



**United States
Department of
Agriculture**

July 14, 2022

**Food and
Nutrition
Service**

Southeast Region

**61 Forsyth St. S.W.
Room 8T36
Atlanta, GA
30303-3415**

Ms. Shevaun Harris, Secretary
Florida Department of Children and Families
1317 Winewood Boulevard
Building 3, Room 100
Tallahassee, Florida 32399

Dear Secretary Harris:

This letter is in response to the Florida Department of Children and Families (DCF) re-submission of its Fiscal Year (FY) 2022 Supplemental Nutrition Assistance Program (SNAP) Employment and Training (E&T) State plan. The Food and Nutrition Service (FNS) has reviewed your re-submission dated April 8, 2022 and is granting approval of the plan effective April 1, 2022. As detailed below, FNS is approving a prorated budget based on DCF's original budget submission, effective April 1, 2022.

FNS is committed to helping State agencies build SNAP E&T programs that increase the ability of SNAP participants to obtain and retain good jobs and that meet the workforce needs of employers. We appreciate and share DCF's interest in helping SNAP participants move towards economic self-sufficiency through participation in SNAP E&T.

FNS is also committed to ensuring that State agencies operate SNAP E&T programs and processes that are fully compliant with Federal law. This is particularly urgent in States such as Florida, that require participation in SNAP E&T as a condition of eligibility for SNAP, given that the penalties for failure to comply with Program requirements can result in individuals and families losing nutrition assistance. While DCF may operate a mandatory E&T program, it must ensure that it implements policies and processes that afford applicants and recipients all the benefits and protections to which they are entitled.

On multiple occasions since DCF's initial submission of its E&T State plan on September 2, 2021, FNS clarified to DCF the need to address several issues in its E&T State plan, such as such as providing an oral explanation and consolidated work notice and establishing a process to exempt individuals from E&T, if their costs to participate in the program exceed DCF's ability to pay and policy for reimbursement. After several revisions and numerous conversations, FNS acknowledges DCF's most recent plan submission has established:

- A process to provide a consolidated written notice and oral explanation of all applicable work requirements to households, and identify which household member is subject to specific work requirements during the certification process; and,
- A process to inform and exempt all mandatory SNAP E&T participants from participation if their monthly participant reimbursement expenses that are reasonable, necessary, and directly related to participation in the SNAP E&T program, including participation in Case Management services and SNAP E&T components, exceed the allowable reimbursement amount paid by the State.

Approval of the FY 2022 SNAP E&T State plan does not close findings or constitute compliance with the Corrective Action Plan (CAP) (also referred to as corrective action

response or CAR) requirements outlined in the January 24, 2022, Advance Warning letter. Issues related to the FY 2021 SNAP Management Evaluation (ME) and required CAP will be addressed in separate correspondence. Similarly, approval of the plan does not mean every outstanding issue has been addressed to FNS’s satisfaction. Rather, this approval reflects the April 8, 2022 E&T plan’s demonstration of DCF’s intent to put in motion necessary changes, and FNS’s expectation that DCF will continue to work with it in addressing all outstanding SNAP E&T program issues.

In accordance with 7 CFR 273.7(d)(1)(ii)(B), FNS is approving a prorated budget effective April 1, 2022, to September 30, 2022, based on DCF’s original SNAP E&T State plan budget submission. While the plan was submitted April 8, 2022, FNS is approving the budget for the period beginning April 1, 2022 for administrative ease. Only allowable costs incurred between April 1 and September 30, 2022, may be charged to this grant. The approved budget is as follows:

E&T 100 Percent Grant	\$4,827,850
Additional E&T Administrative Expenditures	
- 50 Percent Federal	\$0
Reimbursement for Transportation and Other	
- 50 Percent Federal	\$168,449

Regulations at 7 CFR 273.7(d)(1)(ii)(A) and(B) make clear that “A State agency must use E&T program grants . . . in accordance with its approved State E&T plan...” and a “State agency's receipt of its 100 percent Federal E&T grant is contingent on FNS's approval of the State agency's E&T plan.” DCF did not have an approved FY 2022 E&T State plan until April 1, 2022. Prior to that date, DCF did not take appropriate steps to address the issues identified by FNS. Therefore FNS is approving a prorated budget for the period starting April 1, 2022, the approximate time at which Florida demonstrated its intent to correct the issues.

The FY 2022 allocated funding must be expended or obligated by September 30, 2022. FNS strongly encourages States to spend the entirety of their E&T allocations. The Federal funding grant may only be used for allowable E&T costs.

In addition to the conditions of E&T fund usage required by Federal law, as a condition of receipt of these funds, DCF is required to work with FNS to re-examine any SNAP case that was disqualified for failure to comply with the requirement to participate in SNAP E&T while the State was operating its E&T program without an approved plan (October 1, 2021 through March 31, 2022) to ensure that no household was disqualified improperly. FNS will work with DCF to establish an efficient review process.

Again, FNS appreciates DCF’s commitment to moving SNAP participants to good, stable jobs. We appreciate DCF’s agreement to modify SNAP E&T program processes to comply with Federal regulations and secure approval of the FY 2022 SNAP E&T State plan. FNS will continue to provide technical assistance to ensure that the modifications continue to be integrated into Florida’s mandatory SNAP E&T program structure and remain compliant with Federal regulations.

Questions may be directed to Eugene Malveaux, Branch Chief, Supplemental Nutrition Assistance Program, at (678) 704-2021 or Eugene.Malveaux@usda.gov.

Sincerely,

Willie C. Taylor

WILLIE C. TAYLOR
Regional Administrator

cc: Patti Grogan
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