



**FIA ACTION TRANSMITTAL**

**Control Number: #22-14**

**Effective Date: Upon Receipt**

**Issuance Date: February 11, 2022**

**TO: DIRECTORS, LOCAL DEPARTMENTS OF SOCIAL SERVICES  
DEPUTY/ASSISTANT DIRECTORS FOR FAMILY INVESTMENT,  
FAMILY INVESTMENT SUPERVISORS AND CASE MANAGERS**

**FROM: LA SHERRA AYALA, EXECUTIVE DIRECTOR**

**RE: SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM  
EMPLOYMENT AND TRAINING (SNAP E&T) FINAL RULE  
PROVISIONS**

**PROGRAM AFFECTED: SUPPLEMENTAL NUTRITION ASSISTANCE  
PROGRAM EMPLOYMENT AND TRAINING  
(SNAP E&T)**

**ORIGINATING OFFICE: OFFICE OF PROGRAMS**

**SUMMARY:**

This Action Transmittal (AT) outlines the requirements of the SNAP E&T Final Rule and establishes protocols for the SNAP E&T statewide screening and referral process.

On January 5, 2021, the United States Department of Agriculture (USDA), Food and Nutrition Service (FNS) published the final rule [Employment and Training Opportunities in the Supplemental Nutrition Assistance Program](#) (RIN 0584-AE68). Provisions in the rule implement changes in section 4005 of the Agriculture Improvement Act of 2018 on the Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T) program and on aspects of the work requirement for Able-Bodied Adults Without Dependents (ABAWDs).

The SNAP E&T Final rule regulations define the roles of DHS staff and SNAP E&T providers, **increase accountability, and place strong emphasis on program outcomes.** The statutory changes made by section 4005 of the Act were made to strengthen E&T programs, and improve SNAP participants' ability to gain and retain employment, reducing participant reliance on the social safety net.

This Action Transmittal (AT) outlines the requirements of the SNAP E&T Final Rule, and establishes protocols for SNAP E&T statewide screening and referral process.

The AT addresses the following:

- Definitions (ABAWD vs. Work Registrant)
- Screening to identify work registrants;
- Consolidated Work Notification;
- Referrals to a SNAP E&T program;
- Case management as a core component of SNAP E&T program;
- Supervised Job Search;
- Reverse Referrals;
- Provider Determination.

#### **Definitions (ABAWD vs. Work Registrant):**

The easiest way to explain the difference between these two SNAP participant groups is that all ABAWDs are work registrants, but not all work registrants are ABAWDs.

**Work Registrants:** The general work requirements apply to people ages 16 through 59, except those who are:

- physically or mentally unfit for employment,
- care for a child under age 6,
- an incapacitated person already employed 30 hours or more per week, or earning weekly wages at least equal to the federal minimum wage multiplied by 30 hours,
- regularly participating in a drug addiction or alcoholic treatment and rehabilitation program,
- already participating in certain work programs,
- or students in school half-time or more.

Participants who are subject to the general work requirements must register for work, take a suitable job if offered, *or* participate in a SNAP E&T program or a workfare program, if assigned by the SNAP Administering Agency (i.e., DHS). Work Registrants are also prohibited from voluntarily quitting a job of 30 or more hours per week or reducing work hours to less than 30 hours per week without good cause (unless their weekly wages continue to exceed the Federal minimum wage multiplied by 30 hours). Participants subject to the general work requirements are commonly called "work registrants."

**ABAWD:** ABAWDs may receive SNAP benefits only for three months in a 36-month period unless they meet certain work requirements. The ABAWD time limit and work requirement apply to participants ages 18 through 49, unless they are already exempt from the general work requirements, medically certified as physically or mentally unfit for employment, sharing a household with a child under 18, or pregnant. ABAWDs are also work registrants, and must meet the general work requirements. In addition, ABAWDs must work and/or participate in a work program for a minimum of 80 hours per month. Participation in SNAP E&T, which is a type of work program, is one way a person can meet the ABAWD work requirement. In Maryland, participating in other qualifying work programs is acceptable.

### **REQUIRED ACTION:**

### **DHS is required to follow certain procedures to identify and refer Work Registrants and ABAWDs to appropriate resources to help them meet SNAP work requirements.**

#### **Screening for Work Registrants**

All SNAP recipients between the ages of 16-59 years who are unemployed or underemployed should be screened for work registration. Case Managers must screen SNAP recipients to determine if an individual is appropriate to refer to an E&T program. SNAP recipients who are statutorily exempt from work requirements should not be registered for work; however, they can enroll in any work activity at their discretion. SNAP recipients who are temporarily unable to work due to an individual exemption must be registered for work, but granted good cause for not participating in a work program. SNAP recipients who meet the following criteria are exempt from work registration:

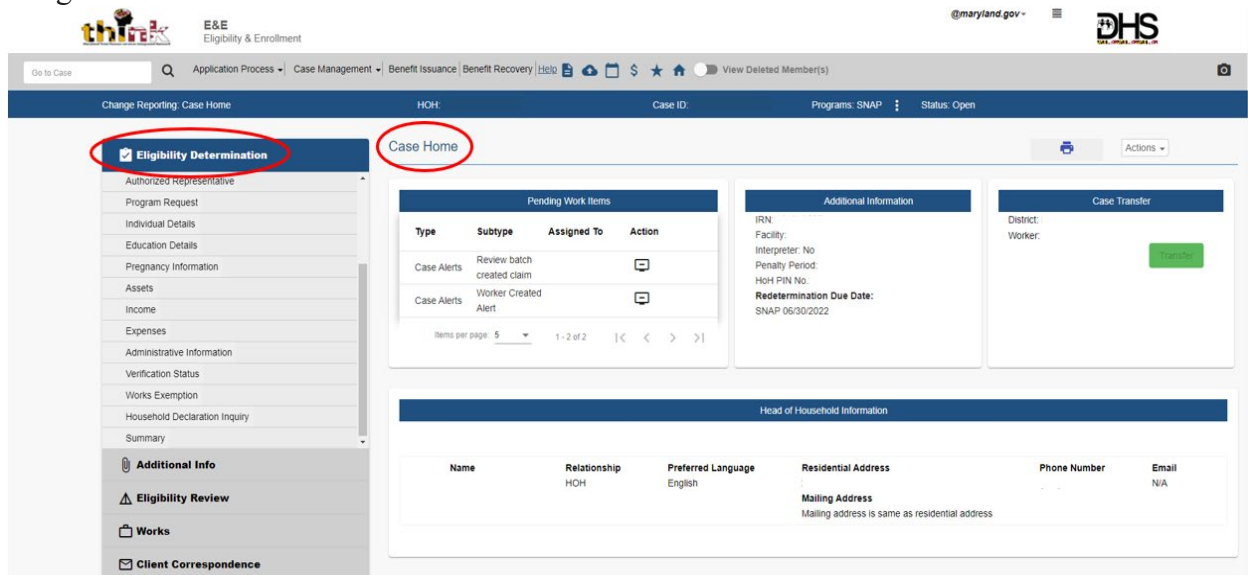
- Under age 16
  - Individuals aged 16 and 17 are exempt if they are not the head of household, or if they are attending school or are enrolled in an employment training program at least half-time.
- Age 60 or older;
- Physically or mentally unfit for employment;
- A parent or other household member who is responsible for the care of a dependent child under age 6 or an incapacitated individual.
- Employed or self-employed and meets one of the provisions below:
  - Working at least 30 hours per week (regardless of wage level).
  - Receiving earnings at least equal to 30 hours a week at the federal minimum wage.
- Subject to and complying with any work requirement under title IV of the Social Security Act including TCA work requirements.
- Receiving or applying for unemployment compensation.
- Participating in a drug addiction or alcohol treatment and rehabilitation program.
- A student enrolled at least half-time in any recognized school, training program, or institution of higher education.

- An ABAWD over the age of 49.

The Case Manager is responsible for determining good cause when a Work Registrant is not able to participate in work activities. Since it is not possible to enumerate each individual situation that should or should not be considered good cause, the DHS case manager must consider the facts and circumstances when determining whether or not good cause exists. Good causes include circumstances beyond the member's control, such as, but not limited to: illness, illness of another household member requiring the presence of the member, a household emergency, the unavailability of transportation, or the lack of adequate childcare for children who have reached age six but are under age 12. A Case Manager may also provide good cause for leaving employment as defined at 7 CFR 273.7(h)(1) and (2). Reference Section 130 - Work Requirements of the SNAP manual on [Knowledge Base](#).

At the application and recertification interview, the Case Manager must provide an oral **comprehensive explanation of the SNAP work requirements** and update the Eligibility and Enrollment (E&E) system with any statutory or individual exemptions that may apply to each household member. The individual exemptions are listed outside of the Eligibility Determination workflow on the Work Exemption tab. The case manager must assess each household member to identify any applicable exemptions, and code the E&E System accordingly. The E&E System has been programmed to automatically send work registration information over to the WORKS System. The coding for the statutory exemptions, such as receiving unemployment, receiving Social Security, or being employed full time, are throughout the Eligibility Determination stream shown in Image 1.

Image 1



Individual exemptions, such as lack of transportation, family problems, or multiple barriers are located on the Work Exemption screen. The system is programmed to prompt the Case Manager to update the Work Exemptions tab. The current E&E System functionality will allow the case

manager to complete the interview process without addressing this important piece of case information. Future system enhancements will include moving the Work Exemptions tab within the Eligibility Determination workflow as a mandatory step. To ensure that the E&E System is capturing valid case information, be sure to access the Work Exemptions tab shown in Images 2 and 3.

Image 2

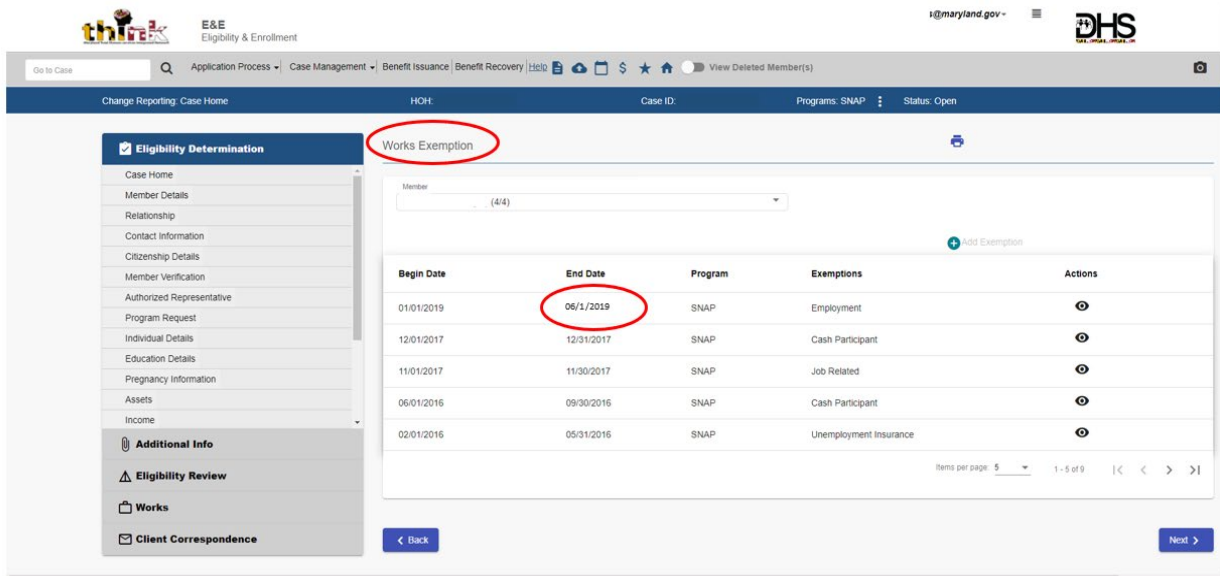
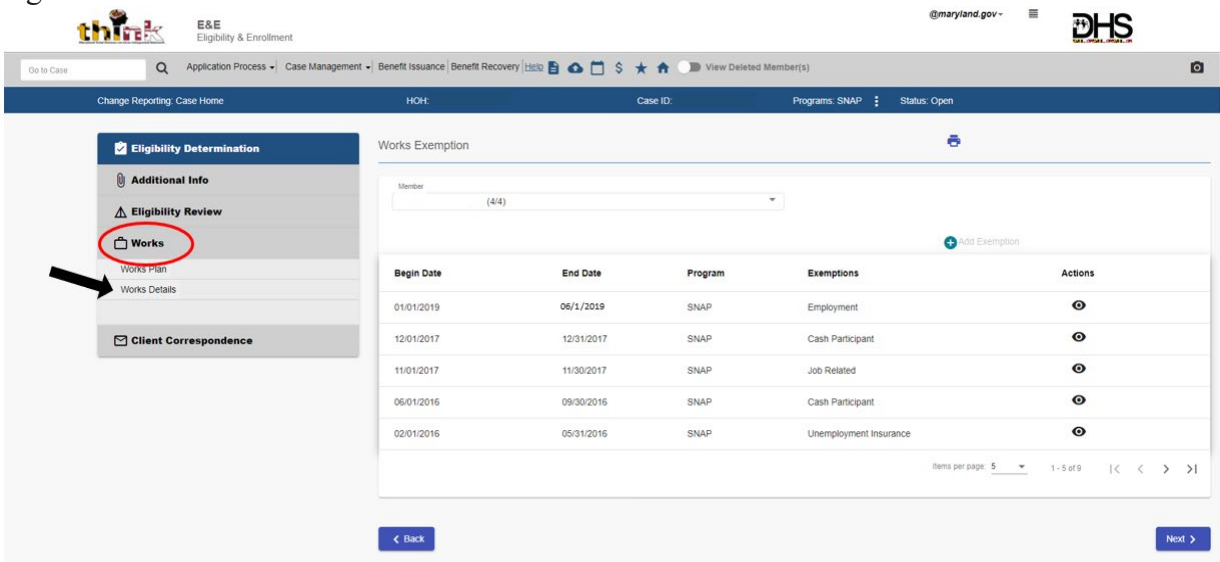


Image 3



When the case is finalized, the E&E System will send work registration information to WORKS for all household members who are subject to a work requirement.

The Case Manager must inform the applicant of the type of training programs and potential participant reimbursements that may be available, and encourage them to leverage these resources by volunteering to participate in employment and training programs to help them overcome barriers. Below are a few services that could be categorized as participant reimbursements:

- Education and Supplies;
- Medical Services (allowable only if required for employment);
- Transportation;
- Work Clothing and Tools; and
- Dependent Care.

SNAP recipients who are subject to work requirements must be sent a [Consolidated Work Notice \(Sample\)](#). The consolidated work notice is provided to any SNAP household where at least one household member has a work requirement (i.e., the general work requirement or the ABAWD work requirement). The notice will list each household member along with the type of work requirement they are subjected to. The E&E System will capture this information and send the Consolidated Work Notice automatically.

#### **Referral to a SNAP E&T Program**

When a customer expresses interest in participating in the SNAP E&T program, review the [MD FY21-FY23 E&T Partner Database-Public.xlsx](#) (appendix 1) along with the customer to select the appropriate program and provider. When selecting a training program, confirm that services are provided in the customer's residential jurisdiction. The case manager must complete the [SNAP E&T Referral Form \(Appendix 2\).docx](#) to include the training program address, and program point of contact information. Schedule the customer to follow up with the program point of contact on the first Monday 30 days after the date of application and upload a copy of the referral with the case documents. Make note of the selected program in the case narration to complete the electronic referral once the case has been finalized.

**NOTE:** The LDSS office may want to consider developing a tool to list the customers who expressed interest in participating in a program that can be easily referenced after the case has been approved to complete the electronic referral in WORKS.

Once the SNAP case has been finalized, and the case goes through overnight, DHS staff must complete the electronic referral in WORKS for each participant that expressed interest to participate in an in-house program, or a Third-Party Partner E&T program.

The WORKS System is also housed on the MDTHINK platform as shown in Image 4.

Image 4

Hi [mischelle.williams@maryland.gov](mailto:mischelle.williams@maryland.gov) Welcome to MDTHINK landing page. Click on the corresponding title to access the application.

Active Websites

Works/OWRA	E&E WorkerPortal	ABAWD Direct	xPression CARES	QLIK View
ECM				

Eligibility & Enrollment

Budget & Finance

Cottage Applications

To complete an electronic referral to a SNAP E&T program, enter the SSN or IRN of the household members being referred on the Customer Search Page in the WORKS System as shown in Image 5.

Image 5

**Customer Search Page**

Enter the customer's Social Security Number below. Enter all 9 digits, including zeros. If the SSN does not find the customer, you may want to try the name search function. If neither SSN nor name search finds the customer and you want the customer's information to be in WORKS, you must manually register the customer. To do so, click the word [here](#) at the bottom of this page to link to the Manual Registration page.

In order for the link to the manual registration page to appear, you must first search for a customer by SSN.

**Customer's Social Security Number:**

SSN Format: 123-45-6789  
OR

**IRN:**

IRN Format: 123456789  
OR

**Customer's First Name:**

**Customer's Last Name:**

The search results will display the household member's registration information as displayed in Image 6 below. Click "Select" next to the DO number at the bottom of the screen.

Image 6

**Search Results**

**Basic Information**

<b>Customer SSN:</b> [REDACTED]	<b>IRN:</b> [REDACTED]	<b>Customer Name:</b> [REDACTED]	
<b>Residential Address:</b> Apt: [REDACTED]	<b>Mailing Address:</b> Apt: [REDACTED]	<b>Date of Birth:</b> [REDACTED]	<b>Sex:</b> [REDACTED]
<b>Phone #:</b> [REDACTED]	<b>Message Phone #:</b> ( ) [REDACTED]	<b>Race/Ethnic Group:</b> [REDACTED]	<b>TLE Counter:</b> [REDACTED]
<b>DO:</b> [REDACTED]	<b>Program:</b> [REDACTED]	<b>FLSA Weekly Hours:</b> 0	<b>BEV Months:</b> 12
<b>Remaining:</b> [REDACTED]	<b>ICode Hours:</b> 0	<b>EA Hours:</b> -50	

**Program List**

DO	Program	Registration Date	De-Reg Date	De-Reg Status	De-Reg Serv Providers
<a href="#">Select</a> 960	Single Parent TCA Applicant	08/16/2005	10/15/2005	OA	

There are currently no open programs. Click [here](#) to go to the Manual Registration page.

On the household member's Basic Information page, you will see the "Referrals" tab listed under the Case Management menu on the left side as displayed below in Image 7.



Image 7

To complete an electronic referral to a SNAP E&T program, click on “Add New Program” as displayed below in Image 8.

Image 8

The system will automatically display the current date as the date of the last referral. The Case Manager must enter the appointment date that the customer should enroll in the program as displayed below in Image 9.

Image 9

**Basic Information**

Customer SSN: [REDACTED] IRN: [REDACTED] Customer Name: [REDACTED]

Residential Address: [REDACTED] Mailing Address: [REDACTED] Date of Birth: [REDACTED] SEX: [REDACTED] TLE Counter: [REDACTED]

Phone: [REDACTED] Message Phone #: ( ) - [REDACTED] FLSA Weekly Hours: 0 Remaining: [REDACTED] BEV Months: 12 EA Hours : 80

Program: Single Parent TCA Applicant

Eligibility Worker: [REDACTED] Employment Specialist: N/A MOE: N/A

Registration Date: [REDACTED] De-Registration Date: [REDACTED] De-Registration Status: OA

Participation Status Code: D Exemption Reason: N/A CK Counter: [REDACTED]

Closure Code: [REDACTED] Case ID: [REDACTED] Client Status: D

Benefit Begin Date: N/A Benefit End Date: N/A Application Date: 8/16/2005

Application Disposition Date: N/A Process Month: [REDACTED] Appointment Date: N/A

ABAWD Status Code: N/A

DO	Program	Registration Date	De-Reg Date	De-Reg Status	De-Reg Serv Providers
Select	060 Single Parent TCA Applicant	08/16/2005	10/15/2005	OA	

**Referrals** Narration

Add Mode - Please complete the following information: \* Required Field

Date of Referral: 12/17/2021

Appointment Date: [REDACTED]

Provider Subcode: (Select One) \*

Activity Codes: (Select One)

Has Child Care?: N/A

Result of Referral: (Select One)

User Defined Fields: User 1 User 2 User 3 User 4 User 5

Submit Cancel

Click on the dropdown box to select the Provider Subcode as displayed below in Image 10.

Image 10

**Basic Information**

Customer SSN: [REDACTED] IRN: [REDACTED] Customer Name: [REDACTED]

Residential Address: [REDACTED] Mailing Address: [REDACTED] Date of Birth: [REDACTED] Sex: [REDACTED]

Apt: [REDACTED] FLSA Weekly Hours: 0 Remaining: 0 BEV Months: 12 EA Hours: 80

Phone: [REDACTED] Message Phone #: ( ) - [REDACTED]

DO: 060 - CARROLL COUNTY Program: Single Parent ICA Applicant

Eligibility Worker: [REDACTED] Employment Specialist: N/A MOE: N/A

Registration Date: [REDACTED] De-Registration Date: 10/15/2005 De-Registration Status: OA

Participation Status Code: D Exemption Reason: N/A CK Counter: [REDACTED]

Closure Code: 550 Case ID: [REDACTED] Client Status: D

Benefit Begin Date: N/A Benefit End Date: N/A Application Date: 8/16/2005

Application Disposition Date: N/A Process Month: [REDACTED] Appointment Date: N/A

ABAWD Status Code: N/A

DO	Program	Registration Date	De-Reg Date	De-Reg Status	De-Reg Serv Providers	
Select	060	Single Parent TCA Applicant	08/16/2005	10/15/2005	OA	

**Referrals** Narration

Add Mode - Please complete the following information: \* Required Field

Date of Referral: 12/17/2021 \*

Appointment Date: 01/03/2022 \*

Provider Subcode: (Select One) \*

Activity Codes: (Select One)

Has Child Care?: N/A

Result of Referral: (Select One)

User Defined Fields: User 1 User 2 User 3 User 4 User 5

Submit Cancel

This field will only display programs that are available in the area where the household resides displayed below in Image 11. Click on the Provider Subcode of the program that the household member is being referred to.

Image 11

**Basic Information**

Participation Status Code: D Exemption Reason: N/A CK Counter: [REDACTED]

Closure Code: 550 Case ID: 640079535 Client Status: D

Benefit Begin Date: N/A Benefit End Date: N/A Application Date: 8/16/2005

Application Disposition Date: N/A Process Month: 200510 Appointment Date: N/A

ABAWD Status Code: N/A

Select Program

**Referrals** Narration

Add Mode - Please complete the following information: \* Required Field

Date of Referral: 12/17/2021 \*

Appointment Date: 01/03/2022 \*

Provider Subcode: (Select One) \*

Activity Codes: (Select One)

Has Child Care?: N/A

Result of Referral: (Select One)

User Defined Fields: User 1 User 2 User 3 User 4 User 5

Submit

- 1C306 - HSP-NONFSET
- 1C308 - Non-Custodial Parent Program
- 1C309 - Carroll Community College
- 1C310 - BERG
- 1C311 - Granite House
- AC300 - Carroll County FIA
- AC304 - Catastrophic Health Planners
- AC312 - Independent Activity
- AC313 - Carroll Area Transit System
- AC315 - GED Program
- AC319 - DORS
- AC317 - GOODWILL
- AC318 - Keystone
- AC319 - S.T.E.P.
- AC320 - Shepards Staff
- AC321 - Winning New Jobs
- AC322 - West End Place
- AC323 - Neighbors in Need
- AC324 - Carroll Lutheran Village

After clicking the correct Provider Subcode, click on "submit" to send the electronic referral to the program as displayed below in Image 12.

Image 12

DO	Program	Registration Date	De-Reg Date	De-Reg Status	De-Reg Serv Providers
Select 060	Single Parent TCA Applicant	08/16/2005	10/15/2005	OA	

User Defined Fields					
User 1	User 2	User 3	User 4	User 5	

Once the Case Manager submits the electronic SNAP E&T referral directly to the selected E&T program through WORKS, send a courtesy email to the point of contact on the Third-Party Partner Database to provide notification of the customer's intended participation. The Case Manager should also provide the intended participant with the contact information for the SNAP E&T vendor.

The Case Manager must narrate in the E&E System noting the work registrants, who may have a statutory exemption, or an individual exemption. Also include in the narration who volunteered to participate in the program, and the program they will be referred to. Send the vendor a courtesy email with a scanned copy of the referral issued to the customers.

### Reverse Referrals

Participants often seek out services directly from the Third-Party Partners. The vendor must follow a reverse process to validate the customer's eligibility to participate in E&T programs. After the potential participant is identified by the Third-Party Partner, that vendor must complete the top section of the [SNAP E&T Reverse Referral Form \(Appendix 3\).docx](#) providing the customer's information, and email it to the [LDSS SNAP E&T Point of Contact](#) (appendix 4) in the jurisdiction where the customer resides. The LDSS must confirm whether the customer is receiving SNAP benefits and is eligible to receive employment and training services.

The LDSS must complete the bottom section of the [SNAP E&T Reverse Referral Form \(Appendix 3\).docx](#) and return it to the SNAP E&T provider via email, and upload a copy to the customer's case record.

## Management Reports

The LDSS must run the **SNAP E&T report** in WORKS at least weekly to identify unengaged work registrants. This report lists all SNAP recipients subject to a work requirement. This report can be accessed from the Customer Search Page, under Reports, click on Local as displayed below in Image 13.

Image 13

The screenshot shows the 'Customer Search Page' of the Maryland Department of Human Services. The header includes the Maryland logo and 'DEPARTMENT OF HUMAN SERVICES Work Programs'. A navigation menu on the left has 'Reports' highlighted, with 'Local' selected. The main content area contains instructions for searching by SSN and IRN, and fields for 'Customer's Social Security Number', 'IRN', 'Customer's First Name', and 'Customer's Last Name'. A 'Search Customer' button is visible at the bottom right.

From the Local Reports Menu select SNAP E&T Report displayed in Image 14.

Image 14

The screenshot shows the 'Local Reports Menu' of the Maryland Department of Human Services. The menu lists various reports, including 'Activity Estimated End Date', 'E&E Download Interface Processing', 'Caseload Report - Current Status', 'Client Activity Record', 'Client Activity Status', 'Client Activity Status (Sanction and Compliance)', 'District Office Referral', 'District Office Status Change', 'Employment Discrepancy E&E Data', 'Employment Discrepancy WP Data', 'Excused Absence (EA) Merged Hours Report', 'Fair Labor Standards Act (FLSA) Deemed Hours Report', 'Food Stamp Mandatory/ ABAWDS Registrants', 'Non-Custodial Parents', 'Skills2Compete Employment Report', 'Skills2Compete Training Report', 'SNAP/ABAWD Caseload Report', 'SNAP/TANF Employment Retention Report', 'SNAP E&T Report' (circled in red), 'TANF Countable Participant Report (30 Hour Local)', 'TANF Countable Participant Report (40 Hour Local)', 'TANF/SNAP Referral Report', 'TCA Recipients Receiving Child Care Vouchers', 'TLE Current Status', 'TLE History', and 'Universal Engagement Report (local)'. The 'SNAP E&T Report' is highlighted with a red circle.

From the SNAP E&T Report page, select your LDSS Code as displayed in Images 15 and 16.

Image 15

The screenshot shows the 'SNAP E&T Report' form on the Maryland Department of Human Services website. The form includes several dropdown menus and radio buttons. The 'LDSS Code' dropdown menu is highlighted with a red circle. The 'District Office' section has two radio buttons: 'All District Offices' (selected) and 'Select District Office(s)'. Other fields include 'Report Month', 'Report Year', 'Provider Subcode', 'Activity Code', and 'Output Options'. A 'Submit' button and a 'Cancel' button are at the bottom of the form.

Image 16

The screenshot shows the 'SNAP E&T Report' form with the 'LDSS Code' dropdown menu open. The menu lists various counties: ALLEGANY COUNTY, ANNE ARUNDEL COUNTY, BALTIMORE COUNTY, CALVERT COUNTY, CAROLINE COUNTY, CARROLL COUNTY, CECIL COUNTY, CHARLES COUNTY, DORCHESTER COUNTY, FREDERICK COUNTY, GARRETT COUNTY, HARFORD COUNTY, HOWARD COUNTY, KENT COUNTY, MONTGOMERY COUNTY, PRINCE GEORGE'S CTY, QUEEN ANNE'S COUNTY, ST MARY'S COUNTY, and SOMERSET COUNTY. A blue arrow points to the 'Select District Office(s)' radio button. The 'All District Offices' radio button is also visible. The 'Submit' and 'Cancel' buttons are at the bottom of the form.

Select the report month and year of the data that you wish to see as displayed in Image 17.

Image 17

The screenshot shows the 'SNAP E&T Report' form. The 'LDSS Code' is set to 'DHS'. Under 'District Office', 'All District Offices' is selected. The 'Report Month' and 'Report Year' dropdown menus are highlighted with blue arrows. The 'Provider Subcode' is set to '(All)', 'Activity Code' is '(All)', and 'Output Options' is 'Summary Only'. There are 'Submit' and 'Cancel' buttons at the bottom.

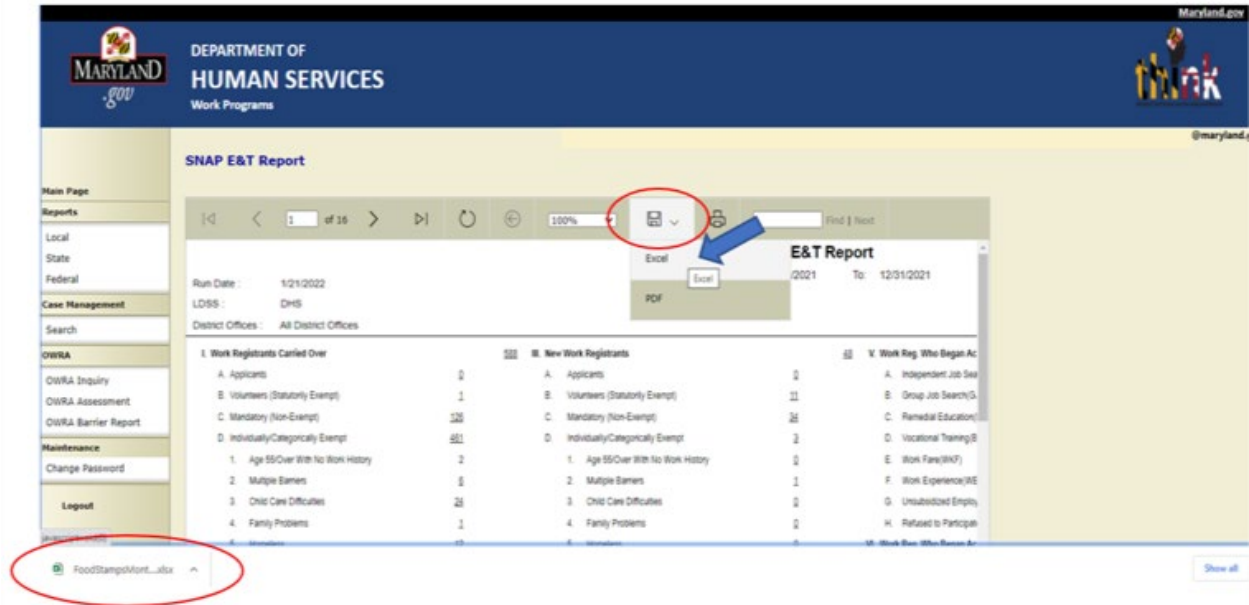
Select the Provider Subcode for your agency, under Activity Code select “All.” You also have the option of selecting “Unengaged.” Select “Summary and Details” from the Output Options then click submit as displayed in Image 18.

Image 18

The screenshot shows the 'SNAP E&T Report' form with updated values. 'LDSS Code' is 'DHS'. Under 'District Office', 'All District Offices' is selected. 'Report Month' is 'December' and 'Report Year' is '2021'. The 'Provider Subcode' dropdown menu is open, showing options like 'AC205 - Unsubsidized Emp-Second Job', 'ACCAR - Vocational Edu-Skill Train Com', 'ACDSS - ACDSS sponsored', and 'ACM00 - Allegany College of Maryland'. A blue arrow points to this dropdown. 'Activity Code' is '(All)' and 'Output Options' is 'Summary Only'. There are 'Submit' and 'Cancel' buttons at the bottom.

The requested SNAP E&T Report will be displayed. To export the report to Excel, click on the disc as displayed in Image 19.

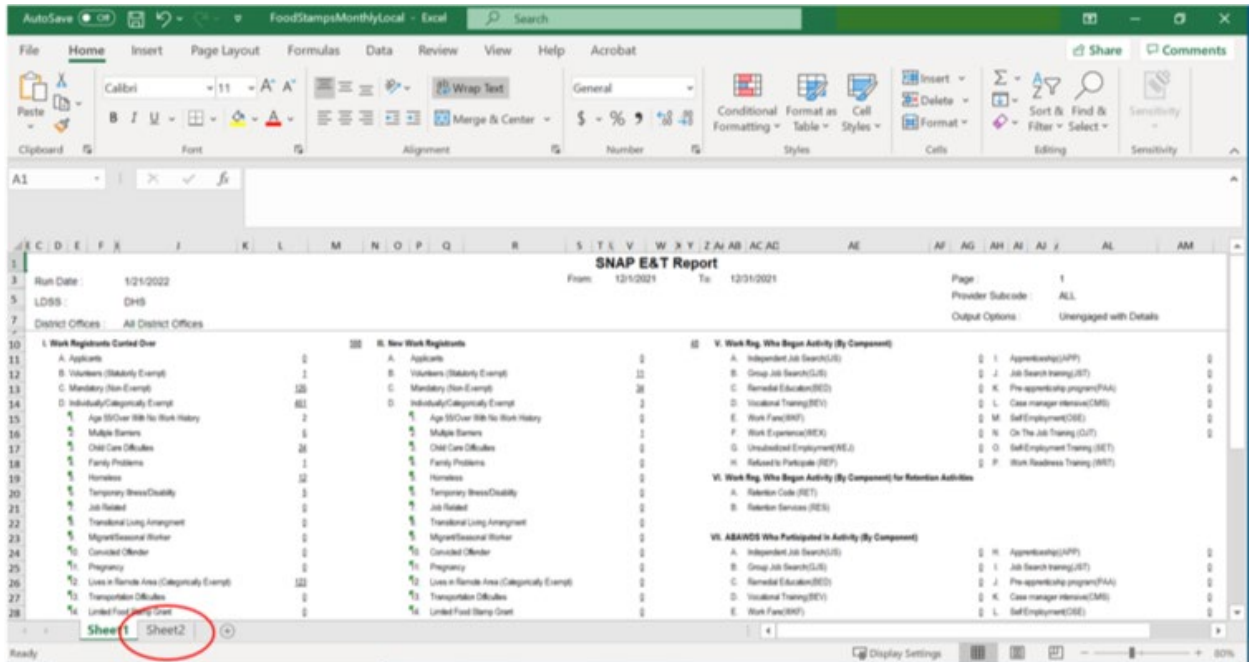
Image 19



An example of a SNAP E&T Report is shown below in Image 20. This report provides a summary of the data on sheet 1.

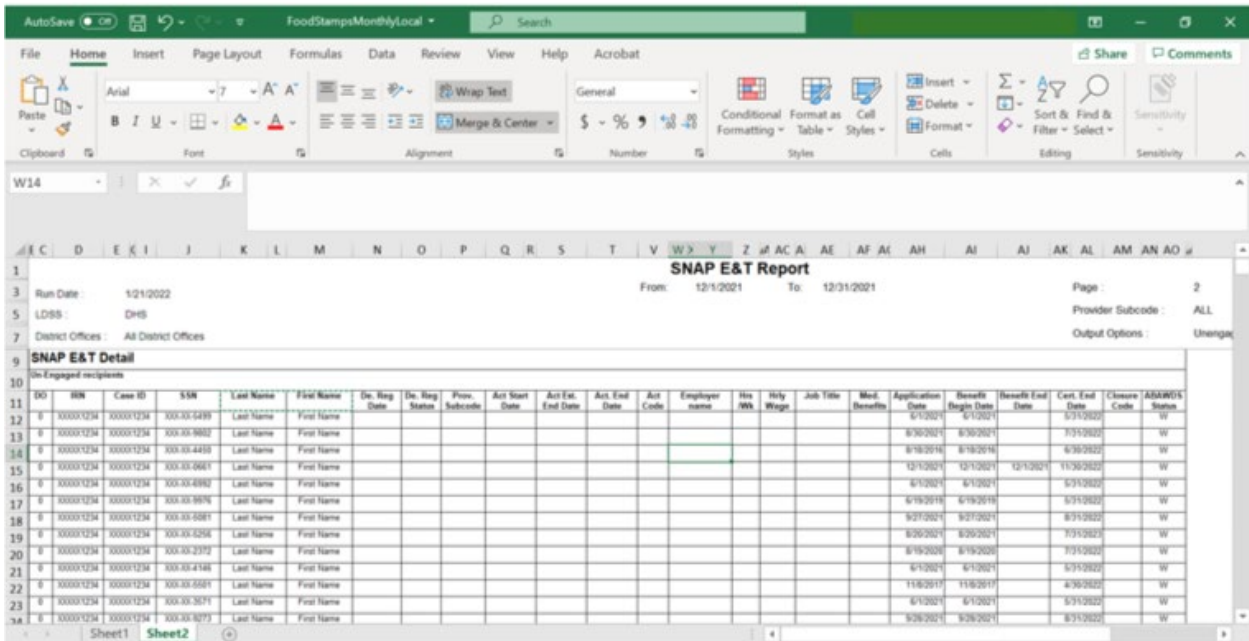


Image 20



Sheet 2 displays the SNAP E&T Details listing the work registrants, and their work activity status as shown in Image 21.

Image 21



This report should be used to identify the customers to complete the electronic referral in WORKS at least weekly to refer voluntary participants to employment and training programs.

LDSS management can utilize this report to:

- Monitor the effectiveness of SNAP recipients leveraging employment and training resources;
- Monitor WORKS data entry of activities;
- Monitor participation of in-house and vendor programs.

### **Tracking Work Activity Compliance**

Eligibility to participate in SNAP E&T must be validated prior to enrolling a customer in a training program. This process is called front-end eligibility. Once a participant has been approved and enrolled in a program, the training program must update WORKS with the assigned activities to include opening case management (CMS) and at least one other component. Attendance and work activities of participants must be entered in WORKS at least weekly. Third Party Partners are responsible for entering SNAP E&T activities in WORKS. Work activities can be monitored by accessing the SNAP E&T report to view the overall summary as well as reviewing the individual case details periodically to track program compliance.

## **SERVICES AND ACTIVITIES AVAILABLE THROUGH SNAP E&T PROVIDERS :**

### **Non-Education, Non-Work Components**

#### **Case Management - (CMS)**

SNAP recipients enrolled in a SNAP E&T program must receive case management in addition to at least one other component. Case management is not meant to hinder participation in the program but is an opportunity to understand individual customer's needs and develop an individual service plan outlining the steps the customer and the provider will take to achieve the goals outlined in the plan.

There is some flexibility in how case management services are delivered. As a best practice, case management services should be provided soon after referral to E&T and periodically, as needed, throughout a participant's progression through an E&T program. Regular engagement with case management services ensures the participant is well-supported to successfully complete the program. The flexibility provided within case management also allows the provider to adjust the timing and frequency of case management appointments based on the participants needs or progress and to avoid disrupting E&T program participation.

### **Supervised Job Search - (IJS)**

Supervised job search replaced the job search component. Each of the partners and LDSS has provided a plan for the supervised job search, and a description and required specification of the component is outlined in our proposal submission guidelines. Staff-assisted job search components require participants to make a predetermined number of inquiries to prospective employers over a specified period of time. Supervised job search programs are supervised and tracked by a specific staff person, or a certified facilitator. Job search components should entail a minimum of 12 contacts with employers per month for two months. The locations of the Supervised job search were chosen based on the partners that are providing the service, as well as the LDSSs that are offering “in-house” SNAP E&T programs.

Supervised job search may be conducted independently or within a group setting, and may also be conducted remotely, in-person, or a combination of both. The SNAP E&T Provider must provide the necessary participant reimbursements required for participation (e.g., laptops and hotspots as needed for remote job search conducted on the internet or transportation vouchers for in-person job search).

The providers must also ensure that supervised job search activities have a direct link to increasing the employment opportunities of individuals engaged in supervised job search. That is, a participant in supervised job search must be likely to find a job through the activity, and there must be appropriate jobs available for that participant in the community.

### **Job Search Training - (JST)**

A component that strives to enhance the job search skills of participants by providing instruction in job-seeking techniques and increasing motivation and self-confidence. The component may consist of job placement services, employability assessments, or other direct training or support activities. Other activities may include resume writing workshops and learning how to use online job search tools. The job search training component may combine job search activities with other training and support activities.

### **Job Retention Services - (RET)**

Job Retention Services include periodic staff check-ins with program participants and employers, ongoing career counseling, life management guidance, and provision of support services. For up to 90 days, services are provided to program participants who have secured employment after receiving SNAP E&T services. Job Retention services are provided and tracked for a minimum of 30 days and a maximum of 90 days.

### **Education Components:**

#### **Basic Education - (BED)**

Participants are in need of Adult Basic Education, basic literacy, English as a Second Language, GED, and post-secondary education. In order for program participants to enter into certain vocational training programs, participants must show proficiency in adult basic education. Further, this will also increase competencies for participants entering the workforce.

**Vocational Training - (BEV)**

Participants are trained in job-specific technical training for work in the trades of their choice. These programs/training focus on providing students with hands-on instruction and can lead to industry-recognized credentials/certifications, or certificates. Students will be prepared for jobs and/or training to build upon their current skill sets.

**Work Readiness Training - (WRT)**

Intensive case management services include comprehensive intake assessments, individualized service plans, progress monitoring, and coordination with service providers and educational remediation services that prepare individuals for the workforce. Work readiness skills may include both foundational cognitive skills such as reading for information, applied mathematics, locating information, problem-solving, and critical thinking and non-cognitive skills, or soft skills, which are defined as personal characteristics and behavioral skills that enhance an individual's interactions, job performance, and career prospects such as adaptability, integrity, cooperation, and workplace discipline.

**Self-Employment Training - (SET)**

This component improves the employability of participants by training them to design and operate a small business or another self-employment venture. Through the Small Business Development Center (SBDC), program participants will receive technical assistance in developing business plans and in creating financial marketing plans; learning how to access small business grants and other business support services; and working with other small business owners as mentors.

**Workfare - (WKF)**

Work experience in the public sector to program participants targeted to those who lack work experience or recent work experience. Upon initial assessment by the LDSS, participants are placed in public service entities, institutes of higher learning, Community Based Organizations (CBO), and Faith-Based Organizations (FBO). Upon successful completion of the workfare assignment, skills obtained by the participant may lead to employment. When developing Workfare sites, LDSS staff ensures that Workfare assignments provide the same benefits and working conditions provided to regular employees performing comparable duties and hours.

**Work Experience - (WEX)**

Work experience in the private sector provides individuals with an opportunity to gain work experience and useful workplace skills at a supervised work site. Work experience may be combined with job search, job search training, or other components. Upon successful completion of the workfare assignment, skills obtained by the participant may lead to employment.

**On the Job Training - (OJT)**

A work placement is made through a contract with an employer or a registered apprenticeship program sponsor in the public, private non-profit, or private sector. An OJT contract must be

limited to the period of time required for a participant to become proficient in the occupation for which the training is being provided. In determining the appropriate length of the contract consideration should be given to the skills requirements of the occupation, the academic and occupational skill level of the participant, prior work experience, and the participant's individual employment plan.

### **Pre-Apprenticeships and/or Apprenticeships - (APP)**

A combination of on-the-job training and related instruction in which workers learn the practical and theoretical aspects of a skilled occupation. Apprenticeship programs can be sponsored by individual employers, joint employer and labor groups, and/or employer associations. Pre-Apprenticeship Programs provide individuals with the basic and technical skills necessary to enter an apprenticeship program, and should be directly linked to an apprenticeship program.

Attendance and work activities of participants must be tracked in WORKS.

### **Provider Determination**

SNAP E&T providers have the authority and responsibility to determine whether SNAP recipients referred to them meet their program enrollment requirement - this is referred to as "Provider Determination." The providers know their programs best and have flexibility to use their own judgment to determine if an individual is a good fit for their program; however, they must not discriminate against protected classes when making such determinations. Provider determinations are based on criteria, specific to an E&T provider, that establish who is likely to be successful in a particular SNAP E&T component. Case Managers who are responsible for making referrals should familiarize themselves with SNAP E&T Provider enrollment requirements to ensure that customers are referred to suitable activities.

If a SNAP E&T provider determines that an individual is not a good fit for their program, they must notify the client's case manager in writing. It is the Case Manager's responsibility to notify the client that the provider has determined him or her not suitable for the activity to which they were referred. Individuals with a provider determination cannot be disqualified for failure to comply with SNAP E&T while the Case Manager explores alternative referrals. .

### **Provider Determination-Next Steps at the LDSS**

If the LDSS receives a provider determination, the DHS case manager must meet with the customer within 10 days of receipt to inform them of the provider determination. During the meeting, inform the individual that a provider determination does not mean that the individual is being disqualified, that the determination will not affect their benefits, and explain the next steps.

The DHS case manager must take one of the following four actions by the individual's next recertification:

1. Refer the individual to an appropriate E&T component. The DHS case manager may refer the individual to another E&T component; however, as a best practice, the DHS case manager is encouraged to consider if an individual who has already received a provider determination is a good candidate for E&T, or if the fourth option below would be a better fit.
2. Re-assess the individual's mental and physical fitness. If the individual is not determined mentally or physically fit, then the individual must be exempted from employment and training participation. The DHS case manager may also re-assess the individual for other exemptions from the individual work requirements, or the ABAWD work requirement, as applicable.
3. Refer the individual to an appropriate workforce partnership, if applicable. If the LDSS has certified one or more workforce partnerships, the DHS case manager may refer an individual to a workforce partnership at the option of the individual. The State agency must provide individuals with sufficient information about workforce partnerships to make an informed decision about participating.
4. Coordinate with other Federal, State, or local workforce or assistance programs to identify work opportunities or assistance for the individual. The DHS case manager may decide that an individual with a provider determination would be better served by a program outside E&T or a workforce partnership. If the State agency chooses this option, the DHS case manager must consider granting the individual good cause from participating in the training program.

Determining good cause is an eligibility function, not an E&T function. As such, E&T case managers cannot determine good cause. However, E&T case managers must report circumstances that may indicate a participant has good cause to the appropriate staff in the State agency who can then use that information to make a good cause determination.

### **INQUIRIES:**

Please direct policy questions to FIA Policy by completing the [FIA Policy Information Request Form](#) found on Knowledge Base or via email at [fia.policy@maryland.gov](mailto:fia.policy@maryland.gov) for Montgomery County only.

For systems questions, please email [fia.bsdm@maryland.gov](mailto:fia.bsdm@maryland.gov).

**Attachments:** MD FY21-FY23 E&T Partner Database (appendix 1)  
SNAP E&T Referral Form (appendix 2)  
SNAP E&T Reverse Referral Form (appendix 3)  
LDSS SNAP E&T Point of Contact List (appendix 4)  
Consolidated Work Notice (Sample)

cc: DHS Executive Staff  
Constituent Services  
DHS Help Desk  
FIA Management Staff  
Office of Administrative Hearings