



MSPWin WHITE PAPER

How to Dramatically Expand SNAP E&T in Minnesota

April 2015

Executive Summary

32,000 very low income adults have been terminated from SNAP in Minnesota in the past year, most of whom have no other income. A number of community advocates, service providers and funders believe many of these terminations could have been avoided had the State been more intentional about planning and organizing around Minnesota's loss of its "ABAWD Waiver." Furthermore, advocates believe Minnesota is "leaving money on the table" that could help expand employment and training supports to low-income job seekers via SNAP E&T match funds. Better use of SNAP E&T funds could help many recipients gain greater levels of self-sufficiency while enabling them to meet re-instituted mandatory work provisions to stay on SNAP.

MSPWin, a workforce funders collaborative in the Minneapolis Saint Paul region, has organized a cross-sector coalition of hunger, housing and workforce advocates to press the State for improvements in SNAP policy and program administration. This coalition includes community based service providers, foundations, County and City staff, legal advocates, and Greater Twin Cities United Way. The coalition has organized multiple meetings with State leaders to express concerns and offer assistance in pursuing change needed to improve outcomes for members in our community who rely on SNAP to meet their basic needs.

This document was commissioned by MSPWin to provide an overview of the issue; document observations of how Minnesota manages its SNAP E&T program; and share opportunities for change/enhancement given the reinstatement of work requirements and changes at the Federal level to improve the SNAP E&T Program.

Cover Letter

04/08/2015

Dear hunger and workforce advocates, policy makers, funders, and interested stakeholders,

Minnesota has the opportunity to dramatically expand SNAP E&T in Minnesota. But will the State do it?

We commissioned this white paper after learning about extensive termination from SNAP, hearing from many advocates that terminations could have been avoided, and learning that many other states are dramatically increasing their SNAP E&T programs.

After reviewing the research, it seems clear that Minnesota has a choice: to dramatically expand SNAP E&T, or not.

Shortly before publication of this white paper, we met with Department of Human Services (DHS) and Department of Employment and Economic Development (DEED) leadership. At that time we learned about the State's actions in regards to SNAP expansion, and suggested that they could use the white paper as a method to share their next steps with the field. We shared a copy of the white paper with them, and a copy of their response is provided as Attachment C on pages 15-18.

While there have been a number of promising developments since MSPWin began engaging State leaders on this topic, we strongly recommend that the State add the following to its planned SNAP E&T improvements:

1. Set clear goal(s) related to the expansion of the SNAP E&T Program, most specifically how much 50/50 match is desired and/or possible; and
2. Outline specific means for engaging community stakeholders in the planning process for expanded use of the 50/50 match option.

MSPWin will continue working with state leaders to improve SNAP E&T, and we look forward to continued engagement on this important issue.

Sincerely,

Bryan Lindsley
Executive Director
MSPWin

Joel Luedtke
Co-Chair
MSPWin

Brian Paulson
Member
MSPWin

Summary

In December 2014, MSPWin commissioned further information and inquiry on recent and extensive terminations of individuals from Minnesota's Supplemental Nutritional Assistance Program (SNAP, aka "food stamps") following re-institution of work requirements for Able-bodied Adults without Dependents (ABAWDs). SNAP is a federal program that assists very low-income individuals and families in meeting basic nutritional needs. SNAP also offers states Employment and Training (SNAP E&T) funding which can support a wide range of employment services for recipients and enable them to meet the work-related requirements to maintain their SNAP benefits. In addition to solving the current problem of unnecessary SNAP terminations, MSPWin is also interested in exploring strategies to significantly expand use of the SNAP E&T funding to support workforce services.

Key Facts

- ❖ Minnesota lost its federal "ABAWD Waiver" in November of 2013 and SNAP enrollment amongst this population dropped dramatically (from 37,017 in January of 2014 to 12,483 in December of 2014).
- ❖ Community advocates, local government, and philanthropic leaders believe the State could have been more proactive in preparing for the waiver expiration and that a number of terminations could have been avoided.
- ❖ Those terminated from SNAP were some of our communities most impoverished.

Key Observations

- ❖ Compared to peer states, Minnesota's SNAP Employment and Training Program offers minimal support to SNAP-only recipients to meet work-related requirements. Other states have exponentially increased work supports by leveraging federal funds available through SNAP E&T "match" funds, an uncapped federal reimbursement option.
- ❖ Minnesota's narrow interpretation of federal guidance currently inhibits its ability to maximize enrollment and engagement in the SNAP Program and SNAP E&T supports. This limitation effectively leaves federal money "on the table" that could benefit low-income communities through food assistance and employment and training supports.
- ❖ Minnesota's SNAP E&T policies, practices and programming are disconnected from SNAP outreach/enrollment goals and activities, community-based safety-net and workforce supports, and the larger workforce development system.

Key Opportunities

- ❖ Minnesota has the opportunity to build a more robust SNAP E&T system through leveraging SNAP E&T "match" funds. The "third-party match" option has allowed other states to

dramatically grow employment and training supports for SNAP recipients with no new state funds.

- ❖ Minnesota should review and revise State policies and practices pertaining to “able-bodied adults without dependents” to ensure they reflect federal flexibility and align with State goals to maximize SNAP enrollment. USDA offers States more flexibility than is often understood.
- ❖ MSPWin is interested in assisting the State in building a more robust, integrated SNAP E&T system.

Overview

The Dramatic Decline in ABAWD Participation in SNAP in Minnesota since 2013

The primary purpose of the SNAP Program is to improve the nutrition of low-income children, families and individuals. However, since 1996, there has been a nationwide time limit on how long non-employed, working-age, non-disabled adults without children (known as "able bodied adults without dependents" or ABAWDs) can receive benefits. This population can only access SNAP for three months in a three-year period, unless they are working at least 20 hours per week, participating in a workfare or comparable program to "work off" the food stamp benefit, or participating in another qualifying work activity for at least 20 hours per week (excluding job search). However, this provision can be waived in areas of high unemployment. For more information, see: <http://www.clasp.org/resources-and-publications/files/SNAP-Work-Requirements-and-Time-Limits-ABAWD.pdf>.

During the Great Recession, nearly all states qualified for statewide waivers of the ABAWD time limits due to high unemployment rates. Starting in 2009, Minnesota received a statewide federal waiver. As the economy improved and the unemployment rate stabilized, Minnesota was no longer eligible for the statewide ABAWD waiver. Effective Nov. 1, 2013, the ABAWD time limits were re-instituted, limiting recipients to three months of SNAP benefits in a 36-month period if they are not meeting the work requirements. Cases eligible in November through January began losing SNAP eligibility in February 2014.

More than 45,000 SNAP recipients in Minnesota were identified as ABAWDs upon expiration of the waiver. Since the change went into effect only 8% of these 45,000 ABAWDs have been engaged in Employment and Training services to meet the new work related requirements. SNAP enrollment amongst ABAWDs has dropped dramatically, going from 37,017 to 12,483 (from January 2014 to December 2014). This decline is in stark contrast to our State's explicit goal to maximize SNAP enrollment amongst those eligible.

Those terminated from SNAP are some of the most disenfranchised in our community and heavily rely upon food stamps as their only source of income. Average SNAP benefits for those terminated were \$118/month, with the vast majority of terminated cases having no other income. Analysis in Hennepin County suggests that terminations were disproportionately people of color (76%), many were experiencing homelessness (34%), and that at least a third of those terminated appear to have attempted to re-apply for SNAP benefits.

There are three primary ways that states can act to minimize the number of individuals who lose SNAP benefits due to the ABAWD provisions.

- ❖ First, states can review and (where appropriate) broaden policies and procedures in determining "fitness" to work (i.e. – how a SNAP recipient is assessed and determined to be "able-bodied").
- ❖ Second, states can minimize the number of people who are subject to the time limits, both by applying for waivers for geographic areas with high levels of unemployment, and by using the flexibility they are granted to exempt up to 15% of ABAWDs from the time limit.

- ❖ Third, states can offer qualifying work activities to ABAWDs subject to the time limit.

Low income Minnesotans need the State to improve its practices in all three of these areas in order to gain full access to SNAP benefits. This paper focuses primarily on how to expand access to qualifying work activities, an issue that is of most interest to MSPWin and appears to be a large part of the SNAP terminations.

SNAP E&T: A Resource to Solve the Crisis

SNAP has an accompanying funding stream, SNAP Employment and Training (E&T), that allows states to provide employment and training and related support services to individuals receiving SNAP benefits. SNAP E&T funds can be used to support a variety of education, training, employment and related supports services needed by SNAP participants to gain employment and greater stability and self-sufficiency. A list of allowable uses of funds can be found in the “SNAP E&T Toolkit” at http://www.fns.usda.gov/sites/default/files/ET_Toolkit_2013.pdf. ABAWDs may use SNAP E&T programs to meet work related requirements to maintain SNAP benefits and an adequate level of nutrition.

The SNAP E&T Program includes two main types of funding: 100 percent federal funds and 50 percent federal reimbursement funds. The 100 percent funds allocated to states are capped and based on total SNAP enrollment, (\$78.6M spent FY2013). The 50 percent federal reimbursement funds are an *uncapped federal match* on local expenses to supplement 100 percent allocations (USDA FNS 50% reimbursements in FY2013 totaled \$206.6M). SNAP E&T 50 percent funds are uncapped, flexible in their use, and are ultimately authorized by USDA through states’ SNAP E&T plans. In addition, states that commit to providing all ABAWDs at risk of losing benefits with a qualifying work activity can receive a share of an additional \$20 million pool of funding. Minnesota’s State E&T Plan for FY2015 is \$19.5M; \$681,160 in 100% E&T funds, \$5.4M in federal 50% reimbursement, \$12.7M in State dollars, and roughly \$600,000 in “third-party match” (see below for more information on uses of this funding).

At the Federal level, SNAP is administered by USDA Food Nutritional Services (FNS) including all activities within the program (Outreach, Education, Enrollment and E&T). Minnesota’s SNAP Program is by run by Department of Human Services and administered by counties, while SNAP Employment and Training is run by Minnesota’s Department of Employment and Economic Development (DEED) through an interagency agreement with DHS (as required by State Statute that dates back to 1987).

Observations and Opportunities

This section documents “observations and opportunities” following a review of : Minnesota’s SNAP E&T Plan (FY2013-FY2015); State guidance on SNAP E&T; other state’s SNAP E&T Plans; federal guidance on SNAP E&T and serving ABAWDs; national research on the topic; and state, county and community stakeholder discussions/meetings. *A list of pertinent resources can be found at the end of this document.*

Observation #1: Minnesota’s SNAP E&T Plan has limited resources specifically for ABAWDs and other SNAP-only participants. Furthermore, we leverage less than many of our peers for this population.

Minnesota’s use of funds authorized in its FY 2015 SNAP E&T Plan (\$19.5M) is as follows:

- ❖ Administration and delivery of the Family Stabilization Services (FSS) and 2-Parent Households on the Minnesota Family Investment Program (MFIP) and the Diversionary Work Program (DWP) = \$5M
- ❖ Childcare related costs for FSS, 2-Parent MFIP households and DWP = \$12.8M
- ❖ 100% SNAP E&T funds allocated to Counties (based on SNAP enrollment) = \$530,000
- ❖ State Administrative Costs (DEED) = \$170,000
- ❖ Third-Party Pilot Projects utilizing 50% match (Navigator Pilot and Heading Home Employment Project) = \$1.2M.
- ❖ *Total Federal funding = \$6,181,160.*

As can be seen above, very little resource is specifically available to SNAP-only recipients. Instead, the vast majority of SNAP E&T funds flow into our state’s welfare to work program for low-income families (MFIP and DWP). This use of SNAP E&T as a supplement to federal TANF funds appears unique to Minnesota. As such, resource available to SNAP-only recipients to meet work related requirements appears to be in the \$600,000 - \$1.2M/year range-- drastically lower than other States who have utilized these funds to expand resources for SNAP-only recipients. So while Minnesota’s total State E&T plan appears to be fairly robust at \$19.5M, it is actually woefully inadequate in resources for SNAP participants who are not involved in MFIP or DWP.

Below are 3 examples of States who have effectively recruited SNAP E&T resources to meet work related needs of SNAP-only recipients. Noteworthy amongst the three is Wisconsin’s rapid growth of E&T resources to increase supports for SNAP participants (going from an \$19.6M State Plan in 2014 to \$44.4M in 2015) and Washington State’s growth from 2003 to 2015 (\$250,000 Statewide Plan in 2003 to \$34M authorized in 2015) reportedly with “no new State dollars.”

- ❖ **South Carolina** - \$24M authorized in FY2015 (approx. \$23M to support job search, education, training and work experience of SNAP only recipients; no spending on dependent care costs). **Total federal funding = \$13,159,878.**
- ❖ **Washington State** - \$33.9M authorized in FY2015 (approx. \$24M to support job search, education, training and job retention to SNAP only recipients; \$22,600 in dependent care). **Total federal funding = \$15,753,171.**

- ❖ **Wisconsin** - \$44M authorized in FY2015 (approx. \$34.6M in job search, work experience, workfare, education, training, self-employment and retention; \$7.7M in transportation; \$711,878 in dependent care). **Total federal funding = \$22,875,980.**

In addition to recent rapid growth and utilization of SNAP E&T at the state Level, USDA has launched a number of recent efforts to help states build more robust SNAP E&T systems. Although Minnesota was not selected to participate in an upcoming SNAP E&T Pilot grant program, FNS will also offer States assistance to explore additional opportunities to utilize 50% funds and grow quality employment training supports for SNAP recipients. Finally, a number of national foundations and advocacy groups have launched initiatives to expand SNAP E&T utilization and services.

Minnesota DEED and DHS convened a “Launch of MN-SNAP Connect,” on December 19, 2014 where a number of expansion efforts were described. MSPWin recently learned that the initial ideas shared at this meeting have evolved substantially. DHS and DEED are now working to implement an expanded SNAP E&T strategy that will advance a broader Career Pathways agenda and include both public and nonprofit workforce providers.

MSPWin was pleased to recently learn that DHS and DEED are moving forward with an ambitious plan to bring more SNAP E&T resources to the state. Despite this ambitious plan with multiple outlined activities, state leaders have not set a specific goal for expansion and have offered limited specificity on how and when community will be engaged in developing the plan for expansion. MSPWin would like to assist State Leaders in setting a goal and planned expansion of a more robust and integrated SNAP E&T system.

MSPWin applauds DHS and DEED for their efforts over the past several months to build a stronger SNAP E&T program into the State’s new Career Pathways strategy in workforce development. As we move towards implementation, MSPWin recommends pursuing the following “Opportunities” related to expansion:

Opportunities:

1. Set a clear goal and timeline related to expanding Minnesota’s utilization of the 50% reimbursement option. Given Minnesota’s strong state, local, and philanthropic investment in job training for low-income job seekers, there is significant opportunity to increase our Federal Financial Participation to levels more commensurate with our peer states (grow federal funds by \$10-15M).
2. MN DEED should implement a “distributed network” strategy that allows local government and community-based providers to identify match and rapidly expand Minnesota’s “Third Party Match” participation. Washington State’s expansion was largely attributed to the Third Party Match option, and South Carolina is pursuing similar expansion that appears to be a streamlined and open application approach (see links in “Additional Resources” section).
3. Grow a network of SNAP E&T providers to assist ABAWDs in meeting re-instituted requirements. See South Carolina and Washington State websites in Attachment A: Additional Resources.
4. Utilize technical assistance offered by USDA FNS, CLASP, and/or National Skills Coalition to grow E&T supports for SNAP recipients.

Observation #2: Minnesota’s attrition of ABAWDs, in-part, appears to be related to its narrow interpretation of federal guidance and allowances for non-disabled adults without children.

USDA provides more flexibility for states than often is understood in running their SNAP E&T programs and establishing state policies and procedures. While time should be taken to review all state level interpretations of federal guidance, we have identified 4 examples where Minnesota could have avoided at least a portion of the ABAWD terminations.

- ❖ *Minnesota’s definition and verification of “unfit to work” appears narrower than other states and likely leads to a number of individuals with significant medical and mental health barriers being identified as “able-bodied.”* Other states include additional medical and mental health criteria, allow social workers and nurses to document “fitness for work,” and accept evidence of enrollment in other government programs targeted to individuals with employment limitations (e.g. – vocational rehabilitation or workman’s compensation).
- ❖ *Minnesota currently DOES NOT utilize its 15% individual exemption allowance and has subsequently accrued 110,000 “banked months” that could be used to extend benefits for ABAWDs.* Through the 15% individual exemption option, states are given federal flexibility to exempt certain subgroups of people who would otherwise be identified as an ABAWD. States can use these exemptions to waive requirements for particularly hard-to-employ ABAWDs (e.g. - individuals experiencing chronic homelessness). These banked months could have been deployed in 2014 to exempt individuals who had extraordinary barriers to employment or could have been used as a re-engagement strategy for those ABAWDs who were willing to participate in work search requirements but may not have fully understood the ABAWD changes.
- ❖ *Minnesota opts out of being a “pledge” state and as such leaves additional federal funding on the table.* USDA provides additional federal funds to states who “pledge” to provide basic employment and training supports to “at-risk” ABAWDs (those ABAWDs who are in their third month and have not improved their economic stability). Becoming a “pledge” state ensures that all “at-risk ABAWDs” would be guaranteed access to qualifying work related activities and have some level of support to meet mandatory work provisions.
- ❖ *Minnesota operates a “mandatory” SNAP E&T program for ABAWDs, in which those who do not comply with work requirements face sanctioning and ultimately termination from SNAP.* Coupled with our lack of “pledging” to serve at-risk ABAWDs – this approach effectively creates the maximum penalty for nonparticipation while offering minimal support to meet mandatory work related requirements. At the time of writing this document, we do not know how many ABAWDs were terminated for noncompliance/prior to reaching their 3 month limit. Advocates were told “several” participants were terminated for failure to attend a mandatory “orientation” and subsequent appointments for SNAP E&T.

In addition to the 4 examples provided above, Minnesota also appears to take a relatively narrow interpretation of the work related activities that “qualify” for the 80hr/month participation requirements for ABAWDs, the activities that can be reimbursed by 50% SNAP E&T match funds, and the allowable sources of match dollars for SNAP E&T 50% funds. All of these policy interpretations should be revisited with an eye towards maximizing SNAP enrollment and expanding SNAP E&T.

Opportunities:

1. Review and revise the policies and procedures that guide Minnesota's approach to serving ABAWDs. Involve advocates and community based providers to ensure transparency while soliciting input on local needs from the SNAP participant point of view.
2. Analyze ABAWD terminations, attempts to re-apply, and the E&T supports that were utilized. This analysis could inform re-engagement strategies and types of E&T supports needed by ABAWDs.
3. Utilize technical assistance and guidance via USDA FNS, Center for Budget and Policy Priorities, FRAC, and others to build a more robust approach to serving ABAWDs given the re-instatement of work requirements.

NOTE: the Office of Economic Opportunity recently convened an "ABAWD Taskforce" that is beginning to implement the "Opportunities" identified above. This promising development at DHS occurred during the drafting of this document.

Observation #3: Minnesota's SNAP E&T Program operates in relative isolation of SNAP Outreach and Education efforts, community-based employment and training supports for low-income job seekers, and the larger workforce development system.

This apparent fragmentation of the system appears to be caused by multiple factors: the administration of the SNAP program by multiple State Departments and divisions; the low-profile SNAP E&T has had throughout its history and subsequent atrophy of the State's program during the waiver; the lack of staffing and resources that Minnesota directs to administer the program; and, the limited engagement of community-based programs and providers in the State's SNAP E&T planning.

Evidence of this fragmentation includes:

- ❖ Policies in Minnesota's E&T program that appear to undermine SNAP enrollment goals (mandatory participation with minimal support to meet requirements).
- ❖ Broad misunderstanding of rules and responsibilities of ABAWDs after the expiration of Minnesota's waiver in 2013. The confusion of County leaders, case workers, hunger and housing advocates, and clients themselves is documented in a Wilder Research qualitative analysis of the ABAWD Waiver Expiration.
- ❖ Lack of leveraged funds in State, county, city and philanthropic funded programs that serve SNAP eligible participants. MSPW in conservatively estimates an additional \$5-10M/year could be leveraged in SNAP E&T funds with no new public/State funds.
- ❖ Low percentage of ABAWDs post-waiver who were able to meet re-instated work requirements (less than 8% of ABAWDs participated in E&T in 2014).
- ❖ Lack of information available on where SNAP recipients can meet work related requirements (no discernable guide or compilation of resources on SNAP E&T).

NOTE: this isolation and fragmentation should not be viewed without added context. The SNAP E&T program at the federal level is complicated, has evolved, and many states are struggling with similar issues. That

said, USDA FNS has taken multiple measures more recently to add guidance, encourage increased utilization of SNAP E&T resources, provide additional support, and is clearly motivated to assist States in utilizing these resources.

Opportunities:

1. Ensure that Minnesota's SNAP E&T Plan is well aligned with the primary purpose of the SNAP Program – to improve the nutrition of low-income children, families and individuals. This would include ensuring that any growth in SNAP E&T resources be prioritized to meet work related needs of ABAWDs while exploring opportunities to enroll low-income job seekers in SNAP.
2. Improve coordination and transparency in SNAP E&T planning through engaging others in the planning process (and potentially the ongoing oversight).
3. Explore how SNAP E&T Planning might be incorporated into the State's Unified Plan required under the Workforce Innovation and Opportunity Act.
4. Capitalize on the opportunity for technical assistance via FNS to build a more robust SNAP E&T system.

Conclusion

While it is exciting to see how DHS and DEED are working to redesign and expand Minnesota's SNAP E&T program, we hope this white paper makes it clear that Minnesota's SNAP program has many opportunities to improve. MSPWin welcomes opportunities to partner with public or nonprofit workforce leaders to ensure that eligible low income adults in our communities can access and retain SNAP benefits as they are supported to advance along promising career pathways.

Attachment A: Additional Resources

Federal Guidance/Resources on SNAP Employment and Training

United States Code of Federal Regulations Title 7, Part 273.7 –
http://cfr.regstoday.com/7cfr273.aspx#7_CFR_273p7

SNAP Employment and Training Toolkit: http://www.fns.usda.gov/sites/default/files/ET_Toolkit_2013.pdf

SNAP Employment and Training Program Handbook: <http://www.fns.usda.gov/sites/default/files/handbook-2003.pdf>

State SNAP Employment and Training Plans

State Plans are public information/available through USDA FNS. SNAP E&T Plans for Minnesota (FY2013 - FY2015), South Carolina (FY 2014-FY2015), Washington State (FY2013-FY2015), and Wisconsin (FY2015) were requested and provided by USDA FNS for purposes of this White Paper.

Minnesota Guidance and Communication on SNAP Employment and Training

Minnesota's SNAP E&T Manual is available at: www.dhs.state.mn.us/dhs16_139696

Memo issued by DHS regarding Minnesota's "Reinstatement of the Work Provisions for Able-Bodied Adults Without Dependents (ABAWDs) for the Supplemental Nutrition Assistance Program (SNAP)" is available at www.dhs.state.mn.us/main/groups/publications/.../dhs16_178057.pdf

National Research and Reports on SNAP Employment & Training

Center for Law and Social Policy (CLASP) - SNAP E&T Overview: <http://www.clasp.org/resources-and-publications/publication-1/SNAP-ET-Overview.pdf>

National Skills Coalition – SNAP Employment and Training: <http://www.nationalskillscoalition.org/federal-policy/snap-employment-and-training>

Seattle Jobs Initiative - SNAP E&T/BFET Resources - <http://www.seattlejobsinitiative.com/innovations/snap-et-bfet-resource-center/>

Center on Budget and Policy Priorities – "Approximately 1 Million Unemployed Childless Adults will Lose SNAP Benefits in 2016 as State Waivers Expire." See: <http://www.cbpp.org/files/1-5-15fa.pdf>

Institute on Disability's "Impact of the Work Requirements in Supplemental Nutritional Assistance (SNAP) on Low-Income Working-Age People with Disabilities. See: <http://www.researchondisability.org/docs/publications/snap-paper-8-23-2014-with-appendix.pdf?sfvrsn=2>

Other SNAP Employment and Training Resources/Websites

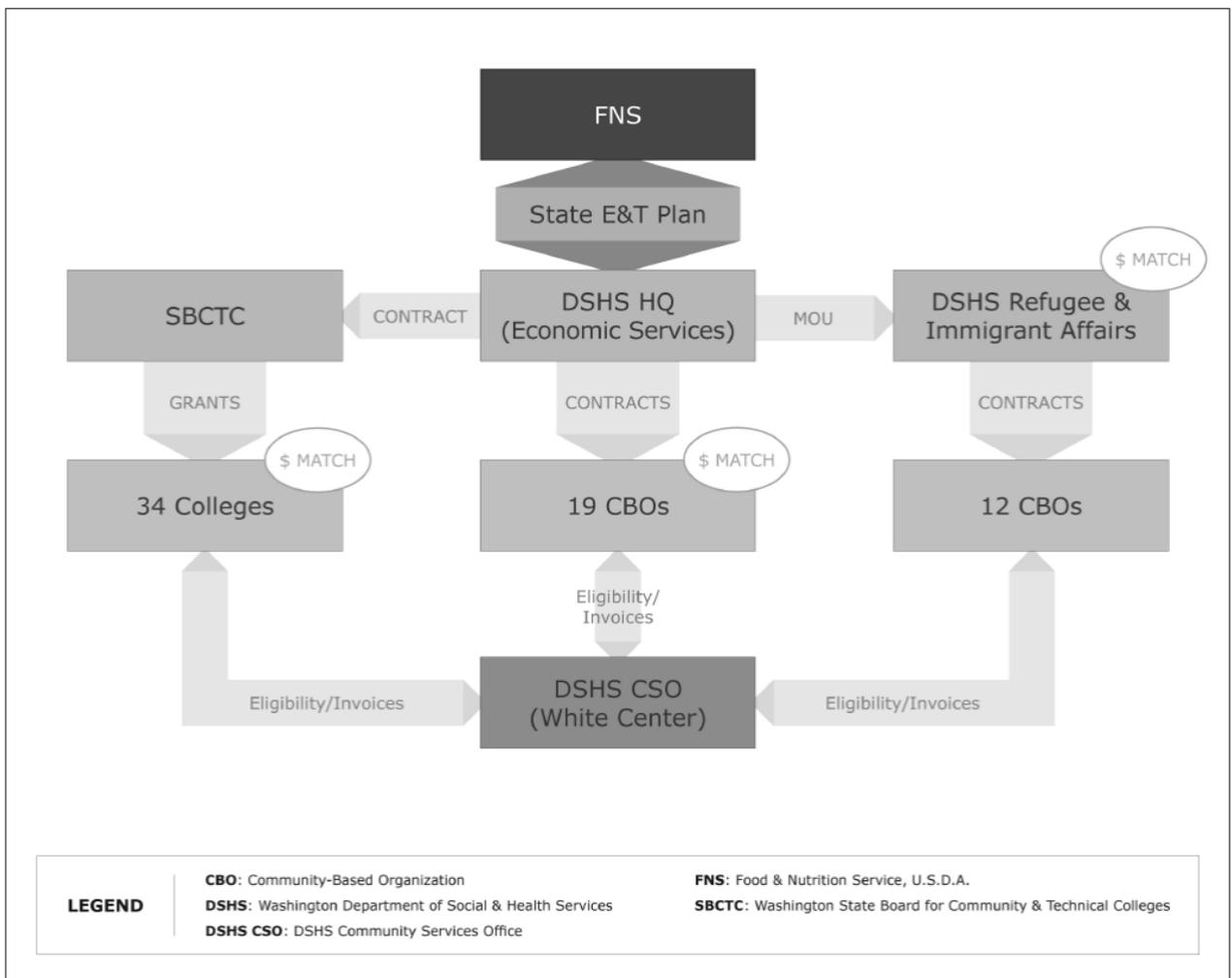
South Carolina's "SNAP@Work," provides a good example of how existing employment and training funds can leverage third-party reimbursement through a "distributed network" strategy. See Provider Handout, SNAP2Work Directory of Partners/Providers, and SNAP2Work FAQs at <https://dss.sc.gov/content/customers/food/snap2wk/index.aspx>

Washington State's Basic Food Employment and Training Resource Website - <http://www.basicfoodet.org/>

Vermont Food Help's ABAWD Tip Sheet at http://vermontfoodhelp.com/outreach_tools/2014_ABAWD_Tip_Sheet.pdf

Attachment B: Example of a “Network Strategy”

Visual of Washington State’s “Third Party Match” model – where 34 Colleges and 19 CBOs identify local match required. This is what is described above as a “network strategy,” engaging numerous community-based programs and providers in supplementing employment and training supports for SNAP recipients. Visual is available in the Seattle Jobs Initiative [“SNAP E&T Training Workbook,”](#) July 2014.



Attachment C: Minnesota Department of Human Services and Department of Employment and Economic Development Response – April 6, 2015

Provided by email on April 6, 2015 by Tom Norman, Director of Workforce Development – MN DEED

Thank you for your ongoing interest in SNAP E and T programs. We appreciate the positive recent meetings we have had with you and the opportunity to provide input for your draft white paper regarding opportunities to enhance Minnesota's services to SNAP recipients. Both DHS and DEED share your commitment and dedication to reshaping these efforts in positive and sustainable directions with the long-term goal of improving the employability and movement of this population toward long-term self-sufficiency.

The following information is designed to provide several clarifications regarding statements outlined in your document and to summarize our overall directions relative to the SNAP E and T program.

Loss of the ABAWD Waiver and ABAWD Task Force

We share the concern, and always have, about the impact of the reinstated mandatory work requirements on vulnerable “able bodied adults” on SNAP. As you know, we are committed to rebuilding this program in a much more comprehensive direction. In a perfect world we would have had the resources and staff to conduct a pre-analysis and to have launched an engagement campaign well in advance of the expiration of the waiver.

As you note in the paper, Minnesota has historically had very little infrastructure at the state level to support more robust programming and oversight of the E and T sites. To respond to this issue, we are looking to the future and are proactively seeking additional resources, re-designing the program, developing policies and procedures, providing staffing resources at both DEED and DHS to provide the infrastructure necessary to expand the SNAP E and T program in new and positive directions. We welcome your constructive involvement as these programmatic elements are established.

Current ABAWD Strategies:

DHS/DEED staff meets with Hennepin County staff and advocates biweekly to assist in developing a more accessible and participant friendly program with orientations held at local service centers rather than only at Sabathani Center. A video, noted in the bullet below, will be shown at each service center. All applicants will be informed of orientation when they interview whether in person or by phone. Alternative methods for orientation are in development. A meeting with DHS, DEED and Hennepin leadership is scheduled in early April to check on progress.

DHS and DEED are working with county staff to expand services to Hennepin County SNAP participants. Planning efforts have been initiated with the goal of expanding the range of services provided. In addition, an RFP will be released in May to potentially expand the number of service providers. A bidder's conference will also be publicized and held in May.

The Nutritious Food Coalition has been designated as the overarching vehicle for the work of the ABAWD Task Force and will make regular reports to the DHS Commissioner. Coalition members will help disseminate new resources and also guide the work of the state agencies as we expand our efforts. Both DEED and DHS staff have and will continue to participate in this effort.

DEED's CARD division along with assistance from DHS staff is preparing a series of informational packets, handouts and an orientation video to provide recipients a more friendly initial engagement with the program. Counties, providers and advocates will use these items. We will work with advocates and food shelf and SNAP outreach personnel to prepare these documents. We expect that these resources will be ready by June 1st.

Policy staff continues to work with advocates to define the state's 'unfit to work' exemption and we will have recommendations in the near term.

Our current **Heading Home program** is recognized at a national level as a model to engage and serve the homeless through a consortium of providers coordinated by Goodwill Easter Seals. DHS/DEED are committed to the ongoing success and expansion of this program. Tom Norman, Mark Toogood and Steve Erbes are presenting to the Midwest SNAP E and T directors in Chicago on April 21-22 and will have a chance to learn from FNS staff and other states how their efforts are working.

15% banked months will be drawn down for the most vulnerable and homeless population beginning with the Heading Home participants, the Anoka County pilot and a draw down for White Earth Nation. Expanded use of banked months will be determined as we gain baseline data on utilization and process challenges.

50/50 Match Fund Expansion Strategies:

Increased 50% match dollars and changes to SNAP E&T will be reflected in amendments to our current SNAP E&T plan as well as the next Federal Fiscal Year plan. All 50% match dollars, the plan and amendments must be approved by FNS. We are preparing to expand state level resources by partnering with state level agencies to leverage state funds currently available to and expended on SNAP recipients. Our partnering with the Office of Higher Education is in its final stages of approval by FNS. We intend to pilot with eight colleges beginning June 1 for summer session, and then move to statewide implementation for fall 2015.

DEED will collaborate with DHS in implementing efforts to further expand sources of reliable program funding. These efforts will include a comprehensive outreach process to state agencies, philanthropic organizations and private non-profit organizations to document state and local investments in workforce development. Policies are being developed for these initiatives. The intended implementation timeline for programming developed through these newly developed resources is October 1, 2015.

DHS and DEED are working with potential new CBOs partners, educating them in the required process and FNS fiduciary reporting requirements to ensure the integrity of SNAP E&T dollars spent on work activities for SNAP recipients.

DEED and DHS will also engage in technical assistance from National Skills Coalition staff (Brooke DeRenzi from NSC and David Kaz from Seattle Jobs Initiative), as NSC and the Seattle Jobs Initiative launch a new technical assistance effort for states looking to advance a skills-focused SNAP E&T program using a 50-50 funding model. We will have a conference call with Brooke and David on April 8th.

A SNAP E&T partnerships RFP is being prepared for release. This RFP will be addressed during upcoming partner meetings. As we discussed in our recent meeting, we are developing the programmatic framework for these resources along the career pathways model that anticipates the need to integrate robust case management approaches with developmental education coupled with skills training and placement assistance. We recognize that individuals participating in these programs will be among the most difficult to serve and place into unsubsidized employment. The career pathways model is well suited to assisting SNAP participants into long-term employment at wage rates permitting self-sufficiency.

We realize that to fully fund a robust SNAP E&T program we need providers skilled in serving this population and funding resources to support these efforts. We will begin to arrange for and hold four to five 'potential partner' meetings with CBOs scheduled for both metro and outstate locations to ensure that all potential partners have the opportunity to learn how they may become a part of the SNAP E&T delivery team. These efforts will be coordinated with the Minnesota Workforce Council Association. DHS and DEED will address partner requirements, allowable activities, the RFP and invoicing processes at these meetings.

As the program parameters of Minnesota's enhanced SNAP initiative are developed, ongoing meetings will be held with potential partners, where we will have an opportunity to review the technical, programmatic and fiduciary requirements of the enhanced SNAP effort. These meetings will commence throughout the summer and fall.

Policy Changes, Partnership, Leadership

We are analyzing and likely to propose several policy changes within our state plan for FFY16 (Due August 15), including moving to a voluntary model, looking at 'pledge state' declaration, etc. Changes to policy that may require changes to MAXIS will be assessed and prioritized.

DHS and DEED are committed to working with community partners and inviting their full engagement in our SNAP E and T partnerships. This will include opportunities to comment on the SNAP draft plan, regular meetings, participation at GWDC, etc.

In addition to agency leadership, the GWDC Career Pathways Committee will be the lead organization providing policy and oversight support. Agencies and CBO's will have the opportunity to help continue to shape our program expansion by participating in committee activities and this group will serve as a forum for convening multiple community interests. We welcome your participation in these activities.

As we move forward there are important dates to remember:

- Draft SNAP FFY 2016 plan due by 6/1/2015 – This will include the identification of new partners and new strategies to be implemented by 10/1/15.
- Revised Plan for public comment out by 7/1/2015 for a 30-day period ending 8/1/2015.
- Completed SNAP FFY 2016 plan published and sent to FNS by 8/15/2015.

Thank you as always for your partnership and support as we continue to expand our efforts to serve vulnerable and hungry Minnesotans on our SNAP and SNAP E and T program! We have appreciated your advocacy on behalf of Minnesota's vulnerable citizens. Please feel free to contact either of us if we can provide you any additional information.

Sincerely,

Mark Toogood and Tom Norman