



SNAP E&T Advocates Guide

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Purpose of this Guide

The *SNAP E&T Advocates Guide* (Guide) and companion ***SNAP E&T Messaging Tool*** (below) were produced by Seattle Jobs Initiative (SJI) with support from The Annie E. Casey Foundation. The Guide is a playbook for advocates that seeks to provide them insight and ideas for their efforts to move States to take steps to develop and expand skills-based Supplemental Nutrition Assistance Program Employment & Training (SNAP E&T) in their States that effectively helps SNAP participants advance to self-sufficiency. The Guide includes some general advocacy strategies as well as practical information on some of the common roadblocks that may be preventing States from moving forward with building quality SNAP E&T programs. It also includes key messaging on SNAP E&T that may be effective in getting State SNAP agencies to act to expand their programs, and/or in building champions for SNAP E&T who can move States to act.

While the Guide gives reference to the use of State-level legislative strategies to advance SNAP E&T expansion, it is not a legislative guide. Such a guide has been recently produced by the National Skills Coalition (see *Resources* section, below). Additionally, the Guide assumes readers have some basic knowledge about SNAP E&T, occasionally using program-related terminology. Advocates needing a basic primer on SNAP E&T should explore the *Resources* section, and perhaps begin by reading the referenced *SNAP E&T 101 Infographic*.

Why Develop and Expand SNAP E&T Programs Now?

There is a confluence of several factors that make it an advantageous time for States to develop and expand their SNAP E&T programs, and thus for advocates to begin or increase their efforts to encourage and support States to act. Some of these factors include:

- Low-income Americans are being left further and further behind, facing relatively high rates of unemployment and/or seeing their real wages stagnate or erode. As labor markets increasingly demand higher skills – particularly for jobs that pay at least a living wage – smart new investments are needed to skill up these typically low-skill individuals to provide them opportunities to compete in today’s labor market. Quality SNAP E&T programs represent such an investment.
- The USDA/Food and Nutrition Service (FNS) is encouraging States to take action to expand employer-driven SNAP E&T programs, and is backing this up with new resources to support States in this effort, including new dedicated FNS staff in its central Office of Employment and Training (OET) and in FNS regional offices. FNS has also recently invested in the SNAP E&T

pilot grants, the *SNAP to Skills* project (which provides technical assistance to 10 States as well as tools and resources for all States), and IT grants to help States build their data systems to support SNAP E&T development.

- States are challenged by the recent loss of waivers for their Able-Bodied Adults Without Dependents (ABAWDs) and the need to develop quality employment and training activities for SNAP recipients that will help them keep their benefits while ideally enhancing their skills and employment opportunities.
- States have for many years faced dwindling federal investments in workforce development, including through Department of Labor programs such as WIA/WIOA. SNAP E&T has the potential to bring in new resources to States to support employment and training efforts.

With all of these driving factors in place, many States are still reluctant or hesitant to build their SNAP E&T programs. For advocates, it is helpful to understand some of the reasons why this may be in order to respond appropriately and effectively through their advocacy efforts.

Who Should SNAP E&T Advocacy Efforts Target?

Ultimately, whether and the extent to which a State will expand and enhance its SNAP E&T program is a determination of the State's SNAP agency, often its Department of Human Services or equivalent agency. While the USDA/FNS must approve a State's plan for program expansion within a SNAP E&T State Plan and is actively working with States to expand quality programs, it is primarily the State agency that will define the scope of its program. Thus, it is the leadership of the State SNAP agency (and not FNS) that should be the chief target of advocacy efforts on the need to expand and enhance SNAP E&T.

That said, there are other important agencies, organizations and individuals for which advocacy efforts may prove valuable in advancing the prospects for SNAP E&T expansion. This may include State elected officials such as Governors and State legislators, namely those who have previously demonstrated support for issues related to workforce development, postsecondary education, poverty alleviation, and/or social equity. These elected officials can direct State agencies to act on SNAP E&T expansion.

Other potential targets for advocacy are corporate or philanthropic leaders who have demonstrated support for these same issues, as well as leaders of community colleges (chancellors, presidents) and larger, influential nonprofits (executive directors) that not only are likely supporters of additional investment in employment and training for low-income residents but could also see their organizations directly benefit from SNAP E&T growth by gaining the ability to access SNAP E&T 50 percent reimbursement funding. Each of these can be valuable allies to advocates in directing or influencing State SNAP agency leadership – or elected officials – to take action on SNAP E&T.

A Note on SNAP E&T State Plans and Timing of Advocacy Efforts

Efforts to influence a State to develop and grow a quality SNAP E&T program may well be ongoing for years before any action is taken. Advocates should be aware that any changes a State chooses to make to its SNAP E&T program must be included within its SNAP E&T State Plan. States have great flexibility in designing their SNAP E&T programs, but they must follow what is currently included in their State Plans. These Plans generally must explain who a SNAP E&T program will serve (by population and geography), what services (components) will be offered, by whom, and at what cost per component.

Typically, States draft their annual Plans in time to submit them to FNS by August 15, to be approved by FNS in time for the Plan activities to commence for the federal fiscal year, which begins October 1st. It is important for advocates to know that States are allowed to amend their State Plans at any time to expand and improve their programs, so the fact that a new annual Plan is not yet due to FNS – or has recently been submitted and approved – does not preclude a State SNAP agency from making changes to its program during the fiscal year.

Reasons Why States May Not Be Developing Their SNAP E&T Programs

As stated, it is State governments – and specifically State SNAP agencies – that determine whether and the extent to which a State will develop and expand its SNAP E&T program (with approval from FNS). There may be multiple reasons why State SNAP agencies are not taking action to build their SNAP E&T programs, including:

➤ **Limited Understanding of SNAP E&T and its Potential**

State SNAP agencies often have only a limited understanding of SNAP E&T. This includes the nuts-and-bolts of how the program works as well as its potential to grow through the development of a third-party partnership model that utilizes 50-50 reimbursement funding.

With a traditional focus on providing SNAP benefits, SNAP agencies may have little knowledge of workforce development programs, and may be reluctant to step into this new arena by expanding SNAP E&T. Many of these agencies may have previously focused only on non-training-related workforce services such as job search assistance and workfare, so any consideration of expanding SNAP E&T might be limited to providing more of this type of service. Agencies may

not be knowledgeable about the elements or effectiveness of more robust employment and training services – such as skills and vocational training – that SNAP E&T can support.

SNAP agencies' lack of knowledge of how SNAP E&T can become an integral part of effective workforce development strategies within their States does not need to be an inhibiting factor. SNAP agencies may not realize that they don't need to fully understand workforce development or start a SNAP E&T program from scratch. Rather, they can work closely with other workforce stakeholders, including State workforce/labor agencies, community colleges, and community-based organizations, to both plan their newly-expanded programs and to provide effective services as third-party partners. Even understanding this, agencies may not be familiar with the organizations that can assist them in these efforts.

➤ **Complexity of SNAP E&T**

The complexity of SNAP E&T is a contributing factor to the limited understanding of the program on the part of State agencies, as described. Advocates should realize that beyond this, even States that are savvy about SNAP E&T may be cowed by the real challenges of implementing a robust program. There are many complexities related to SNAP participation rules that interact with SNAP E&T, including around work registration, serving Able-Bodied Adults Without Dependents (ABAWDs, described in more detail below), qualifying activities, student eligibility rules, and more. And States may face fiscal penalties for being out of compliance with participation rules. Risk-averse State agencies may thus be more comfortable operating a very limited SNAP E&T program than a robust one where there are more opportunities for mistakes to be made.

➤ **Lack of Champions for SNAP E&T**

States may lack champions for building strong and expansive SNAP E&T programs. There is a tremendous value in strong advocates who are committed to helping people advance out of poverty through skills and living-wage jobs and have at least a general vision and basic understanding of how SNAP E&T can play an important role in advancing this objective. Champions can be influential individuals outside of State government, such as policy advocates or leaders of community colleges, community-based organizations, and local governments. Ultimately, champions are needed among State SNAP E&T agency leadership (or a Governor's office or State legislature, which can move the agency to act).

➤ **Lack of Capacity**

Even if a State agency sees the potential of SNAP E&T and how utilizing partners can help with its efforts to plan and operate an expanded program, it does need to dedicate staff to planning its new program, and commit both staff and infrastructure for program operations. State agencies may already feel short of resources, and have many competing projects and priorities. In fact, it is likely true that many States possess inadequate staff and infrastructure in place, such as management information systems (MIS), policies and procedures, to significantly grow

their SNAP E&T programs. State agencies may not be aware that there are effective strategies to increase staffing and infrastructure capacity for SNAP E&T expansion, including repurposing existing resources, and utilizing SNAP E&T 100 percent funds to fund new capacity.

➤ **Lack of Political Will/Political Opposition**

State agencies may be operating under a current administration/political leadership that is simply not interested in expanding services for individuals on SNAP. Or, it may be the case that within States operating mandatory SNAP E&T programs, SNAP agencies and other advocates for SNAP participants may be concerned that expansion of SNAP E&T will put more SNAP participants at risk of losing their food benefits as a result of not meeting program participation requirements. In fact, some States may have elected leaders that see SNAP E&T as a way to reduce the number of individuals on SNAP in just this way, not as a program that can increase participants' skills for living-wage employment. Advocates should know whether their State's SNAP E&T program is mandatory or voluntary to understand whether these concerns come into play. This issue is addressed further in the *Factors Impacting SNAP E&T* section of the Guide, below.

What Steps Can Advocates Take?

What can advocates for expansion of SNAP E&T programs do to push States to build quality SNAP E&T programs, particularly in response to these "sticking points" that may be preventing States from moving forward? Depending on the specific situations within States, actions will likely include:

➤ **Becoming a Resource to the State**

Advocates should consider how they can be most helpful to States, and State SNAP agencies in particular, in growing their SNAP E&T programs. Unless they have information to the contrary, advocates might start from the assumption that State agencies are committed to approaches to helping those on SNAP improve their lives and reach self-sufficiency, but are not considering implementing a quality SNAP E&T program due to one or more of the factors discussed above. Advocates should seek to initiate a constructive dialogue with State agency leaders to gauge their interest in and understanding of SNAP E&T, possible reasons they haven't moved ahead with program development, and how they can assist. In seeing themselves as collaborators with State agencies, advocates will be more likely to find ways to bring knowledge and resources to the State to remove obstacles to program development.

➤ **Becoming Knowledgeable about SNAP E&T**

It will be difficult for advocates to make the case for the value of expanding a skills-based SNAP E&T program to their State SNAP agencies, policymakers or other key stakeholders that can

become allies in pushing States to take action, without themselves having knowledge about the program. Advocates should be informed and conversant about *why* SNAP E&T expansion is needed (the challenges within the State that a robust program can help address) and about *how* SNAP E&T works. There are many existing resources for advocates to gain this understanding of the program, including those mentioned in the *Resources* section of this Guide, below.

➤ **Anticipating Resistance by Understanding the Specific Context for SNAP E&T**

Just as it is important to have knowledge about why SNAP E&T is needed and how it works, it is also important for advocates to understand the specific context for SNAP E&T in their States and how this may be influencing the relevant decisions of the agency/leadership they are trying to persuade. In addition to the general political leadership/climate within a State, other key factors (discussed further in the *Factors Impacting SNAP E&T*, below) include the loss of ABAWD waivers and whether a State offers a voluntary or mandatory SNAP E&T program. As mentioned, advocates can initiate a dialogue with State SNAP agency leaders to learn about these factors, why they may not have taken action on expanding SNAP E&T, and what may motivate them to take action. Advocates can try to better understand agencies' drivers and concerns, and how they might respond to these.

➤ **Developing Champions**

Champions can be critical drivers of the expansion of quality SNAP E&T programs. These individuals can spark States to take action initially and to ensure that momentum is kept as program planning and implementation likely will stall at various intervals as attention and resources are diverted. How can champions for SNAP E&T be created?

- ✦ ***Messaging*** – Advocates should develop and utilize strong messaging and messaging materials describing the importance to States of building a robust, employer-driven SNAP E&T program. Messaging can be tailored to different audiences, including individuals on different parts of the political spectrum. Some key messages advocates can utilize to get started are included in the following section of the Guide. In addition, SJI has created the ***SNAP E&T Messaging Tool*** to help advocates get started.
- ✦ ***Resource Mapping*** – One important message that can resonate with States is the potential for SNAP E&T to bring new federal resources into the States. For advocates to be able to describe the amount of funds being left on the table, they may wish to formally or informally map the non-federal funding currently being invested in employment and training services for low-income residents by State and local governments and potential third-party SNAP E&T partners (e.g., community colleges and community-based organizations). These are the funds that could be utilized to attract federal 50 percent reimbursement in States with expansive, third-party partnership SNAP E&T models in place.
- ✦ ***Examples from Other States*** – Information can be presented about States with more advanced SNAP E&T programs to inspire champions, showing them what is possible (or that

their State is getting “left behind”). High-level data about these States’ programs may be most effective, including how many individuals are being served, overall program budget and amount of federal 50-50 reimbursement being invested, and program outcomes, if available.

- ✦ **Facilitation** – Advocates should consider ways that they can facilitate the efforts of those leaders they identify to be champions for SNAP E&T expansion. This may mean arming them with powerful information about the program and why it should be expanded; helping them make the case with talking points and marketing materials; helping to organize and plan for the right meetings with those individuals that champions need to influence, and so on.

➤ **Supporting the State SNAP Agency and Connecting it to Resources**

Advocates should consider what their State SNAP agency may need in order to take the first steps to move its SNAP E&T program forward. A likely first order of business, for example, may be forming a Planning Group of knowledgeable individuals both within and outside of the agency to begin to develop a plan for implementing an expanded SNAP E&T program. This could include representatives from American Job Centers, community colleges, community-based organizations that provide employment and training services, anti-poverty organizations, etc. The State may need assistance identifying these individuals (particularly those outside of State government), developing a planning process, and thinking through what elements a plan should include. Advocates should think about how they can provide this assistance to States, including by providing direct support and by connecting States to resources that exist to help them so they don’t have to reinvent the wheel. This may include providing published resources, such as those produced by FNS and the *SNAP to Skills* project (see *Resources* section, below), or connecting State agencies to their counterparts in other States with robust SNAP E&T programs, or to their FNS regional officer.

➤ **Developing Other Advocates**

At some point in the process, advocates may need to build advocacy coalitions in order to apply more “pressure” on States to take action and/or bring more help to the State. Advocates may need to work to identify community-based organization or community colleges leaders, local workforce board leaders, philanthropists, or others who will work with them. This may entail educating other advocates about SNAP E&T and motivating them to help push things forward, a process that may entail steps similar to those for developing champions.

➤ **Drafting/Supporting Legislation**

Drafting and/or supporting legislation directing State agencies to expand skills-based SNAP E&T programs, and providing them with the goals, general parameters and importantly, the resources to accomplish this, can be an effective strategy for advocates to pursue. Legislation can be the impetus for reluctant State agencies to take action. And for willing State agencies, it can provide the resources and vision they need to move things ahead. The National Skills Coalition has developed a tool to help advocates think through legislative strategies to advance skills-based SNAP E&T programs (see *Resources*, below).

Core Messages for Promoting SNAP E&T

Advocates should incorporate powerful messaging about the need for and potential impact of skills-based SNAP E&T programs into their advocacy work. The core messages promoting the growth of SNAP E&T programs within States are represented within the ***SNAP E&T Messaging Tool*** (see pull-out box on the Tool, below). Which message(s) are most appropriate and how specifically they are created will, of course, depend on the target audience. Core messages may include the following:

➤ **SNAP E&T Helps People in Need**

This central message about the value SNAP E&T can be modified in many ways: SNAP E&T helps people “advance out of poverty”, “build skills”, “secure living-wage/family-sustaining wage jobs,” etc. More formally stated, SNAP E&T can be an integral part of a State’s efforts to help its low-income and low-skill residents secure the employment, training and supportive services they need to advance out of poverty to economic self-sufficiency through living-wage jobs.

As set out in the *Messaging Tool*, labor markets across the U.S. are increasingly requiring individuals to have some education and training beyond high school in order to secure stable, living-wage jobs. Between 1991 and 2015, good jobs that require only High School Diploma or less decreased by 8%, while the number of good jobs requiring at least some college grew by 11% (some college) to 83% (Associate’s degree).ⁱ Yet, as also illustrated in the Tool, fully 56% of SNAP households are led by someone with only a High School Diploma or less, such that the majority have not reached the level of educational attainment to compete for good jobs.ⁱⁱ SNAP participants need additional skills and education to access jobs that will help them reach self-sufficiency.

SNAP E&T is uniquely targeted to help this low-income, low-skill population get the skills they need to connect to good jobs in local economies. Its flexibility allows States to focus on providing effective employment and training services tailored to these individuals, while also supporting a robust set of wrap around services – such as coaching, career navigation or case management, transportation, and childcare – that are important to removing barriers SNAP participants very often face to success in training and securing good jobs.

➤ **SNAP E&T Helps Businesses/The Local Economy**

As with any quality workforce program, SNAP E&T serves employers as well as jobseekers by helping to provide them with the skilled workers they need. FNS guides States to develop SNAP E&T programs that are “job-driven” or “employer-driven”. This means that quality SNAP E&T programs, utilizing available State and local labor market information (LMI), focus on connecting participants to in-demand jobs and/or offering training that provides participants with the skills

required for these jobs. SNAP E&T programs can be integrated with a State’s overall workforce plan and strategies developed pursuant to the Workforce Investment Opportunity Act (WIOA) to ensure that the right skills for in-demand jobs are being provided.

As described in the *Messaging Tool*, the U.S. is experiencing a shortage of middle-skill workers (those with education and training beyond high school but less than a 4-year degree). Advocates can also develop and provide messaging around this skills gap that is specific to their States using data available from the National Skills Coalition (see *Resources*, below). An example is provided within the *Messaging Tool* for the State of Pennsylvania. Skills gaps are a key factor in raising unemployment rates and also hamper employers’ ability to grow their businesses, negatively impacting the growth of States’ economies.

Importantly, middle-skill jobs are not only those that employers most need to fill, but they are at the same time those that can provide the best opportunity for SNAP participants. These jobs are more attainable for lower-skill individuals with the type of shorter-term training/education and supportive services offered by a robust SNAP E&T program, and they are more likely to offer stable, living-wage employment.



➤ **SNAP E&T Attracts Critical New Federal Resources**

It can be a powerful message that a large amount of funding is potentially being “left on the table” by failing to build a robust SNAP E&T program. Both the State and prospective SNAP E&T partner providers (e.g., community colleges and community-based organizations) are not accessing the significant level of federal funding that they otherwise could be to build their workforce system and expand services. The potential to build a new funding stream is particularly important in light of diminishing federal investments in workforce development in recent decades.

Many States are not utilizing all (or even more than a small percentage in some cases) of their 100 percent SNAP E&T grants from FNS, returning these funds to the federal government each year for other States to claim. Advocates can explore whether this is true in their States and incorporate this information into their messaging.

Beyond this, it is by building a robust SNAP E&T 50-50 reimbursement model (utilizing third-party partnerships) that States can truly grow the size of their SNAP E&T programs and attract a large amount of new federal dollars into the State for employment and training. Importantly, as set out in the *Messaging Tool*, such a model does not require the State to invest its own resources to serve as local “match” for federal SNAP E&T reimbursement. Instead, by utilizing third-party partnerships, it is the non-federal investments already being made by SNAP E&T partners like community colleges and community-based organizations that can serve as this match. The State then passes through the federal 50 percent reimbursement to these partners, allowing them to expand services. A robust SNAP E&T program can even attract new investments from local funders spurred by the knowledge that their investments can leverage additional federal dollars.

As portrayed in the *Messaging Tool* (using Pennsylvania as an example), advocates should consider gathering and presenting rough data on the current investments of non-federal dollars in their States that could potentially be reimbursed by SNAP E&T 50-50 funding. Using this information, they can develop a conservative estimate for the amount of federal SNAP E&T dollars that the State *could* be accessing. This can be a powerful incentive for a State to consider expanding SNAP E&T.

➤ **SNAP E&T Reduces Reliance on Public Benefits**

Ultimately, the goal of SNAP E&T is to help participants secure the skills and jobs that they need to advance to economic self-sufficiency and no longer require SNAP (and potentially other public benefits). This message can be used strategically for audiences on different ends of the political spectrum – for those who are primarily interested in helping people advance out of poverty, and for those who are more concerned with reducing the number of people utilizing public benefits. As will be discussed in more detail below, employing this message with the latter audience should be done with care. SNAP E&T should not be viewed or designed simply as a mandatory activity to move more people off of SNAP who fail to comply with participation requirements; rather, the focus should be on providing a robust set of services through SNAP E&T that will lead participants to no longer need SNAP as a result of their increased skills and earnings.

➤ **SNAP E&T Supports States to Develop Efficient and Effective Workforce Systems**

Building a skills-based SNAP E&T programs leverages existing workforce development programs; that is, it allows States to expand on existing infrastructure as well as employment and training programs that have proven effective. By utilizing a third-party partnership model for SNAP E&T, States are neither duplicating existing services or reinventing the wheel. Rather, they are building on what works.

Factors Impacting SNAP E&T of Which Advocates Should Be Aware

Advocates should work to encourage and support their States to build SNAP E&T programs that are effectively designed with the goal of helping as many SNAP participants as possible secure skills and stable, living-wage jobs. Some States, however, may be looking to SNAP E&T not necessarily to this end, but to either test an individual's willingness to work or to provide their Able-Bodied Adults Without Dependents (ABAWDs) an activity to keep their food benefits.

In the former case, SNAP E&T may be utilized as a way to reduce SNAP participation, not by focusing on a robust set of services to help participants get good jobs, but by creating new participation requirements (often mandatory job search, workforce or work experience SNAP E&T components) that many will fail to meet (or benefit from if they do participate). In the latter case, intentions may be good on the part of States to respond to the loss of waivers for ABAWDs, but SNAP E&T development may be short-sighted and narrow in its approach, limiting its potential to increase the skills and employment of a broad range of SNAP participants. Below are described some common challenges advocates may face relating to the expansion of SNAP E&T programs in their States, and some messaging ideas for meeting these challenges.

➤ **A Focus on ABAWDs**

There has been a heightened level of concern and conversation in States recently about Able-Bodied Adults Without Dependents (ABAWDs), because States have been losing or voluntarily giving up their ABAWD waivers. Under federal law, ABAWDs may only receive SNAP benefits for three months in a three-year period unless they are working at least 80 hours per month, participating in qualifying education and training activities at least 80 hours per month, or complying with a workfare program. In past years, most States opted to have full or partial waivers in place exempting ABAWDs from this requirement due to high unemployment rates, but with improving economies these waivers are being lost. And some States are voluntarily giving up their waivers based on policy decisions. This means that ABAWDs are at great risk of losing their benefits unless they can meet work or training requirements.

States, and some advocates for SNAP participants, may be looking to SNAP E&T as a quick fix – as a way to put in place basic employment and training activities primarily in order to allow more ABAWDs to meet their 80 hours of monthly training activities and/or in hopes that these activities will quickly lead to employment. In some States, elected officials who are *voluntarily* giving up ABAWD waivers may be pointing to SNAP E&T as justification for why waivers aren't needed (because SNAP E&T will lead people to work). In some of these States, this has triggered a response from advocates challenging the effectiveness of what are typically nascent SNAP E&T programs or pilots (with as yet limited outcomes) in helping SNAP participants secure good jobs. Such a response has the potential to damage the ability of these new SNAP E&T programs to grow and improve.

This difficult situation for advocates requires a balanced approach to messaging. SNAP E&T can and certainly should be part of a solution for States losing their ABAWD waivers, but it is not a cure-all. A robust SNAP E&T program should work not alone, but in conjunction with *all* parts of a State's workforce system, such as its American Job Centers, to help ABAWDs secure training and employment. Further, States whose efforts to quickly expand their SNAP E&T programs in reaction to the ABAWD challenge may be focused on services that merely help participants meet their hour requirements, as opposed to those that help them build skills to increase their long-term ability to secure and retain stable, living-wage employment. Advocates should encourage States, as set out below, to build skills-based programs that generate the best outcomes for participants.

Finally, States operating in this reactive mode may limit their program participation exclusively or primarily to ABAWDs. This can be a problem because the large majority of SNAP participants are not ABAWDs, meaning that the size of the program will be severely restricted (and many service providers may not wish to become third-party partners due to this factor, further limiting program growth). Advocates should help States understand that they should be laying the foundation for a program open to all qualified SNAP recipients if they truly want an expansion program that is attractive to third-party partners.

➤ **Mandatory vs. Voluntary SNAP E&T Programs**

Federal regulations governing SNAP E&T give States the option of selecting whether and which components of their program will be voluntary or mandatory. States can also determine if certain populations will be exempt from participation if some or all components its SNAP E&T program are mandatory. Currently, about half of all States have SNAP E&T programs that are at least partially mandatory (see list, below).

Some advocates for SNAP participants in mandatory States have been concerned that a focus on expanding SNAP E&T might serve as a vehicle to diminish SNAP roles by disqualifying from benefits those who don't meet participation requirements. Advocates for SNAP E&T expansion in these States can focus on two strategies: 1) ensuring that mandatory SNAP E&T

programs provide a robust set of services, including skills training, that are truly aimed at helping participants secure good jobs that can lead to self-sufficiency (see following section); 2) encouraging States to consider operating partial or all-voluntary programs.

With regard to the latter strategy, advocates should consider whether there is an opportunity to encourage or support their States to move to all-voluntary SNAP E&T programs, where participants (even mandatory work registrants) can elect to enroll in SNAP E&T activities or choose not to participate without the consequences of SNAP disqualification. All-volunteer programs have multiple advantages and benefits on which messaging can focus, as will be discussed.

Some States are operating under the false assumption that ABAWD time limits mean that they are required to operate a mandatory SNAP E&T program in non-waivered areas of the State. Mandatory SNAP E&T programs do nothing to increase incentives for unwilling ABAWDs to work toward self-sufficiency and add no value to tracking ABAWD time limits. Further, whether an ABAWD refuses to participate under a mandatory program or voluntary program does not affect him or her losing benefits after the 3-month time limit is up.

Voluntary SNAP E&T programs offer many benefits that mandatory programs do not. Advocates seeking to encourage their States to move to all-voluntary programs can incorporate some of the information contained here into their messaging. Tracking ABAWDs under a mandatory program adds a redundant layer of oversight for ABAWD program benefit participation and an added program restriction administrative burden to community partners. Voluntary SNAP E&T programs require less administrative oversight and participant tracking. With the exception of ABAWD participants, volunteers have no minimum or maximum hourly participation requirement so there is no need for participants or service agencies to track and report participation hours. Since there are no minimum participation hours, participants can't be disqualified and lose their SNAP food assistance benefits. Program and eligibility staff don't have to spend their valuable time determining if good cause elements exist, executing disqualifications, and completing related tracking and paperwork.

When individuals *volunteer* to participate in SNAP E&T it is because they are motivated to find work and achieve self-sufficiency. They recognize they need help and are more open to discuss their past experiences, goals, and barriers. This will lead to greater individual success and better program outcomes. Volunteer participants know their participation will not affect their food assistance benefits, leading to less stress and greater focus on achieving their goals. Voluntary programs help to change perceptions of SNAP E&T as a punitive program into one where participants get added value and help to become self-sufficient, rather than just meeting a requirement. As a result of the positive perception of the program, volunteer participants are more likely to spread optimistic feedback and messages about the program, which helps with program outreach efforts and produces more voluntary participation.

States Currently with Mandatory SNAP E&T Programs

Arizona, Colorado, Florida, Georgia, Idaho, Illinois, Louisiana, Minnesota, Mississippi, Nevada, New Jersey, New Mexico, New York, North Dakota, Ohio, Oklahoma, Oregon, South Carolina, South Dakota, Tennessee, Texas, Utah, Vermont.

Third-party partners see the benefits of an all-volunteer program as well since they realize a greatly reduced administrative burden, including: no requirement to track or report participant hours; the ability to evaluate program participant needs and goals and decide whether their agency is a good fit for the individual; more open assessment discussions with volunteer participants that lead to better targeted services; motivated, willing participants resulting in better outcomes.

➤ **Low-Touch Activities vs. Skills-Based Programs**

In some States, the push to expand SNAP E&T may be interpreted as simply a need to “do something.” And what many State SNAP agencies may be most familiar with – and/or what they believe they can most afford with current investment levels – is low-touch job search support. This focus may have been intensified by a mistaken understanding of the recent emphasis on making all federal workforce programs, including SNAP E&T, “job-driven.” Job-driven (or employer-driven), which is correctly defined previously in this document, is not the same as “job search” or a need to move people quickly into the workforce without the skills needed for good jobs.

Job search is historically what most SNAP E&T services have focused on across the U.S. According to 2014 USDA data, among allowable SNAP E&T activities, about half of SNAP E&T participants (49 percent) received job search, and another 13 percent received workfare. By contrast, only about 17 percent received job search training, and just under 10 percent received more skills-based education and training. While skills-based SNAP E&T programs have grown significantly since 2014, overall SNAP E&T is still weighted to low-touch activities. Particularly in mandatory programs, this creates a choice for SNAP participants of either losing benefits for non-participation, or participating in activities that can be of limited effectiveness in terms of helping them secure good jobs.

As set forth previously, many SNAP participants possess limited skills and educational attainment, while labor markets are requiring increasing levels of skills and education, particularly for stable jobs that pay living-wages. This messaging, along with messaging around the economic impact of skills gaps and the role SNAP E&T can play in helping to close these gaps (also set forth previously), can be utilized by advocates to push States to build SNAP E&T programs that offer much more than job search or workfare. States that are less familiar with SNAP E&T third-party reimbursement models can be educated about how these models, through partnerships, can integrate existing services - at no new cost to the State – focused on building participants’ skills.

SNAP E&T Advocacy in Action - Two State Examples

Washington State

Washington State's SNAP E&T Program – known as Basic Food Employment & Training Program (BFET) – is a frequently-referenced success story. Prior to the initial efforts of the State's SNAP agency (Department of Social and Health Services, or DSHS), to expand the program in 2005, SNAP E&T in Washington was extremely limited in scope, investing less than \$150,000 statewide in workfare activities.



Advocates played a significant role in helping to both spur and support DSHS to develop the robust, third-party partnership model that became BFET. First, it was representatives of the Annie E. Casey Foundation who presented a big vision of the untapped potential of SNAP E&T to an existing King County-based collaborative of community colleges, community-based organizations, and the regional DSHS office that was working to improve skills and earnings opportunities. The vision of SNAP E&T was very general – no substantial third-party partnership model yet existed from which to draw lessons – but it created enough excitement that a sub-group of the collaborative agreed to fill in the details. This group became the initial Planning Team for the new SNAP E&T model, and they also became the chief advocates for the program.

The plan for expanding SNAP E&T was not going to move forward, of course, without the approval of DSHS leadership, a group that could be risk averse. Most of these individuals were truly committed to moving people to self-sufficiency, but needed convincing that the risks

of SNAP E&T expansion would be outweighed by the rewards. Importantly, as an advocacy group, the Planning Team had the advantage of having the local DSHS office as a partner – an internal advocate that knew what agency leadership would be concerned about as well as motivated by. This led to a strategy of drafting a Business Plan for an expanded program. The Plan clearly presented the rewards of expansion (what it could achieve for people in terms of skills and employment gains; and the resources that could be reimbursed and number that could be served based on resource mapping). The Plan also presented strategies to minimize risk, including starting with a small, local pilot; utilizing existing staff; and adapting an existing MIS).

The Business Plan, itself, was not enough. It had to be supported by vocal champions, starting in the King County DSHS office but also with strong organizations like SJI, Seattle Goodwill, South Seattle College that all had previous experience advocating with State government. Annie E. Casey Foundation also contributed to these efforts.

Minnesota

Advocacy for growing SNAP E&T in the State of Minnesota was sparked in 2008, when a group of organizations collaborating on efforts to address homelessness in Hennepin County (Minneapolis) began working to identify ways to build sustainable new investments supporting employment services for homeless jobseekers. Members of the collaborative had heard about successful SNAP E&T programs then operating in Washington State and Wisconsin, and reached out to learn more about how these programs operated. In 2009 and 2010, when the Great Recession was driving far more



jobseekers to the doors of local workforce providers than they could handle, interest in SNAP E&T among local philanthropy intensified. Advocates from the nonprofit provider community and philanthropy approached the State about the opportunity to build its SNAP E&T program, but initially were able to make only limited progress. They believed that the reasons for the State's hesitancy included the fact that SNAP E&T was a not a well-known or understood program at the State, and that responsibility for its administration was divided between the State's workforce and human services agencies. Advocates were able to generate some interest in SNAP E&T among State officials, yet expansion was limited in scope and scale, operating more at a pilot than systems level. SNAP E&T, advocates argued, could advance the State's efforts by increasing available resources.

Advocates felt the tide began to turn in terms of Minnesota's interest in growing SNAP E&T starting around 2014. The primary impetus was the State's loss of its ABAWD waiver, which created an urgency to better address the reinstated work requirements. Nearly 40,000 ABAWDs were terminated from SNAP. The Minnesota Governor's Office became interested in the potential of SNAP E&T after advocates were able to brief Office representatives, which made the development of the program a higher priority (among many competing priorities) for State agency leadership. In addition, SNAP E&T advocates within Hennepin/Ramsey Counties, led by county officials and private philanthropy, supported the creation of a detailed SNAP E&T resource map. This map, which became a valuable advocacy tool, described all the current employment and training investments being made in the two-county area that could trigger federal SNAP E&T 50-50 reimbursement, showing the dollars potentially being left on the table.

The State's growing interest in building its SNAP E&T program was spurred further by having access to information about other States' successful programs provided through national advocates such as National Skills Coalition and others. This interest was also advanced by the State's ability to secure technical assistance through the USDA/Food and Nutrition Service's *SNAP to Skills* project, which helped Minnesota move from strong interest to action by learning *how* build its program. This is a key recommendation of Minnesota advocates to others: seek to provide States with the information, connections and technical assistance they need to not only build their interest in SNAP E&T, but to help them see what can be accomplished and what steps to take.

Sources

ⁱ Georgetown Center on Education and the Workforce (2002-2016); "Good jobs" consist of those paying between \$35,000 - \$50,000 per year.

ⁱⁱ Mathematica Policy Research (2014)

Related SNAP E&T Resources for Advocates

- Seattle Jobs Initiative, *SNAP E&T Messaging Tool*:
<http://www.seattlejobsinitiative.com>
- SNAP to Skills homepage:
<https://snaptoskills.fns.usda.gov/>
- *SNAP to Skills SNAP E&T 101 infographic*:
<https://snaptoskills.fns.usda.gov/about-snap-skills/what-is-snap-et>
- SNAP to Skills Policy Brief, *Why Now is the Time for States to Build Their SNAP E&T Programs*:
http://www.fns.usda.gov/sites/default/files/snap/S2SBrief1_NowIsTheTimeforBuildingSNAPETPrograms.pdf
- SNAP to Skills Policy Brief, *Using SNAP E&T to Offer Job-Driven Training for Able-Bodied Adults without Dependents (ABAWDs)*:
http://www.fns.usda.gov/sites/default/files/snap/S2Sbrief2_OfferJobDrivenTrainingABAWDS.pdf
- SNAP to Skills Policy Brief, *Building State Capacity to Support Expanded SNAP E&T Programs*:
https://snaptoskills.fns.usda.gov/sites/default/files/2016-11/S2SBrief4_BuildingStateCapacity.pdf
- USDA Food and Nutrition Service, SNAP E&T policy and guidance webpage:
<https://www.fns.usda.gov/snap/et-policy-and-guidance>
- USDA Food and Nutrition Service, *SNAP E&T Toolkit*:
https://www.fns.usda.gov/sites/default/files/ET_Toolkit_2013.pdf
- USDA Food and Nutrition Service, *SNAP E&T State Plan Handbook*:
<https://www.fns.usda.gov/snap/et-state-plan-handbook>
- National Skills Coalition, general SNAP E&T webpage:
<http://www.nationalskillscoalition.org/federal-policy/snap-employment-and-training>
- National Skills Coalition, *Skills-Based SNAP E&T Policy Toolkit*:
<http://www.nationalskillscoalition.org/resources/publications/file/SNAP-ET-Policy-Toolkit-1.pdf>
- U.S. Agriculture Act of 2014 (current law government SNAP E&T):
<https://www.gpo.gov/fdsys/pkg/PLAW-113publ79/pdf/PLAW-113publ79.pdf>
- National Skills Coalition and Seattle Jobs Initiative, *Building Skills Through SNAP E&T: Recommendations from Lessons Learned in Four States*:
<http://www.seattlejobsinitiative.com/wp-content/uploads/SNAP-final-web.pdf>
- Seattle Jobs Initiative, *Washington State's Basic Food Employment and Training Program*:
http://www.seattlejobsinitiative.com/wp-content/uploads/SJI_BFET_June2014.pdf
- National Skills Coalition, Middle-Skill Job Fact Sheets (shows demand and skills gaps for all States):
<http://www.nationalskillscoalition.org/state-policy/fact-sheets>

Using the *SNAP E&T Messaging Tool*

The *SNAP E&T Messaging Tool* was created as a resource for advocates to use when seeking to introduce SNAP E&T to a variety of audiences who generally are new to the program. It seeks to catch the attention of the audience by alerting them of the timely opportunity of expanding skills-based SNAP E&T programs; describing the program's critical benefits for both SNAP participants and employers; offering very basic information about how SNAP E&T works, including that it can be expanded without the need for new State investments or expertise; and issuing a call to action.

Customizing the Messaging Tool

The version of the Tool below was developed using Canva software (a PDF version is also available [here](#)), and illustrates how the Tool can be customized by advocates using data for a particular State in which they are working. In the sample provide, data for Pennsylvania is included.

There are two areas of the Tool intended for customization. First, advocates can include information about the skills gap in their State to demonstrate the need for more middle-skill workers and the opportunity SNAP E&T presents to help train these workers. Skills-gap data for each State is available from the National Skills Coalition (NSC) in their *Middle Skill Jobs Fact Sheets* (see *Resources*, above).

Second, advocates can customize the Tool by including information on current non-federal investments being made in employment and training in their State (or locality) by State or local governments, community colleges, community-based organizations and philanthropy that might qualify for SNAP E&T 50 percent reimbursement. This adds powerful information to the Tool for advocates to demonstrate the potential new federal dollars that the State or locality could be accessing with a robust SNAP E&T program. Securing this information will likely require advocates to perform research to identify potential investments, which can be done through surveys or more formal resource mapping.

Steps to Customize the Tool

1. Download a customizable version (PDF) of the Messaging Tool [here](#). This version has readily apparent blank spaces to add a graph and text in the "Employers Need Skilled Workers" section, and text below the "Potential Reimbursable Funds" section ([see the Pennsylvania example](#)).
2. Open the PDF in Adobe Acrobat and switch to "Edit PDF" mode.

ⁱ Source: Georgetown Center on Education and the Workforce (2002-2016); "Good jobs" consist of those paying between \$35,000 - \$50,000 per year.

ⁱⁱ Source: Mathematica Policy Research (2014)

3. To add a graph (“Jobs and Workers by Skill Level”), create a graph in your preferred program using the NSC data for your State, then insert as an image in the PDF using the “Add Image” option from the ribbon.

4. To add text next to the graph, as well as below the “Potential Reimbursable Funds” section (per the Pennsylvania example), use the “Add Text” option from the ribbon and insert a text box where desired. Use the Cooper Hewitt, Norwester or Arimo font for additions, size 11 (Cooper Hewitt is available for free download and use at <https://www.fontsquirrel.com/fonts/cooper-hewitt>)

Any customization of the Tool in these or other areas can be also done utilizing Canva. Or advocates can simply recreate the Tool, or elements thereof, employing other software with which they are more familiar.

Using a Generic Version of the Tool

For those who wish to make use of the Messaging Tool but do not want to customize by developing and inserting State-specific data, a version of the Tool has been created that does not include blank space for this data to be added. This generic version of the Tool (PDF) can be downloaded [here](#).

Related Information

Advocates seeking a companion piece to the Messaging Tool that illustrates in somewhat greater detail how SNAP E&T works should consider using FNS’ *SNAP to Skills SNAP E&T 101 Infographic* (see *Resources*, above).

Downloadable Versions

[SNAP E&T Messaging Tool – Customizable \(PDF\)](#)

[SNAP E&T Messaging Tool – Generic \(PDF\)](#)

[SNAP E&T Messaging Tool – Pennsylvania Example \(PDF\)](#)

Printing Instructions: The *SNAP E&T Messaging Tool* should be printed in **color** for best results.

THE OPPORTUNITY OF SNAP E&T: UNTAPPED POTENTIAL

WHAT IS SNAP EMPLOYMENT AND TRAINING (E&T)?

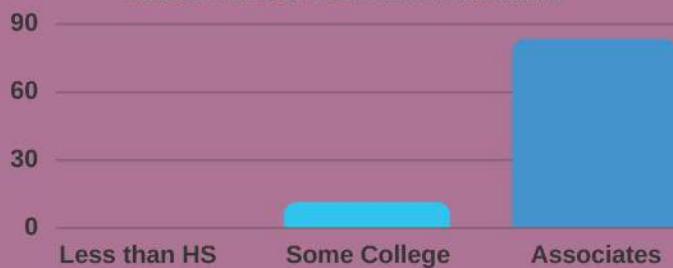
SNAP E&T is a program that is administered by the Food and Nutrition Service of the U.S.D.A. It **provides federal funding for education and training** for people receiving SNAP food assistance.

States are required to operate SNAP E&T programs, but few states have realized the program's potential. SNAP E&T can be used to help people train for good jobs.

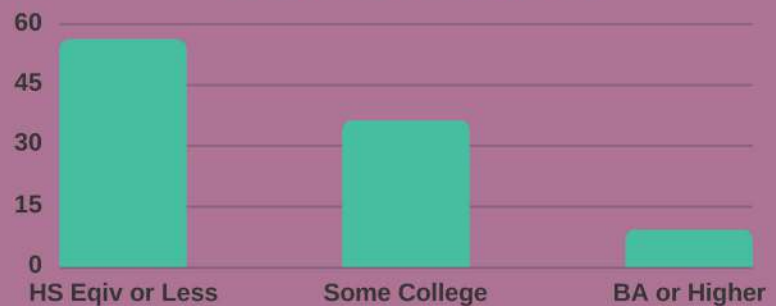
SNAP PARTICIPANTS NEED SKILLS TO BE SUCCESSFUL

Since 1991, **"Good Jobs"** that require a HS degree or less have decreased by 8%, while those requiring some college or beyond have increased from 11-83%.

% CHANGE IN "GOOD JOBS" FROM 1991 TO 2015 BY EDUCATIONAL ATTAINMENT*



% EDUCATIONAL ATTAINMENT OF SNAP HOUSEHOLD LEADS IN THE U.S.**



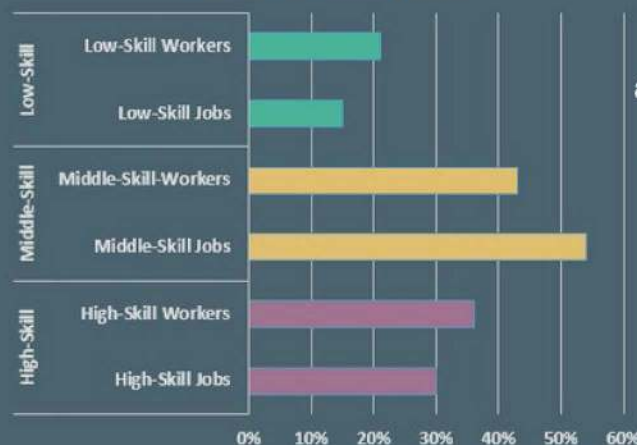
Yet 56% of SNAP households are led by someone with only a High School diploma or less, limiting their ability to find family sustaining work.**

EMPLOYERS NEED SKILLED WORKERS

Employers are facing a shortage of middle-skill workers, which consist of those with education and training beyond high school but less than a 4-year degree. In fact, 1/3 of the U.S. unemployment rate is due to the **lack of skills for open jobs**, particularly middle-skill jobs in the Health Care and Manufacturing sectors (e.g., CNAs, CNC Machinists, Welders, etc.).

The inadequate supply of skilled workers hampers economic growth, and reflects missed opportunities for people who are unemployed.

JOBS AND WORKERS BY SKILL LEVEL, PENNSYLVANIA, 2015**



JOBS AND WORKERS BY SKILL LEVEL, PENNSYLVANIA, 2015***

Middle-skills jobs account for 54 percent of Pennsylvania's labor market, but only 43 percent of the state's workers are trained to the middle-skills level.***

*Source: Georgetown University Center on Education and the Workforce (1992-2016); "Good Jobs" consist of those paying \$35,000/year up to \$55,000

**Source: Mathematica Policy Research (2014)

***Source: National Skills Coalition

FUNDS ARE AVAILABLE FOR STATES \$\$

State SNAP E&T programs are able to secure a 50% federal reimbursement for any non-federal money being spent on employment and training for work eligible people on SNAP as long as they enroll in SNAP E&T.



STATES DO NOT HAVE TO INVEST NEW MONEY TO CLAIM REIMBURSEMENT FROM U.S.D.A.

States do not have to spend their own money to claim reimbursement (but they can!). Funding can come from local government, philanthropy or other private sources. Reimbursement funds can then be reinvested in programs to grow and expand services.

POTENTIAL REIMBURSABLE FUNDS IN PENNSYLVANIA

- Example 1
- Example 2
- Example 3



USE SNAP E&T TO BUILD SKILLS

A strength of SNAP E&T is the program's ability to support employment and training programs, as well as providers or colleges that are **already successful** in advancing skills and delivering credentials. These organizations may already use non-federal funds to pay for their programs, and SNAP E&T can be used to leverage that funding for federal reimbursement.



WHO CAN TRAIN WITH SNAP E&T?

Anyone who is:

- Eligible for SNAP benefits
- Able to work
- Not on TANF \$ assistance

WHAT CAN SNAP E&T PAY FOR?

- Basic Skill Building
- Tuition and Fees
- Sector-Based Training Programs
- Case Management
- Supportive Services (e.g., childcare & transportation)
- Equipment and Uniforms



WHO CAN DELIVER THE TRAINING?

- Community Colleges
- Community-Based Organizations
- Companies and Employer Partners

WHY YOU SHOULD EXPAND SNAP E&T TODAY

- SNAP E&T can provide education and skills training to SNAP participants to help them **prepare for work** and **reduce their need for SNAP**.
- SNAP E&T can bring **new funding** to workforce organizations at a time of dwindling resources, and can help to **cover supportive services** that are needed for participants to be most successful (e.g., childcare & transportation).
- SNAP E&T can spur **synergistic collaborations** between government, community, colleges, community-based organizations, and philanthropy for **state-wide success**.

