ABAWD's non-compliance. Upon learning of the non-compliance, DCF will send a Notice of Adverse Action (NOAA) letter, with compliance language, to the individual. DCF will outline the number of days an individual has to comply before the sanction is imposed and review the case for a good cause determination.

An ABAWD's engagement in E&T activities may resume prior to a good cause determination being finalized. Engagement in E&T activities during this review process does not impact the final result of a good cause determination. The participant will be encouraged to contact DCF for the status of good cause reviews and determinations. Participants have to comply or show good cause before the effective date of the sanction. If they do this, DCF will not impose the sanction. If no good cause can be determined, ABAWDs will be sanctioned by DCF. DCF will impose the appropriate sanction on ABAWDs for noncompliance in the following manner:

- First non-compliance will result in a loss of benefits for one month
- Second non-compliance will result in a loss of benefits for three months
- Third non-compliance will result in a loss of benefits for six months.

If the noncompliant individual is the head of the household then the entire household will be sanctioned and if not the head of household, then only the individual will be sanctioned.

Right to a Fair Hearing: A participant has a right to a fair hearing to resolve any complaint or disagreement about participation in the SNAP E&T program and/or food assistance eligibility.

DCF and DEO meet on a regular basis to discuss coordination of services and program delivery.

3. Coordination Time Frames

The interface runs daily, Monday through Friday. Information/referral 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 a Notice of Voluntary Participation (NOVP) letter for the period of October – December or a Notice of Mandatory Participation (NOMP) letter for

the period of January – September, using the data received from the FLORIDA system. DCF also receives information from the workforce system and processes this information daily.

B. Interagency Coordination

See Table 3 for details of Interagency Coordination. Coordination will occur at the state agency level and LWDB local level.

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 a grantee/sub grantee agreement with the LWDBs.

Part IV – 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 SNAP 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. The Food and Nutrition Act of 2008 and 7 CFR 273.7 identify education and training as allowable components. This includes programs that improve basic skills and literacy or that improve employability.

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.
- 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.

SNAP 100 percent funds cannot be used to pay the participant directly for costs incurred. 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).

B. Contracts

As 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. There will be an interagency agreement between the DEO and the DCF for programmatic purposes.

C. Participant Reimbursements

Reimbursements: (Table 4)

Workfare	\$2,378,257
Work Experience	\$2,881,067
Self-Initiated Work Experience	\$517,569
Education and Training	\$423,107

Total: \$6,200,000

Dependent Care Reimbursements

Work Experience	\$0
Self-Initiated Work Experience	\$0
Education and Training	\$0
Job Search	\$0
Job Search Training	\$0
Total:	\$0

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 LWDBs 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 to the LWDBs, including 100 percent funds, may be used to pay for fingerprinting, drug tests, and background checks when needed to participate in SNAP components.

1. Method of Reimbursement

Individuals participating 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.

- 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 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 individual participated in the component.

- **Bus Pass Receipts**
 - Participants 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. In some cases, the LWDB can provide reimbursement for transportation at a cost less than what it costs the state agency. In those cases, the state will provide the LWDB with a portion of the 50/50 funds budgeted for transportation reimbursement to pay for the reduced cost of that reimbursement.

2. Procedure for Reimbursement

Reimbursements will be authorized by the LWDB and may include transportation or other costs such as, but not limited to, automobile gas, taxi, tools, clothing, and resume writing or printing. Reimbursements are made specifically for transportation.

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

Reimbursements may also be provided by local LWDBs that enter into an agreement with the state to receive match funds to provide reimbursements at the local level, if funding is available. The LWDB will be required to outline its process for ensuring the reimbursement does not exceed the state allowed maximum per month and follow the state guidelines. The LWDB 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.

D. Cost Allocation

State level: DEO staff devoted full-time to Florida’s SNAP E&T program are 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 postage 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:

DEO Administrative Costs	\$1,116,335
Indirect	\$31,500
CareerSource Florida Costs	\$79,840
OSMIS/Legacy and Geo Sol Job Bank	\$52,500
EBT Fees	\$5,325
Postage	\$600,000
SNAP E&T Participant Reimbursement	
Transportation and Other Costs	\$6,200,000

Local level: The SNAP E&T service delivery and participant case management costs are incurred by the local LWDBs. The amount of funds available to each LWDB 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 LWDBs operating SNAP E&T programs.
3. The counties that are offering an E&T program.
4. The number of work registrants by county. This will determine the workload in each SNAP county.

The amount of funds available to LWDBs 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 LWDB to arrive at the LWDB regional allocation.

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 LWDBs.

It's important to note that as the state prepares for the transition to a mandatory program for ABAWDs, the number of participants required per full-time employee, under the voluntary program, may fall below 50 in order to prepare for welcoming and engaging the ABAWDs expected to enter the program and Florida's workforce system.

Part V – Program Reporting and Management Information

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 FFY. 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 recipients that are currently work registered in a given month.

B. Method for Ensuring an Unduplicated Work Registrant Count

Requirement: The state agency has 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. Work registrants are tracked by their social security number. The OSST system 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 DCFs 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

i. 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.

ii. What information must local agencies and service providers report? E&T providers are required to record participant engagement in DEOs 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.

e. Participant entry into employment.

iii. How frequently must local agencies and service providers report? The LWDBs 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

Department of Economic Opportunity

Supplemental Nutrition Assistance Program Employment and Training State Plan

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 VI – Tables

**Table 1
 Estimated Participant Levels
 Fiscal Year 2016**

A.	Anticipated number of work registrants in the state during the fiscal year.	1,517,645
B.	List planned exemption categories and the number of work registrants expected to be included in each during the fiscal year.	
	1. ABAWDs who are in Labor Surplus Areas (LSAs)	0
	2. All SNAP Mandatory Non-ABAWDs	954,138
	Total Exemptions	954,138
C.	Percent of all work registrants exempt from E&T.	62.9
D.	Number of E&T mandatory participants.	563,507
E.	Anticipated number of ABAWDs in the state during the fiscal year.	563,507
F.	Anticipated number of ABAWDs in waived areas in the state during the fiscal year.	0
G.	Anticipated number of ABAWDs to be exempted under the State’s 15 percent exemption allowance during the fiscal year.	0
H.	Number of at-risk ABAWDs expected in the State during the fiscal year.	563,507

**Table 2
Estimated E&T Placements
Fiscal Year 2016**

1.	Number of ABAWD applicants and recipients expected to begin a qualifying ABAWD component during the FFY, unduplicated.	563,507
2.	Number of all other applicants and recipients (including ABAWDs involved in non-qualifying activities) expected to begin a component during the FFY, unduplicated.	3,277
3.	Total number of applicants and recipients the State agency expects to begin a component during the FFY, unduplicated.	566,784

**Estimated Individual Participation
Fiscal Year 2016**

1.	Number of individuals expected to participate in the E&T program during the FFY, unduplicated.	566,784
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**Estimated ABAWD Activity
Fiscal Year 2016**

1.	Number of workfare slots expected to be filled by ABAWDS.	216,161
2.	Number of education and training slots to be filled by ABAWDS.	38,431

Table 3
Summary of Interagency Coordination for the E&T Program in Fiscal Year 2016

Areas of Coordination	Agencies: list all agencies involved	Number of Placements Expected	Methods of Coordination
1. Delivers an E&T component	DEO does not provide direct customer services but participates in the development of program elements. LWDB designated providers, educational institutions, employers, businesses, and community agencies offer services directly to program participants.	563,507	Statewide and local interagency agreements and memorandums of understanding (MOU)
2. E&T program delivers a service for another agency or program	N/A	N/A	N/A
3. Joint component of the E&T program and another agency or program	N/A	N/A	N/A
4. Referral of individuals from the E&T program to another program or agency	WIOA/TAA programs	518	Local agreements, as well as local operating procedures
5. Other forms of coordination (be specific)	N/A	N/A	N/A

TABLE 4: OPERATING BUDGET

**OPERATING BUDGET
 FISCAL YEAR 2016**

Components	State Agency Costs		Contractual Costs	Participant Reimbursement (State plus Federal)		State Agency Cost for Dependent Care Services	Total
	Salary & Benefits	Other Costs		Dependent Care	Transportation & Other Costs		
Work Experience 46.47%	\$331,090	\$545,078	\$4,370,026	\$0	\$2,881,067	\$0	\$8,127,261
Self-Initiated Work Experience 8.35%	\$59,479	\$97,922	\$785,052	\$0	\$517,569	\$0	\$1,460,022
Education 6.82%	\$48,623	\$80,049	\$641,773	\$0	\$423,107	\$0	\$1,193,552
Workfare 38.36%	\$273,308	\$449,951	\$3,607,361	\$0	\$2,378,257	\$0	\$6,708,877
Total Component Costs							\$17,489,712
Overall State Agency E&T Operational Costs							\$1,885,500
Total State E&T Costs							\$17,489,712

TABLE 5

**PLANNED FISCAL YEAR COSTS OF THE STATE SNAP PROGRAM BY CATEGORY OF FUNDING
 FISCAL YEAR 2016**

Funding Category	Approved FY 2015 Budget	Federal Fiscal Year 2016
1. 100 Percent Federal SNAP Grant:	\$10,260,616	\$11,289,712
2. Share of \$20 Million ABAWD Grant (if applicable)	\$0	\$0
3. Additional SNAP Administrative Expenditures		
50% Federal	\$0	\$0
50% State	\$0	\$0
4. Participant Expenses:		
a. Transportation/Other		
50% Federal	\$482,000	\$3,100,000
50% State	\$482,000	\$3,100,000
b. Dependent Care		
50% Federal	\$18,000	\$0
50% State	\$18,000	\$0
5. Total SNAP Program Costs (1+2+3a+3b+4a+4b = 5)	\$11,260,616	\$17,489,712
6. 100% State Agency Cost for Dependent Care Services	\$0	\$0
7. Total Planned Fiscal Year Costs (Must agree with Table 4-Operating Budget)		\$17,489,712

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