SNAP Employment and Training Plan

Federal Fiscal Year 2018

Texas Workforce Commission Federal Fiscal Year 2018

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Section A: Cover Page and Authorized Signatures

State: Texas

State Agency: Texas Workforce Commission

Federal FY: 2018

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Section B: Assurance Statements

Section B: Assurance Statements Check box at right to indicate you have read and understand each statemen	t.
I. The State agency is accountable for the content of the State E&T plan and will provide oversight of any sub-grantees.	✓
II. The State agency is fiscally responsible for E&T activities funded under the plan and is liable for repayment of unallowable costs.	☑
III. State education costs will not be supplanted with Federal E&T funds.	V
IV. Cash or in-kind donations from other non-Federal sources have not been claimed or used as a match or reimbursement under any other Federal program.	₫
V. If in-kind goods and services are part of the budget, only public in-kind services are included. No private in-kind goods or services are claimed.	I
VI. Documentation of State agency costs, payments, and donations for approved E&T activities are maintained by the State agency and available for USDA review and audit.	☑
VII. Contracts are procured through appropriate procedures governed by State procurement regulations.	₫
VIII. Program activities are conducted in compliance with all applicable Federal laws, rules, and regulations including Civil Rights and OMB regulations governing cost issues.	₫
IX. E&T education activities directly enhance the employability of the participants; there is a direct link between the education activities and jobreadiness.	
X. Program activities and expenses are reasonable and necessary to accomplish the goals and objectives of SNAP E&T.	⊡
XI. The E&T Program is implemented in a manner that is responsive to the special needs of American Indians on Reservations. State shall: consult on an ongoing basis about portions of State Plan which affect them; submit for comment all portions of the State Plan that affect the ITO; if appropriate and the extent practicable, include ITO suggestions in State plan. (For States with Indian Reservations only)	Ø

Texas Workforce Commission Federal Fiscal Year 2018

Acronyms

Below is a list of common acronyms utilized within this plan:

ABAWD Able-Bodied Adult without Dependents

E&T Employment and Training

FFY Federal Fiscal Year

FNS Food and Nutrition Service

SNAP Supplemental Nutrition Assistance Program

USDA United States Department of Agriculture

Section C: State E&T Program, Operations and Policy Overview

I. Summary of the SNAP E&T Program

- Mission
- Program Scope and Services
- Administrative Structure of Program

• Mission:

The Texas Workforce Commission's (TWC) mission is to promote and support a workforce system that creates value and offers employers, individuals, and communities the opportunity to achieve and sustain economic prosperity.

• Program Scope and Services:

Texas implements its SNAP E&T program in accordance with 7 U.S.C. \$2015(d)(4)(A). Texas' SNAP E&T program promotes long-term self-sufficiency and independence by preparing SNAP recipients for employment. The goal of SNAP E&T is to assist SNAP recipients in obtaining employment, including provision of work opportunities for 18- to 49-year-old Able-Bodied Adults Without Dependents (ABAWDs). Texas' SNAP E&T program operates under a work first service model. The work first service delivery model emphasizes job search with the goal of employment at the earliest opportunity for applicants and recipients of cash assistance. There are 28 Local Workforce Development Boards (Boards) that have the ability to offer additional E&T components through contracted Workforce Solutions Offices for recipients who are unable to find or retain employment with their existing skills and abilities.

As stated in Texas' Federal Fiscal Year 2017 (FFY'17) and prior years' SNAP E&T State Plans of Operations, TWC has sought all opportunities to create consistency between the Temporary Assistance for Needy Families (TANF) employment program called Choices and SNAP E&T. Federal law supports these endeavors. Specifically, 7 U.S.C. §2015(d)(4)(E) and §2015(d)(4)(J), and 7 C.F.R. §273.7(c)(2). This type of program design is referred to in Texas as the Work First Philosophy. Workforce Solutions Offices operate Choices and the SNAP E&T program under the following compatible work requirements:

- Individuals may participate in any activities, including job search, work experience, education and training, and workfare (SNAP E&T ABAWDs only), based on Boards determination.
- Individuals may attend the same employment planning sessions and group job search seminars for either program.
- Individuals may receive similar support services or participant reimbursements to assist with participating in work activities.

 Individuals who are unable to comply with their Choices or SNAP E&T work requirements may receive a good cause exception for circumstances beyond the individual's control. The Choices and SNAP E&T good cause criteria are the same.

TWC continues to abide by federal law that prohibits the use of SNAP E&T funds for TANF recipients. Based on this, Boards are prohibited from using their SNAP E&T funds to pay for Choices services.

Job Retention Services and Support Services

In Texas, job retention services and support services are provided for up to 90 days to E&T participants who gain employment after participating in another E&T component such as job search, job search training, workfare, work experience or training, educational programs or activities, self-employment activities, and other appropriate programs, as approved by FNS. These services assist SNAP recipients to retain employment by: improving basic skills; increasing employability; aiding progress up a career ladder; and enabling them to gain better employment.

Support Services

Support services are provided to SNAP E&T participants if they are reasonable, necessary, and directly related to their participation or to the recipient's employment. Support services include payment or reimbursement for:

- transportation expenses;
- work-related expenses;
- training or education related expenses such as GED test payment, uniforms, personal safety items or necessary equipment, books, or training materials;
- clothing suitable for job interviews or employment;
- licensing and bonding fees;
- vision needs;
- housing assistance; or
- child care (SNAP E&T General Population).

Support services may be provided for SNAP recipients who are participating in the following SNAP E&T activities:

- Job search
- Vocational training
- Nonvocational education

- Work experience
- Workfare (ABAWDs only)

• Administrative Structure of Program:

The SNAP E&T program in Texas is administered through TWC. TWC coordinates and collaborates with the 28 Boards and their contracted workforce service providers and community partners. Collectively known as Texas Workforce Solutions, this network offers local access to integrated and statewide services to all employers, workers, job seekers, and youth, including individuals with disabilities and other barriers to employment.

Each component activity of Texas' SNAP E&T program is delivered through its statewide workforce development system. In Texas, SNAP recipients may receive any of the following SNAP E&T components:

- Job search
- Vocational training
- Education
- Work experience
- Workfare (ABAWDs only)

Other services include:

- work services under the Workforce Innovation and Opportunity Act of 2014 (WIOA); and
- work services under Trade Adjustment Assistance (TAA).

All services are delivered through Texas' statewide workforce development system.

Texas' SNAP E&T Policy Guidance

All TWC's SNAP E&T policies and guidance used for the provision of services to SNAP recipients are outlined in the following:

- Chapter 813 Supplemental Nutrition Assistance Program Employment and Training rules, codified in the Texas Administrative Code, Title 40, Part 20;
- SNAP E&T Comprehensive Guide;
- Workforce Development Letters; and
- Technical Assistance Bulletins.

II. Program Changes

- New Initiatives
- Significant Changes in State Policy or Funding
- New Initiatives
- HHSC and TWC Two-Way Automated Interface for Processing Disqualifications for Noncompliance with SNAP E&T Work Requirements

Texas Health and Human Services Commission (HHSC) and TWC are programming a two-way SNAP E&T automated interface to be used in FFY'18 for SNAP E&T noncompliance actions and sanction processes. The two-way SNAP E&T automated interface mitigates data inconsistencies for SNAP recipients who non-comply with SNAP E&T requirements and enables both agencies to effectively and efficiently track all SNAP E&T noncompliance actions. HHSC, Board, and Board contractor staff will receive guidance and will be trained on the new two-way SNAP E&T automated interface. The two-way automated interface is scheduled for release by the end of the first quarter in FFY'18.

• County Expansion

In FFY'18 TWC and HHSC will begin a phased-in approach to Texas' county expansion project. Effective October 1, 2017, TWC will expand SNAP E&T services to SNAP recipients in the following 19 counties:

Aransas	Hutchinson	Refugio
Bailey	Jim Hogg	Scurry
Bandera	Karnes	Zapata
Brewster	Kendall	
Brooks	Lampasas	
Deaf Smith	Medina	
Garza	Milam	
Gillespie	Presidio	

The following policy changes and actions for the 19 counties are as follows:

- 19 counties will be designated by TWC and HHSC as fullservice SNAP E&T counties. The full-service county criteria is outlined on page 12;
- TWC will notify Boards impacted by this change at least one month prior to implementation;
- HHSC will notify SNAP eligibility staff of the county changes at least one month prior to implementation;

- HHSC will notify all SNAP recipients impacted by this change of their requirement to participate in SNAP E&T if outreached;
- HHSC will send notification of the 3 out of 36-month time-limit and work requirements to all ABAWDs residing in the 19 minimum-service counties; and
- HHSC and TWC will provide technical assistance and support during this process.
- SNAP E&T service delivery priority will be given to ABAWDs with time limits.
- Boards will be required to outreach and offer ABAWDs a qualifying SNAP E&T component within 10 days of appearance in TWC's automated system.
- The SNAP E&T General Population (non-ABAWDs) will be outreached based on available funding.

The anticipated monthly number of SNAP E&T ABAWD work registrants residing in the 19 counties is 1,576.

The anticipated monthly number of SNAP E&T General Population work registrants in the 19 counties is 4,893.

• Significant Changes in State Policy or Funding

Administrative authority of the SNAP E&T Program in Texas will transfer from TWC to HHSC, effective April 1, 2018. TWC and HHSC are working together on the details of the transfer and will provide a detailed transition plan to FNS no later than November 30, 2017, outlining the action steps that need to be taken, who is responsible for each step, and the anticipated completion date.

III. Workforce Development System

- General Description
- In-demand and Emerging Industries and Occupations
- Connection to SNAP E&T, Components Offered Through Such System, Career Pathways, and Credentials Available

General Description

Texas complies with 7 U.S.C.§2015(d)(4)(A)(ii) as amended by §817 of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996. The Texas workforce development system is composed of many workforce partnerships and business operations, including Boards, contracted service providers, and others in workforce development. Boards, using a competitive procurement process, contract with public or private companies, or nonprofit organizations, to operate Workforce Solutions Offices throughout the state. The Workforce Solutions Offices, which are overseen by the Boards, provide access to multiple services—including SNAP E&T—at one site and offer services to employers and job seekers that are tailored to meet the needs of the local workforce development area (workforce area).

TWC aligns workforce development activities by establishing rigorous strategic planning requirements coupled with common performance accountability measures and requirements governing Texas' one-stop delivery system.

TWC coordinates and collaborates with the 28 Boards and their contracted workforce service providers and community partners. Collectively known as Texas Workforce Solutions, this network offers local access to integrated and statewide services to all employers, workers, job seekers, and youth, including individuals with disabilities and other barriers to employment.

Each component activity of Texas' SNAP E&T program is delivered through its statewide workforce development system. In Texas, SNAP recipients may receive any of the following SNAP E&T components:

- Job search
- Vocational training
- Education
- Work experience
- Workfare (ABAWDs only)

Other services include:

- work services under the Workforce Innovation and Opportunity Act of 2014 (WIOA); and
- work services under Trade Adjustment Assistance (TAA).

All services are delivered through Texas' statewide workforce development system.

Initial and Ongoing Assessment

One-stop providers (Workforce Solutions Offices) conduct initial and ongoing case management activities for SNAP recipients participating in SNAP E&T, including:

- analyzing and gathering information;
- identifying a SNAP recipient's strengths and weaknesses;
- assisting with the removal of barriers;
- developing and updating the recipient's employment plan;
- validating educational attainment and work experience;
- providing counseling and direction to individual work registrants;
- making referrals to other agencies and programs, as appropriate;
- developing jobs;
- providing job-readiness services to enhance employability;

- documenting all events impacting SNAP E&T services, face-toface meetings, and participation hours; and
- identifying employment opportunities that can help the SNAP recipient's progress toward independence from public assistance.

SNAP E&T Full- and Minimum-Service Counties

In FFY'18, Texas will continue applying the full- and minimum-service county designations. Texas will continue to use the state's 15 percent ABAWD exemption allowance for minimum-service counties (full- and minimum-service county criteria is listed on pages 14-15). Boards may serve all SNAP recipients (mandatory work registrants and exempt recipients) who reside in one of the minimum-service counties if the recipients volunteer to participate in SNAP E&T.

The current full- and minimum-service county criteria are as follows:

Full-Service Counties:

- Boards are required to outreach all ABAWDs in full-service counties within 10 days of receipt of an automated referral from HHSC.
- Boards may, as funding allows, outreach SNAP E&T General Population work registrants. (See Notes 1 and 2 below)
- All mandatory work registrants who are outreached or who volunteer (i.e., ABAWDs and General Population) have access to all services and support services. Mandatory work registrants who are outreached or currently participating in the SNAP E&T program are sanctioned (i.e., SNAP benefits will be denied) for failure to comply with SNAP E&T program requirements.
- Exempt SNAP recipients can volunteer to participate in SNAP E&T.
- Exempt recipients have access to all services and support services.
- Exempt recipients are not sanctioned for failure to comply with SNAP E&T program requirements.
- Exempt recipients' hours of participation will not exceed the hours required of mandatory work registrants.

Note 1: Additional Funds Request to Serve Non-ABAWDs

Because of a reduction in Texas' SNAP E&T 100 percent federal grant and an anticipated reduction in Texas' ABAWD pledge state funding, Texas anticipates requesting additional 100 percent funds after October

1, 2017 for FFY'18 to provide SNAP E&T services to more SNAP E&T General Population (non-ABAWDs) participants. Texas has a very large mandatory work registrant population and has only been able to serve a fraction of the work registrants because of funding constraints.

Note 2: TWC provides services to non-ABAWDs, as funding permits, in accordance with FNS regulations, which give states broad flexibility to design and deliver services. As noted in 7 CFR §273.7(e), "work registrants not otherwise exempted by the State agency are subject to the E&T program participation requirements imposed by the State agency. Such individuals are referred to in this section as E&T mandatory participants. Requirements may vary among participants." However, although there is no statutory or regulatory requirement for establishing a statewide methodology for outreaching non-ABAWDs, TWC is exploring options for developing such a methodology.

Minimum-Service Counties:

- All SNAP recipients can volunteer to participate in SNAP E&T and will have access to all services.
- Outreach is not conducted in these counties.
- SNAP recipients are not sanctioned for failure to comply with SNAP E&T program requirements.
- Hours of participation for recipients residing in these counties will not exceed the hours required of mandatory work registrants residing in full-service counties. Lists of the full- and minimum counties are on pages 40-41. In addition, the SNAP E&T Map attachment that displays the full- and minimum county designations is page 42.

All SNAP E&T services are available to SNAP recipients who volunteer in the minimum-service counties.

• In-demand and Emerging Industries and Occupations in Texas

TWC examines the number of workers by industry as the basis for producing industry employment projections. TWC produces these industry employment projections and corresponding occupational employment projections to help job seekers (including SNAP recipients), policy makers, and company hiring managers better understand their regional labor markets. Occupational employment growth is based on industry growth and other variables, which include population growth and employers' changing skills requirements.

Occupations found within these industries are growing and projected to experience the most employment growth.

Leveraging an integrated workforce system, TWC also strives to create a seamless approach that attracts and retains in-demand employers. TWC understands that an employer may not care which funding source or program is covering the service it is receiving. By creating specific Business Service Units (BSUs) at each Board, the workforce system rallies a group of dedicated individuals to meet employer needs and present employers with services in ways that are beneficial and easy to understand. BSUs are Boards' frontline business advocates, often having strong ties to the local business communities. Furthermore, because Boards are predominantly comprised of local business leaders, TWC taps a continuous flow of current and relevant information from employers. Board members may shape local policies and procedures to best fit the local marketplace.

BSUs address the ever-increasing need for skilled workers in highdemand fields by offering job search assistance, skills training, and other workforce development services.

• Third-Party Reimbursement

In Federal Fiscal Year 2018 (FFY'18), TWC will continue its Third-Party Reimbursement (TPR) initiative with the Capital Area Workforce Development Board (Capital Area) in Austin, Texas.

Capital Area will partner with the City of Austin and Travis County to leverage 50 percent federal SNAP E&T funds to cover the costs of providing SNAP E&T services to exempt and mandatory SNAP recipients not currently served due to funding limitations in the SNAP E&T program. The City of Austin (City) and Travis County (County) fund a local Workforce Education and Readiness Continuum (WERC) program, with local (non-Federal) City and County funds, which will supply nonfederal funding for the provision of allowable SNAP E&T activities and support services to SNAP recipients participating in the initiative. The source of the nonfederal funding is State General Revenue. Capital Area will not receive any advanced payment from the City or County for the TPR initiative.

Capital Area will contract with their Workforce Solutions contractor C2 Global for the TPR initiative. C2 Global will be responsible for:

• Intake and assessment;

- Verification of SNAP eligibility before enrolling the SNAP recipient into TPR services. HHSC staff determines eligibility for SNAP in Texas;
- All TPR case management activities;
- Outreach to exempt or mandatory recipients participating in the initiative. TWC will provide Capital Area with a listing of exempt recipients to outreach and market SNAP E&T TPR services. C2 Global will outreach mandatory work registrants from the pool of SNAP E&T mandatory recipients located in The Workforce Information System of Texas (TWIST);
- The provision of allowable SNAP E&T services and support services to exempt or mandatory participants. (C2 Global may offer job search, education, training, or work experience services);
- Tracking and reporting all SNAP E&T TPR activities and support services in TWIST using special TWC-established codes created specifically for TPR; and
- Submitting an invoice to the Board for expenditures incurred.

Capital Area will be responsible for:

- providing oversight and technical assistance to C2 Global for TPR.
- invoicing the City/County for services provided to SNAP recipients;
- submission of the *TPR Certification of Expenditures* form to TWC. TWC requires the Board to report the following:
 - > TPR Administration (maximum allowed, 10%);
 - > TPR Direct Program;
 - > TPR Support Services Transportation;
 - > TPR Support Services Other than Transportation; and
 - ➤ Total Expenditures); and
- Monitoring SNAP E&T TPR.

All contracts will be signed before the FFY'18 TPR initiative is implemented by the Capital Area.

TWC will provide technical assistance throughout the FFY'18 TPR project. TWC monitoring activities outlined in Section H: *Contractor Detail Addendum* will include Capital Area's TPR project. SNAP E&T TPR participation reports can be generated in TWIST. The reports capture data and participation information on all SNAP recipients participating in the TPR project.

Connection to SNAP E&T, Components Offered Through Such System, Career Pathways, and Credentials Available

Supported by state and federal funds, most basic services are provided free of charge to employers registered with the state and federal governments. Some Boards also provide certain services, including workshops and seminars, at nominal fees. BSUs within an integrated workforce system offer a unique opportunity to ensure that all workforce services are structured to ensure that the business needs are considered when delivering services to job seekers and consumers.

Dedicated BSUs provide businesses access to customized service options that address their specific business needs. BSUs offer a range of services designed to help employers with hiring and training needs to maximize their competitiveness, including:

- applicant recruitment, screening, and referral;
- listing and maintaining job orders through WorkInTexas.com,
 TWC's online job-matching system;
- assistance with and participation in job fairs;
- information resources (e.g., labor market and business statistics, employment and labor law, unemployment insurance (UI));
- testing and prescreening job candidates;
- basic employment skills training and referral to education and training providers;
- customized training—including training through the statefunded Skills Development Fund—and on-the-job (OJT) skills training;
- assistance with and information on the Work Opportunity Tax Credit; and
- rapid response and downsizing assistance in the event of closings or mass layoffs.

Career Pathways

Career Pathways delivers a comprehensive approach to career development by delivering fully on the student customer experience in education and training. Initiating a student into Career Pathways begins with understanding *why* the student is coming back to education, clarifying what the student's career goals are, and developing a program of study that accelerates completion toward those goals. Then, rather than delay a student's entry into workforce or career training through possible years of remediation, students in Career Pathways receive both educational and training elements contextually and concurrently, meaning the student is immediately immersed in a training

environment. Additionally, students in Career Pathways are provided the support and career navigation needed to realistically achieve their short-term and long-term professional goals.

TWC is committed to investing in the education of Texas students and the future of the Texas economy, and has established a bold and transformative vision for Texas by setting a 20x2020 goal: To have 20,000 adult learners enrolled in career pathways programs through partnerships among Texas employers, community and technical colleges, adult education and literacy providers, and Boards by 2020.

Adult education and literacy providers are making strides in reaching this milestone, with career pathways first piloted in higher education in 2010, helping set the stage for transformation. In the first year at TWC, AEL served over 1,500 students in career pathways programs and is serving more than 3,000 in its second year.

Texas has led the nation in setting career pathways, requiring implementation by all grantees and expanding through special initiatives. Additionally, WIOA establishes the programmatic and fiscal flexibility needed to fully achieve an integrated system across the core WIOA programs. In 2017-2018, Texas is set to serve over 6,000 students in career pathways programs, including new models such as Integrated Education and Training and Integrated English Literacy and Civics Education.

IV. Other Employment Programs

- TANF, General Assistance, etc.
- Coordination Efforts, if applicable

TWC coordinates the delivery of employment programs and facilitates the development of a more comprehensive, integrated service network that is locally managed, market driven, and high performing. Through an integrated workforce system, TWC administers WIOA Title I, TAA, Employment Service (ES), child care, employment programs under Title IV-A of the Social Security Act (i.e., Choices, (TANF) employment program), vocational rehabilitation, and Adult Education and Literacy under WIOA Title II. These programs offer Texas job seekers employment and training services and necessary support services to help them gain employment and attain self-sufficiency. Cooperative agreements with agencies administering other programs, including HHSC, the Texas Education Agency (TEA), and the Texas Veterans Commission (TVC), are initiated through the development of memoranda of understanding. As stated on pages 6 and 7, Workforce Solutions Offices operate Choices and the SNAP E&T program under the following compatible work requirements:

 Individuals may participate in any activities, including job search, work experience, education and training, and workfare

- (SNAP E&T ABAWDs only), as offered by 28 Local Workforce Development Boards (Boards).
- Individuals may attend the same employment planning sessions and group job search seminars for either program.
- Individuals may receive similar support services or participant reimbursements to assist with participating in work activities.
- Individuals who are unable to comply with their Choices or SNAP E&T work requirements may receive a good cause exception for circumstances beyond the individual's control.
 The Choices and SNAP E&T good cause criteria are the same.

Additionally, HHSC and TWC implement SNAP E&T and Choices-related processes under a Coordinated Interagency Case Management memorandum of understanding (MOU) to improve the transition of SNAP recipients between local HHSC offices and Boards. TWC and HHSC's priority is to:

- improve coordinated case management that will assist in transitioning SNAP and TANF recipients from public assistance to independence;
- provide coordinated services to SNAP and TANF recipients who are experiencing barriers to employment and addressing the barriers in order to assist the SNAP recipient in finding and retaining employment;
- ensure coordinated interagency case management through local HHSC offices and through local Workforce Solutions Offices; and
- facilitate effective communication among TWC, HHSC, Boards, and Board contractors by:
 - (1) providing consistent messages to SNAP and TANF recipients regarding the importance of finding employment and adhering to program requirements; and
 - (2) identifying and mitigating barriers to finding and retaining employment.

TWC and HHSC conduct quarterly meetings to discuss SNAP E&T-related processes and issues. Boards and local HHSC staff conduct meetings on a regular basis.

Simplified SNAP

Texas will continue operating a mini-simplified SNAP for FFY'18. This will allow TANF recipients participating in TANF work experience or community service programs to have the value of their SNAP benefits combined with the value of their TANF benefits. The

Section C: State E&T Program, Operations and Policy Overview			
	policy allows TWC to deem a family as meeting its participation requirement based on the maximum hours allowed under the minimum wage requirements of the Fair Labor Standards Act.		
V. Consultation with Tribal Organizations • Description of consultation efforts • Services available through E&T	 The State will ensure that annual consultations occur with Texas tribes about the SNAP E&T State Plan and any special needs of the members of the tribes. The State provided the FFY2018 plan to the tribal organizations in October 2017, and received no comment. The State will continue to work with the tribal organizations and consider and respond to any comments received. If comments require changes to the plan, the State will submit an amended plan to FNS for review and approval. TWC does not operate separate SNAP E&T programs on the reservations in Texas. Individuals who reside on reservations in Texas and receive SNAP are eligible for all available SNAP E&T services provided through TWC. Full-service Workforce Solutions Offices that provide E&T components are available in all counties with an Indian Tribal Organization, as follows: Eagle Pass (Maverick County) – Kickapoo Livingston (Polk County) – Alabama-Coushatta El Paso (El Paso County) – Ysleta de sur Pueblo 		
VI. State Options • Select options the State is applying	 □ Serving applicants □ Serving zero-benefit households □ Serving mandatory participants only X Serving mandatory and voluntary participants □ Voluntary participants only 		
VII. Screening Process • Process for identifying whether work registrant should be referred to E&T	HHSC is responsible for determining if an applicant is a work participant. During the SNAP application process, HHSC staff reviews information provided by the applicant on his or her application and/or during the eligibility interview, such as the individual's citizenship/alien status, eligible student status, and any disqualifications, such as a felony drug conviction or intentional program violations the individual may have.		
	Additionally, HHSC staff reviews other factors delineated in 7 CFR 273.7(b)(1), such as age, disability status, children residing in the home, employment status, as well as current participation in TANF employment services or receipt of UI benefits during the interview. HHSC staff data enters the information into the state's automated system, which appropriately designates an individual.		

Section C: State E&T Program	n, Operations and Policy Overview
	HHSC uses the Texas Integrated Eligibility Redesign System (TIERS) to determine work registration status based on data entry of client-provided information. HHSC sends a daily electronic file through an automated interface of all SNAP recipients to TWC when SNAP is certified or when the SNAP recipient's work registration code changes. TWC uses information from this daily electronic file to outreach
	mandatory work registrants, which include ABAWDs and, as funding permits, General Population (non-ABAWDs). TWC also uses the automated interface to notify HHSC of SNAP recipients' noncompliance with SNAP E&T.
	HHSC reviews the noncompliance information from the automated interface to ensure the SNAP recipient was not exempt from work registration or denied at the time of noncompliance. HHSC staff data enters the penalty information in the TIERS <i>Non-Cooperation</i> page.
	TIERS uses <i>Non-Cooperation</i> page entries to track SNAP E&T penalties. When HHSC staff enters the noncompliance into TIERS, the system generates Form TF0001, Notice of Case Action, notifying the SNAP recipient of the noncompliance, the length of the disqualification, and action taken on the recipient's SNAP benefits. Work registration and penalty information is displayed in TIERS on the individual's inquiry pages.
VIII. Conciliation Process (if	Not applicable.
applicable)	
 IX. Disqualification Policy Length of disqualification period Sanction applies to individual or entire household 	 When a SNAP recipient fails to comply with SNAP E&T requirements without good cause, the primary wage earner (i.e., head of household) or disqualified household member is sanctioned as follows: First Occurrence: One month for the first noncompliance or until the individual complies, whichever is longer. Second Occurrence: Three months for the second noncompliance or until the individual complies, whichever is longer. Third or Subsequent Occurrence: Six months for a third or subsequent noncompliance or until the individual complies, whichever is longer. Cood Cause for Noncompliance with SNAP Work
	Good Cause for Noncompliance with SNAP Work Requirements
	TWC received correspondence from FNS on November 18, 2016, requesting that TWC and HHSC modify the good cause process.

Effective October 1, 2017, HHSC will be responsible for determining all good cause actions for noncompliance with SNAP E&T work requirements.

Good Cause Claim for Failure to Respond to Outreach

Effective October 1, 2017, when a SNAP recipient fails to respond to a SNAP E&T outreach notification—sent after the SNAP certification process takes place—Workforce Solutions Office staff discusses the circumstances with the SNAP recipient and notifies HHSC of the SNAP recipient's request for good cause through the TIERS/TWIST interface. This notification through the TIERS/TWIST interface includes the reason the SNAP recipient is requesting good cause. HHSC will determine if the SNAP recipient had good cause based on the information provided by the SNAP recipient through the interface and will respond to the SNAP recipient accordingly. The determination of good cause is a certification function and is performed by HHSC personnel. As the E&T providers, Workforce Solutions Office staff who have more regular contact with E&T participants—collect information on the circumstances for why an individual did not comply with the E&T activity and make a recommendation on good cause to HHSC.

Good Cause Claim for Failure to Comply with SNAP E&T Requirements After Enrolling in SNAP E&T Activities

When a SNAP recipient fails to comply with SNAP E&T work requirements assigned in accordance with the SNAP recipient's SNAP E&T employment plan, the SNAP recipient can request good cause. Workforce Solutions Office staff enters the circumstances surrounding the noncompliance in the TIERS/TWIST interface. HHSC will determine if the SNAP recipient has good cause based on the information provided through the interface and will respond to the SNAP recipient accordingly.

Sanction applies to: Individuals

X. Participant Reimbursements

- List all participant reimbursements (or link to State policy/handbook)
- Reimbursement cap

Participant reimbursement or support services are given in accordance with 7 C.F.R. §273.7(d)(4) and guidance from FNS entitled "Q&A Package on E&T Financial Policy," dated May, 2006. Reimbursement or support will be provided to SNAP recipients who request assistance with obtaining or retaining employment. Boards have the flexibility to decide whether to limit or place a cap on participant reimbursements or

• Payment method (in advance or as reimbursement)

support services. Reimbursement or support for job retention will be provided for up to 90 days.

Texas provides reimbursement for expenses incurred, or in advance as payment for anticipated expenses in the coming month, that are reasonably necessary and directly related to participation in SNAP E&T. Payments and reimbursements are provided directly to the SNAP E&T participant by the Workforce Solutions office. Each Board develops its own policy for reimbursements based on available funding, including reimbursement caps and monitoring and oversight. In accordance with 7 C.F.R. (d)(4)(v), Boards notify mandatory SNAP E&T participants that they may be exempted from E&T participation if their monthly expenses for participation exceed the state's allowable reimbursement amount, or the participant will be placed, if possible, in another suitable component in which the individual's monthly E&T expenses would not exceed the allowable reimbursable amount paid by the State agency. If a suitable component is not available, these individuals will be exempt from E&T participation until a suitable component is available or the individual's circumstances change and his/her monthly expenses do not exceed the allowable reimbursable amount paid by the State agency.

ABAWDs and the SNAP E&T General Population can receive payments and reimbursements, which may include:

Transportation, such as:

- bus tokens;
- gas vouchers;
- prepaid gas cards;
- automobile repairs;
- Toll road charges;
- mileage reimbursement (personal vehicles only);
- taxicab services;
- contracts with private entities, such as transit providers who provide shuttle or van services;
- purchase of tires or automobile batteries (applicable to SNAP E&T mandatory customers only); and
- driver license fees (includes renewals).
- Other work, training, or education-related expenses such as:
- GED test payments, uniforms, personal safety items, or other necessary equipment, and books or training manuals;
- suitable clothing for job interviews;
- licensing and bonding fees for a work experience or workfare placement;
- vision needs (such as eyeglasses, eye exam); and

Section C: State E&T Program	n, Operations and Policy Overview
	housing assistance. *
	*Housing assistance is provided based on methods and amounts established in Boards' local policies and procedures. Housing assistance is limited to no more than two months in a 12-calendar-month period.
	Boards may provide support services to SNAP recipients to support the recipients' participation in the following allowable activities: Job search Vocational training Non-vocational education Work experience Workfare (ABAWDs only)
	Information regarding support services is located in the Texas SNAP E&T Comprehensive Guide, Section B-200.
	TWC's Sub-Recipient Monitoring, Regulatory Integrity Division will conduct yearly tests of transactions, fiscal, and program controls for participant reimbursements.
XI. Work Registrant Data	Work Registrant Data
 Methodology used to count work 	Mandatory Work Registrants
registrants	
	The following method is used to record the number of mandatory work registrants for the year:
	1. Combine the monthly Mandatory Work Registrant Reports into one single report.
	2. This creates a dataset containing all Mandatory Work Registrants
	 for the period of October–April. (See Note) 3. Compare unduplicated work registrants for each month of the Federal Fiscal Year (FFY) against all recorded work registrants in the previous months of the fiscal year. 4. If a work registrant has not been recorded in any previous months of the FFY, that registrant is recorded as new for the month of first activity.
	Duplicates: Using this method, individuals can only be counted once for the FFY. <i>Note</i> : Due to the timing of the report, October—April are the only actuals that ae available. An average for October—April is used for May—September.

For example, if an individual was a work registrant for the months of October, November, and December, the individual is counted only once in the month of October.

Source data: Mandatory Work Registrant Report (MWRR)

New SNAP Work Registrants

The following method is used to record only SNAP work registrants who are new for each month of the Fiscal Year:

- 1. Compare unduplicated SNAP work registrants for each month of the FFY against all recorded SNAP work registrants in the previous months, including those active on October 1.
- 2. If a SNAP work registrant has not been recorded in any previous month or on October 1, that registrant is recorded as new for the month of first activity.

Duplicates:

Using this method, individuals can only be counted once for the FFY.

For example, if an individual was a SNAP work registrant for the months of October, November, and December, the individual is counted only once in the month of October.

Source data: The Health and Human Service Commission (HHSC) standard monthly dataset "waec.vods_foodstmp_hist," db2_warehouse

XII. Outcome Reporting Data Source and Methodology

- Data sources
- Methodology

Outcome Reporting Data Source and Methodology

TWC will report on the four national measures in January 2018. In addition to the national measures, TWC will report on the state measures as indicated below, and in Section E – Table 2: E&T Component Detail.

The following method is used to determine the number and percentage of E&T participants that are in unsubsidized employment during the second and fourth quarter after completion of participation in E&T job search, education, vocational training, work experience, and workfare services:

- The denominator is the number of SNAP E&T participants who completed participation in activities listed above (SNAP E&T Exiters).
- The numerator is the number of SNAP E&T Exiters who were employed in the second calendar quarter after exit.

Employed means that actual wage records (UI Wage Records or Federal Employment Records) show earnings during the applicable time frame.

Note: SNAP E&T Exiters are former SNAP E&T participants who did not receive a SNAP E&T qualifying component for at least 90 days.

The following method is used to determine the number and percentage of E&T participants who successfully completed education, training, work experience, and workfare components*:

- The denominator is the number of SNAP E&T participants who received a SNAP E&T education, training, work experience, or workfare component.
- The numerator is the number of SNAP E&T participants who successfully completed activities listed above.

Note: The percentage of all measures is calculated by dividing the numerator by the denominator.

The following method is used to determine the number and percentage of E&T participants who successfully completed participation in SNAP E&T and are employed in the second calendar quarter after exit.

- Quarterly earnings are wage earnings of SNAP E&T Exiters employed in the second calendar quarter after exit. Employed means that True Wage Records (UI Wage Records or Federal Employment Records) show earnings during the applicable time frame.
- The median quarterly earnings are the middle of the ordered quarterly earnings values. In cases where there are two middle earning values, the median quarterly earnings are the average of the two middle earning values.

Note: SNAP E&T Exiters are former SNAP E&T participants who went at least 90 days without receiving a SNAP E&T qualifying component.

All measures are based on actual wage records. Actual wage records are updated after the end of each calendar quarter (January, April, July, and October) and require time to fully mature. Because of the frequency of updates, not all wage records will be captured or calculated until the end of the cycle. Wage information obtained through the Federal Employment Data Exchange System (FEDES) is available several months after the end of each calendar quarter.

Section D: Pledge to Serve All At-Risk ABAWDs

Section	on D: Pledge to Serve All At-Ris	sk ABAWDs
I.	Is the State agency pledging to offer qualifying activities to all at-risk ABAWDs?	Yes. For FFY'18, TWC commits to offer a qualifying activity to every ABAWD recipient residing in a full-service SNAP E&T county.
II.	Information about the size & needs of ABAWD population	TWC estimates that there will be approximately 209,295 ABAWDs in Texas in FFY'18.
III.	The counties/areas where pledge services will be offered	See full-service county table on page 35.
IV.	Estimated cost to fulfill pledge	Based on historical data analysis, Texas estimates spending approximately \$145 monthly for each ABAWD (in full-service counties) to ensure that qualifying work activities are offered.
V.	Description of State agency capacity to serve at-risk ABAWDs	TWC has a nightly automated interface with HHSC and receives a list of all individuals certified to receive SNAP benefits. ABAWDs residing in full-service counties are placed in an "outreach pool" in TWIST. TWC requires that all ABAWDs be outreached within 10 days of referral from HHSC. This ensures that at-risk ABAWDs are provided an opportunity to participate in SNAP E&T services. Funding priority for serving the ABAWD population first is specified in each Board's contract.
VI.	Management controls in place to meet pledge requirements	Outreach Reports are generated on a monthly basis in TWIST and used by TWC's Technical Assistance staff to determine whether ABAWDs from each Board were outreached and offered a work opportunity within 10 days of appearance in TWIST.
VII.	Description of education, training, and workfare components State agency will offer to meet ABAWD work requirements	Because the primary goal of workfare is to improve employability and encourage individuals to move into regular employment, ABAWDs participate in the workfare component once outreached. The ABAWD participates in an upfront 30 days of job search associated with the workfare activity and then enters the work assignment after nonfinancial agreements are established between the public nonprofit entity.

Section D: Pledge to Serve All At-Risk ABAWDs				
	An ABAWD who is participating in job search associated with the workfare component, or who is participating in workfare can change to a different activity if Workforce Solutions Office staff determines during a reassessment that an education or training activity is more suitable or appropriate.			

Section E: E&T Component Detail

Components by Category (Non-Education, Non-Work Components; Education Components; Work Components)

Non-Education, Non-Work Components

Job Search Description	Job search requires SNAP recipients participating in SNAP E&T to search for employment 30 hours per week; incorporates job readiness, job search training, assisted job search, and group job search; and includes: job skills assessment; job placement services; job development services focused on active engagement of employers; training in techniques for employability; counseling; job search skills training; information on available jobs; occupational exploration, including information on local emerging and demand occupations; interviewing skills and practice interviews; assistance with applications and resumes; job fairs; life skills; guidance and motivation for development of positive work behaviors necessary for the labor market; completing job applications; setting employment goals for job inquiries and follow-up; and defining general workplace expectations and information on how to retain employment.				
Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost*	Provider(s)	Reporting measure(s) if > 100 participants per year
Job search will be conducted in full-service counties in the state. Job search will be conducted in minimum-service counties if SNAP recipients volunteer for SNAP E&T services.	SNAP E&T General Population recipients (i.e., non-ABAWDs), and exempt SNAP recipients who volunteer for SNAP E&T, may engage in a variety of job search activities.	20,827	\$519,866	Contracted -Workforce Solutions Office staff in 28 local workforce development areas.	The number and percentage of SNAP E&T participants and former participants who are in unsubsidized employment during the second quarter after completion of participation in SNAP E&T

^{*}Limit anticipated monthly cost to administrative costs only. Do not include participant reimbursements.

Description	Job retention services will be offered for up to 90 days to E&T participants who gain employment after participating in another E&T component such as job search, job search training, workfare, work experience or training, educational programs or activities, self-employment activities, and other appropriate programs, as approved by FNS. These services assist SNAP recipients to retain employment by: improving basic skills; increasing employability; aiding progress up a career ladder; and enabling them to gain better employment.				
Geographic area	Target audience (e.g., homeless, re-entry population, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost*	Provider(s)	Reporting measure(s) if > 100 participants per year
Provided to SNAP recipients in full-service counties who participated in SNAP E&T and entered full- or part-time	Provided to any SNAP recipient who participates in SNAP E&T and becomes employed.	29 ABAWDs – 22 SNAP E&T General Population –7	\$724	Contracted -Workforce Solutions Office staff in 28 local workforce development areas.	N/A

Education Components

**Basic Education					
Description	on Basic education includes adult basic education, English as a second language, and General Education Development				
Geographic area	Target audience (e.g., homeless, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost*	Provider(s)	Reporting measure(s) if > 100 participants per year
Provided in full-service counties and in minimum-service counties if the SNAP recipient volunteers.	Any SNAP E&T ABAWD or General Population recipient.	ABAWDs—82 SNAP E&T General Population—134	\$5,392	Contracted—Workforce Solutions Office staff in 28 local workforce development areas.	The number and percentage of E&T participants and former participants who are in unsubsidized employment during

		the second quarter after completion of participation in SNAP E&T
		The number and percentage of SNAP E&T participants that successfully completed an educational component. Successful completion would result in an increased skill level.

^{*} Limit anticipated monthly cost to administrative costs only. Do not include participant reimbursements.

^{**}SNAP E&T funds will only be used on educational programs that improve the job search capacity of SNAP E&T participants and are not available free of charge through any other available organization. Allowable expenses from SNAP E&T 100% funds include tuition and fees and administrative costs from other non-governmental partners. Participant reimbursement fees for education include transportation, child care, eye care and dental care (only if reasonable and necessary-what a prudent person would pay under similar circumstances and necessary for participation in the E&T program), and books.

Description	in a skill or trade. This a occupational assessmen training; customized tra training must be: relate	SNAP E&T activity tha allows SNAP recipients of and remedial and entry aining; institutional skill d to the types of jobs averecipient's employment p	to move directly into em y-level job skills training s training; upgrade train ailable in the labor mark	ployment. Vocational t ;; short-term, prevocation ning; and vocational edu set; consistent with empl	raining incorporates: onal, entrepreneurial cation. Vocational oyment goals
Geographic area	Target audience (e.g., homeless, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost*	Provider(s)	Reporting measure(s) if > 100 participants per year
Provided in full-service counties and in minimum-service counties if the SNAP recipient volunteers.	Any SNAP E&T ABAWD or General Population recipient.	ABAWDs—39 SNAP E&T General Population-90	\$3,220	Contracted -Workforce Solutions Office staff in 28 local workforce development areas.	The number and percentage of SNAP E&T participants and former participants who are in unsubsidized employment during the second quarter after completion of participation in E&T.
					The number and percentage of SNAP E&T participants that successfully completed a training component, as
					determined by successful progression

Work Components

Workfare					
Description	training, or both. None	gned to improve the emp xempt ABAWDs performent to which their house	m work in a public servi	ce capacity as a condition	
Geographic area	Target audience (e.g., homeless, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost*	Provider(s)	Reporting measure(s) if > 100 participants per year
Full-service counties.	ABAWDs	31,356	\$782,681	Contracted - Workforce Solutions Office staff in 28 local workforce development areas.	The number and percentage of E&T participants and former participants who are in unsubsidized employment during the second quarter after completion of participation in SNAP E&T. The number and percentage of SNAP E&T participants that successfully completed workfare component. Successful completion is determined by the number of hours participated in workfare per month. To obtain the number of work hours per month, the ABAWD's monthly household

Workfare			
			SNAP allotment amount is divided by the number of ABAWDs in the SNAP household (when there are multiple ABAWDs in the household), which is then divided by the federal minimum wage.

^{*} Limit anticipated monthly cost to administrative costs only. Do not include participant reimbursements

Work Experience Description	Defined in WIOA implementing regulations at 20 CFR §680.170 as planned, structured, learning experiences that take place in a workplace for a limited time. Work experience is authorized by 7 U.S.C. §2015(d)(4)(B)(iv) and WIOA [20 CFR §680.180]. The work experience activity is available to all SNAP recipients who need help acquiring basic work skills. Work experience activities must: occur in the workplace for a limited period of time; occur in either the private for-profit, nonprofit, or public sectors; and be paid or unpaid.				
Geographic area	Target audience (e.g., homeless, ABAWDS)	Anticipated monthly participants (unduplicated count)	Anticipated monthly cost*	Provider(s)	Reporting measure(s) if > 100 participants per year
Full- or minimum- service counties.	Any SNAP E&T ABAWD or General Population Recipient.	ABAWDS—89 SNAP E&T General Population—55	\$3,594	Contracted - Workforce Solutions Office staff in 28 local workforce development areas.	The number and percentage of E&T participants and former participants who are in unsubsidized employment during the second quarter

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Work Experience			
			after completion of participation in SNAP E&T
			The number and percentage of SNAP E&T participants that successfully completed work experience component, as determined by completion of work experience.

^{*} Limit anticipated monthly cost to administrative costs only. Do not include participant reimbursements

The anticipated monthly cost included above for the E&T components includes both federal and state contractual costs for a total of \$15,785,724.

Section F: Estimated Participant Levels

<u> </u>	
Section F: Estimated Participant Levels	
I. Anticipated number of work registrants in the State during	804,380
the Federal FY (unduplicated count):	,
II. Estimated Number of Work Registrants Exempt from	34,539
E&T	
List below planned State option exemption categories and the	
number of work registrants expected to be included in each	
during the Federal FY	
1. SNAP E&T ABAWD population not meeting work	34,539
requirements in 69 minimum-service counties.	
2.	
3.	
4.	
5.	
III. Percent of all work registrants exempt from E&T (line	4.207
II/line I)	4.2%
IV. Anticipated number of mandatory E&T participants (line	
I – line II)	769,841
1 – IIIIC 11)	
V. Anticipated number of voluntary E&T participants	393
VI. Anticipated number of ABAWDs in the State during the	209,295
Federal FY	4U7,473
VII. Anticipated number of ABAWDs in waived areas of the	Δ
State during the Federal FY	0
VIII. Anticipated number of ABAWDs to be exempted under	24 520
the State's 15 percent ABAWD exemption allowance during	34,539
the Federal FY	
IX. Number of potential at-risk ABAWDs expected in the	17475
State during the Federal FY (line VI–(lines VII+VIII))	174,756

Section G: Summary of Partnerships and/or Contracts

	Section G: Summary of Partnerships and/or Contracts				
Partner/ Contractor	Nature of Contract (Consulting, Data Analysis, E&T Services, Other)	Total Admin Costs	Total Participant Reimbursements Costs	Total Cost	% of Total Budget
Panhandle Regional Planning Commission	E&T Services, Other	\$26,775	\$240,973	\$267,748	1.4%
South Plains Regional WDB	E&T Services, Other	\$28,434	\$255,906	\$284,340	1.5%
Nortex Regional Planning Commission	E&T Services, Other	\$17,278	\$155,503	\$172,781	0.9%
North Central Texas Council of Governments	E&T Services, Other	\$81,586	\$734,270	\$815,856	4.2%
Tarrant County WDB	E&T Services, Other	\$93,697	\$843,268	\$936,965	4.8%
Dallas County Local WDB INC	E&T Services, Other	\$141,044	\$1,269,401	\$1,410,445	7.2%
North East Texas WDB	E&T Services, Other	\$21,930	\$197,371	\$219,301	1.1%
East Texas Council of Governments	E&T Services, Other	\$59,810	\$538,286	\$598,096	3.1%
West Central Texas Workforce Development	E&T Services, Other	\$26,017	\$234,147	\$260,164	1.3%
Upper Rio Grande WDB INC	E&T Services, Other	\$70,206	\$631,853	\$702,059	3.6%
Permian Basin Workforce	E&T Services, Other	\$27,438	\$246,939	\$274,377	1.4%

Development						
Board						
Concho Valley						
Workforce	E&T Services,	*12.00	0.1.0.0.0.7.0	***	0.504	
Development	Other	\$12,095	\$108,852	\$120,947	0.6%	
Board						
Education						
Service	E&T Services,	Ф22.262	Φ210.2 <i>c</i> 4	Ф222 с26	1.20/	
Center Region	Other	\$23,362	\$210,264	\$233,626	1.2%	
12						
WorkSource-						
Greater	E&T Services,	\$46,049	¢422.520	\$460.479	2.40/	
Austin Area	Other	\$46,948	\$422,530	\$469,478	2.4%	
WDB						
Rural Capital						
Area	E&T Services,	\$31,086	\$279,772	\$310,858	1.6%	
Workforce	Other	φ31,000	\$219,112	\$310,636	1.070	
Development						
Brazos Valley	E&T Services,					
Council of	Other	\$17,403	\$156,627	\$174,030	0.9%	
Governments	Other					
The Deep East						
TX Local	E&T Services,					
Workforce	Other \$34,211	\$34,211	\$307,902	\$342,113	1.8%	
Development	Other					
Board						
South East						
Texas	E&T Services,					
Workforce	Other	\$34,263	\$308,374	\$342,637	1.8%	
Development	-					
Board						
Golden						
Crescent	E&T Services,	φ12.2 <i>c</i> 1	ф120 24 7	ф122 coc	0.70/	
Workforce	Other	\$13,361	\$120,245	\$133,606	0.7%	
Development						
Board						
Alamo	EOTE :					
Workforce	E&T Services,	\$138,801	\$1,249,210	\$1,388,011	7.1%	
Development	Other					
INC	E %-T Carriage					
South Texas	E&T Services,	\$26,044	\$234,400	\$260,444	1.3%	
WDB	Other					

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Coastal Bend					
Workforce	E&T Services,	\$55,023	\$495,206	\$550,229	2.8%
Development	Other	Ψ33,023	ψτ/3,200	Ψ330,227	2.070
Board					
Lower Rio	E&T Services,	\$76,999	\$692,984	\$769,983	3.9%
Grande WDB	Other	4.0,555		<i>\$7.03</i> ,500	
Cameron	E&T Services,	\$40,591	\$365,317	\$405,908	2.1%
County WDB	Other	Ψ10,371	Ψ303,317	Ψ105,200	2.170
Workforce	E&T Services,				
Solutions	Other	\$12,662	\$113,961	\$126,623	0.6%
Texoma					
Central Texas	E&T Services,	\$34,257	\$308,307	\$342,564	1.8%
COG	Other	φ3 1,22 / φ3 00,30 /	Ψ3 12,301	1.070	
Middle Rio	E&T Services,				
Grande Dev	Other	\$23,249	\$209,243	\$232,492	1.2%
Council	Other				
Houston-	E&T Services,		\$3,062,288	\$3,402,543	
Galveston	Other	\$340,255	ψ3,002,200	ψ3,102,313	17.4%
Area Council	Other				
WorkSource-					
Greater	E&T Services,				
Austin Area	Other	\$23,750	\$213,750	\$237,500	1.2%
WDB – TPR	Other				
Contract					
Total		\$1,578,575	\$14,207,149	\$15,785,724	80.8%

^{*}Local Workforce Development Board FY2018 contract totals are contingent upon the availability of State Match Funds.

For each partner/contractor that receives more than 10% of the E&T operating budget, complete and attach a Contractor Detail Addendum.

Section H: Contractor Detail Addendum

Dection H: Contractor	
Partner/Contract Name	Gulf Coast Workforce Development Board-Houston-Galveston Area Council
Monitoring and communication with contractor(s)	Boards are required to supply to the Agency an audit that is in compliance with 2 C.F.R. Part 200 Subpart F Audit Requirements (Uniform Guidance), and the State of Texas Single Audit Circular (UGMS, Part IV), as specified within any grant awarded and in effect at the time costs were incurred. • The Texas Workforce Commission's (TWC) Subrecipient Monitoring (SRM) group performs desk reviews, issues management decisions and follows up on any required corrective actions for audits required under the Uniform Guidance. • TWC responds to boards requests for guidance about grant requirements on an on-going basis, including, but not limited to questions about allowable costs. • TWC may impose sanctions or take other corrective actions where issues are significant or go uncorrected, pursuant to TWC rules codified at 40 TAC Part 20, Chapter 802, Subchapter G. • TWC has requirements in place for boards to address questioned costs, should they occur. • SRM conducts fiscal testing of transactions regarding the SNAP E&T program. Workforce Technical Assistance staff members conduct on-site reviews to ensure that Boards are in compliance with the following program requirements: • Eligibility; • Outreach to clients is conducted; • Compliance with employment plan (service delivery); • Activities are allowable • Participation hours in TWIST match documentation in case file; • Support services (needed to participate); • Support services (needed to participate); • Performance and outcomes, including employment outcomes, have been tracked and documented in TWIST; • Performance and outcomes, including whether the penalty is initiated timely and appropriately; • job retention services are provided as funding allows; and • cases are referred back to HHSC once circumstances arise that could affect the customer's eligibility.
Role of Contractor	Gulf Coast Workforce Solutions Office staff:

Partner/Contract	Gulf Coast Workforce Development Board-Houston-Galveston
Partner/Contract Name	 Gult Coast Workforce Development Board-Houston-Galveston Area Council conducts employment planning meetings to provide SNAP recipients with an introduction to SNAP E&T services and activities; develops an employment plan; schedules appointments for and enrolls mandatory work registrants or exempt recipients who voluntarily participate in SNAP E&T activities; assists with job search and job readiness activities; arranges child care services as needed for the SNAP E&T General Population; provides support services including reimbursement of transportation expenses, as needed; develops workfare work sites for ABAWDs; monitors participation in all SNAP E&T activities; informs HHSC of an ABAWD's participation in SNAP E&T activities within two weeks of initial participation; informs HHSC of employment, need for reconsideration of work registration status, and noncooperation with service requirements; enters all actions into TWIST (e.g., all appropriate documentation of services); maintains a written Accounting & Financial Policies and Procedures Manual; reviews summary level invoices from its sub-recipients, requiring additional information, as needed, such as for unexpected credits and large variances; contracts with a firm to perform on-site quarterly billing reviews and comprehensive annual reviews of HGAC sub-recipients, issue monitoring reports and follow up on any related corrective action; HGAC staff conducts on-going quality assurance reviews to check eligibility, good cause, ABAWD outreach and types of services provided; and staffs an internal audit department that performs an annual risk assessment, prepares an audit plan, conducts on-going reviews of HGAC operations, and issues reports on its findings. The internal audit department also performs audit oversight activities for HGAC sub-recipients that are required to have an audit performed in accor
	and the receipt of those audits, desk review, issuance of

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Partner/Contract Name	Gulf Coast Workforce Development Board-Houston-Galveston Area Council			
	management decisions and resolution of any required corrective actions.			
Timeline	Start	October 1, 2017	End	September 30, 2018
Description of Activities/Services	Same as those listed in Table 1 pages 4 and 6.			
Funding	 SNAP E&T Funding: 100 Percent Federal SNAP E&T Grant ABAWD Grant (i.e., Texas' Share of the \$20 Million) 50/50 Additional SNAP E&T Administrative Expenditures 50/50 Participant expenses (i.e., transportation and other support services). 			
Evaluation	(See monitoring and communication language on page 39.)			

Section I: Operating Budget and Budget Narrative

	State cost	Federal cost	Total	
I. Direct Costs:			_ 0 000_	
a) Salary/Wages	\$417,931	\$431,244	\$849,175	
b) Fringe Benefits* Approved Fringe	·	·	·	
Benefit Rate Used 40.32% (estimated)	\$168,443	\$173,931	\$342,374	
c) Contractual Costs (Admin Only)	\$5,551,076	\$10,234,648	\$15,785,724	
d) Non-capital Equipment and Supplies	\$50,310	\$109,844	\$160,154	
e) Materials	\$2,417	\$2,429	\$4,846	
f) Travel	\$15,499	\$15,617	\$31,116	
g) Building/Space	\$10,090	\$15,444	\$25,534	
h) Equipment & Other Capital	\$0	\$5,069	\$5,069	
Expenditures	\$0	\$3,009	\$3,009	
Total Direct Costs	\$6,215,766	\$10,988,226	S17,203,992	
II. Indirect Costs:				
Indirect Costs*Approved Indirect Cost	\$67,166	\$69,386	\$136,552	
Rate Used: N/A %	φ07,100	Ψ02,380	Ψ130,332	
III. In-kind Contribution				
State in-kind contribution				
Total Administrative Cost (Total of	\$6,282,932	\$11,057,612	\$17,340,544	
items I, II, and III)	ψ0,202,232	, ,	, ,	
100 Percent Federal E&T Grant		\$4,774,680	\$4,774,680	
50 percent Additional Administrative	\$6,282,932	\$6,282,932	\$12,565,864	
Expenditure	ψ0,202,732	ψ0,202,732	φ12,303,004	
IV. Participant Reimbursement (State				
plus Federal):				
a) Dependent Care (including contractual	\$0	\$0	\$0	
costs)	ΨΟ	ΨΟ	ΨΟ	
b) Transportation & Other Costs	\$1,100,000	\$1,100,000	\$2,200,000	
(including contractual costs)	Ψ1,100,000	Ψ1,100,000	Ψ2,200,000	
c) State Agency Cost for Dependent Care	\$0		\$0	
Services	ΨΟ		ΨΟ	
Total 50 percent Participant	\$1,100,000	\$1,100,000	\$2,200,000	
Reimbursement Expenses		. , ,		
<u>V. Total Costs</u>	\$7,382,932	\$12,157,612	\$19,540,544	

^{*} Attach an approval letter from the cognizant agency identifying the indirect cost rate being used.

Section J: Budget Narrative and Justification

TWC developed this budget utilizing projections based on historical costs and projected expenditures, as well as approved allocation methodologies. The salaries and FTEs reflect direct services supporting the contractual activities of the program, as well as administrative support derived via the cost allocation methodologies. The Contractual Costs are comprised of amounts to be distributed to our service provider partners and includes an anticipated increase of ABAWD funding to be received and contracted during the federal fiscal year.

Item	Narrative
I. Direct Costs:	
	State level Workforce Development Division Staff costs as well as Agency Support Staff Costs. Administrative Assistant III \$32,792.16 x .25 FTE = \$8,198.04 Administrative Assistant V \$44,760 x .10 FTE = \$4,476.00 Director I \$89,880 x .41 FTE = \$36,850.80 Executive Assistant I \$56,766.70 x .20 FTE = \$11,353.34 Program Specialist II \$40,179.56 x 1.50 FTE = \$60,269.34 Program Specialist III \$48,074.42 x .50 FTE = \$135,186.63 Program Specialist IV \$62,877.50 x 2.15 FTE = \$135,186.63 Program Specialist V \$55,956 x .30 FTE = \$16,786.80 Program Specialist VI \$63,996 x .25 FTE = \$15,999.00 Program Supervisor V \$58,291.68 x .50 FTE = \$29,145.84 Program Supervisor VI \$69,159.85 x .33 FTE = \$22,822.75 Project Manager I \$64,549.20 x .25 FTE = \$16,137.30 System Analyst III \$43,800 x .15 FTE = \$6,570.00 System Analyst III \$53,171.86 x .37 FTE = \$19,673.59 Manager II \$72,000 x .30 = \$21,600.00 Contractor \$0 Salary x .04 = \$0.00 Sub-total: 7.70 FTEs, \$435,911.84 The remaining 7.36 FTEs are assigned to the SNAP Program Codes throughout TWC via the Financial cost allocation processes. These allocated FTEs are assigned to executive divisions of the agency, such as the Commissioner's Office, Executive Director's Office and Deputy Executive Director's Office, as well as support divisions such as General Counsel, Finance, Information Technology, Business Operations, Regulatory Integrity, Operational Insight and External Relations. The average cost per FTE of these 7.36 FTEs
	(comprised of fractions of 732 positions) is \$56,149.89 for a total of \$413,263.16. Total: 15.06 FTEs, \$849,175
b) Fringe Benefits* Approved Fringe Benefit	\$342,374 - FICA and retirement is determined as a percent of staff salary and Employee Insurance is calculated as cost per employee.

Texas Workforce Commission Federal Fiscal Year 2018

Rate Used 40.32% (estimated) Retirement = 9.50% FICA = 7.65% Insurance = 17.97% Retiree Insurance = 5.20% Total = 40.32% c) Contractual Costs \$15,785,724 - Local Workforce Development Board Allocations, Professional Service Contracts, Third Party Reimbursement Contracts, and Other Contracted Services d) Non-capital Equipment and Supplies e) Materials \$4,846 - General Office Supplies, including paper, toner, etc. f) Travel \$31,116 - Travel by TWC Sub-Recipient Monitoring Department as well as Workforce Division Staff for monitoring and technical assistance on an as needed basis. g) Building/Space \$5,069 - Allocated portion of Capital IT/Equipment S5,069 - Allocated indirect costs as a result of our approved Cost Allocation Plan approved by the Department of Labor.
Insurance = 17.97% Retiree Insurance = 5.20% Total = 40.32% c) Contractual Costs \$15,785,724 - Local Workforce Development Board Allocations, Professional Service Contracts, Third Party Reimbursement Contracts, and Other Contracted Services d) Non-capital Equipment and Supplies e) Materials \$160,154 - Computer Rental, Postage, etc. f) Travel \$4,846 - General Office Supplies, including paper, toner, etc. f) Travel \$31,116 - Travel by TWC Sub-Recipient Monitoring Department as well as Workforce Division Staff for monitoring and technical assistance on an as needed basis. g) Building/Space \$25,534 - Rent and Utilities h) Equipment & Other Capital Expenditures II. Indirect Costs: \$136,552 - Budgeted indirect costs as a result of our approved
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II. Indirect Costs: \$136,552 - Budgeted indirect costs as a result of our approved
Cost Allocation Plan approved by the Department of Labor
Cost Allocation Plan approved by the Department of Labor
-
III. State In-kind N/A
Contribution
-
IV. Participant -
Reimbursements
a) Dependent Care N/A
b) Transportation & \$2,200,000 - Client Support Services provided by Local
Other Costs Workforce Development Boards, and Third-Party
Reimbursement Contracts
c) State Agency Cost for N/A
Dependent Care Services

Geographic Coverage FFY'18

SNAP E&T services will be delivered in the following 185 full-service counties:

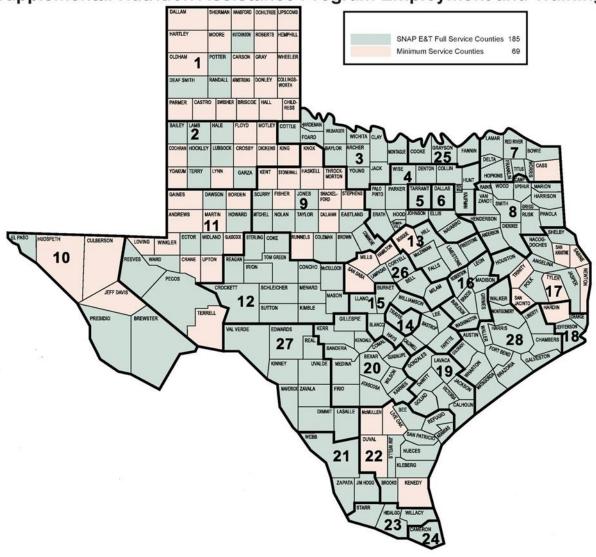
Anderson	Cottle	Hidalgo	Mason	Shelby
Angelina	Crockett	Hill	Matagorda	Smith
Aransas	Dallas	Hockley	Maverick	Somervell
Archer	Dawson	Hood	McCulloch	Starr
Atascosa	Deaf Smith	Hopkins	McLennan	Sterling
Austin	Delta	Houston	Medina	Sutton
Bailey	Denton	Howard	Menard	Tarrant
Bandera	DeWitt	Hunt	Midland	Taylor
Bastrop	Dimmitt	Hutchinson	Milam	Terry
Baylor	Eastland	Irion	Mitchell	Titus
Bee	Ector	Jack	Montgomery	Tom Green
Bell	Edwards	Jackson	Montague	Travis
Bexar	Ellis	Jasper	Morris	Upshur
Blanco	El Paso	Jefferson	Nacogdoches	Uvalde
Bowie	Erath	Jim Hogg	Navarro	Val Verde
Brazoria	Falls	Jim Wells	Nolan	Van Zandt
Brazos	Fannin	Johnson	Nueces	Victoria
Brewster	Fayette	Jones	Orange	Walker
Brooks	Foard	Karnes	Palo Pinto	Waller
Brown	Fort Bend	Kaufman	Panola	Ward
Burleson	Franklin	Kendall	Parker	Washington
Burnet	Freestone	Kerr	Pecos	Webb
Caldwell	Frio	Kimble	Polk	Wharton
Calhoun	Galveston	Kinney	Potter	Wichita
Cameron	Garza	Kleberg	Presidio	Wilbarger
Camp	Gillespie	Lamb	Rains	Willacy
Chambers	Goliad	Lamar	Randall	Williamson
Cherokee	Gonzales	Lampasas	Reagan	Wilson
Clay	Grayson	LaSalle	Real	Wise
Coke	Gregg	Lavaca	Red River	Wood
Coleman	Grimes	Lee	Reeves	Young
Collin	Guadalupe	Leon	Refugio	Zapata
Colorado	Hale	Liberty	Robertson	Zavala
Comal	Hardeman	Limestone	Rockwall	
Comanche	Harris	Llano	Rusk	
Concho	Harrison	Lubbock	San Patricio	
Cooke	Hays	Madison	Schleicher	
Coryell	Henderson	Marion	Scurry	

COUNTIES COVERED BY THE STATE'S 15 PERCENT EXEMPTION ALLOWANCE (Minimum-Service Counties)

Andrews	Gaines	McMullen	Trinity
Armstrong	Glasscock	Mills	Tyler
Borden	Gray	Moore	Upton
Bosque	Hall	Motley	Wheeler
Briscoe	Hamilton	Newton	Winkler
Callahan	Hansford	Ochiltree	Yoakum
Carson	Hardin	Oldham	
Cass	Hartley	Parmer	
Castro	Haskell	Roberts	
Childress	Hemphill	Runnels	
Cochran	Hudspeth	Sabine	
Collingsworth	Jeff Davis	San Augustine	
Crane	Kenedy	San Jacinto	
Crosby	Kent	San Saba	
Culberson	King	Shackelford	
Dallam	Knox	Sherman	
Dickens	Lipscomb	Stephens	
Donley	Live Oak	Stonewall	
Duval	Loving	Swisher	
Fisher	Lynn	Terrell	
Floyd	Martin	Throckmorton	

SNAP E&T County/Local Workforce Development Board Area Map

Supplemental Nutrition Assistance Program Employment and Training



- 1. Panhandle
- 2. South Plains
- 3. North Texas
- 4. North Central
- 5. Tarrant County
- 6. Dallas
- 7. North East Texas
- 8. East Texas
- 9. West Central
- 10. Upper Rio Grande

- 11. Permian Basin
- 12. Concho Valley
- 13. Heart of Texas
- 14. Capital Area
- 15. Rural Capital
- 16. Brazos Valley
- 17. Deep East Texas
- 18. Southeast Texas
- 19. Golden Crescent
- 20. Alamo

- 21. South Texas
- 22. Coastal Bend
- 23. Lower Rio Grande
- 24. Cameron County
- 25. Texoma
- 26. Central Texas
- 27. Middle Rio Grande
- 28. Gulf Coast