

**STATE OF TEXAS
SUPPLEMENTAL NUTRITION
ASSISTANCE PROGRAM EMPLOYMENT
AND TRAINING
FEDERAL FISCAL YEAR 2011
STATE PLAN OF OPERATIONS
January 2011**

PART I

SUMMARY OF TEXAS'S SNAP EMPLOYMENT AND TRAINING PROGRAM

A. ABSTRACT OF TEXAS'S SNAP EMPLOYMENT AND TRAINING SERVICES

The Supplemental Nutrition Assistance Program (SNAP) Employment and Training (SNAP E&T) program assists SNAP recipients by improving their ability to obtain regular employment, increase earnings, and reduce their dependency on public assistance.

The Texas Health and Human Services Commission (HHSC) is the administering agency for SNAP in Texas. HHSC determines eligibility and mandatory or exempt status, and electronically transmits this information to the Texas Workforce Commission (TWC).

TWC is the state level administering agency for integrated workforce services, and is part of a local/state network dedicated to developing the workforce system in Texas. The network is composed of the statewide efforts of TWC coupled with planning and service provision on a regional level by 28 Local Workforce Development Boards (Boards) and their contracted providers.

Boards provide oversight and planning for integrated workforce services, which are delivered through contracted one-stop providers. One-stop providers operate a variety of SNAP E&T components. Comprehensive services—including job search, training, workfare (i.e., community service), work experience, vocational and basic education components, and support services—are provided to SNAP recipients, who are classified in Texas as:

- Able-Bodied Adults Without Dependents (ABAWDs); or
- General Population (i.e., non-ABAWDs, or those SNAP recipients with families).

Integrated services, including those under the Workforce Investment Act (WIA); Project Reintegration of Offenders (Project RIO); Choices, the Temporary Assistance for Needy Families (TANF) employment program; and others provide job seekers (including those receiving SNAP benefits) with a variety of work activities that lead to permanent, unsubsidized employment. This plan addresses the work activities, support services, and coordination procedures for SNAP E&T, and includes a flow chart that displays the complete service delivery process from point of certification for SNAP benefits to obtaining full-time employment.

1. Program Changes

Subsidized Employment

TWC added a subsidized employment component to its SNAP E&T program in Federal Fiscal Year 2010 (FFY'10). This subsidized employment component is part of TWC's TANF Subsidized Employment Initiative (TSE), which is scheduled to end January 31, 2011.

Board participation in TSE:

- 21 Boards will participate in TSE through the end of January 2011.
- Only two of the 21 Boards will outreach SNAP E&T General Population recipients with children.

ABAWDs cannot participate in this initiative.

TSE is designed to help low-income individuals, including TANF recipients and SNAP E&T General Population recipients, enter the labor market by acquiring work experience and enhancing connections to employers. By combining time-limited, paid employment with a comprehensive set of services—including activities designed to remove barriers and to provide education and training—participants develop skills that prepare them for workplace success.

While all subsidized employment activities for SNAP recipients will be monitored under TWC's SNAP E&T program, SNAP E&T funds will not be used for the subsidized employment component or any other part of the TANF Subsidized Employment Initiative. TANF funds and state General Revenue Funds appropriated to TWC for the State Fiscal Year 2010 (SFY'10)–SFY'11 biennium will be used instead.

Additionally, if child care is needed to assist SNAP recipients with participation in the subsidized employment component, TANF funds or Child Care and Development Fund (CCDF) funds, rather than SNAP E&T funds, will be used.

The following describes specific elements for this component:

- **Geographic areas covered and variations among workforce areas:** TSE will be provided in full-service counties in two local workforce development areas (workforce areas)—North Texas and Texoma—through January 31, 2011.
- **Anticipated number of ABAWDs who will begin this component:** None.
- **Anticipated number of non-ABAWD participants, both mandatory and volunteer, who will begin the component:** 10

- **Level of participation effort, or number of hours of participation, in the component and duration:** SNAP E&T General Population recipients in the North Texas workforce area participate in the subsidized employment component for 40 hours per week, for 12 weeks. SNAP E&T General Population recipients in the Texoma workforce area participate in one or two weeks of intensive job search activities before placement in the subsidized employment component.
- **Targeted population:** This component will serve SNAP E&T General Population (non-ABAWD) participants with children. ABAWDs cannot participate.
- **Organizational responsibilities:** Following an employability assessment, SNAP E&T participants are referred by the Board's contractor to private-sector employers providing subsidized employment. Boards must ensure that contractual worksite agreements are established with an employing entity before assigning participants to subsidized employment with the employer.
- **Total cost of the component:** Approximately \$48,000. TWC will use the following funds for the subsidized employment component:
 - TANF funds; and
 - State General Revenue funds appropriated to TWC for SFY'11.

Note: If child care is required, TANF or CCDF funds will be used.

On January 21, 2010, TWC notified HHSC of guidance received from the U.S. Department of Agriculture's (USDA) Food and Nutrition Service (FNS) Southwest Regional Office, which requires that the wages received by SNAP recipients from the subsidized employment component be counted as household income for SNAP certification purposes.

Job Retention

TWC implemented job retention services and support services effective September 1, 2009, in accordance with §4108 of the Food Conservation and Energy Act (FCEA) of 2008 and 7 U.S.C. §2015(d)(4)(B)(vii). TWC will continue the provision of these services in FFY'11.

Job retention services will be made available in full- and minimum-service counties in Texas. Information on full- and minimum-service counties is on page 10.

TWC will use the following funds for job retention services and support services:

- 100 percent federal grant funds to administer job retention services; and
- 50 percent state and federal matching funds to administer job retention services and provide participant reimbursements or support services.

SNAP E&T 100 percent and 50 percent state and federal matching funds will be used to provide:

- job retention services for up to 90 days for SNAP recipients who gain full-time employment during or after participation in SNAP E&T; and
- support services for up to 90 days for SNAP recipients who gain full- or part-time employment during or after participation in SNAP E&T.

Note: SNAP recipients employed part time must successfully participate in SNAP E&T activities before job retention support services are provided. Successful participation means that the SNAP recipient's part-time employment coupled with SNAP E&T activities total 30 hours per week.

Allowable job retention activities provided during the 90-day period are limited to the following:

- **Job search**—SNAP recipients volunteer to participate in activities that will increase their employability and assist them with obtaining better jobs to progress up a career ladder. This includes job skills assessments, job finding clubs, training in techniques for employability, and educational programs to expand their job search abilities or employability.
- **Education**—SNAP recipients volunteer to participate in activities to improve basic skills or improve employability, activities that include a direct link between the education and job readiness of the individual.
- **Training**—SNAP recipients volunteer to participate in job retention training services that will increase their skills.

Job retention support services that are reasonable, necessary, and directly related to SNAP E&T include, but are not limited to:

- clothing required for the job;
- equipment or tools required for the job;
- test fees;
- union dues;
- relocation expenses;
- tools;
- licensing and bonding fees;
- vision needs;
- transportation; and
- child care.

Note: Transportation assistance is detailed on page 21. Child care services that will assist SNAP recipients in retaining employment will be funded by CCDF funds. All support services, which are intended to assist SNAP recipients in retaining employment, are limited to 90 days.

Based on information from HHSC and TWC automated systems, TWC estimates that approximately:

- **1,597** SNAP recipients will volunteer for job retention services; and
- **1,550** SNAP recipients will request job retention participant reimbursements or support services.

Geographic areas covered and variations among local areas: Job retention services will be available in full- and minimum-service counties. SNAP recipients who obtain employment while participating in SNAP E&T may volunteer for and receive job retention and support services.

Per participant cost of participant reimbursement: Employed SNAP recipients will be reimbursed an estimated **\$44.91** for transportation or other expenses.

Total cost of the component: TWC estimates that the total cost of the job retention component will be: **\$561,838** (excluding reimbursements), or **\$631,444** (including reimbursements).

Additionally, TWC will continue implementing the 120-hour work limitation policy on September 1, 2009, in accordance with §4108 of the FCEA. SNAP recipients who are employed or self-employed at least 30 hours per week can volunteer and participate in SNAP E&T services. Mandatory work registrants who voluntarily participate in additional hours of SNAP E&T activities will not be sanctioned at 120 hours.

Documentation, Verification and Supervision of SNAP E&T Work Activities

In June 2006 and February 2008, the U.S. Department of Health and Human Services issued TANF interim rules and TANF final rules and regulations, establishing general documentation and verification procedures for each TANF work activity.

In September 2007, TWC complied with this federal requirement by implementing new documentation and verification procedures for its Choices program.

To further align TWC's Choices and SNAP E&T programs, TWC implemented the new TANF verification and documentation procedures for SNAP E&T in January 2008, and will continue implementing this requirement in FFY' 11.

Verification is the actual proof of participation hours, such as a job search log or attendance record from a service provider.

Documentation is the written information about the provided verification and other details about the SNAP E&T or Choices participant's work activities.

Acceptable verification sources include, but are not limited to:

- attendance records;
- signed letters or e-mails from service providers;

- time cards (for ABAWDs participating in workfare or work experience, or for any SNAP recipient employed part time and participating in SNAP E&T activities); and
- job search logs.

Documentation is entered in TWC's automated system, The Workforce Information System of Texas (TWIST), which has been modified to include a new daily time tracking feature and a new verification screen to ensure that participation hours are captured appropriately, and that verification of participation in SNAP E&T activities is documented.

2. ABAWD Population

In Texas, ABAWDs continue to be subject to a limitation on the receipt of SNAP benefits for three months out of 36 months if the individual does not work or participate in employment and training activities.

ABAWDs are limited to receiving SNAP for three months out of 36 months unless they:

- are employed at least 20 hours per week; or
- are participating in and complying with SNAP E&T requirements or other specified work programs for at least 20 hours or more per week, as determined by TWC.

Note: Federal law establishes requirements for the number of hours an ABAWD must work to be considered exempt, and the number of hours that an ABAWD must participate in SNAP E&T activities. Specifically, 7 U.S.C. §2015(o)(2), regarding work requirements, states:

No individual shall be eligible to participate in the SNAP Program as a member of any household if, during the preceding 36-month period, the individual received SNAP benefits for not less than 3 months during which the individual did not—

- (A) work 20 hours or more per week, averaged monthly;
- (B) participate in and comply with the requirement of a work program for 20 hours or more per week, as determined by the State agency.

TWC's work participation requirement for ABAWDs conforms to 7 U.S.C. §2015(o)(2)(B), which states that ABAWDs shall participate and comply with the requirements of a work program for 20 or more hours per week, as determined by the state agency. The work participation requirement in Texas for FFY' 11 is 30 hours per week.

Texas does not require ABAWDs who have fulfilled the work requirement through 20 hours of employment to participate and comply with SNAP E&T ABAWD work requirements. ABAWDs employed at least 20 hours per week when certified for food

stamps are not referred to TWC from HHSC for SNAP E&T services. However, they may voluntarily participate in SNAP E&T.

Based on information from HHSC, TWC estimates there will be 151,845 ABAWDs in Texas in FFY' 11.

ABAWD Time-Limited Benefits Waiver Counties

On May 18, 2010, HHSC submitted a request to waive the ABAWD time limit in 22 counties with unemployment rates exceeding 10 percent. The 22 counties are:

Cameron	Matagorda	Sabine
Cass	Maverick	San Augustine
Dimmit	Milam	Starr
Duval	Morris	Willacy
Hidalgo	Newton	Zapata
Jasper	Orange	Zavala
Liberty	Presidio	
Marion	Reeves	

Waiver counties are determined annually by HHSC and become effective each October.

ABAWDs residing in waiver counties are not subject to the three out of 36-month time limit, but they are still subject to SNAP E&T requirements in full-service counties. Therefore, ABAWDs in full-service counties, regardless of the waiver designation, are outreached in full-service counties. If they do not respond to outreach or do not comply with work requirements, they will be sanctioned.

Texas will use the 15 percent exemption allowance authorized by FNS, which allows ABAWDs to continue receiving SNAP benefits beyond the three-month time-limited period. The 15 percent exemptions will be used to exempt ABAWDs from the three out of 36-month time limit if the ABAWD resides in a minimum-service county and:

- the ABAWD is not otherwise exempt from the three out of 36-month time limit;
- the minimum-service county is not otherwise classified as a waiver county; and
- the ABAWD is not fulfilling the work requirement.

The designation of waiver counties and 15 percent exemption counties allows Texas to continue to qualify for additional Pledge State dollars.

Additional Allocation for “Pledge” States

The Food and Nutrition Act of 2008 provides for an additional allocation of up to \$20 million each fiscal year to be used to reimburse eligible state agencies for costs incurred in serving ABAWDs. Eligible state agencies are ones that commit to offer a

qualifying activity to every ABAWD applicant or recipient (not waived or exempted) who is in the last month of the three-month period of eligibility. In FFY' 11, the State of Texas will comply with the commitment, allowing the state to receive a portion of the \$20 million used to reimburse state agencies for costs incurred in serving ABAWDs.

TWC offers ABAWDs who reside in full-service counties (not waived or exempted), a qualifying activity within 10 days of receiving the HHSC referral to prevent ABAWDs from losing their benefits before the three months of the 36-month expiration period. TWC monitors the SNAP E&T program monthly to ensure that Texas complies with its commitment.

It is very common for participants to be enrolled simultaneously in more than one activity and to participate for more than one month. Transportation and other reasonable and related support services are provided to ABAWDs every month that they are enrolled in a component activity. ABAWDs participate in all program components.

Based on historical data analysis, Texas estimates spending approximately \$222.00 monthly for each ABAWD (in full-service counties) to ensure that qualifying work activities are offered. Based on Texas's portion of the \$20 million received for FFY' 11, TWC will be able to determine the number of additional ABAWDs it will be able to serve.

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 SNAP E&T counties must be served, and they 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.

3. SNAP E&T General Population

In addition to serving ABAWDs ages 18–50, SNAP E&T services are provided to other mandatory work registrants ages 16–59, and to exempt SNAP recipients who voluntarily participate in SNAP E&T services. These work registrants and volunteers are expected to participate in all SNAP E&T activities for a minimum of 30 hours per week. The 30 hours must be spent in SNAP E&T program components.

4. Program Summary

In accordance with 7 C.F.R. §273.7(e)(4), Texas provides statewide access to SNAP E&T components and services to all SNAP recipients including exempt SNAP recipients who voluntarily participate in SNAP E&T. All counties in Texas are classified as **full-service** or **minimum-service counties**.

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.
- All mandatory work registrants (i.e., ABAWDs and General Population) have access to all services and support services. Mandatory work registrants are sanctioned (i.e., SNAP benefits will be denied) for failure to comply with SNAP E&T program requirements.
- Exempt SNAP recipients may 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.

Minimum-Service Counties:

- All SNAP recipients may volunteer to participate in SNAP E&T and will have access to all services and support services, at Board discretion.
- 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.

In the minimum-services counties, Boards will not be required to serve ABAWDs, as Texas will utilize the state's 15 percent ABAWD exemption allowance (see pages 8, and 26). 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.

Before services are provided to SNAP recipients in minimum-service counties, Boards will determine (through an analysis of their expenditures) whether they are able to serve individuals who volunteer to participate in SNAP E&T services. If Boards determine that funds are sufficient to serve individuals who volunteer, then the SNAP recipients will have access to all services and support services offered. If there is insufficient SNAP funding, a Board will use other resources such as WIA services to assist these individuals.

Note: SNAP recipients who are also receiving TANF and who are subject to and comply with their TANF work requirements (under Title IV-A of the Social Security Act) may not volunteer to participate in SNAP E&T. These individuals will continue to participate in and comply with TANF employment

program work requirements. While the same program components and services are offered to both TANF and SNAP recipients, TANF funds are used to provide services to individuals participating in the TANF work program. SNAP funds are not used.

5. Program Components

Each component of the state's SNAP E&T program is delivered through the Boards.

The following components will be provided to ABAWDs and the SNAP E&T General Population in FFY' 11:

- Job Search
- Vocational Training
- Education
- Work Experience
- Workfare (ABAWDs only)

As allowed by 7 C.F.R. §273.7 and §273.24, services from other sources will count toward SNAP E&T work requirements. Other sources include:

- work services under WIA; and
- work services under Trade Adjustment Assistance (TAA).

6. Sequencing of Components

Upon entering the program, the SNAP E&T participant and the Board's contractor assess the participant's strengths and employment goals and jointly develop an employment plan based on the participant's needs and the available community resources. The agreed-upon plan is required for all SNAP recipients who participate in SNAP E&T. While the plan is required for every individual participating in SNAP E&T, the plan can be modified when a participant's needs or circumstances change. Boards have the flexibility to decide the sequence of service components for individuals participating in SNAP E&T.

7. Other Employment Programs

TWC coordinates the delivery of employment programs and has facilitated 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 WIA, Project RIO, TAA, Employment Service (ES), child care, employment programs under Title IV-A of the Social Security Act (i.e., Choices, the TANF employment program), and Rapid Reemployment Services. 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 Department of Assistive

and Rehabilitative Services (DARS), are initiated through the development of memoranda of understanding.

TWC has sought all opportunities to create consistency between Choices and SNAP E&T. The law supports these endeavors. Specifically, 7 U.S.C. §2015(E) states that each state agency shall establish requirements for SNAP E&T participation by individuals who are not exempt under subparagraph (D) in one or more employment and training programs, including the extent to which any individual is required to participate. Such requirements may vary among participants. Further, 7 U.S.C. §2015(d)(4)(J) states that the Secretary shall promulgate guidelines that enable state agencies, to the maximum extent practical, to design and operate an employment and training program that is compatible and consistent with similar programs operated within the state.

7 C.F.R. §273.7(c)(2) indicates that the state agency may, with FNS approval, use intake and sanction systems that are compatible with its Title IV-A work program. Such systems must be proposed and explained in the state agency's E&T plan. Texas Workforce Centers operate Choices and the SNAP E&T program under the following compatible work requirements:

- TWC has created compatible and consistent work requirements for individuals participating in Choices and SNAP E&T. Individuals may participate in job search, work experience, education and training, and community service (i.e., workfare for SNAP E&T ABAWDs).
- Individuals are limited to four consecutive weeks of job search.
- Individuals may attend the same employment planning sessions, and may attend the same group job search seminars.
- Individuals may receive similar support services to assist them in 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 upon this, Boards are prohibited from using their SNAP E&T funds to pay for Choices services.

8. Simplified SNAP

Texas will continue operating a mini-simplified SNAP for FFY' 11. 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 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.

9. Workforce Development System

The Texas workforce 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 Texas Workforce Centers throughout the state. The Texas Workforce Centers, 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).

10. Outcome Data

TWC will continue to use Common Measures, an integrated method for evaluating performance outcomes, which was derived as a way to develop standard performance measures for programs with similar goals. TWC uses Common Measures to measure performance for all workforce programs.

Key Common Measures for SNAP E&T and other workforce programs in Texas include:

- Entered Employment;
- Employment Retention; and
- Earnings Increase.

Note: While Texas will track job retention and earnings increase data, TWC will ensure that SNAP E&T funds are not expended to support an employed SNAP recipient's job.

B. PROGRAM COMPONENTS

Component Definitions/Explanations:

1. Job Search—A nonwork component that requires participants to make a predetermined number of inquiries to prospective employers over a specified period of time. Upon initial certification of SNAP benefits, each SNAP E&T General Population work registrant outreached must enter the job search component.

Job search incorporates job readiness, job search training, directed job search, or group job search assistance. The SNAP E&T General Population and exempt recipients may receive job search services that include one or more of the following:

- Job skills assessment
- Job placement services
- 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 résumés
- Job fairs
- Life skills
- Guidance and motivation for development of positive work behaviors necessary for the labor market

TWC has established a job search expectation that aligns with the job search expectation for Choices participants. This includes the weekly number of participation hours, and the number of weeks that mandatory work registrants (non-ABAWDs) and exempt recipients who volunteer may participate in job search. The number of weeks of job search is as follows:

- ABAWDs must not be enrolled in job search for more than four weeks, and the job search activity shall be provided in conjunction with the workfare activity.
- The SNAP E&T General Population mandatory work registrants and exempt recipients who voluntarily participate in SNAP E&T services must not be enrolled for more than four weeks of consecutive activity and for more than six weeks of total job search activities.

In order to meet the weekly participation requirement, each participant may engage in any allowable job search activity, including in-person job search contacts, résumé writing, interviewing skills classes, counseling, occupational exploration, training in techniques for employment, and other activities to help SNAP recipients become job ready. To be counted toward SNAP E&T participation, a job search contact must be made in person with the employer's representative. When possible, the contact should include completion of a job application.

In areas in which the labor market does not support multiple job search contacts, individuals participate in other allowable job search activities to meet SNAP E&T participation requirements.

The Boards have many resources at their disposal to assist individuals secure employment. In Texas market-driven and high-performing workforce system, Boards and their partners focus on meeting the workforce needs of local employers through appropriate job referrals. Boards are cautioned against making inappropriate referrals to employers. Each Board takes an individualized approach to assisting SNAP recipients with finding employment. Prior to initiating job search, the recipient's work history, training, or vocational experience and education is assessed to determine the jobs that best fit the recipient's needs. This process ensures that employers' needs are being met with quality job seekers.

Job seekers are linked with appropriate employment through the creation of an individualized employment plan. In addition, staff identifies appropriate employment opportunities through WorkInTexas.com, TWC's state-of-the-art job-matching system. WorkInTexas.com provides extensive job opportunities for SNAP E&T job seekers.

The following describes specific elements for this component:

- **Geographic areas covered and variations among workforce areas:** Job search will be conducted in all full-service SNAP E&T counties in the state. Job search will be conducted in minimum-service counties if SNAP recipients volunteer for SNAP E&T services.
 - **Anticipated number of ABAWDs who will begin the component:** None. ABAWDs will participate in job search activities in conjunction with the workfare component listed on page 19.
 - **Anticipated number of non-ABAWD participants, both mandatory and volunteer, who will begin the component is 10,879 .**
 - **Level of participant effort, or number of hours of participation, in the component and duration:** Participants may engage in a variety of job search activities to meet their 30-hour job search requirements. Participants who live in areas that do not support multiple job search contacts may engage in other job search activities such as résumé writing and assistance with interviewing skills.
 - **Targeted Population:** Services for this component will be targeted to work registrants whose education or work experience match the needs of employers in the local labor markets.
 - **Organizational responsibilities:** TWC contracts with Boards that in turn contract with service providers to provide job search activities.
 - **Number of participants expected to receive reimbursement: 3,974**
 - **Per participant cost of participant reimbursement:** The SNAP E&T General Population participating in directed job search will be reimbursed an estimated **\$44.91** for transportation and other expenses. SNAP E&T funds will not be used for child care reimbursement.
 - **Total cost of the component: \$3,827,325** (excluding reimbursements), or **\$4,005,784** (including reimbursements).
- 2. Vocational Training**—A nonwork component that includes occupational assessment, remedial and entry-level job skills training, customized training,

institutional skills training, and upgrade training. Services are provided through the Boards, TEA, and DARS.

All vocational training provided by employment and training programs, including those operated under WIA, are driven by the skill needs of local employers, the population, and the labor market. Boards determine the length of vocational training required to promote successful outcomes. Training normally lasts one to six months. Participation in the component is at least 30 hours per week.

The following describes specific elements for this component:

- **Geographic areas covered and variations among workforce areas:** Vocational training will be conducted in all full-service SNAP E&T counties in the state and in minimum-service counties if SNAP recipients volunteer for services, and the Board determines that there are funds available.
- **Anticipated number of ABAWDs who will begin the component: 142**
- **Anticipated number of non-ABAWD participants, both mandatory and volunteers, who will begin the component: 157**
- **Level of effort, or number of hours of participation, in the component and duration:** This component's level of effort complies with the regulations set forth by the United States Department of Education. Vocational training provided by employment and training programs, including those operated under WIA, or by TEA and DARS, are driven by the needs of local employers, the population, and the labor market. Boards determine the length of vocational training required to promote successful outcomes. Training normally lasts one to six months. Participation in this component will be at least 30 hours per week.
- **Targeted Population:** This component will serve all ABAWDs and SNAP E&T General Population participants for whom vocational training is appropriate.
- **Organizational responsibilities:** Following an employability assessment, SNAP E&T participants will be referred by the Board's contractor to appropriate training services including WIA, TEA, or DARS services. The service provider will confirm participation status.
- **Number of participants expected to receive reimbursement: 218**
- **Per participant cost of participant reimbursement:** All work registrants' (ABAWDs and SNAP E&T General Population) participating in vocational training will be reimbursed an estimated **\$44.91** for transportation and other expenses. SNAP funds will not be used for dependent care reimbursement.

- **Total cost of the component: \$105,191** (excluding reimbursements), or **\$114,980** (including reimbursements).

3. Education—SNAP E&T participants are referred to existing educational entities based on individual need and assessment. Education is a nonwork component designed to increase employability by providing remedial education as well as postsecondary education leading to a degree or certification. Assessment, literacy training, high school courses, General Educational Development (GED), remedial education, alternative education, English-as-a-Second Language (ESL), and postsecondary education are included in the education component. All lead to a degree or certificate awarded by a training facility, career school courses, or other educational institution classes that prepare individuals for employment in current or emerging occupations not requiring baccalaureate or advanced degrees. Services designed to meet the needs of individual geographic areas may be provided through WIA, TEA, or community-based programs. GED tests and certificates may be paid for with SNAP E&T funds. Individuals participating in an education component must participate for at least 30 hours per week.

The following describes specific elements for this component:

- **Geographic area covered and variations among workforce areas:** Education will be conducted in all full-service SNAP E&T counties in the state and in minimum-service counties if SNAP recipients volunteer, and the Board determines that there are available funds.
- **Anticipated number of ABAWDs who will begin the component: 142**
- **Anticipated number of non-ABAWD participants, both mandatory and volunteers, who will begin the component: 76**
- **Level of effort, or number hours of participation, in the component and duration:** This component encompasses education activities that include GED preparation. Services are based on the needs of the individual and will directly enhance the employability of the participants. A direct link between education and job readiness must be established. Education services generally will be provided on a short-term basis of six months or less. The duration is determined by Boards to ensure successful outcomes and will be based upon an individual employment plan. Participation in this component will be at least 30 hours per week.
- **Targeted population:** This component will serve all ABAWDs and SNAP General Population participants for whom education is appropriate.
- **Organizational responsibilities:** Following an employment plan, the Board's contractor will refer work registrants to the appropriate education program. Education service providers will confirm participation status.

- **Number of participants expected to receive reimbursement: 183**
- **Per participant cost of participant reimbursement:** All work registrants' (ABAWDs and the SNAP General Population) participation in education activities will be reimbursed an estimated **\$44.91** for transportation and other expenses. SNAP E&T funds will not be used to reimburse dependent care costs.
- **Total cost of the component: \$76,694** (excluding reimbursements), or **\$89,912** (including reimbursements).

4. Work Experience—Work experience is defined in WIA (20 C.F.R. Part 652) as a work component that occurs in the workplace for a limited period of time. The work experience may be paid or unpaid, and may occur in either the private for-profit or the public sectors. SNAP E&T funds will not be expended for paid work experience. SNAP E&T funds will not be used to reimburse dependent care costs.

The following describes specific elements for this component:

- **Geographic areas covered and variations among workforce areas:** Work experience will be conducted in all full-service SNAP E&T counties in the state and in minimum-service counties if SNAP recipients volunteer, and the Board determines that there are available funds.
- **Anticipated number of ABAWDs who will begin the component: 101**
- **Anticipated number of non-ABAWD participants, both mandatory and volunteers, who will begin the component: 153**
- **Level of effort, or number hours of participation, in the component and duration:** This component complies with federal regulations set forth by the U.S. Department of Labor (DOL). Boards determine the length of training required to promote successful outcomes.
- **Targeted population:** This component will serve all ABAWDs and SNAP E&T General Population participants for whom work experience is appropriate.
- **Organizational responsibilities:** Following an employment plan, work registrants may be referred for work experience. The Board will confirm participation status.
- **Number of participants expected to receive reimbursement: 239**
- **Per participant cost of participant reimbursement:** All participants including ABAWDs and the SNAP E&T General Population will be reimbursed an estimated **\$44.91** for transportation and other support service-related costs.

- **Total cost of the component: \$89,359** (excluding reimbursements), or **\$100,092** (including reimbursements).

5. Workfare—A work component in which nonexempt ABAWDs are required to perform work in a public service or private nonprofit capacity as a condition of eligibility for SNAP benefits.

All ABAWD work registrants must enroll in job search upon initial certification and must participate in job search for a maximum of four weeks before entering the workfare component. ABAWDs may also receive job search training, directed job search, or group job search assistance during the job search period.

ABAWDs not employed at the end of the four-week job search period will be offered workfare placements with public or private nonprofit entities. Public entities are city, county, state, and federal agencies. Private nonprofit entities include, but are not limited to, community-based organizations. Job sites can be created for ABAWDs through Texas Workforce Centers regardless of the Texas Workforce Center’s profit or nonprofit status because the Boards, which are nonprofit entities, oversee each Texas Workforce Center.

Based on HHSC’s SNAP allotment information, ABAWDs are assigned to workfare job sites for the number of hours per month equal to their household SNAP allotment amount, divided by the number of ABAWDs in the household, and then divided by the federal minimum wage.

Workfare participation is scheduled for each week in a month and is based on employer needs, administrative efficiency, and the needs of the program participants.

The following describes specific elements for this component:

- **Geographic areas covered and variations among workforce areas:** Workfare will be conducted in full-service SNAP E&T counties in the state and in minimum-service counties if SNAP recipients volunteer, and the Board determines that there are available funds.
- **Anticipated number of ABAWDs who will begin the component: 33,350 .**
- **Anticipated number of non-ABAWD participants, both mandatory and volunteers, who will begin the component: None.**
- **Level of effort, or number of hours of participation, in the component and duration:** The level of effort of this component complies with federal regulations set forth by the USDA. Services for work registrants 18–50 are based on employer need and require an assigned number of hours equal to the SNAP allotment divided by the federal minimum wage.

- **Targeted population:** This component will serve ABAWD participants for whom workfare is appropriate.
- **Organizational responsibilities:** Following an employment plan, ABAWDs will be enrolled in an up-front four weeks of job search, and assigned to workfare. Employers of developed sites will confirm participation.
- **Number of participants expected to receive reimbursement: 12,785**
- **Per participant cost of participant reimbursement:** All ABAWDs participating in workfare will be reimbursed an estimated **\$44.91** for transportation and other expenses.
- **Total cost of the component: \$11,732,813** (excluding reimbursements), or **\$12,306,947** (including reimbursements).

6. Work Programs under WIA—Apart from WIA work experience, work registrants may explore education or training through activities authorized under WIA, in order to prepare SNAP E&T work registrants with the skills necessary to meet the current and emerging demands of local businesses. Texas has the following three WIA service levels: core, intensive, and training.

These service levels include job search, job referral and placement assistance, career counseling, short-term prevocational classes, occupational skills training, and entrepreneurial training services for ABAWDs and the SNAP E&T General Population.

7. TAA—TAA provides job search, relocation allowances, training, and income support to SNAP recipients who lose their jobs in the manufacturing or service industry or whose work hours or wages are reduced because of foreign imports and who are certified as trade affected by DOL. Most TAA participants will become exempt from SNAP E&T before a referral for services is made from HHSC because of an application for or a receipt of Unemployment Insurance benefits.

8. Unsubsidized Employment—Unsubsidized employment serves as a component if the SNAP recipient is participating in SNAP E&T education or training activities while employed. Unsubsidized employment is full- or part-time employment with wages paid in full by an employer. SNAP recipients who are employed less than 30 hours per week may enter into an education or training activity that will increase the total number of hours of participation to 30 hours per week. SNAP E&T funds are not used to pay the wages of any SNAP recipient who is employed.

TWC will provide Boards the flexibility to use SNAP E&T funds for awarding bonuses to contractors for placing SNAP E&T participants in full- or part-time employment.

Participant Reimbursement (Support Services):

Participant reimbursement or support is 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. 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 for both ABAWDs and the SNAP E&T General Population and may include:

- Transportation such as:
 - bus tokens;
 - gas vouchers;
 - prepaid gas cards;
 - automobile repairs;
 - Toll road charges;
 - Car Pools;
 - Mileage reimbursement (personal vehicles only);
 - Taxicab services;
 - Contracts with private entities, such as transit providers who provide shuttle or van services;
 - Job Access and Reverse Commute (JARC) projects;
 - Purchase of tires or automobile batteries (applicable to SNAP E&T Mandatory customers only);
 - driver license fees (includes renewals);
 - vehicle inspection fees; and
 - car insurance;
- 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
- housing assistance.

Boards may provide support services to SNAP recipients to support the recipients’ participation in the following allowable activities:

- Job search
- Vocational training

- Nonvocational education
- Work experience
- Workfare (ABAWDs only)

Failure to Comply with SNAP E&T Requirements:

When an individual fails to comply with SNAP E&T requirements, the primary wage earner (i.e., head of household) or disqualified household member is sanctioned as follows:

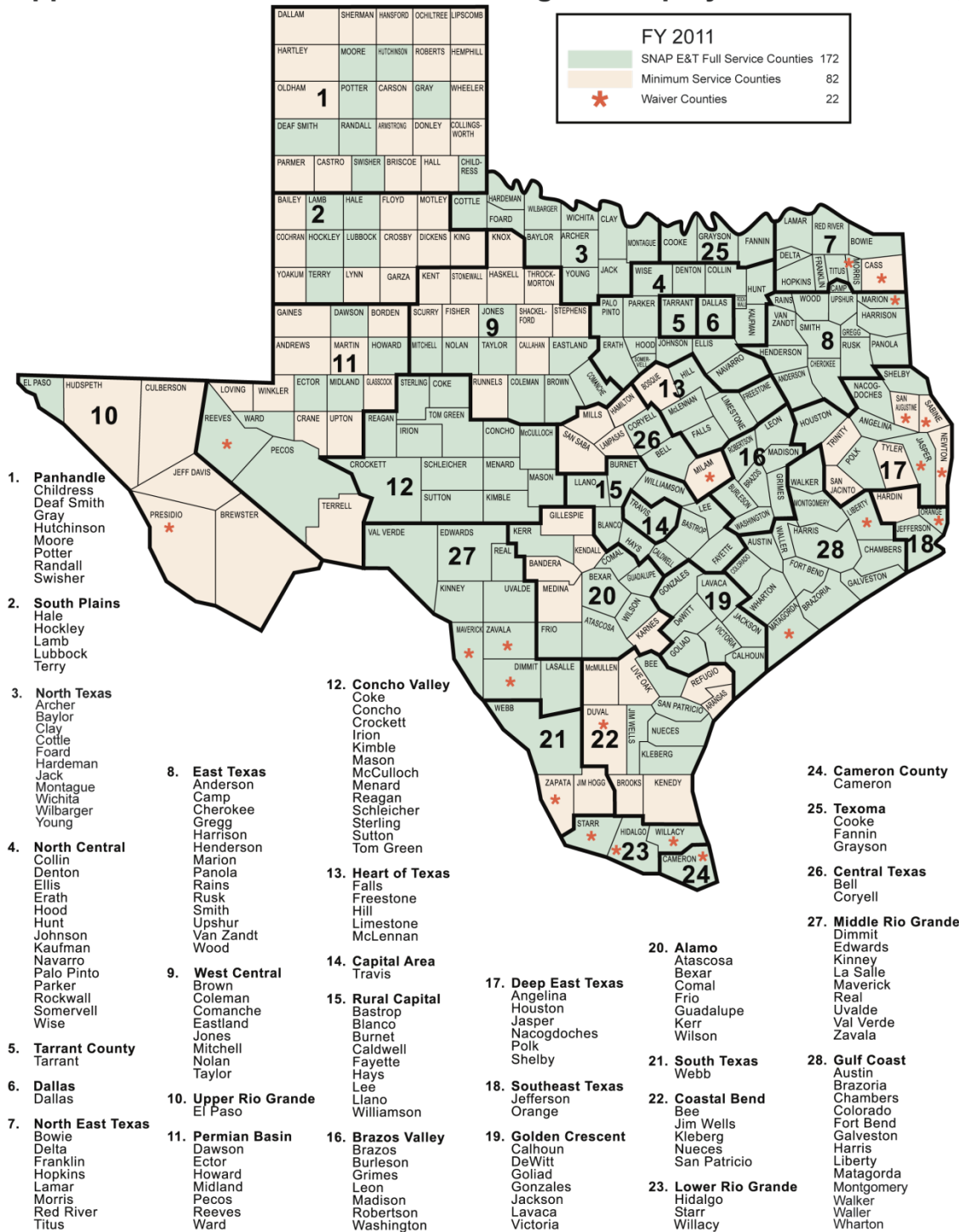
- One month for the first noncompliance or until the individual agrees to comply, whichever is longer
- Three months for the second noncompliance or until the individual agrees to comply, whichever is longer
- Six months for a third or subsequent noncompliance or until the individual agrees to comply, whichever is longer

Geographic Coverage FFY'11

SNAP E&T services will be delivered in the following 172 full-service counties:

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

Supplemental Nutrition Assistance Program Employment and Training



PART II PROGRAM PARTICIPATION AND EXEMPTIONS

A. WORK REGISTRANT POPULATION

1. **Number of Work Registrants.** The projected SNAP E&T state work registrant data for FFY' 11 is as follows:
 - a) **211,686** work registrants are expected to be in the state on October 1 of the fiscal year.
 - b) **399,927** new work registrants are expected to be added between October 1 and September 30 of the fiscal year.
 - c) **611,613** work registrants are expected to be in Texas between October 1 and September 30 of the fiscal year.
2. **Unduplicated Work Registrant Count.** At the beginning of the fiscal year, participant records are flagged at the September cutoff to identify those included in the initial count of work registrants. The count of new work registrants excludes those individuals whose records were flagged at the September cutoff, resulting in an unduplicated count of individuals during the fiscal year.
3. **Characteristics of SNAP registrants.** Characteristics of SNAP work registrants are summarized on the chart, "SNAP E&T Characteristics of Work Registrants Statewide" on page 29.

B. EXEMPTION POLICY

1. Waiver Counties

Texas will claim geographic exemptions based on high unemployment (10 percent or higher) in FFY' 11. ABAWDs living in these counties will not be subject to the three out of 36-month time limit, as defined in A.2. *ABAWD Population*. Boards will continue to conduct outreach and serve all ABAWDs in geographically exempted full-service counties. Mandatory work registrants will not be subject to the three out of 36-month time limit in these counties, but will be expected to participate in SNAP E&T and will be sanctioned if they fail to comply with SNAP E&T requirements.

Waiving the three out of 36-month time limit means that ABAWDs will not be in jeopardy of losing their SNAP benefits if they are not:

- employed at least 20 hours per week; or
- participating in SNAP E&T before their three-month time-limited benefits period expires.

Boards in geographically exempted minimum-service counties will allow exempt individuals and mandatory work registrants who reside in these geographic areas to volunteer to participate in SNAP E&T.

2. Fifteen Percent Exemption

In FFY'11, Texas will use its 15 percent exemption in minimum-service counties not otherwise designated as waiver counties. ABAWDs living in minimum-service counties covered under the 15 percent exemption will not be subject to the three out of 36-month time limit, but may volunteer to participate in SNAP services. ABAWDs who volunteer will not be sanctioned if they fail to participate.

3. Good Cause

In accordance with 7 C.F.R. §273.7(i)(1), Texas will authorize good cause in FFY'11 for mandatory work registrants who are unable to participate for the following reasons:

- Temporary illness or incapacitation
- Court appearance
- Caring for a physically or mentally disabled household member who requires the recipient's presence in the home
- No available transportation (customer must provide documentation that there is no available public transportation service) and the distance prohibits walking; or no available job within reasonable commuting distance, as defined by the Board
- The distance from the registrant's home to the Texas Workforce Center or employment services provider requires commuting time of more than two hours a day (not including taking a child to and from a child care facility), the distance prohibits walking, and there is no available transportation
- Farm workers who are away from their permanent residence or home base who travel to work in agriculture or a related industry during part of the year and are under contract or similar agreement with an employer to begin work within 30 days of the date the individual notified the Board
- An inability to obtain needed child care, as defined by the Board and based on the following reasons:
 - Informal child care by a relative or child care provider under other arrangements is unavailable or unsuitable based on, where applicable, Board policy regarding child care. Informal child care may also be determined unsuitable by the parent.
 - Eligible formal child care providers, as defined in TWC's child care rules relating to Child Care and Development, are unavailable.
 - Affordable formal child care arrangements within maximum reimbursement rates established by the Board are unavailable.
 - Formal or informal child care within a reasonable distance from home or the work site is unavailable.
- An absence of other support services necessary for participation

- Receipt of job referral that results in an offer below the federal minimum wage, except when a lower wage is permissible under federal minimum wage law
- An individual or family crisis or a family circumstance that may preclude participation, including substance abuse, and mental health and disability-related issues
- The individual is a victim of family violence

B. NUMBER OF WORK REGISTRANTS EXEMPT FROM THE SNAP E&T PROGRAM. See Table 1: “Estimated Participant Levels Fiscal Year 2011” on page 30.

C. PLANNED SNAP E&T PROGRAM PARTICIPATION. See Table 2: “Estimated SNAP E&T Placements Fiscal Year 2011” on page 31.

D. PLANNED SNAP E&T PROGRAM PARTICIPATION See Table 2: “Estimated Individual Participation Fiscal Year 2011” on page 31.

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

Andrews	Culberson	Hudspeth	Mills	Stonewall
Aransas	Dallam	Jeff Davis	Motley	Terrell
Armstrong	Dickens	Jim Hogg	Newton	Throckmorton
Bailey	Donley	Karnes	Ochiltree	Trinity
Bandera	Duval	Kendall	Oldham	Tyler
Borden	Fisher	Kenedy	Parmer	Upton
Bosque	Floyd	Kent	Presidio	Wheeler
Brewster	Gaines	King	Refugio	Winkler
Briscoe	Garza	Knox	Roberts	Yoakum
Brooks	Gillespie	Lampasas	Runnels	Zapata
Callahan	Glasscock	Lipscomb	Sabine	
Carson	Hall	Live Oak	San Augustine	
Cass	Hamilton	Loving	San Jacinto	
Castro	Hansford	Lynn	San Saba	
Cockran	Hardin	Martin	Scurry	
Colingsworth	Hartley	McMullen	Shackelford	
Crane	Haskell	Medina	Sherman	
Crosby	Hemphill	Milam	Stephens	

FSET State Plan: FY 2011

Characteristics of Work Registrants
Statewide Participant Profile
October 2009 - May 2010

	ABAWDs				Non-ABAWDs				Volunteers	
	N	%			N	%			N	%
Male	11,755	61.72%			2,041	36.60%			60	22.47%
Female	7,291	38.28%			3,536	63.40%			207	77.53%
Declined to state	1	0.01%			0	0.00%			0	0.00%
Total	19,047	100.00%	0	0.00%	5,577	100.00%	0	0.00%	267	100.00%

	%		%		%	
White	5,856	30.74%	1,654	29.66%	95	35.58%
Black	6,028	31.65%	953	17.09%	87	32.58%
Hispanic	3,507	18.41%	1,611	28.89%	37	13.86%
Native American	39	0.20%	19	0.34%	2	0.75%
Asian	78	0.41%	41	0.74%	3	1.12%
Multi-ethnic	3,524	18.50%	1,293	23.18%	41	15.36%
Not Listed	15	0.08%	6	0.11%	2	0.75%
Total	19,047	100.00%	5,577	100.00%	267	100.00%

Age Group	%		%		%	
Under 24	3,700	19.43%	683	12.25%	44	16.48%
24 - 30	3,669	19.26%	599	10.74%	100	37.45%
31 - 37	2,901	15.23%	1,118	20.05%	50	18.73%
38 - 44	4,067	21.35%	1,093	19.60%	31	11.61%
45 - 51	4,498	23.62%	934	16.75%	30	11.24%
52 - 54	95	0.50%	497	8.91%	3	1.12%
55 - 59	106	0.56%	602	10.79%	1	0.37%
60 And Older	11	0.06%	51	0.91%	8	3.00%
(Missing Birthdate)		0.00%		0.00%		0.00%
Total	19,047	100.00%	5,577	100.00%	267	100.00%

Household Number	Includes zero		Excludes zero		Includes zero		Excludes zero		Includes zero		Excludes zero	
	N	%	N	%	N	%	N	%	N	%	N	%
0	12,924	60.82%			3,392	60.82%	NA		115	43.07%	NA	
1	4,028	5.90%	4028	65.78%	329	5.90%	329	15.06%	30	11.24%	30	19.74%
2	985	7.78%	985	16.09%	434	7.78%	434	19.86%	36	13.48%	36	23.68%
3	527	9.32%	527	8.61%	520	9.32%	520	23.80%	34	12.73%	34	22.37%
4	308	7.87%	308	5.03%	439	7.87%	439	20.09%	29	10.86%	29	19.08%
5	167	5.24%	167	2.73%	292	5.24%	292	13.36%	15	5.62%	15	9.87%
6+	108	3.07%	108	1.76%	171	3.07%	171	7.83%	8	3.00%	8	5.26%
Total	19,047	100.00%	6,123	100.00%	5,577	100.00%	2,185	100.00%	267	100.00%	152	100.00%

	%		%		%	
No Formal Education	710	3.73%	504	9.04%	3	1.12%
1st to 6th grade	239	1.25%	227	4.07%	2	0.75%
7th to 9th grade	1,544	8.11%	591	10.60%	13	4.87%
10th to 11th grade	3,078	16.16%	771	13.82%	31	11.61%
High School Graduate/GED	9,686	50.85%	2,356	42.24%	129	48.31%
Some College	3,160	16.59%	904	16.21%	78	29.21%
College Graduate	543	2.85%	183	3.28%	10	3.75%
12th Grade (No Diploma or GED)	64	0.34%	23	0.41%		0.00%
4th Year of College (No Degree)	4	0.02%	1	0.02%		0.00%
Other Credential (Degree, Certificate, etc.)	7	0.04%	12	0.22%	1	0.37%
Post-Secondary (No HS Diploma or GED)	11	0.06%	5	0.09%		0.00%
Post-Secondary Vocational/Skills Credential	1	0.01%		0.00%		0.00%
ESL Completion		0.00%		0.00%		0.00%
Total	19,047	100.00%	5,577	100.00%	267	100.00%

N=number %=Percent

Note: Data was compiled from TWIST based upon SNAP recipients who were enrolled in an activity.

TABLE 1
ESTIMATED PARTICIPANT LEVELS
FISCAL YEAR 2011

A. Anticipated number of work registrants in the state during the fiscal year:	611,613
B. List planned exemption categories and the number of work registrants expected to be included in each during the fiscal year:	0
C. Percent of all work registrants exempt from SNAP E&T:	0
D. Number of SNAP E&T mandatory participants:	611,613
E. Anticipated number of ABAWDs in the state during the fiscal year:	151,845
F. Anticipated number of ABAWDs in waived areas of the state during the fiscal year:	12,664
G. Anticipated number of ABAWDs to be exempted under the state's 15 percent exemption allowance during the fiscal year:	10,685
H. Number of at-risk ABAWDs expected in the state during the fiscal year:	128,496

TABLE 2

**(1). ESTIMATED E&T PLACEMENTS
FISCAL YEAR 2011**

1.	Number of ABAWD applicants and recipients expected to participate in a qualifying ABAWD component each month.	2985
2.	Number of all other applicants and recipients (including ABAWDs involved in non-qualifying activities) expected to participate in a component each month.	866
3.	Total number of applicants and recipients the State agency expects to participate in a component each month during the fiscal year.	3851

**(2). ESTIMATED INDIVIDUAL PARTICIPATION
FISCAL YEAR 2011**

	Number of individuals expected to participate in the E&T Program during the fiscal year	46,226
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1. TWC estimated the numbers of individuals that will participate in components each month and total them on line 3. This information represents a duplicate count of participants over the course of the fiscal year and corresponds to lines 3 and 4 on the FFY'10 FNS-583, E&T Program Activity Report.

2. TWC estimated the unduplicated numbers of all individuals (ABAWDs and the General Population) who will participate during the fiscal year.

PART III PROGRAM COORDINATION

A. PROGRAM COORDINATION

As previously stated, HHSC is the administering agency for the SNAP Program in Texas. HHSC determines eligibility and mandatory or exempt status, and electronically transmits this information to TWC.

1. Narrative Coordination Statement. HHSC Texas Works Advisors are responsible for all areas related to SNAP recipients' benefits, including:

- intake and eligibility;
- certification;
- recertification;
- mandatory and exempt status for SNAP E&T participation;
- providing SNAP allotment amount for calculation of number of workfare hours ABAWDs must complete;
- preparation of Notice of Adverse Action; and
- sanctions resulting from noncompliance with SNAP E&T requirements.

ABAWD recipients are directly referred to the Board's contractor for SNAP E&T services. The Board's contractor enrolls work registrants in appropriate SNAP E&T activities based on assessment and employment planning. The Board's contractors are also responsible for:

- conducting employability assessments of individual registrants;
- assigning SNAP E&T program components;
- 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;
- monitoring compliance with component requirements;
- determining good cause for noncompliance;
- maintaining participant records;
- reporting all significant data to certification staff (e.g., noncompliance or employment);
- disbursing participant expense reimbursements; and
- referring participants to the child care contractor when appropriate.

Boards will also be responsible for planning, including:

- negotiating contracts and interagency agreements;
- coordinating service delivery;
- identifying policies and procedures negatively impacting the program;
- analyzing performance and demographic data; and
- developing program enhancements.

- 2. Information Coordination.** Information systems developed in prior operating years will be continued. These include:
- maintaining automated records of participation in SNAP E&T services;
 - initiating determination of good cause and determining when noncompliance has occurred;
 - reporting noncompliance to HHSC; and
 - developing procedures to ensure that noncompliance reports are processed as mandated by regulation.

In addition, when a mandatory work registrant fails to comply with SNAP E&T requirements, the Board notifies HHSC through an automated system. The notice of the noncompliance request is transferred to an HHSC eligibility worker for action.

- 3. Coordination Time Frames.** An automated interface between TWC and HHSC occurs nightly to allow ABAWDs and the SNAP E&T General Population to be outreached for services through TWIST. Boards send notices offering qualifying work, education, or training opportunities to all ABAWDs in full-service SNAP E&T counties within 10 days of the individual's name and Social Security number appearing in TWIST.

The automated interface between TWC and HHSC also transmits eligibility data for SNAP E&T General Population customers who are eligible to receive SNAP E&T services. SNAP E&T General Population customers are outreached through TWIST as funding permits.

All reports of noncompliance (both ABAWDs and the SNAP E&T General Population) will be entered into TWIST within three working days and then forwarded to HHSC eligibility staff at the time of the weekly data transfer.

HHSC will provide to the noncomplying household a Notice of Adverse Action for noncompliance without good cause notification. The denial/disqualification will be imposed within the first month following the expiration of the Notice of Adverse Action unless a fair hearing is requested.

B. INTERAGENCY COORDINATION

Areas of Coordination. Texas operates a fully integrated workforce system in which Boards provide seamless service delivery through the administration of multiple funding sources, including:

- ES;
- WIA;
- TANF;
- Project RIO;
- TAA; and

- Child care.

In 2006 and 2007, all veterans' employment services programs and staff were transferred from TWC to the Texas Veterans Commission (TVC). However, TVC staff remains colocated in Texas Workforce Centers, and veterans' services are provided at each Texas Workforce Center.

TWC remains committed to providing opportunities for all veterans and recently formed the Texas Veterans Leadership Program, a resource and referral network that connects returning veterans of Iraq and Afghanistan with the resources and tools they need to lead productive lives and enjoy the full benefits of the society they have willingly served. TWC is also continually seeking opportunities to improve workforce services to veterans and military spouses in Texas.

Methods of Coordination. As previously described in the plan, Texas's fully integrated workforce system promotes the delivery of comprehensive services through Texas Workforce Centers. Local partnerships required by state law bring together businesses, educational entities, social service agencies, community- and faith-based organizations, and labor entities and representatives in order to create viable workforce solutions at the local level.

Boards oversee the delivery of coordination services through the procurement of one-stop service delivery partners—that is, Texas Workforce Centers. The Texas Workforce Centers coordinate with other local partners through the establishment of memorandums of understanding, contracts, and interagency meetings.

PART IV PROGRAM COSTS AND FINANCIAL MANAGEMENT

A. PLANNED COSTS OF THE STATE SNAP E&T PROGRAM

1. **Operating Budget.** See Table 4: “Operating Budget Fiscal Year 2011” on page 39.
2. **Sources of SNAP E&T Funds.** See Table 5: “Planned Fiscal Year Costs of the State E&T Program by Category of Funding Fiscal Year 2011” on page 40.
3. **Justification of Education Costs.** TWC remains committed to complying with the requirements at 7 C.F.R. §273.7. The Hunger Prevention Act of 1988 prohibits state agencies from using SNAP E&T funds to supplant nonfederal funds for existing educational programs. This statement serves as TWC’s assurance that such supplantation has not and will not occur.

B. CONTRACTS

TWC will contract the provision of SNAP E&T services to Boards, including assessment, determination of good cause, etc. The contractual agreement between TWC and Boards is maintained by TWC in accordance with 7 C.F.R. §272.1(f) and is available upon request.

C. PARTICIPANT REIMBURSEMENT

Method of Reimbursement. Individuals receiving SNAP E&T services will receive payments for transportation and other work, training, or education-related expenses as determined by each Board. SNAP E&T participants will be issued payments or be reimbursed for expenses based on planned or actual activities. Participants in need of child care services may receive dependent child care from Boards. If child care services are needed, CCDF funds are used and the provision of child care services is arranged and provided through the Board’s child care contractors.

Procedure for Reimbursement. Boards reimburse transportation and other work, training, or education-related expenses to individuals when participation is initiated and payments are recorded in an automated system. Participants may receive dependent child care for children who are 12 years of age or younger. Child care services for SNAP E&T participants are funded with CCDF funds.

TWC has in place a more flexible system for purchasing child care to accommodate the needs of SNAP E&T participants. The system consists of a network of Board child care contractors who are responsible for a broad spectrum of functions and activities, including those commonly performed by child care brokers, vendors, and resource and referral agencies.

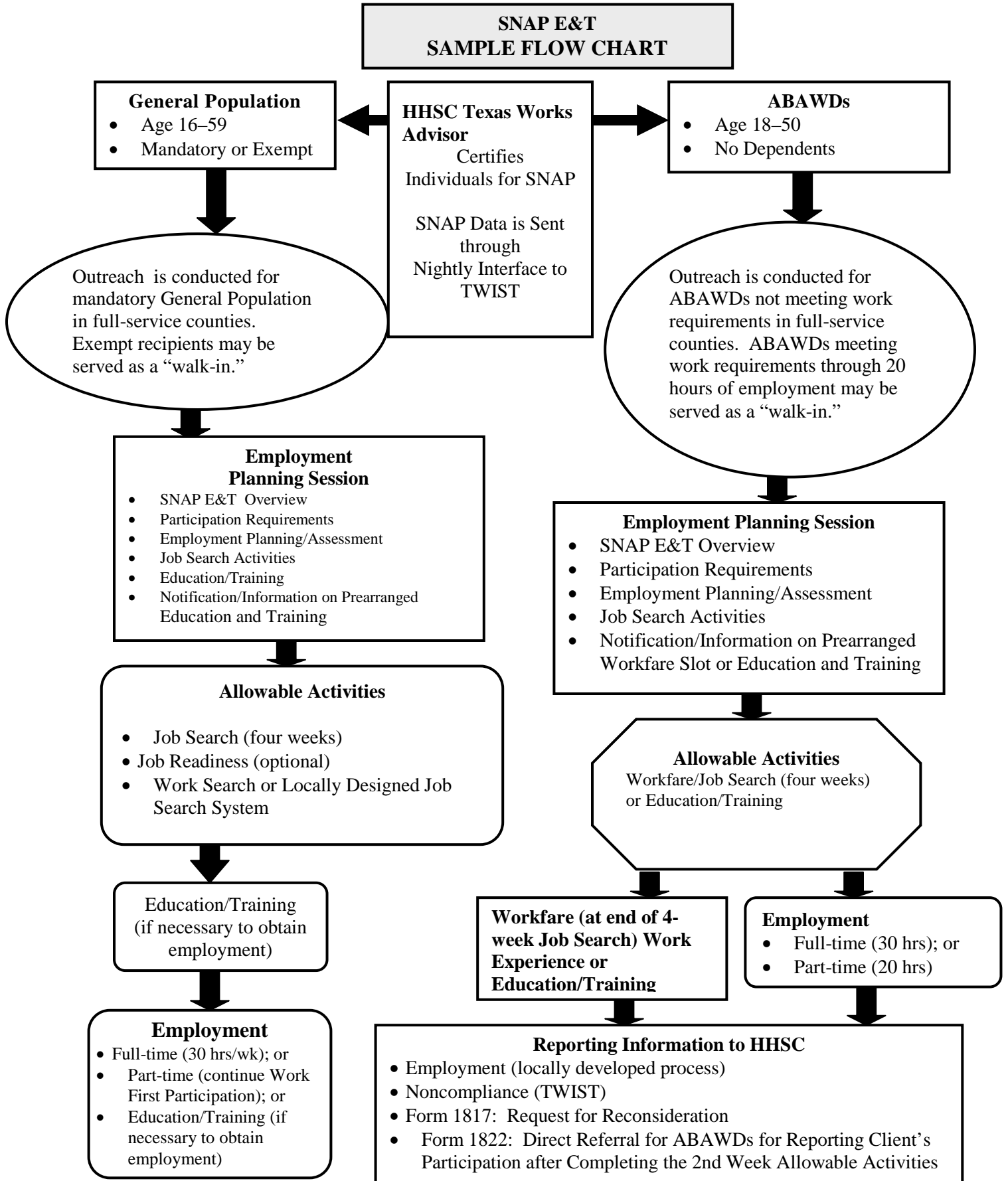
SNAP E&T contractors refer participants to the Board child care contractors for assessment and coordination of child care services. Continuity of child care based on employment is essential. Therefore, a participant is eligible for continuing child care services when the participant becomes employed and exits SNAP E&T services.

D. COST ALLOCATION

Boards are required to comply with TWC's policy for contracts and grants, which covers cost allocation and includes:

- definitions relating to cost allocation;
- the fundamental basis for cost allocation; and
- essential elements of a cost allocation plan.

**SNAP E&T
SAMPLE FLOW CHART**



Delivery of services will vary in workforce areas.

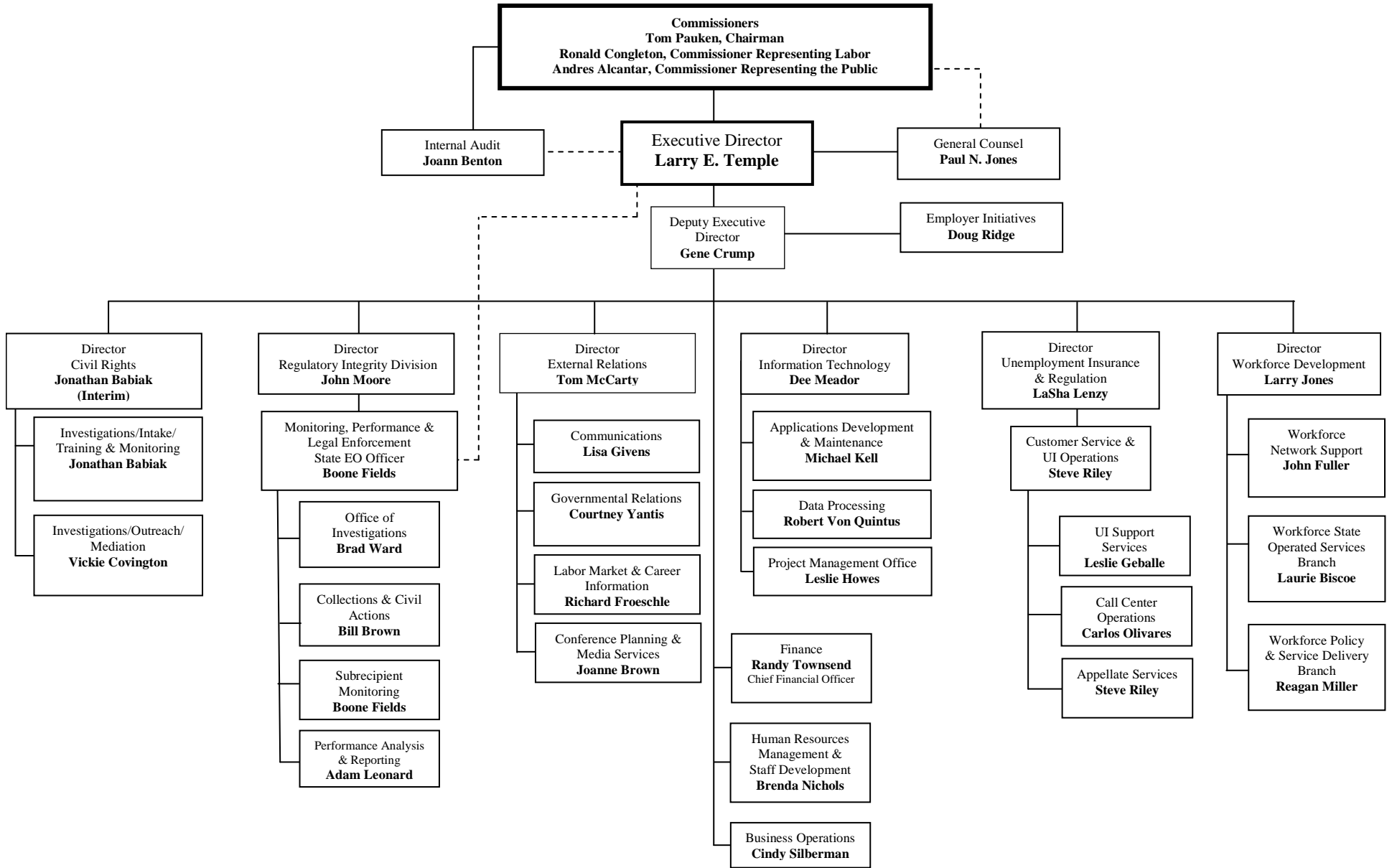


TABLE 4
OPERATING BUDGET
FISCAL YEAR 2011

Components	State Agency Costs		Contractual Costs	Participant Reimbursement (State plus Federal)		State Agency Cost for Dependent Care	Total
	Salary & Benefits	Other Costs		Dependent Care	Transportation & Other Costs		
Directed Job Search			\$3,827,325		\$178,460		\$4,005,784
Vocational Training			\$105,191		\$9,790		\$114,980
Education		\$5000	\$76,694		\$8,218		\$89,912
Work Experience			\$89,359		\$10,733		\$100,092
Workfare			\$11,732,813		\$574,134		\$12,306,947
Job Retention			\$561,838		\$69,606		\$631,444
Total Component Costs							\$17,249,160
Overall State Agency E&T Operational Costs							\$2,281,695
Total State E&T Costs							\$19,530,855

**TABLE 5:
PLANNED FISCAL YEAR COSTS OF THE STATE E&T PROGRAM BY CATEGORY OF FUNDING
FISCAL YEAR 2011**

Funding Category	Fiscal Year 2010	Fiscal Year 2011
1. 100 Percent Federal E&T Grant:	\$5,224,590	\$4,893,848
2. Texas' Share of Additional \$20 Million in 100 Percent Federal Funds	\$6,976,744	\$5,494,505
3. Additional E&T Expenditures	\$8,419,278	\$8,291,562
A. 50% Federal	\$4,209,639	\$4,145,781
B. 50% State	\$4,209,639	\$4,145,781
4. Participant Expenses Reimbursed	\$850,940	\$850,940
A. Transportation and Other Costs:		
50% Federal	\$425,470	\$425,470
50% State	\$425,470	\$425,470
B. Up to Statewide limit per month per dependent for dependent care costs:		
50% Federal	\$0	\$0
50% State	\$0	\$0
C. Above \$25 per month for transportation and other costs	n/a	n/a
D. Above Statewide limit per dependent per month for dependent care costs (Optional) 100% State	\$0	\$0
Total E&T Program costs	\$21,471,552	\$19,530,855