

This document includes the second set of clarifications on the Fiscal Year 2015 Pilot Projects to Reduce Dependency and Increase Work Requirements and Work Effort under the Supplemental Nutrition Assistance Program (SNAP) Request for Applications (RFA).

These questions are based on those received by potential applicants. The responses are not intended to address the merit of proposed projects or the likelihood that a project would be funded.

## Questions regarding...

Work Requirements, ABAWDs & Time Limits.....	1
Pilot Participants .....	2
Screening Work Registrants.....	3
Allowable Activities.....	4
Other .....	5

## Work Requirements, ABAWDs & Time Limits

Question 1: Does a State agency with a voluntary E&T program have to operate a mandatory program under the pilot?

Answer 1: No. A State agency that currently operates a voluntary E&T program may continue operating a voluntary program under a pilot.

Question 2: Are the pilot project areas or participants exempt from the ABAWD work requirement and the 3-month time limit?

Answer 2: ABAWDs participating in a pilot are subject to the 3-month time limit unless the pilot is operating in an area covered by a geographic waiver. State agencies have the option of using 15 percent exemptions for ABAWDs participating in a pilot project.

Question 3: Can a State agency alter exemptions from the work registration requirements? For example, could a State agency change the exemption for a household member responsible for the care of a child under 6 years of age to responsible for the care of a child under 4 years of age?

Answer 3: No. State agencies cannot alter Federal exemptions from SNAP work requirements. State agencies cannot require SNAP recipients to participate in the pilot if they are exempt from work registration requirements by Federal law. However, State agencies continue to have discretion as to which work registrants they require to participate in E&T and which to exempt.

Question 4: By law, we are not allowed to use SNAP E&T or pilot funding on TANF cash recipients. What if an individual is participating in the pilot project and is subsequently approved for TANF cash assistance?

Answer 4: In this scenario, the State agency may reassign the participant to another work activity under TANF or identify a different funding source to allow the participant to continue the activity he or she was assigned to under the pilot. The State agency may not use pilot funding or the State's contribution towards a 50 percent reimbursement for services provided to TANF cash recipients. The independent evaluation will continue to track Individuals who begin participation in a pilot project and subsequently leave, regardless of the reason for exit.

Question 5: What does willful misconduct for failure to work mean?

Answer 5: Please refer to page 19 of the RFA.

## Pilot Participants

Question 1: The RFA says that at least 85 percent of all pilot participants must meet the criteria of a work registrant at section 6(d) of the Food and Nutrition Act. Is there any flexibility on this? Would a proposal that specifically targets a population exempt from work registration (e.g. receiving TANF in addition to SNAP, or working more than 30 hours per week, but underemployed), be acceptable?

Answer 1: No. The purpose of these pilots is to develop and test methods that increase earnings and employment among work registrants. A State agency must include assurance in its application that at least 85 percent of pilot project participants will be SNAP work registrants at the time of referral to an E&T pilot. In other words, pilots may serve up to 15 percent of participants who are not mandatory work registrants at the time of referral to the pilot.

Question 2: Are there any age limitations on pilot participants? For example, can pilot projects serve individuals that are over the age of 50?

Answer 2: At least 85 percent of pilot participants must be work registrants. Work registrants are between the ages of 16 and 59. A 16 or 17 year old who is not the head of a SNAP household or who is attending school or enrolled in an employment training program on at least a half-time basis, is exempt from work registration.

Question 3: If pilot participants are required to participate in substance abuse treatment or mental health treatment activities, will they be considered part of the 85 percent of participants who are work registrants at referral?

Answer 3: If an individual is a regular participant in a drug addiction or alcoholic treatment and rehabilitation program or mentally unfit for employment, he is exempt from work requirements and would not be a work registrant nor could he be required to participate in a pilot project. If a work registrant is referred to a pilot project and subsequently placed in substance abuse treatment or mental health treatment that is determined to be appropriate by a qualified medical, substance abuse, or mental health professional, that individual would be counted toward the 85 percent threshold.

Question 4: If a specific group is required to participate statewide (such as delinquent non-custodial parents) regardless of work registrant status, would those clients still be counted against the number of clients which may not exceed 15% of exempt clients who elect to volunteer?

Answer 4: Only SNAP work registrants may be required to participate, if assigned by the State agency. SNAP participants who are exempt from SNAP work requirements under Federal law cannot be required to participate, would not count as work registrants if they elected to participate in the pilot, and could not be sanctioned for failure to comply.

## Screening Work Registrants

Question 1: Can we ask questions on the SNAP application that would help establish for referral purposes, such as whether an individual may have a specific need we may be interested in targeting in the pilot project?

Answer 1: No. State agencies may identify possible pilot participants when screening work registrants.

Question 2: Does USDA expect the screening of basic needs and barriers to occur at work registration or is screening expected to occur after the work registrant is referred to the pilot?

Answer 2: The State agency may not add screening questions to the SNAP application but it has discretion on the screening process after an individual or household submits an application. The State agency is responsible for screening each work registrant and the screening must include, at minimum, identification of basic needs and barriers. The State agency may determine the process for screening and whether this will occur in one stage at the point where a client work registers or in multiple stages (at referral to the pilot and then again before placement in a pilot activity).

## Allowable Activities

Question 1: Are there any time limits tied to training services that will be offered in the pilot? For example, could there be short-term training of 3 months or longer-term training of up to a year?

Answer 1: State agencies have discretion in the design of pilot activities and their duration. The only restriction is on job retention services, which may be provided for up to 90 days. State agencies should provide detail on the length, duration, and level of support associated with each pilot activity and will be evaluated on the clarity of this information as well as its connection to promising practices, evidence-based strategies, or the project logic model.

Question 2: Can State agencies provide job retention services for longer than the current 90-day period under a pilot?

Answer 2: No. Job retention services are limited to 90 days. If a State agency includes work as an allowable pilot activity, the State agency is required to provide payments or reimbursements to both mandatory and voluntary participants for the cost of dependent care, transportation, and other costs that are reasonably necessary and directly related to participation in the pilot.

Question 3: Can the pilot provide job retention services to clients that did not participate in SNAP E&T, whether they are on Transitional Food Assistance (TFA), SNAP only, or terminated from SNAP completely?

Answer 3: No. Only individuals that have participated in SNAP E&T or a pilot activity are eligible for job retention services.

Question 4: Can pilot funds be used to support internet access or computer purchases for program participants?

Answer 4: No. However, a State agency may provide access to computer labs and work stations with internet access. If the State agency is investing in new equipment, this should be identified and described in the project budget and narrative.

Question 5: Can we contract healthcare providers or agencies to provide service to our pilot participants that may need substance abuse or mental health services?

Answer 5: Yes. A State agency may contract with healthcare providers.

## Other

- Question 1: If the pilot proposal includes waiver requests, should the State agency submit waiver requests through the regular FNS process? Or, will the waivers be approved as part of the pilot application review process?
- Answer 1: Projects predicated on waiving SNAP regulations are not allowable and will not be considered for funding.
- Question 2: Does the application require the identification of private partners and the agreements, or is it permissible to conduct a solicitation for partners based on the program components after grant award?
- Answer 2: If the State agency intends to partner with an entity that would contribute resources and expertise to the proposed project, the State agency should clearly articulate the duties of such partners in the application and must submit a Letter of Commitment with the application. If the State agency intends to contract out services described in the application, the State agency is not required to identify the contractor in its grant application.