

# Supplemental Nutrition Assistance Program - Employment and Training Program (SNAP E&T)

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## Issue

This report describes (1) federal requirements for SNAP E&T programs and (2) program administration in Connecticut.

## Summary

SNAP E&T is a federally funded, state administered program. Federal law requires states to have a SNAP E&T program, but states have flexibility in how to design it. States may make their programs mandatory for SNAP recipients who are subject to work requirements (“work registrants”), voluntary for all, or some combination of mandatory and voluntary. States must provide case management and must select one additional program component (e.g., supervised job search, vocational training, or job retention services).

The federal United States Department of Agriculture’s (USDA) Food and Nutrition Service (FNS) allocates federal funds to states based on a formula. States may receive additional funds for pledging to provide E&T services to all SNAP Able Bodied Adults Without Dependents (ABAWDs). Additionally, states may use nonfederal funds for certain E&T expenses and FNS will reimburse these costs at 50%.

Connecticut’s SNAP E&T program, [CTPathways](#), provides certificates and associate degree programs through Connecticut’s 12 community colleges and the community college system office, as well as one private university and three community-based organizations. CTPathways also offers

supervised job search and job retention services through New London Homeless Hospitality Center. Connecticut's state SNAP agency, the Department of Social Services (DSS) estimates that SNAP E&T serves 1,644 people annually.

DSS states in its FY 23 SNAP Employment and Training Plan that the department is "maximizing all revenue opportunities in its state plan and community colleges are using other funding sources and strategies to make programs more financially stable and sustainable." DSS has consulted or partnered with other state agencies, employers, and other entities to administer the program.

## **Federal Requirements**

### ***Program Purpose and Design***

The federal Food and Nutrition Act requires each state SNAP agency to operate a SNAP E&T program to help members of SNAP households gain, skills, training, work, or experience that will (1) increase their ability to obtain regular employment and (2) meet state or local workforce needs ([7 U.S.C. § 2015\(d\)\(4\)\(A\)\(i\)](#)).

Federal law requires states to have an E&T program, but states have considerable flexibility in how to design it. The law requires programs to include case management and at least one of the following components:

1. supervised job search and job search training (i.e., "work readiness" activities);
2. workfare programs;
3. programs designed to improve participants' employability through actual work experience, training, or both (e.g., internships or apprenticeships);
4. programs designed to increase participants' self-sufficiency through self-employment;
5. education that improves basic skills or employability and have a direct link to employment;
6. vocational training;
7. job retention for at least 30 days and no more than 90 days; or
8. other programs approved as authorized under USDA regulations ([7 U.S.C. § 2015\(d\)\(4\)\(B\)\(i\)](#)).

States choose which components they will offer in their programs and describe them in their annual E&T state plan. States must consult with their workforce development boards when designing the

program unless the state demonstrates to USDA that consultation with private employers or employer organizations would be more effective or efficient ([7 U.S.C. § 2015\(d\)\(4\)\(A\)\(i\)](#)).

### ***Mandatory and Voluntary Programs***

Federal law requires certain SNAP enrollees to comply with work requirements. These “work registrants” are required to participate in SNAP E&T programs unless the state exempts them. States have broad authority to exempt work registrants from the requirement to participate in SNAP E&T programs. A state may do so for various reasons, including a lack of appropriate or available spot in the E&T program or a work registrant’s pregnancy, homelessness, lack of proficiency in English, or geographic location. Exempt work registrants or other SNAP enrollees may participate in SNAP E&T programs voluntarily. If a state requires a work registrant to participate in SNAP E&T, the work registrant may be sanctioned or lose SNAP benefits for failing to participate.

Alternatively, states may exempt all work registrants from the requirement to participate, essentially administering an entirely voluntary E&T program.

Federal regulations require state SNAP agencies to screen and refer SNAP applicants for E&T programs (whether voluntary or mandatory) as part of a SNAP eligibility determination ([7 C.F.R. § 271.2](#) & [7 C.F.R. § 273.7\(c\)\(2\)](#)).

### ***Funding***

The USDA allocates federal funds as “100% funds” among the 53 state SNAP agencies according to a formula based on the number of work registrants and ABAWDs in the state or territory (approximately \$103.9 million total in 2022). States that pledge to provide E&T activities to every ABAWD may receive additional funds (“pledge funds,” approximately \$20 million total in 2022). (ABAWDs are subject to a time limit on benefits based on compliance with additional work requirements.) Amounts for these federal funds are set in federal statute (\$123.9 million total ([7 U.S.C. § 2025\(h\)\(1\)\(A\) & \(E\)](#))).

States may also identify nonfederal funds to support E&T programs. The USDA will reimburse states for 50% of these expenditures (“50% funds”). These nonfederal funds may be state funds, appropriated by the state, or other nonfederal funds. These funds may be used for administrative costs or “participant reimbursements.” State SNAP agencies are required to pay for or reimburse E&T applicants and participants for all expenses reasonably necessary and directly related to participation in an E&T program (e.g., dependent care, transportation, books, or training materials). These “participant reimbursements” may not be paid for with federal funds; these must be paid for through 50% funds ([7 C.F.R. § 273.7\(d\)\(4\)](#)). USDA estimates amounts for these 50% funds based on (1) last year’s spending, (2) projected inflation, and (3) consultation with the state program.

## SNAP E&T in Connecticut

Connecticut's SNAP E&T Program, CTPathways, is entirely voluntary. As described in [its FY 23 SNAP Employment and Training Plan](#), DSS contracts with Connecticut's 12 community colleges and the Community College System Office, as well as one private university and four community-based organizations. In addition to case management, CTPathways offers (1) education or vocational training, (2) supervised job search, and (3) job retention services. Connecticut is not a "pledge" state in that it does not accept extra funds in return for pledging to provide E&T services to all ABAWDs.

### *Funding*

According to DSS, for federal FY 24, the department is expected to receive \$694,164.79 in 100% funds and has requested an additional \$450,000. Additionally, DSS states that nonfederal, 50% funds for the program in federal FY 24 total \$7.4 million, most of which is contributed by the colleges and community-based organizations that partner with DSS for the program.

### *Program Components*

*Case Management.* SNAP E&T coordinators provide case management services. Additionally, DSS requires E&T providers to have staff on site to provide case management services. These services include comprehensive intake assessments, individualized service plans, progress monitoring, and coordination with service providers.

*Education or Vocational Training.* DSS describes Connecticut's SNAP E&T education or vocational training component as short-term, job driven programs in occupations supported by labor market information from the Department of Labor (DOL). It includes certificate and associate degree programs. All SNAP recipients over age 15 who do not receive Temporary Family Assistance (TFA) are eligible. (TFA is Connecticut's cash assistance program funded through the federal Temporary Assistance for Needy Families block grant. It has separate work requirements and supports.) DSS targets SNAP-eligible work registrants. [Most programs](#) require a high school diploma or equivalent and, while computer literacy is not a prerequisite, E&T providers encourage it for hybrid or online courses. Programs operate statewide, with a projected annual participation of 1,121 people. The following organizations contract with DSS to provide these services:

1. Connecticut's 12 community colleges,
2. Goodwin University,
3. Connecticut Center for Arts and Technology,

4. Opportunities Industrialization Center (OIC) of New London, and
5. Capital Workforce Partners.

*Supervised Job Search.* CTPathways offers supervised job search through New London Homeless Hospitality Center. A SNAP coordinator at that location offers classes on interview preparedness, job search techniques and virtual interviewing. She also assists participants with job applications, resumes, and issues relevant to those with criminal records. DSS targets SNAP recipients who are unemployed or underemployed, including those experiencing homelessness. All SNAP recipients over age 15 who do not receive TFA are eligible. The program operates in New London with a projected annual participation of 48 people.

*Job Retention.* CTPathways offers job retention services through New London Homeless Hospitality Center. These services help participants with supportive services after they have participated in another component and gained employment. Job retention services last for at least 30 days and no more than 90 days. The projected annual participation for these services is 48 people.

### ***Participant Reimbursements***

As described above, states must pay for or reimburse E&T applicants and participants for all expenses reasonably necessary and directly related to participation in an E&T program. As described in its state plan, E&T providers in Connecticut will reimburse for the following expenses (all based on actual cost, except for childcare):

1. childcare (subject to a \$619.20 cap and based on payment rates under the Care 4 Kids program);
2. transportation (e.g., gas cards, bus passes, car repairs);
3. books;
4. licensing and exam fees;
5. uniforms and equipment;
6. course registration; and
7. other reasonable and necessary expenses.

The state plan estimates that 583 people will receive participant reimbursements. The plan also notes that the Connecticut State Colleges and Universities system provides funding for participant reimbursements, as well as administrative support for the college partnerships.

## ***Consultations and Other Partnerships***

As described in the state plan, DSS collaborates with the Governor’s Workforce Council, through the Office of Workforce Strategy, to guide the department’s strategy in helping low-income SNAP recipients and avoid duplicating services across state agencies. The department also coordinates with DOL. Some of DOL’s American Job Centers are co-located at locations where E&T services are provided. DSS advises E&T providers to obtain labor market information to inform which programs to support. Additionally, E&T participants who complete vocational training are referred to an American Job Center to register in the CTHires database, enabling them to receive additional job seeking services.

DSS has also consulted with employers, including Eversource, to determine placement opportunities and discuss potential partnerships. It has consulted with [the National Community Reinvestment Coalition](#) to expand E&T opportunities within the state.

Also, DSS’s E&T staff has worked with DSS [Wilson Fish TANF Coordination consultants](#), local refugee resettlement agencies, and the federal Office of Refugee Resettlement to direct eligible SNAP refugees to CTPathways programs.

## ***Recent Trends and Program Changes in Connecticut***

Table 1 shows the number of participants for SNAP E&T in Connecticut from federal FY 18 to FY 22. According to DSS, the program supports between 4 to 5.5% of the total SNAP work registrants not receiving TFA.

**Table 1: SNAP E&T Participation (FFYs 18-22)**

<i>Federal Fiscal Year</i>	<i>Total Participation (individuals)</i>
2018	1,716
2019	1,564
2020	1,579
2021	1,613
2022	1,594

Source: DSS

As shown in the table, program participation decreased during the COVID-19 public health emergency. According to DSS, during this time, the program operated mostly through virtual classes, implementing a laptop loaner program with the community colleges to allow participants to continue their training if they wished to do so. Additionally, federal funds through the American

Rescue Plan Act (ARPA) supported other workforce initiatives; DSS expects that when ARPA funds expire, SNAP E&T programs will see increased participation.

Since last year, one organization, Community Culinary of Northwestern Connecticut, has ceased to be a contractor in the program due to low enrollment and the COVID-19 public health emergency. According to DSS, Capital Workforce Partners is also struggling with enrollment and the department plans to monitor their participation.

DSS has been implementing a new data management system for CTPathways that, according to the department, will include invoicing and more efficient reporting. The department also notes that despite the alignment of community colleges into a one college model system in 2023, DSS does not intend to merge into one contract with the system until 2024.

DSS has also [been selected](#) to participate in USDA's [FY 2023 E&T State Institute](#), a two-day event in September in Alexandria, Virginia. As described by the USDA, the event will “provide an opportunity for a select number of state SNAP agencies to build a vision for their SNAP E&T program and begin developing a strategic plan to accomplish the state’s long-term E&T goals.”

## Resources

DSS, “[FY 2023 SNAP Employment and Training Plan](#),” August 2022.

USDA, “[SNAP E&T Funding: SNAP 2022 Employment & Training National Forum](#),” December 2022.

USDA, “[SNAP E&T 101: SNAP 2022 Employment & Training National Forum](#),” December 2022.

USDA, “[Supplemental Nutrition Assistance Program \(SNAP\) Employment and Training \(E & T\) Best Practices Study: Final Report](#),” November 2016.

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