

25.3 SNAP E&T ACTIVITIES

All clients will complete a Self-Sufficiency Plan. The activities available for placement are listed below. SNAP E&T funds may only be used to pay for activities after all other funding sources (PELL, WIOA, etc.) have been used. If the same activity is offered through multiple vendors, participants must be placed in free programs prior to using SNAP E&T funds to pay for a program.

A. JOB SEARCH ACTIVITY

Job Search is a qualifying E&T Participants activity only when it immediately precedes a qualifying placement.

Individuals who are determined to be job ready or individuals who have satisfactorily completed another program activity are placed in this activity. This activity consists of counseling on an as needed basis. The duration of this activity must not exceed one month.

Participants are required to make a pre-determined number of employer contacts in a month, not to exceed 12 per month. Job contacts must be recorded on the WorkForce West Virginia DHHR Employer Contact Form, DFA-WVW-25, and returned to the SNAP E&T Worker at the end of the Job Search period. Contacts are verified on a random sample basis. When feasible, one contact should be with Job Service to register for work and to obtain WIOA and WOTC certification. If the required contacts have not been made or if other questions arise, an interview is scheduled to determine good cause or to discuss other concerns when the DFA-WVW-25 is not returned.

Participants are to be paid a \$25 transportation reimbursement per month of activity, not to exceed actual cost. Payment will be made prior to, or when Job Search begins, and must be taken into consideration when scheduling the Job Search activity.

- Client must provide receipts

It may not always be feasible for a participant to complete the required number of contacts. The SNAP E&T Worker must determine on a case by case basis if good cause exists for not completing the required number of contacts. An example of good cause is a lack of employers within a reasonable distance to the individual. Also, the individual must possess the skills normally required by the local employers.

When the Worker determines that an insufficient number of employers are available, the individual satisfies the requirements for Job Search if he/she has contacted the available employers and attended the scheduled classroom training.

B. EDUCATIONAL ACTIVITIES

This activity includes placement in existing structured activities such as High School, high school equivalency classes, Adult Basic Education (ABE), Literacy, English as a Second Language and post secondary education. High School, high school equivalency, English as a second language and Adult Basic Education classes are operated by the County Board of Education. In some counties, private not-for-profit groups offer this type of activity with Workforce Investment Board (WIB) funding. Individuals in college and other post-secondary activities must use private funds, existing grants such as PELL, to cover the cost of tuition, books, and fees before SNAP E&T funding may be used. Skills training may be paid after all other resources are exhausted for vocational training not including college.

Individuals under the age of 30 without a High School Diploma or high school equivalency are required to enter remedial or secondary education activities if they are not working part time or involved in another activity. Individuals who are already in college courses are expected to continue participating or, as required, participate in another activity.

Only those scheduled to attend classes at least 24 hours each month will receive reimbursement for transportation. Hours spent attending online classes from the customer's home do not count toward the 24 hours.

The SNAP E&T Worker must refer individuals to the appropriate program, such as ABE, high school equivalency, or post-secondary, and must monitor progress on a monthly basis. A time sheet, DFA-TS-12, must be completed for each month's participation and signed by each service provider. The SNAP E&T Worker must also work with participants to help eliminate barriers to participation by making referrals to other services available in the community. The SNAP E&T Worker must work with each service provider to determine the level of progress being made.

Individuals who participate in these activities are expected to improve basic functioning levels and/or obtain a high school equivalency. Upon completion, individuals may be required to enter either the Job Skills/Vocational Training or another more advanced, educational activity.

In order for non-exempt ABAWDs to meet the E&T participation requirement, the individual must attend the educational facility 20 hours per week. The minimum number of hours all other individuals must meet to be in good standing with the program is equal to the negotiated hours found on the individual's Personal Responsibility Plan. For individuals who are not non-exempt ABAWDs, there is no minimum number of hours the individual must commit to on the Personal Responsibility Plan.

Participants are paid actual transportation reimbursement costs not to exceed \$25 for each month of participation.

The following lists educational activities that may meet an individual's work requirement.

1. Literacy Program

When the client cannot read, he may be placed in a Literacy Program. To qualify for such placement, the individual must test at or below standards set by the literacy program.

2. High School

The student must adhere to the established attendance policy of the institution.

When the individual is no longer eligible to be in the school system, or placing him back in the school system is inappropriate, he must be placed in Adult Basic Education (ABE), vocational training or an alternative school setting.

3. English As A Second Language

Those adults who cannot read, write, and/or speak English, may receive education in English language skills. This is considered ABE/ high school equivalency for coding purposes.

4. Adult Basic Education (ABE)

ABE includes training in basic skills. It may also be used to help prepare for the high school equivalency test.

5. College

NOTE: Student policy applies. See Section 9.1,A.

For non-exempt ABAWDs, attending undergraduate college classes part-time may meet the work requirement for an individual if the 20 hours per week requirement is met. Otherwise, hours spent in class may help meet the requirement. If the 20-hour requirement is not met, the individual may be subject to a penalty. For every credit hour the participant attends class, the participant will receive credit for one additional hour for study time. For individuals not subject to ABAWD work requirements, there is no SNAP penalty for failing to meet the hours agreed upon in the Personal Responsibility Plan, but failure to meet obligations without good cause may lead to disenrollment from the SNAP E&T Program.

Some undergraduate courses require that students be placed in an unpaid work environment. Such undergraduate placements may also be used to meet the work requirement. These placements include, but are not limited to: student teaching, internships, clinical work assignments and unpaid work experience. When the non-exempt ABAWD student does not participate in such activities for a sufficient number of hours to meet his participation requirement, the individual must also participate in another activity.

NOTE: Participation in College Work Study is considered employment for coding purposes.

A release of information form may be used to obtain information about a client's participation in education from institutions and other education activity providers. The form authorizes the SNAP E&T Worker to request such information.

The form must be read and explained to the client prior to a specific placement or requirement. The form is signed by the client at the time the SNAP E&T Worker needs to obtain specific information. After completion, the form is filed in the case record.

An actual transportation payment not to exceed \$25 may be made for each month of participation.

C. JOB SKILLS/VOCATIONAL TRAINING

Jobs Skills/Vocational Training enables individuals to acquire the necessary knowledge and skills to compete in a specific occupation. This component may only be used when the training is likely to lead to employment. This activity is provided through existing resources available in the community on a non-reimbursable basis, until the resources have been exhausted.

This training must be preparation for a specific occupation and conducted by an instructor in a non-work site or classroom setting. Entry into this activity is selective and training is authorized only for programs that can be completed in one year or less.

NOTE: Exceptions may be made by DFA Policy Unit.

Non-exempt ABAWDs enrolled in Vocational Training are required to participate a minimum of 80 hours per month. The Vocational Training component is used to train participants in specific job skills for jobs that exist in the local labor market area. Participants in need of skill training must be referred to available vocational training schools, WIB sponsors and industrial training programs that provide the training free to the individual. The individual may be referred to a facility that charges a fee, only after it is determined that cost free training is not available.

The SNAP E&T Worker refers suitable candidates to Vocational Training. Attendance and progress must be reported on a monthly progress report, DFA-TS-12, completed by the vocational training facility. The SNAP E&T Worker must monitor and review the progress on a monthly basis. Vocational Training will vary according to training availability and the labor market needs of a particular area.

Individuals who have obtained a high school equivalency or certification to become employed in a particular occupation, or to learn a skill in order to become employable, may be referred to Vocational Training facilities operated on the local level by the Board of Education.

The SNAP E&T Worker must determine who should be referred to outside sources for training during the assessment process, See Section 25.4, and the development of the Personal Responsibility Plan. Referrals are made to WIB and Third Party Partners for certification and to specific programs located on the local level. The SNAP E&T Worker must monitor the attendance sheets, DFA-TS-12, monthly. The SNAP E&T Worker must maintain contact with the participant and service provider to insure satisfactory progress is being made and to help eliminate barriers when needed. Individuals who fail to meet their required hours cannot be considered as making satisfactory progress, unless they are also in another component and meeting their hourly requirements.

Each participant receives an actual transportation payment not to exceed \$25 for each month of participation.

1. Placement Criteria

An individual, who is determined to have the ability to complete the course work and meets the entrance requirements, may participate when:

The goal is to enter an occupation that requires completion of a vocational course prior to employment; or

Has no job skills, obsolete or non-marketable skills, and must be retrained to find employment; or

Does not have a High School Diploma/High School Equivalency, and the skill training has been identified as an alternative which will lead to employment.

1. Participation hours for Job Skills are governed by the Fair Labor Standards Act (FLSA). For non-exempt ABAWDs, the maximum monthly participation obligation is determined by dividing the amount of SNAP benefits by either of the state or federal minimum wage, whichever is higher.

Participants are deemed to have met the required number of hours in the component if they participate for the maximum number of hours permitted by FLSA.

2. Placement Standards

The training institution and instructor must meet the licensing and certification standards of the appropriate governing agency. Unlicensed or uncertified instructors are not approved for training when licensing or certification standards exist.

3. Contracts

Participants must be placed into training positions on a no-cost basis, if such positions are available through WIB, the Department of Education, Veterans Administration, or other providers, before additional training positions may be considered. These providers are not reimbursed unless all existing training positions have been filled.

The SNAP E&T Worker may write contracts for individuals, without DFA approval, for an amount not exceeding \$600. Individual contracts exceeding \$600 must be approved by DFA.

The SNAP E&T Worker uses the Training Agreement, DFA-TA-34.

4. Payment Limitations

Payments are limited to tuition, books, supplies and expenses associated with completing the course of study. Costs for medical procedures, such as Hepatitis B vaccines or physical exams, are not included. There is a

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limit of \$600 per individual contract. This limit cannot be exceeded without approval from DFA. To obtain approval, a written request must be submitted to the Director of DFA and include the client's name, address, SSN, name of the training facility and the occupation for which training is sought. The request must also include the usual pay rate for the occupation, as well as the current employment prospects and labor demands.

Participants are paid actual transportation reimbursement costs not to exceed \$25 for each month of participation.

D. COMMUNITY SERVICES PROGRAM

This program is for non-exempt ABAWD E&T Participants. These individuals must be placed with agencies described below in order to meet the work requirement. The primary purpose of Community Service is to provide work experience and training to assist a client who has limited work experience, is under-employed or has no immediate employment opportunities.

Placements are only made with private not-for-profit agencies or public agencies. The SNAP E&T Worker is responsible for approving all work positions and for collecting monthly time sheets for each participant.

Participants are paid actual transportation reimbursement costs not to exceed \$25 for each month of participation.

Participation hours for Community Services are governed by the Fair Labor Standards Act (FLSA). The maximum monthly participation obligation is determined by dividing the amount of SNAP benefits by either of the state or federal minimum wage, whichever is higher.

Participants are deemed to have met the required number of hours in the component if they participate for the maximum number of hours permitted by FLSA.

The SNAP E&T Worker must work closely with the local WV WORKS staff in making Community Service Placements. An E&T Participant cannot be placed with an existing CWEP sponsor.

1. Who May Be A Community Service Sponsor

Community Service sponsors are limited to public agencies, such as federal, local, state and not-for profit employers. It is limited to public services projects in fields such as health, social services, environmental protection, education, urban and rural development and re-development, welfare, recreation, public activities, public safety and child care. A Community Service sponsor must not place an E&T Participant at a site which has employees in layoff status.

2. Requirements Of The Sponsor

The Community Services Sponsor must meet the following requirements:

- Provide the client with guidance and supervision necessary to participate in the work experience project;
- Provide safety equipment, special clothing and tools needed to perform the assigned duties;
- Assume the cost of any required pre-employment medical examinations;
- The agency should provide medical coverage in the event the individual is injured while volunteering at the work site; and
- Not schedule clients to work split shifts during the work period.

E. DRIVER'S EDUCATION

This program is for E&T Participants. Individuals without a driver's license, may be placed in a class to learn how to drive. The instructor must be a certified driver's education instructor. The class must be designed to teach driving skills for beginning drivers. This component does not include classes designed to reduce driver's "points" received for traffic violations, nor does it include regaining a driver's license after losing it for a driving violation.

Participants are paid actual transportation reimbursement costs not to exceed \$25 for each month of participation. A tuition payment may be made once during the lifetime of the participant. The tuition payment is limited to no more than \$350.

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