









# Minnesota SNAP Employment and Training Provider Handbook

**Revised October 2024** 

# **Provider handbook**

#### Introduction

The Minnesota Department of Children, Youth, and Families (DCYF) is an organization of individuals with a commitment to bettering the lives of Minnesotans. The department, working with many others, helps people meet their basic needs so they can live in dignity and achieve their highest potential. Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T) is managed by DCYF in close partnership with the Minnesota Department of Employment and Economic Development (DEED). Minnesota's SNAP E&T program is administered by counties, county-contracted providers, state-contracted providers, and Tribal Nations, and requires a joint effort between all entities, encouraging maximization of the use of funds and resources available in each local area. Success is built on the foundation of a strong collaborative culture amongst partners.

This Provider Handbook outlines the responsibilities for all providers. DCYF will update the Provider Handbook periodically and will communicate any changes. The most current version of the handbook is available on <u>Minnesota's SNAP E&T</u> website.

#### Vision

Minnesota envisions a SNAP E&T program where Minnesotans with low incomes have clear pathways in developing marketable and in-demand skills, leading to career advancement and self-sufficiency.

#### Mission

Through strong partnerships, our mission is to help recipients fully utilize their SNAP benefits, gain the essential skills needed for gainful employment, and successfully transition off public assistance.

#### **Strategic Partners**

Collaboration between state agencies, counties, and providers can produce the best services. All partners will have a role in supporting the priority strategies identified in this strategic plan.

#### Equity

Minnesota's SNAP program serves a disproportionate number of black and indigenous people of color, women, and people with a disability. Minnesota is committed to equity in the SNAP E&T program through service delivery, outcomes, data collection and strategic goal setting.

#### **Guiding principles for partnership**

The Department of Children, Youth, and Families Economic Assistance and Employment Support division has adopted five guiding principles in an effort to form meaningful and constructive partnerships. We believe that these principles will set a positive tone for working together. They are: Mutual Respect, Open Communication, Joint Problem Solving, Valuing Diversity and adhering to an Ethical Code of Conduct.

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### **SNAP** program overview

#### **Basics of SNAP**

The Supplemental Nutrition Assistance Program (SNAP), formerly known as food stamps, helps Minnesotans with low incomes get the food they need for nutritious and well-balanced meals. The program provides support to help stretch the household food budget. It is not intended to meet all food needs of the household; it is a supplement.

If approved for the program, a person is issued an Electronic Benefit Transfer (EBT) card. It is like a debit card. For each month of eligibility, benefits will be credited to the EBT account. The card can be used to purchase food at stores that display a poster or sign that reads: "We Accept EBT." Grocery stores and convenience stores must sell a variety of foods to be approved to accept EBT. The card also may be used at authorized sites for Meals on Wheels and congregate dining. Many farmers markets and some online retailers also accept EBT.

#### **Applying for SNAP**

#### Household income, expenses, and assets

SNAP eligibility depends on income, expenses, and the number of people in the household. Most types of income are counted. There are many deductions from income that are allowed under SNAP. A county or tribal eligibility worker can provide more information on income limits and deductions.

For a complete list of SNAP Outreach grantees for federal fiscal years 2020-2022, visit the <u>SNAP</u> <u>Outreach grantees webpage</u>.

#### **Screening for SNAP**

Visit <u>Minnesota's food helper website</u> for more information on SNAP and a link to apply for the program online.

#### **Emergency SNAP**

Minnesotans may receive food benefits within five days of application if their household meets one of the following criteria:

- Units with less than \$150 in monthly countable income and \$100 or less in liquid assets.
- Migrant or seasonal farmworkers who have \$100 or less in liquid assets.
- Units whose combined monthly countable income and liquid assets are less than their monthly housing costs and the applicable standard utility deduction amounts.

#### Application

Minnesotans can apply for SNAP:

- Online at <a href="https://mnbenefits.mn.gov/">https://mnbenefits.mn.gov/</a>
- **By** filling out the <u>Combined Application Form (PDF)</u>. Mail or bring the completed application form to the local county or tribal office.

When benefits begin depends on the date the county or tribe receives an application through MN Benefits, or the date listed on the first page of a paper application. A county or tribe cannot decide whether a person will receive benefits until the entire application is completed and all required

verifications are provided. A SNAP eligibility worker will also need to complete an interview with the applicant.

# **SNAP E&T program overview**

The SNAP E&T program helps SNAP recipients improve their employment prospects and wage potential through participation in job searches, training, education, or work activities. The goal is to assist participants in obtaining a livable wage, and successfully transition off public assistance.

The federal government requires each state to develop and implement an employment and training program for SNAP recipients. States have the flexibility to shape the size and scope of their programs. The program requires the development of an annual plan reflective of the service strategies and coordination of services across the state. Minnesota's SNAP E&T State Plan can be found on the <u>SNAP</u> <u>E&T website</u>.

In Minnesota, SNAP E&T participant information and services provided are tracked by a statewide data management system called Workforce One (WF1). Eligibility for SNAP benefits are determined by counties and tribes using an automated eligibility system called MAXIS.

A portion of SNAP recipients may be subject to work and time limit provisions; however, all SNAP recipients are potentially eligible to participate in SNAP E&T. The state operates an all-voluntary SNAP E&T program, exempting all work registrants, from mandatory participation in SNAP E&T. In a voluntary program, time-limited SNAP recipients cannot be sanctioned if they choose not to participate in employment and training activities during their three counted months of eligibility. However, time-limited individuals must work or participate in work activities for at least 80 hours per month to maintain their benefits beyond the three counted months.

Refer to the <u>SNAP E&T Manual</u> for all policy-related information. Additional program guidance can be found in the <u>Food and Nutrition Service Employment and Training Toolkit</u>.

# **SNAP E&T eligibility**

Minnesotans can receive SNAP E&T services if they:

- Receive federal food assistance
- Are age 16 or older (there are additional requirements to serve 16-17 year olds)
- Report that they intend to work at least part-time; clients reporting a disability may participate in SNAP E&T if they state they will be able to work with appropriate supports and/or training
- Are referred to SNAP E&T by an eligibility worker.

An individual cannot receive SNAP E&T services if they receive Temporary Assistance for Needy Families (TANF), (in Minnesota, this is known as the Minnesota Family Investment Program (MFIP)), or other cash assistance under Title IV such as Tribal Temporary Assistance for Needy Families. However, an individual participating in the Diversionary Work Program can participate in SNAP E&T as they are not a TANF or Title IV recipient.

All SNAP households will be informed of SNAP E&T at the application and recertification interviews, and then screened to determine if anyone in the household is interested in participating. If anyone in the household is interested, the eligibility worker will provide a customized paper referral which includes a list of SNAP E&T providers available in their area. The customized list of providers can be printed from the <u>SNAP E&T Provider Map</u>, located on the SNAP E&T website. If the person interested in participating is a Time-limited Recipient (TLR), an electronic referral from MAXIS to WF1 will also be sent to a designated SNAP E&T provider.

**E&T TIP:** A provider can serve an individual if they are receiving SNAP and meet the above criteria. The participant does not need to be listed in the MAXIS system as the "01" (primary individual on the case) as long as they are part of the food unit.

# **Time-limited Recipient (TLR)**

Time-limited recipients (TLRs) are eligible for SNAP only three months in a 36-month period unless the individual meets the work requirements defined below. The three-month time limit applies to individuals who are:

- Age 18 52 years of age.
- Not exempt from work registration. Work registration exemptions include individuals who are unfit for employment (have a physical illness, injury, or disability, are suffering from substance abuse disorder, or who are homeless). See <u>CM 28.06.12</u> for a complete list of exemptions.
- Not residing in a unit with a member under the age of 18, even if the unit member is not eligible for SNAP.
- Not pregnant.
- Not someone who has served in the U.S. military.
- Not age 24 or younger and was in foster care on their 18<sup>th</sup> birthday.
- Participants of Refugee Cash Assistance (RCA) who are NOT working with a Refugee Employment Services Provider, or SNAP E&T.

Time-limited recipients can meet the work requirement by:

- Working at least 80 hours per month. Work can be for pay, for goods or services (for something other than money), unpaid, or as a volunteer.
- Participating in an approved work or training program at least 80 hours per month. In SNAP E&T, job search activities are not countable unless they make up less than 50% of the required 80 hours per month.
- Participating in a combination of any of the above work and work or training programs for at least 80 hours per month.

SNAP E&T is only responsible for tracking participation hours for SNAP E&T activities; employment and volunteer hours, for example, are not SNAP E&T activities and would be tracked by the participant and their eligibility worker. Visit the <u>SNAP E&T Activities Guide</u> for more information on countable SNAP E&T activities for TLRs.

A time-limited recipient who has lost SNAP eligibility by exhausting their initial three out of 36 months

may qualify for a second three-month period, or regain eligibility under certain circumstances. See <u>CM</u><u>11.24</u> for more information.

**E&T TIP:** The work requirement does not apply to time-limited recipients who reside in areas of the state that are granted a waiver of the three-month time limit by the Food and Nutrition Service.

### **Students**

Students must meet at least one of the criteria found in section <u>11.18</u> of the Combined Manual to be eligible for SNAP food benefits. The Combined Manual contains the policy for the cash and food assistance programs in Minnesota.

Students that do not meet any student criteria in section 11.18 and have already enrolled themselves in a career or technical education program may be able to participate in SNAP E&T to become an eligible student for SNAP. SNAP E&T may accept students when the program the student is enrolled in is an associate degree level or lesser that is not intended for transfer a 4-year degree program. Associate of Arts programs do not qualify for E&T enrollment as they are intended for transfer to a 4year degree program.

When the career or technical education program meets the guidelines above, the self-enrolled student must be referred to a local SNAP E&T provider using the <u>Student Enrollment Statement for SNAP E&T</u> (<u>DHS-7868</u>). If the student is enrolled in an approved program of study and will be accepted into the SNAP E&T program when SNAP eligibility has been approved, the provider will complete and sign the form to be returned to the eligibility worker.

- If the program of study can be supported by SNAP E&T and the student has already been approved for SNAP, the provider will enroll the student with E&T.
- If the program of study can be supported by SNAP E&T but SNAP is still pending, consider the student meeting the student eligibility criteria for SNAP based on being enrolled in SNAP E&T with the expectation that the student will follow-up with the provider. The provider will officially enroll the student in SNAP E&T once SNAP is approved.
- When the program of study cannot be supported by a SNAP E&T provider, the student is ineligible for SNAP.

#### **High school students**

SNAP E&T funds may not be used to pay for costs associated with programs or courses offered through public high schools. This extends to paying for costs associated with programs offered through private high schools. Since a free public education is available through the state's public education system, it is neither reasonable nor necessary to pay for services that are available to the individual for free. This is true even if the course meets the purpose of SNAP E&T. For example, if a public high school offers a curriculum choice for a class that leads to an industry-wide credential, SNAP E&T funds cannot be used to pay for any costs associated with that course.

While there are instances when it may be appropriate to provide SNAP E&T services to individuals outside of a high school setting, services must not be duplicative, and the activities must meet the

purpose and design requirements of SNAP E&T. Participants, if offered regular employment, should be in a position to accept it. Programs designed for individuals who are still in high school are unlikely to meet these requirements.

#### **College students**

SNAP E&T supports career and technical education activities that are intended to provide a direct link to employment. Career or technical education programs or other vocational training are organized activities at the post-secondary level that provide individuals with the academic and technical knowledge and skills necessary to prepare for further education and careers in current or emerging employment sectors. Programs are primarily designed for those who are beyond the age of compulsory high school attendance. Ideally, such programs should be employer-driven and lead to industry-recognized certificates or credentials.

Classroom training and educational activities may be included in an employment plan, but are limited to a 2-year associate degree level or lesser and may not include a 2-year associate degree intended for transfer into a 4-year bachelor level degree or higher such as an Associate of Arts (AA) or Transfer Pathway degree. This may include prerequisite courses (other than a remedial course which may be considered basic education and/or foundational skills instruction) that meet the requirements of a career or technical education program. In order for a post-secondary education program to be approved, the provider must ensure that:

- The goals in the participant's employment plan could be met with the post-secondary training.
- There is a market for employees with the proposed training where the participant will (or is willing) to reside upon completion of the program.
- The participant can meet the requirements for admission into the program.
- There is a reasonable expectation that the participant will complete the training program based on such factors as current assessment, previous education, training, work history, current motivation, and circumstances.

**E&T TIP:** Associate of Liberal Arts (AA) and Transfer Pathway programs do not qualify for E&T enrollment as they are intended for transfer to a 4-year degree bachelor program and are not intended to lead directly to employment.

### **Provider roles and responsibilities**

Providers are responsible for delivering SNAP E&T services to SNAP recipients. Individuals must participate in SNAP E&T knowingly. It is important for providers to determine a process for documenting program intentionality, which can be done in a variety of ways. When program intentionality is not documented, this may be considered data matching. Data matching occurs when a provider reviews their non-federally funded programming, looking for individuals receiving SNAP, and considers the SNAP recipients to be SNAP E&T participants. In short, participants must be informed of the program, and their choice to participate must be documented.

SNAP E&T services include an employability assessment to determine employment and training goals, activities, and case management. The purpose of an employability assessment is to collect and evaluate

information to identify a participant's employment goals, barriers, and support service needs. Based on the assessment, the provider and participant select the appropriate SNAP E&T activities to move the participant toward employment.

Providers are responsible for tracking costs, maintaining records, and invoicing according to federal and state regulations. In this model, a provider puts forth the full cost of program operations, including assessment, case management, SNAP E&T activities and support services. Provider funds used to leverage the SNAP E&T program funds cannot originate from a federal source (with the exception of Community Development Block Grant funds) and cannot supplant another funding source. The Minnesota Department of Children, Youth, and Families then reimburses the provider a percentage of allowable SNAP E&T expenditures; the percentage of reimbursement is 75 percent for services administered on a reservation for residents of the reservation, otherwise it is 50 percent.

#### **Eligibility verification**

Participant eligibility verification is required prior to enrolling an individual in SNAP E&T and before requesting reimbursement for services each month. A participant must be on SNAP at the time the cost was incurred, regardless of when billing for the service took place. It is the responsibility of the provider to verify participant eligibility each month utilizing the MAXIS eligibility system. If an individual is not receiving SNAP, they cannot participate in SNAP E&T, **unless** they are open in job retention services.

**E&T TIP:** In addition to monthly MAXIS verification of SNAP eligibility for each participant, providers can choose to verify SNAP eligibility before providing support services to participants to ensure expenses are eligible for reimbursement.

#### Enrollment

SNAP E&T services may begin as early as the date SNAP eligibility is approved. Prior to enrollment, a series of enrollment questions must be answered and information must be entered into WF1. The Eligibility and Enrollment form can be found on <u>Minnesota's SNAP E&T website</u>.

#### **Screening and referral**

Eligibility workers must complete a SNAP E&T screening for all unit members ages 16 and older at application and recertification. This includes providing general information about SNAP E&T, determining if anyone in the household is interested in learning about education, training, or job search assistance, and referring those that are. A SNAP E&T provider cannot enroll a participant without a referral from eligibility.

When a referral to SNAP E&T is made, eligibility workers must update the STAT/WREG panel in MAXIS with the date the referral was made. On the STAT/WREG panel, this date can be found on the FSET Orientation Date field; this field tag will be updated in the future to Referral Date. There must be a date in this field prior to enrollment in SNAP E&T.

If there is no date in the FSET Orientation Date field, the provider must reach out to eligibility to ask if a SNAP E&T screening has been completed and request that a date be entered once screening is complete.

**E&T TIP:** Since a screening is required at application and recertification, it is likely that a screening was completed, but nobody in the household was interested in SNAP E&T at that time and no referral was made. The process by which eligibility workers complete the screening allows for a referral to be made at a later date if anyone in the household later wishes to participate in SNAP E&T, without re-screening.

#### Communication

Providers must relay to the county agency or tribe information that may affect a participant's program eligibility or benefit amount, such as employment status changes, or when a time-limited participant meets their minimum monthly work requirement. Eligibility worker name and contact information can be found by placing the cursor on the PW number located at the bottom of the MAXIS panels and pressing PF1. In WF1, eligibility worker name and contact information can be found in the person record under case assignment.

If the county agency, Tribal Nation, or provider become aware of circumstances that indicate a participant's exemption status has changed, inform the other of the change. The eligibility worker will then review the participant's exemption status. The participant, however, may choose to continue to engage in SNAP E&T regardless of their exemption status.

A general overview of provider roles and responsibilities is illustrated below.



#### **Provider determination**

A provider determination is a notification issued when a provider has decided that they are unable to serve an individual in their program. This occurs when an individual wishes to participate, but the provider is unable to support them. The provider must send a Provider Determination Form (DHS-8205) to the county or Tribal Nation eligibility staff within 10 days of making a determination.

A provider determination must be issued when both of the following are true:

- An individual receiving SNAP wants to participate in a component of the SNAP E&T program.
- A provider is unable to serve them in employment and training because it is determined that they would be unable to be successful in the program.

The determination is most likely to be issued after assessment, but the provider may issue it at any time.

A provider determination does NOT need to be issued when:

- A participant elects not to participate in SNAP E&T either by notifying staff or through loss of contact.
- A participant is initially interested in SNAP E&T, but the provider is able to offer another employment and training program (such as a Workforce Innovation and Opportunity Act program) that the participant is willing to engage in and in which the participant may be successful.
- New barriers are discovered that require the provider to make a change to a participant's employment plan, which can still be addressed through SNAP E&T or another employment and training program offered by that provider.
- A participant completes participation, or is enrolled with one provider and is referred to another provider for another service (co-enrollment).

#### **Provider determination process**

- Step 1. Provider determines that an individual is unable to be successful in the employment and training services offered at their organization, but the individual still wishes to participate.
- Step 2. Provider discusses concerns with the individual.
- Step 3. If a provider is unable to offer another employment and training program or SNAP E&T activity in which the person could be successful and the person wants to receive employment and training services, a provider will discuss this with the person and complete a Provider Determination Form (DHS-8205). Within 10 days of a determination, the provider will complete all sections of the form and send to the county or Tribal Nation eligibility staff. Use encrypted email to send this form.
- Step 4. Upon notification of a provider determination, the eligibility worker must either re-assess the recipient for possible work registration exemptions, or re-refer the recipient to another provider or service. The eligibility worker must notify the recipient within 10 days that a provider determination has been issued, and the steps the worker intends to take. If the recipient is time-limited and the provider determination recommends reassessing work registration status, eligibility must attempt to contact the recipient by phone or email as well.

### **Case management**

#### Participant record

A provider must clearly document all activities and services provided to a participant in WF1. In addition, records must also contain information about the employability assessment, release of information/consent form (if applicable), employment plan, participant engagement, and participant reimbursements. A minimum of one monthly contact must be made and case noted. Documentation must be kept in paper or electronic formats and is reviewed as part of the annual monitoring visit. The record should clearly tell the story of the participant's engagement, successes, supports, and

challenges during their time working with SNAP E&T.

**E&T TIP:** The <u>Case Management Checklist</u> is a tool to help ensure case management requirements are met, and that documentation is completed and retained for participants. The checklist can be found on <u>Minnesota's SNAP E&T Website</u>.

#### **Employability assessment**

A participant must be assessed prior to placement in a SNAP E&T activity. An employability assessment should include an in-depth evaluation of employability skills coupled with counseling on how and where to search for employment. The assessment is an allowable SNAP E&T expense.

The purpose of an employability assessment is to collect and evaluate information to identify a participant's employment goals, barriers, and support service needs. It should be individualized and completed in an interactive meeting with the participant. The information collected from this assessment is the basis for the employment plan. The employability assessment should consider:

- Literacy level (see NOTE below)
- Communication skills (including English language proficiency)
- Education and employment history
- Employment related skills, abilities, and interests
- Employment barriers and steps necessary to overcome barriers.

The state does not require that a particular form be used for recording the results of the employability assessment. Providers may develop and utilize their own forms for this purpose or may record relevant information in a standard location in the case record. Employability assessment must be documented in WF1 through either a case note, opening and closing the activity, or including a copy of the assessment in the electronic document storage (EDS) system. If not using the EDS system, the assessment must be part of the case file.

**NOTE:** Literacy testing may be routinely included as part of the assessment, but is not required. The provider should use available information about the participant (for example, how applications and other forms are completed, the participant's speech, participant disclosure, reports from other sources) to determine the participant's literacy and reading capabilities. The participant's literacy capabilities should be a factor in determining appropriate activities.

#### **Employment plan**

An employment plan (EP) must be completed for each SNAP E&T participant within 30 days of enrollment in the program. The employment plan shall be the result of assessing each participant's career goals, employability skills and barriers. An employment plan may be in paper form, or created electronically in WF1, and must be included in either the electronic document storage (EDS) system or be physically in the case file. A plan from another employment and training program may also be utilized. If the plan is in paper form, or a plan from another program is utilized, this must be indicated in WF1. The employment plan must be updated and revised as the participant's circumstances change, but not less than once per year. The participant must sign and receive a copy of the employment plan.

At a minimum, an employment plan must contain:

- Date the plan was created
- Proposed employment and training activities
- Employment goal(s)
- Participant signature
- Any other information relevant to employment and training

For time-limited participants, it is expected that the <u>SNAP Employment and Training Plan (DHS-6020)</u> or a plan with comparable information be used. The plan must outline how a participant can meet the work requirements to earn additional months of benefits, if applicable.

#### **Case notes**

A participant record recounts the story of the activity(ies) the participant is engaged in, and the services provided. Regular case notes provide documentation of the details and rationale for these activities and services. A SNAP E&T case note must be entered in WF1 at a minimum of once per month.

At minimum, case notes must contain the following:

- Date of the event
- Category or purpose of contact (intake, employment/service plan, check-in, etc.)
- Summary of correspondence or conversation
- When providing a support service, the case note must identify how the support service relates to the activity.

It is important that documentation be done in an objective and fact-based manner with the understanding that case notes may be reviewed and used by other providers and professionals, as well as by the participant.

Case notes about medical information should contain only the minimum necessary information. The following are best practices when documenting this type of information:

- Rarely include an actual diagnosis
- Use general language
- Examples include: "Medical condition present. See case file." or "Medical condition restricts activities. See case file." Or "Mental health condition restricts activities. See case file."

**E&T TIP:** Remember, if it is not documented in a case note, it never happened.

#### **Support services**

SNAP E&T expenses must be directly related to an approved activity that the participant is enrolled in and receiving case management services for, at the agency seeking reimbursement. Costs must also be reasonable and necessary. A cost is reasonable if, in its nature and amount, it does not exceed that which a prudent person would pay under the circumstances prevailing at the time the decision was made to incur the cost. Necessary costs are incurred to carry out essential functions, cannot be avoided without adversely affecting an individual's ability to participate, and are not already supplied

by another SNAP E&T provider.

Documentation of support services must be on file and listed in Workforce One (WF1) under Support Services in the SNAP E&T person record. Case note why it was determined to be reasonable and necessary, and select the activity it is supporting.

See <u>Guidance on Costs and Reimbursements</u> for a complete list of allowable expenses.

**E&T TIP:** Providers are encouraged to contact state program staff to request review of unusual requests.

#### **Opening and closing activities**

An activity must only be opened when a participant is actively engaged in that activity, not just assigned to it. Likewise, the activity must be closed when the participant is no longer engaged. Determine at this point whether or not the participant's record should be exited. If the participant is not being exited, closing of an activity should be case noted.

#### Exiting a participant from the program

Exit the participant's SNAP E&T record in WF1 within 30 days of SNAP closure (or as soon as the benefit end date is known if beyond 30 days), unless they are open in job retention services. The exit date must be backdated to the last day of the month SNAP benefits were received. For example, a November closure would have an exit date of October 31.

When a participant achieves employment, job retention services should be offered whenever possible. When the retention period ends, the participant should be exited to employment. Participants may also opt to exit SNAP E&T after completion of activities or training, but before gaining employment. Document this exit as completely as possible and case note.

Also exit a participant's SNAP E&T record in WF1 within 60 days of non-engagement. The record should be exited within 60 days of failed contact and a corresponding exit date entered. If the participant is a SNAP eligible student based on enrollment in SNAP E&T, the employment counselor must also communicate this with the county or tribal point of contact. It is best practice to case note the efforts made to contact the participant before exiting.

## Collaboration

#### **Co-enrollment**

Participants can be enrolled with more than one provider at the same time, creating multiple SNAP E&T program sequences in WF1. For example, one may open the participant in Supervised Job Search, while the other may open the participant in Basic Education and/or Foundational Skills Instruction, each opening an activity and providing case management and support for the activity they are offering. It is the responsibility of the providers to coordinate services to ensure the participant is engaging in the activities and meeting their employment plan goals while both serving the participant. Close communication between providers is necessary to prevent duplication of services. Duplication of

service means an individual receives the same service from more than one provider at the same time. It is best practice for both providers to retain a written co-enrollment plan in the participant's file, or in WF1.

When working with a college student, be sure to check if the college they are enrolled in is a SNAP E&T provider. A college that is also a SNAP E&T provider may be able to provide more appropriate case management and resources for the student.

DCYF encourages SNAP E&T providers to collaborate and make referrals for services that they do not have available. For example, when a participant nears the end of their training goals, the participant may benefit by enrolling with a provider that offers job search and has available resources to support that activity. The referring provider will continue to provide case management and support for as long as the participant remains engaged in the training activity, while the provider offering job search begins providing case management and support for the job search activity as soon as services begin. Each partner serving that participant can receive reimbursement for allowable expenditures that are not duplicative.

# Sharing of information

Providers contracted directly with the state are considered to be part of the "welfare system" for the purpose of serving SNAP recipients in SNAP E&T. Participant information based on business need can be shared between counties, tribes and all SNAP E&T providers without a separate release of information. Coordination between providers is essential, especially for time-limited participants. As a reminder, correspondence containing sensitive or private information must be sent via a secure email portal.

# **Limited-English proficiency**

All forms and services to the participant must be communicated in the individual's preferred language.

# **Operations**

#### Activities

SNAP E&T activities are designed to help SNAP recipients gain skills, training or work experience that will increase their ability to obtain regular employment and achieve self–sufficiency. For a definition of each activity, see <u>SNAP E&T Activities Guide</u>.

States are required to submit SNAP E&T program activity reports to Food and Nutrition Services that provide *actual counts* of E&T participation. Therefore, an activity must only be opened in WF1 when a participant is actively engaged in that activity, not just assigned to it. Likewise, the activity must be closed when the participant is no longer engaged.

For more information, refer to the SNAP ET Workforce One User Guide, which can be found in WF1 under Resources.

#### **Participation hours**

Participation hours must be tracked by activity in WF1 for time-limited participants who wish to meet the work requirement through participation in the program.

For the educational programs activity, input the number of activity hours based on the number of hours the participant is expected to participate, not on credit hours. For example, if a participant attends vocational training for six hours per week and has an estimated 10 hours of homework or study time per week, the vocational training should show 16 hours per week.

# Monitoring

SNAP E&T programs are monitored to ensure compliance with the Minnesota Office of Grants Management policies and procedures, to determine contract compliance, and to ensure that federal rules and regulations are maintained.

Per the Office of Grants Management, at least one monitoring visit must be conducted before final payment is made on all state grants over \$50,000, and at least annual monitoring visits on grants of over \$250,000. New grantees receive a monitoring visit during the first year of the grant cycle. More visits may be scheduled at the discretion of DCYF if additional assistance is required, for example, or if key staff turnover occurs.

DCYF reviews fiscal procedures and expenditures of counties and Tribal Nations at least every other year for those that are anticipated to receive more than \$250,000, and at least one time every five years for all other host counties and Tribal Nations. Financial reconciliation involves reconciling the request for payment with supporting documentation for that request.

DCYF also conducts statewide program reviews focusing on subpopulations of active SNAP E&T records at least twice per year. Providers will be notified of any case records needing corrective actions.

SNAP E&T programs can expect:

- Monitoring that follows the guiding principles of: mutual respect, open communication, joint problem solving, valuing diversity and an ethical code of conduct.
- At least a two-week advanced notice of the monitoring date and time.
- Monitoring to alternate between on-site and virtual.
- Review of the work plan and budget, goals, challenges, successes, and best practices learned over the past year.
- Monitoring tools to be shared in advance of the visit for preparation purposes. Tools may include a pre-monitoring worksheet, financial reconciliation worksheet, internal controls checklist, and a state and federal compliance checklist.
- A sample size of the caseload to be reviewed to determine participant eligibility for SNAP and subsequent eligibility for SNAP E&T.
- Fiscal reconciliation of a sample period. DCYF will request a select sample size of expenses to reconcile expenses with supporting documentation, such as purchase orders, receipts, payroll records, receipts, and tracking of support services.
- A report following the visit to be issued within 45 days detailing any findings and a timeline for any follow up needed.

### Secure email

Email containing sensitive or private information must be sent via a secure email portal. This includes

provider determination forms, identifying information and any information about a participant's health. Do not send social security numbers via email.

## Workforce One

Workforce One (WF1) is a web-based client management application used by nearly 2,000 state, city, county, tribal, and non-profit employment and training providers to track employment and training services for more than 100,000 customers across Minnesota's One Stop network. WF1 was created through a partnership between DCYF and DEED and is maintained by MNIT-DEED.

Having accurate and timely participant information within WF1 is critical. As participants are coenrolled in multiple programs, the system supports the coordination of services, monitoring of programs and reporting and tracking of information.

#### **Records retention**

The records retention policy for SNAP E&T follows the County Human Services General Records Retention Schedule. For the purpose of this program, agencies may choose an electronic or paper format. This includes the WF1 Electronic Document Storage or a provider specific electronic storage system. At this time, there is no requirement to use or store specific documents in the WF1 Electronic Document Storage (EDS) system for SNAP E&T.

The SNAP ET Workforce One User Guide addresses all operations within the management information system. The SNAP ET Workforce One User Guide can be found in WF1 under "Resources."

#### Training

WF1 training will be provided during the onboarding process and throughout the contract period, as needed.

Access to WF1 must be requested and approved by a supervisor and the Minnesota Department of Employment and Economic Development's WF1 staff. Access forms may be found on the WF1 homepage; forms and directions to request access can be found in the SNAP ET Workforce One User Guide.

For questions about WF1, contact Lynn Dahn at lynn.dahn@state.mn.us.

### MAXIS

MAXIS is the computer system used by state and county workers to determine eligibility for public assistance and health care programs. For cash assistance and food programs, MAXIS also determines the appropriate benefit level and issues benefits. Access to MAXIS Inquiry will be granted for providers contracting directly with the Minnesota Department of Children, Youth, and Families. At this time, the department is limiting the number of SNAP E&T staff with MAXIS access to **two individuals**. If a provider indicates a need for more than two staff members to access MAXIS, they should contact their state SNAP E&T grant manager. This request will be taken under consideration on a case-by-case basis.

For MAXIS Inquiry access, email Erin White at erin.white@state.mn.us.

# Fiscal

#### **Budgets**

Providers submit a budget request annually with their workplan. Budgets will be reviewed by contract managers prior to being approved to be included in the State plan and budget. Budgets are only approved after Food and Nutrition Service approves the Minnesota Department of Children, Youth, and Families' Annual SNAP E&T State Plan and budget.

#### **Budget requirements**

- Include a projected one-year budget for the SNAP E&T services that will be provided. The costs are broken down into administrative cost, program cost, and support services cost.
- Include a cost allocation plan and any approved federal indirect cost rate.
- Reflect and support the anticipated workplan participation numbers and activities offered.
- List all non-federal, eligible funding sources. The SNAP E&T program requires up-front funding from non-federal (with the exception of the Community Development Block Grant), eligible sources, in order to receive 50 percent reimbursement for SNAP E&T eligible expenditures. Further, SNAP E&T programs can leverage non-federal funds currently used for existing employment and training services.

#### **Budget changes**

Providers are responsible for monitoring their budgets throughout the grant period to ensure they are within their contract budget amount.

If a budget change does not increase or decrease the total contract budget, a budget revision can be done.

- If a provider needs a budget change that is **less than a 10% variance**, no approval or form is needed. Providers can submit expenditure reports within the 10% variance in EGMS. The administrative budget line item has **no variance**.
- If a provider needs a budget change that is **more than a 10% variance**, a budget revision form must be completed and sent to the contract manager for approval.

If a budget change is going to increase or decrease the total contract budget amount, a contract amendment is needed.

- The provider will need to complete a budget revision form and send to the grant manager for approval.
- Budget amendments are allowed until April 30th for each contract period.

## Funding

Minnesota utilizes three types of funding to support SNAP E&T programs. The program expectations and policies outlined in this document apply to all funding sources:

#### **50 percent reimbursement**

There are two kinds of 50 percent reimbursements that a state agency can claim. The first kind is a 50 percent reimbursement for administrative and program costs related to the planning, implementation and operation of an employment and training program.

The second kind of 50 percent reimbursement that a state agency can claim is for support services. The Food and Nutrition Act of 2008 and SNAP regulations require that state agencies reimburse employment and training participants for all expenses that are reasonable, necessary, and directly related to participation in an employment and training activity.

Funding is based on a 50 percent reimbursement basis, unless otherwise approved. The United States Department of Agriculture, through the Minnesota Department of Children, Youth, and Families, will reimburse 50 percent of all allowable SNAP E&T expenses. The cost of all program operations, SNAP E&T services and participant reimbursements must be expended up front from a non-federal funding source, and then billed to the department for 50 percent of all eligible costs.

Funds received from reimbursement of SNAP E&T expenditures can be used to seek reimbursement again in future SNAP E&T invoices. This is known as reutilizing SNAP E&T funds. These funds must be received, spent on valid SNAP E&T costs, and invoiced through the regular invoicing process to reutilize SNAP E&T funds. There is no restriction on how reimbursed funds must be spent.

#### 75 percent reimbursement

There are two kinds of 75 percent reimbursements that a state agency can claim. The first kind is a 75 percent reimbursement for administrative and program costs related to the planning, implementation and operation of an employment and training program for services administered on a reservation for residents of the reservation.

The second kind of 75 percent reimbursement that a state agency can claim is for support services issued on a reservation for residents of the reservation. The Food and Nutrition Act of 2008 and SNAP regulations require that state agencies reimburse employment and training participants for all expenses that are reasonable, necessary, and directly related to participation in an employment and training activity.

Funds received from reimbursement of SNAP E&T expenditures can be used to seek reimbursement again in future SNAP E&T invoices. This is known as reutilizing SNAP E&T funds. These funds must be received, spent on valid SNAP E&T costs, and invoiced through the regular invoicing process to reutilize SNAP E&T funds. There is no restriction on how reimbursed funds must be spent.

#### **100 percent funding (program grants)**

The Food and Nutrition Service provides grant money to fund a portion of the administrative and program costs of a SNAP E&T program. These grants are often called 100 percent funds, because it is 100 percent federal funding and must be used on the planning, implementation and operation of a state employment and training program. One-hundred percent money cannot be used for any participant reimbursements, such as transportation, uniforms or child care. Employment and training grants vary based on state work registrants and the number of time-limited individuals in a state. This

funding may be allocated to counties and tribes to market, connect, and/or provide SNAP E&T services and is very limited. Additional allocations are subject to availability.

### Invoicing

Minnesota Department of Children, Youth, and Families-contracted providers are required to submit reimbursement requests, known as an expenditure report, through the <u>Enterprise Grant Management</u> <u>System</u>. The expenditure report should reflect 50% of the cost of services expended by the provider on eligible SNAP E&T costs. Providers should have a process for program and fiscal staff to communicate about monthly expenses. Keep all back-up fiscal documentation and tracking.

Expenditure reports are due by the 20<sup>th</sup> of the month following the month the expense was incurred in accordance with the terms of the contract. If no expenses are incurred during a month, providers should submit a request for \$0 in reimbursement.

To request a copy of the Enterprise Grant Management System (EGMS) User Guide, email Kristina Anderson at kristina.m.anderson@state.mn.us.

### **Glossary of terms**

**Cost incurred date:** The date the expense has occurred, or a transaction has taken place.

**Enterprise Grant Management System (EGMS):** The electronic system used by the Minnesota Department of Children, Youth, and Families contracted providers to enter monthly reimbursement requests.

**50 percent reimbursement:** An uncapped federal SNAP E&T reimbursement funding stream. The federal government reimburses 50 percent of non-federal funds used to serve non-Temporary Assistance for Needy Families SNAP recipients. Non-federal funds must not already be used as a match for other programs.

**Fiscal year:** The state fiscal year (SFY) cycle begins July 1 and ends June 30. The federal fiscal year (FFY) cycle begins October 1 and ends September 30.

**MAXIS:** The computer system used by state, county, and tribal workers to determine eligibility for public assistance and health care programs.

**100 percent funding:** A fixed amount of federal dollars allocated to states for the administration of a SNAP E&T program that is based on the number of work registrants in the state.

Participant: A SNAP recipient participating in SNAP E&T.

**Point of contact:** County agency and Tribal Nation point of contact for State-Contracted Providers, as identified by the county agency or Tribal Nation. This may be the county agency or Tribal Nation contracted provider.

**Provider determination:** A provider determination is a notification issued when a provider has decided that they are unable to serve a person in their program. This occurs when a person wishes to participate in SNAP E&T, but the provider is unable to support them.

**Recipient:** A person receiving SNAP food benefits.

**75 percent reimbursement:** An uncapped federal SNAP E&T reimbursement funding stream. The federal government reimburses 75 percent of non-federal funds used to serve non-Temporary Assistance for Needy Families SNAP recipients for services administered *on a reservation for residents of the reservation*. Non-federal funds must not already be used as a match for other programs.

Time-limited participant: A participant who is subject to the work and time limit provisions.

**Time-limited recipient (TLR):** A SNAP recipient who is limited to receiving up to 3 months of SNAP food benefits within a 36-month period, unless the recipient meets the work requirement.

**Workforce One (WF1):** The web-based client management application used by nearly 2,000 state, city, county and non-profit employment and training providers to track employment and training services.

**Workforce One MAXIS-Generated Program Sequence:** A program sequence used for enrolling a participant in Workforce One when a referral from MAXIS is received. Referrals are typically generated only for time-limited SNAP recipients. This referral can only be received by county or tribal providers operating in-house, by county or tribal contracted providers, or by DCYF contracted providers.

**Workforce One User-Generated Program Sequence:** A program sequence created to enroll a participant in Workforce One when a referral from MAXIS is not received.

## **Frequently asked questions**

Q. How do I access the training region in MAXIS to complete the annual oath?

**A.** Enter CICSDT2 at the State of Minnesota screen and press **ENTER**. On the following page, put in the login ID and password and press **ENTER**. On the last screen enter FMTP. Now the user is in the training region. Sign the oath. After the oath is signed, log all the way out.

Q. How do I verify SNAP eligibility when a case is private in MAXIS?

**A.** When a case is marked private in MAXIS, SNAP E&T case managers should reach out directly to the eligibility worker to verify the participant is active on SNAP each month. The eligibility worker contact information can be found in MAXIS.

**Q.** Will the Minnesota Department of Children, Youth, and Families complete monthly participant verifications on behalf of my agency or tribe?

A. No. DCYF has provided all contracted providers with MAXIS Inquiry Access. This allows agencies and

tribes to complete the required SNAP eligibility verifications in accordance with their contracts. It is expected that, at minimum, participant eligibility verifications are completed each month before a request for reimbursement is made.

Q. Can mental health services be provided under SNAP E&T?

**A.** Federal SNAP E&T policy does not include mental health services or substance use disorder treatment (refer to <u>7 CFR 273.7(b)(ii)</u>). Therefore, mental health treatment or substance use disorder treatment may not be funded by SNAP E&T. However, referral for mental health services and case management around the impact of mental health on employment may be part of SNAP E&T.

**Q.** Are there general guidelines that can be used to assess whether SNAP E&T expenditures are allowable?

**A.** To be allowable, expenditures must be **reasonable**, **necessary**, and **directly related** to an approved SNAP E&T program activity.

A cost is **REASONABLE** if, in its nature and amount, it does not exceed that which a prudent person would pay under the circumstances prevailing at the time the decision was made to incur this cost. **NECESSARY** costs are incurred to carry out essential functions, cannot be avoided without adversely affecting program operation, and do not duplicate existing efforts. E&T expenses must also be **DIRECTLY RELATED** to an approved E&T program activity.

Refer to <u>Guidance on Costs and Reimbursements</u> for more information.

**Q.** What if an educational activity is normally available at no cost to participants because it is funded by a state or local government, but space and funds are limited and more classes would be required to serve SNAP E&T participants? Can a state agency use SNAP E&T funds to pay for additional classes?

A. No. If the educational activity is a state or local entitlement, SNAP E&T funds cannot be used to pay for expansion of classes or additional classes. For example, if a state or local government guarantees that all adults, age 21 and under, are entitled to a GED at no cost and the state funds this activity, SNAP E&T funds cannot be used to pay for these services nor can the funds the state provides be used for reimbursement. In another example, a state commits to pay for 30 percent of the operational expenses at its universities and community colleges. In this example, SNAP E&T funds cannot be used to gay for that commitment and the state commitment cannot be used to draw down federal SNAP E&T reimbursement.

Q. Am I responsible for tracking employment or volunteer hours for TLRs?

**A.** No. SNAP E&T is not responsible for tracking participation hours for activities outside of SNAP E&T, which includes employment and volunteer hours.

Q. Are marketing expenses eligible for reimbursement?

**A.** Yes. This can include hiring a consultant to improve administration, marketing the SNAP E&T program and salaries for third-party providers, as well as state agency administration of SNAP E&T.

Q. Can 100 percent funds be used for support services?

**A.** No

**Q.** Are federal Community Development Block Grant funds used to pay for allowable SNAP E&T expenses reimbursable?

**A.** In general, federal funds cannot be reimbursed by other federal funds. However, there are some exceptions to this rule when authorized by federal legislation (7 CFR 277.4(d)). Community Development Block Grants may be used to cover SNAP E&T expenses and reimbursed with federal SNAP E&T money.

Q. What does it mean to have a voluntary SNAP E&T program?

**A.** Minnesota operates an all-voluntary SNAP E&T program, exempting all work registrants, from mandatory participation in SNAP E&T. This means that no person can be sanctioned for not participating in SNAP E&T. Participants that are subject to the work and time-limit provisions are still subject to these provisions and can continue to earn additional months of food benefits by meeting the work requirement (for example, by participating in a qualifying work activity for an average of 20 hours per week).

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Recommended changes/additions to the Provider Handbook should be directed to: **Andrea McConnell** at andrea.mcconnell@state.mn