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A. Cover Page and Authorized Signatures

STATE: Virgin Islands

STATE Agency Name: Dept. of Human Services

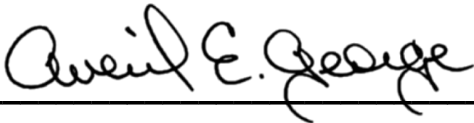
Federal FY: 2025

Date Submitted to FNS (revise to reflect subsequent amendments): Click or tap here to enter text.

List STATE agency personnel who should be contacted with questions about the E&T STATE plan.

Name	Title	Phone	Email
Cira Burke	JOBS director	340-774-0930 ext. 4377	cira.burke@dhs.vi.gov
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Natalie Bailey	Administrator	340-772-7101	natalie.bailey@dhs.vi.gov

Certified By:



STATE Agency Director (or Commissioner)

11/29/24

Date

Certified By:



STATE Agency Fiscal Reviewer

11/29/2024

Date

B. Amendment Log

In accordance with 7 CFR 273.7(c)(8), STATE agencies must submit plan revisions to the appropriate FNS Regional office for approval if it plans to make a significant change. For a complete list of situations requiring an amendment to the E&T STATE plan, see Plan Modifications in the E&T STATE Plan Handbook. The STATE agency must submit the proposed changes for approval at least 30 days prior to the planned implementation.

Please use the log below to document the submission of an amended plan. A single line in the log should capture each time a plan is amended and resubmitted, not each individual amendment throughout the plan.

To expedite the review process for amendment changes, please highlight areas where text has been added or changed. After FNS approval of amendment changes, highlighting must be removed and a clean, updated plan submitted to FNS.

Table B.I. Amendment Log

Amendment Number	Brief description of changes or purpose for amendment (If amendment includes budget changes, include in description)	Sections of Plan Changed (Highlight areas of plan with changes)	Date submitted to FNS	Date approved by FNS

C. Acronyms

STATE agencies may consider including acronyms for the SNAP STATE agency, SNAP E&T program name, STATE's management information system, and SNAP E&T providers or contractors.

Below is a list of common acronyms utilized within this plan. Please delete acronyms that do not apply and add additional acronyms in alphabetical order.

Table C.I. Acronyms

Acronym	Acronym Definition
ABAWD	Able-Bodied Adult without Dependents
E&T	Employment and Training
FY	Fiscal Year
FNS	Food and Nutrition Service
GA	General Assistance
STATE	Virgin Islands Department of Human Services
SNAP	Supplemental Nutrition Assistance Program
TANF	Temporary Assistance for Needy Families
USDA	United STATES Department of Agriculture
WIOA	Workforce Innovation and Opportunity Act
MPI	The Missions Project Inc.
JOBS	Jobs Opportunity & Basic Skills
CARIBS	Client Application Registration & Issuance Benefits System
WDB	Work Development Board
SSP	Self Sufficiency Plan
DOL	Department of Labor
DOE	Department of Education
VIDHS	Virgin Islands Department of Human Services

D. Assurances

By signing on the cover page of this document and checking the boxes below, the STATE agency Director (or Commissioner) and financial representative certify that the below assurances are met.

Table D.I. Assurances

Check the box to indicate you have read and understand each Statement.	Check Box
I. The STATE agency is accountable for the content of the E&T STATE plan and will provide oversight of any sub-grantees. (7 CFR 273.7(c)(4) and 7 CFR 273.7(c)(6))	<input checked="" type="checkbox"/>
II. The STATE agency is fiscally responsible for E&T activities funded under the plan and is liable for repayment of unallowable costs. (7 CFR 271.4, 7 CFR 276.2, and 7 CFR 277.16)	<input checked="" type="checkbox"/>
III. STATE education costs will not be supplanted with Federal E&T funds. (7 CFR 273.7(d)(1)(ii)(C))	<input checked="" type="checkbox"/>
IV. Cash or in-kind donations from other non-Federal sources have not been claimed or used as a match or reimbursement under any other Federal program. (7 CFR 277.4(d)(2))	<input checked="" type="checkbox"/>
V. Documentation of STATE agency costs, payments, and donations for approved E&T activities are maintained by the STATE agency and available for USDA review and audit. (7 CFR 277.17)	<input checked="" type="checkbox"/>
VI. Contracts are procured through appropriate procedures governed by STATE procurement regulations. (7 CFR 277.14)	<input checked="" type="checkbox"/>
VII. Program activities are conducted in compliance with all applicable Federal laws, rules, and regulations including Civil Rights and OMB regulations governing cost issues. (7 CFR parts 271, 272, 273, 274, 275, 276, 277, 281, and 282)	<input checked="" type="checkbox"/>
VIII. E&T education activities directly enhance the employability of the participants; there is a direct link between the education activities and job-readiness. (7 CFR 273.7(e)(2)(vi))	<input checked="" type="checkbox"/>
IX. Program activities and expenses are reasonable and necessary to accomplish the goals and objectives of SNAP E&T. (7 CFR 277.4(d)(3))	<input checked="" type="checkbox"/>

Table D.II. Additional Assurances

<p>The following assurances are only applicable to STATE agencies with the situations described below. If the condition applies, check the box to indicate you have read and understand each Statement.</p>	<p>Check Box</p>
<p>I. If in-kind goods and services are part of the budget, only public in-kind services are included. No private in-kind goods or services are claimed. (7 CFR 277.4(d) and (e))</p>	<p><input checked="" type="checkbox"/></p>
<p>II. The E&T Program is implemented in a manner that is responsive to the special needs of Indian Tribal members on Reservations. The STATE agency shall consult on an ongoing basis about portions of the E&T STATE Plan which affect them; submit for comment all portions of the E&T STATE Plan that affect the Indian Tribal Organization (ITO); if appropriate and to the extent practicable, include ITO suggestions in the E&T STATE plan. (For STATES with Indian Reservations only.) (7 CFR 272.2(b)(2) and 7 CFR 272.2(e)(7))</p>	<p><input type="checkbox"/></p>

E. STATE E&T Program, Operations, and Policy

I. Summary of E&T Program

- a) Provide the vision and mission of the STATE E&T program. In addition, describe how your STATE agency's E&T program meets the purpose of E&T which is to: 1) increase the ability of SNAP participants to obtain regular employment; and 2) meet STATE or local workforce needs.

Virgin Islands DHS Mission

The Department of Human Services is committed to emerging as a public sector agency that empowers individuals and families towards self-sufficiency through a seamless delivery system of services.

DHS Vision

The Department of Human Services is geared toward and prepared to provide responsive and effective services, designed to motivate individuals and families to achieve their highest levels of self-sufficiency.

The Virgin Islands Department of Human Services Supplemental Nutritional Assistance Program (SNAP) Employment and Training (E&T) plays a vital role in this mission by providing a wide range of employment and training services for clients who receive SNAP benefits. The SNAP E&T program provides:

- Intensive case management to support client goals
- Supervised Job search training

These services are provided to non-public assistance SNAP recipients to increase opportunities for paid employment that leads to increased family self-sustainability and independence.

VIDHS Eligibility Specialists will identify & refer E&T voluntary participants who wants to participate in E&T activities, by checking off that section on the E&T Participation form.

VIDHS Eligibility Specialists also verbalize this at application and recertification process.

VIDHS currently administers a voluntary E&T program that is primarily available in person and will also be provided online. Clients who participate in the E&T program are referred to register with the identified service MPIs (MPI), our community partners and the VI Dept. of Education (DOE). STATE in cooperation with the Department of Labor (DOL), under the newly enacted Workforce Innovation and Opportunity Act (WIOA) continues to implement the Supplemental Nutrition Assistance Program (SNAP) Voluntary Employment and Training Program (E & T).

The program will serve (50) voluntary participants.

Section 6(d) (4) (k) of the Food & Nutrition Act of 2008, as amended, provides that the amount of Federal E & T funds a STATE funded under Title IV-A of the Social Security Act (42 U.S.C. 601 et seq.) is limited to the amount of Federal E & T funds the STATE agency expended in fiscal year 1995 to provide services to Title IV-A recipients. Those members of a mixed TANF/SNAP household who receive only SNAP remain subject to SNAP work requirements.

STATE will provide E&T voluntary participants with information regarding the voluntary E&T program during the application & recertification process.

The E&T program is voluntary and participants who want to engage in the program will be referred to the service MPI. The VIDHS agency will refer (50) voluntary participants to MPI. MPI will meet the purpose of the E&T program by rendering voluntary participants with opportunities to gain skills, case management and supervised job search. E&T voluntary participants are assessed, in person & online, trained and provided with wrap around services to include Case Management, Supervised Job Search. MPI is required to provide bi-weekly updates through reporting attendance of participants regarding referred clients & progress made for each. The individualized case management will provide participants with strategies & interventions which will address barriers that hinder E&T participants from obtaining employment. With the assistance of MPI & the implementation of supervised job search, coordinated services are effectively matched to job seekers. E&T participants will increase opportunities of securing employment to meet the demands of the local workforce specific needs.

b) Is the STATE's E&T program administered at the STATE or county level?

The VI E&T Program is administered by the VI Department of Human Services.

c) (For county administered STATES only) Describe how counties share information with the STATE agency (e.g. county E&T plans), and how the STATE agency monitors county operations.

N/A

d) Provide the geographic areas of the STATE where the E&T program operates and describe the rationale for this selection. Designate which areas, if any, operate mandatory E&T programs.

The E&T Program operates in the St. Thomas/St. John and St. Croix districts in the VI.

e) Provide a list of the components offered.

Supervised Job Search

- f) Provide the web addresses (URLs) of STATE E&T policy resources such as handbooks and STATE administrative code, if available.

N/A

II. Program Changes

Please complete this section if applicable, and only include changes to the program for the upcoming Federal fiscal year (FY).

- a) Summarize changes for the upcoming Federal fiscal year (FY) from the prior FY. Significant changes may include new initiatives, changes in funding or funding sources, policy changes, or significant changes to the number of partners or participants. Significant changes could include those made as a result of management evaluation findings or participation in program improvement initiatives, such as SNAP to Skills. It is not necessary to include changes made as a result of new Federal rulemaking.

VIDHS is working diligently towards an effective and efficient return to a business strategy that includes:

- Leveraging technology to connect SNAP E&T participants to work activities and education and/training opportunities
- Media and public relations campaigns that target SNAP recipients with employment and training opportunities via DHS website & Facebook.
- Virtual case-management & in person when possible & needed.
- Renewed efforts with WIOA and VIDHS workforce partners to leverage employment opportunities for SNAP E &T recipients.
- Ensure participation reimbursement.

- b) Highlight any changes from above that the STATE agency is making to the E&T program based on the prior year's performance, for instance changes made as a result of E&T outcome and participation data.

N/A

III. Consultation and Coordination with the Workforce Development System

STATE agencies must design the E&T program in consultation with the STATE workforce development board and operate the E&T program through the Statewide workforce development system (7 CFR 273.7(c)(5)). The goal of this section is to explain the relationship between the STATE agency and other organizations it plans to consult and coordinate with for the provision of services, including organizations in the Statewide workforce development system. The Statewide workforce development system refers to a network of providers, which may include government and the public sector; community-based organizations and non-profits; employers and industry; occupational training providers and post-secondary institutions, such as community colleges. Please note the STATE workforce development board is an entity that establishes regional strategic plans and sets funding priorities for their area. They are distinct from STATE workforce agencies.

Consultation

Consultation with the workforce development system generally includes discussions to learn about services provided in the community and how each organization functions and coordinates with others in the community. STATE agencies can demonstrate they consulted with their STATE workforce development board by noting the dates of conversations, who they spoke with, what they spoke about, and how they incorporated this information into the design of their E&T program.

- a) **Consultation with STATE workforce development board:** Describe how the STATE agency consulted with the STATE workforce development board in designing its SNAP E&T program. This description should include whom the STATE agency consulted and the outcomes of the consultation. If the STATE agency consulted with private employers or employer organizations in lieu of the STATE workforce development board, skip to question (b).

The workforce development system is implemented by the Virgin Islands Department of Labor (DOL). Meetings with the Commissioner of Labor & the State have & will continue to take place. State representatives attend the One Stop Core Partner monthly meetings, and where applicable attend weekly meetings to support Workforce Development Training activities that occur annually. The State Agency will attend the annual Governor's Workforce Summit in October 2024 which will focus on the Employment & Training "Career Expo". The summit will benefit voluntary E&T participants by providing resources & employment leads. The VIDHS will collaborate and share information and data with them as we continue to develop the E&T program, engaging in meetings, etc.

- b) **Consultation with employers:** If the STATE agency consulted with private employers or employer organizations in lieu of the STATE workforce development board, document this consultation and explain the determination that doing so was

more effective or efficient. Include with whom the STATE agency consulted and the results of the consultation.

N/A

Coordination

Coordination with the workforce development system consists of efforts to partner with workforce MPIs to directly serve SNAP E&T participants or to align the flow or types of services offered across programs.

- c) **Special STATE Initiatives:** Describe any special STATE initiatives (i.e. Governor-initiated or through STATE legislation) that include SNAP E&T. Describe any efforts taken by the STATE agency to coordinate these programs, services, partners, and/or activities with the STATE's E&T program.

Continued relationship, partnership, and engagement with the Workforce Development Board to foster relationships, share ideas and provide feedback through this collaboration.

- d) **Coordination with title I of WIOA:** Describe the extent to which the STATE agency is carrying out SNAP E&T programs in coordination with title I programs under the Workforce Innovation and Opportunity Act (WIOA).

VIDHS has primary responsibility for the administration of the SNAP voluntary E&T program. DOL is responsible for providing employment related services to SNAP participants subject to employment & training requirements. The Virgin Islands E&T program coordinates with WIOA Title 1 programs by conducting economic analysis including an analysis of the economic conditions and trends in the VI. This includes the existing demand industry sectors and occupations. The efforts provide an analysis of the industries and occupations for which there is existing demand. Emerging Industry sectors and occupations to include hospitality, tourism, and refinery provides an analysis of the industries and occupations for which demand is emerging. E&T voluntary participants are referred to interagency training and follow-up meetings at least one meeting per quarter, at the district level for staff of both agencies. As part of its strategy to increase the number of qualified and certified workers in the Territory, in addition to traditional classroom education and training the Virgin Islands Workforce System will roll out alternative education and training opportunities via online distance learning and competency-based learning formats to ensure that job seekers at all levels of the education spectrum have the opportunity to receive training that allows them to compete for locally in demand jobs. Employers have consistently expressed a willingness to work with individuals who attain basic or entry level certification in these occupations to take them to an advanced level through on-the-job training

apprenticeships or other work-based learning options. E&T voluntary participants will be provided with resources through MPI, which will assist in meeting the demands of the local workforce.

- ✓ Provide a Division Coordinator to promote communication, cooperation, and program implementation. The Coordinator for DOL will be the Program Coordinator assigned to SNAP and the Coordinator for SNAP will be the Director.
- ✓ Designate a liaison for each local office to expedite the exchange of information. Liaison for the local SNAP district office will be the Directors in St. Thomas and St. Croix.
- ✓ Establish a system for monitoring compliance by local offices and evaluate effectiveness of procedures and reporting.

Based on a collaborative approach to delivering streamlined workforce development solutions, Virgin Islands' workforce system focuses on regional labor demands and engages the training capacity of school divisions, workforce development boards, through WIOA and Title I, Title II Department of Education Adult Education (Adult ED) as well as local Workforce Development Boards (WDB) and community-based organizations to get Virgin Islands citizens prepared for high-skilled, high-wage jobs. A broad spectrum of supportive services is provided including childcare and transportation. VIDHS continue to expand these collaborative relationships throughout this fiscal year and beyond as a strategic commitment to be an integral part of Virgin Islands workforce system.

e) **WIOA Combined Plan:** Is SNAP E&T included as a partner in the STATE's WIOA Combined Plan?

Yes

No

f) **TANF/GA Coordination:** Describe how the STATE agency is coordinating with TANF/GA programs, services, partners, and/or activities. Describe any TANF/GA special initiatives targeting specific populations and any actions taken to coordinate with these efforts.

SNAP recipients who also received TANF benefits are served by the Job Opportunity Basic Skills (JOBS) Programs. At time of application and recertification, CARIBS identifies which programs each head of household member is applying for. In CARIBS, the worker is responsible for completing the SNAP Work Registration Panel with exemption code (14) for work eligible individuals who apply for TANF. SNAP recipients who fail to adhere to the TANF work requirements currently are not being sanctioned due to COVID-19 Pandemic. The recipients will be informed about the SNAP E&T program and be provided with the opportunity to volunteer as a participant. However, as the Virgin Islands is operating a voluntary program, there are no sanctions to the participants for non-compliance.

- g) **Other Employment Programs:** Describe how the STATE agency is coordinating its SNAP E&T program with any other Federal or STATE employment program (e.g. HUD, child support, re-entry, refugee services).

VIDH Intake Eligibility Specialists will refer clients to the service provider which includes the Mission Inc. Project (MIP), which is responsible for referring clients to educational services. The provider will also render supervised job searches. TANF clients are referred to VIDHS JOBS Program which provides soft skills, job training and referral services. The monitoring of clients is done virtually and in person when possible. The Employment Training Officers (ETOs) are assigned cases by the supervisor who makes the determination based on TANF guidelines and working abilities through our CARIBS. Each participant is assigned an ETO which assists clients in becoming self-sufficient through conducting weekly contact meetings and referrals to community partners who offer educational components and job referrals to those clients who qualify. TANF clients are monitored by DHS Employment Training Officers but are not paid by E&T funds.

IV. Consultation with Indian Tribal Organizations (ITOs)

STATE agencies are required to consult with Tribes about the SNAP STATE Plan of Operations, which includes the E&T STATE Plan, per 7 CFR 272.2(b) and 272.2(e)(7). The consultations must pertain to the unique needs of Tribal members. STATE agencies are required to document the availability of E&T programs for Tribal members living on reservations in accordance with 7 CFR 273.7(c)(6)(xiii). The goal of this section is to describe how the STATE agency consulted with Indian Tribal Organizations (ITOs), describe the results of the consultation, and document the availability of E&T programs for Tribal members living on reservations.

- a) Did the STATE agency consult with ITOs in the STATE?

- Yes, ITOs in the STATE were consulted. *(Complete the rest of this section.)*
- No, ITOs are located in the STATE but were not consulted. *(Skip the rest of this section.)*
- Not applicable because there are no ITOs located in the STATE. *(Skip the rest of this section.)*

- b) Name the ITOs consulted.

N/A

- c) **Outcomes:** Describe the outcomes of the consultation. Provide specific examples of how the STATE agency incorporated feedback from ITOs into the design of the E&T program (e.g., unique supportive service, new component, in-demand occupation).

N/A

d) **Enhanced reimbursement:** Will the STATE agency be seeking enhanced reimbursement for E&T services (75%) for ITO members who are residents of reservations, either on or off the reservation?

Yes

No

V. Utilization of STATE Options

STATE agencies have the flexibility to implement policy options to adapt and meet the unique needs of STATE populations. Check which options the STATE agency will implement.

a) The STATE agency operates the following type of E&T program (*select only one*):

Mandatory per 7 CFR 273.7(e)

Voluntary per 7 CFR 273.7(e)(5)(i)

Combination of mandatory and voluntary

b) The STATE agency serves the following populations (*check all that apply*):

Applicants per 7 CFR 273.7(e)(2)

Exempt members of zero benefit households that volunteer for SNAP E&T per 7 CFR 273.10(e)(2)(iii)(B)(7)

Categorically eligible households per 7 CFR 273.2(j)

c) Does the STATE agency enable ABAWDs to regain SNAP eligibility through E&T and verify that the ABAWD will meet the work requirement within 30 days subsequent to application per 7 CFR 273.24(d)(1)(iv)?

Yes

No

VI. Characteristics of Individuals Served by E&T

STATE agencies are required to include information about the categories and types of individuals they plan to exempt from mandatory E&T participation (7 CFR 273.7

(c)(6)(iv)), as well as the characteristics of the population they plan to place in E&T (7 CFR 273.7 (c)(6)(v)).

- a) Describe the categories and types of individuals the STATE will exempt from mandatory E&T participation. In accordance with 7 CFR 273.7(e), STATE agencies may exempt from mandatory E&T participation, categories of work registrants (e.g. all those in counties X, Y, Z, or those in their first 30 days of receipt of SNAP) and individual work registrants based on certain personal characteristics or circumstances (e.g. lack of transportation or temporary disability). These exemptions are in addition to the federal exemptions from work requirements at 273.7(b) and only applicable to the E&T requirement at 7 CFR 273.7(a)(1)(ii). Exemptions from Mandatory E&T must also be listed in Table H 'Estimated Participant Levels' Sheet of the Excel Workbook.

(Note: States that run all-voluntary E&T programs would note that they exempt all work registrants.)

All work registrants are exempt.

- b) How frequently will the STATE plan to re-evaluate these exemptions from mandatory E&T?

N/A

- c) What are the characteristics of the population the STATE agency intends to serve in E&T (e.g. target population)? This question applies to both mandatory and voluntary participants.

- ABAWDs
- Homeless
- Veterans
- Students
- Single parents
- Returning citizens (aka: ex-offenders)
- Underemployed
- Those that reside in rural areas
- Other: Click or tap here to enter text.

VII. Organizational Relationships

STATE agencies are required to include information on the organizational relationship between the units responsible for certification and the units operating the E&T components, including units of the Statewide workforce development system, if available. For the purposes of the questions below, E&T providers are considered to include units of the Statewide workforce development system. FNS is specifically interested in ensuring that the lines of communication are efficient and that, if applicable, noncompliance with mandatory E&T is reported to the certification unit within 10 working days after the noncompliance occurs, per 7 CFR 273.7(c)(4). STATE agencies must also include information on the relationship between the STATE agency and other organizations it plans to coordinate with for the provision of services.

The following questions are about how the E&T program is structured in your STATE agency.

- a) Please indicate who at the STATE agency directly administers the E&T program (i.e. establishes E&T policy, contracts for E&T services, monitors providers). For example, if the E&T program unit is separate from the SNAP certification unit, and if there are separate E&T units at the county level.

Director Program Operations – oversees the Certification Unit in St. Thomas/St. John & St. Croix districts; Assistant Director of the SNAP Certification – oversees the Certification Unit in the St. Thomas district; and JOBS Director – oversees the JOBS Opportunity & Basic Skills Unit in the districts of St. Thomas/St. John & St. Croix and has direct oversight of the E&T Program.

- b) How does the E&T unit coordinate and communicate on an ongoing basis with the units responsible for certification policy?

The VIDHS Eligibility Specialist conducts initial or recertification applications. Determination is made based on eligibility set criteria which includes participant being over the age of 18 years, not working over 30 hours, and not participating in any other programs. The Eligibility Specialist received training on the E&T program and how to use the Work Registration Form. This form serves a dual purpose for SNAP eligibility and for voluntary participation in the E&T program. Staff were also introduced to MPI during the training, who gave an overview of what its role is in the program. Communication between SNAP E&T and the Certification Unit is ongoing as both units are in the same Division. The JOBS and Program Operations Director are in constant contact as it pertains to the program's goals and objectives. Additionally, referrals are sent directly from the Certification Unit to the JOBS Director, who sends it to MPI for further processing.

The following criteria are used to determine if a participant is eligible to be enrolled in SNAP voluntary E&T:

- Those receiving SNAP benefits in the month they participate
- Those having SNAP benefits verified by staff and receiving a referral from VIDHS

The initial appointment is the introduction of the participant to the SNAP E&T voluntary program and is generally the first contact the participant will have with MPI staff. This opportunity should be used to build rapport and establish trust with the participant. SNAP E&T Program staff must inform each participant in attendance of their rights and responsibilities, and the role of Program staff in assisting the participant in achieving employment goals.

Once a referral is coded in the CARIBS system it is processed automatically, creating a partial registration. After the initial appointment or recertification, E&T voluntary participants are informed that they will be contacted by MPI. The names of the E&T participants are referred to MPI names of voluntary interested E&T participants who will make direct contact with clients via phone or virtually. Participants will need to complete this step when they visit the VIDHS for orientation.

- After the orientation has been completed, program participants will be assessed during a one-on-one meeting and referred to MPI.
- A case manager from MPI is assigned to develop a Self-Sufficiency Plan to assist E&T participants to identify goals, program design & plans.

Summary of Participant Flow

1. Referral received from VIDHS to verify E&T eligibility
2. If a client misses the orientation, a follow-up call will be made to participants, and if there is still no response, another reminder letter will be sent to client.
3. Participant reports on orientation
4. One-to-one initial assessment conducted by MPI
5. Placement into a component to include Case Management & Supervised Job Search
6. Follow up with appropriate MPI staff for continued enrollment procedures
7. Monthly follow-up to bring attendance verification and receive transportation reimbursement for the previous month's activity. All training costs, including transportation, must be reviewed and a determination made concerning which costs will be covered by SNAP-allocated funds. If a SNAP participant does not receive

transportation assistance from Title, I then SNAP E&T program will need to cover these costs.

c) Describe the STATE's relationships and communication with intermediaries or E&T provider (if applicable):

1. Describe how the STATE agency, intermediaries, E&T partners, share participant data and information. Include the names of any MIS systems (or other modes of communication) used.

VIDHS and MPIs entered into a Memorandum of Agreement where scope of service is identified, and reporting & meeting requirements are outlined. The mode of communication is both written via email and verbal conversations through meetings either in person or using online platforms such as Zoom or Teams.

Processes Include:

- ▶ Referral, Eligibility Verification
- ▶ Back-and-forth process (with VIDHS) to ensure that participants are eligible for, enrollment in SNAP E&T
- ▶ Participant Tracking
- ▶ Case files, case notes
- ▶ Fiscal / Invoicing
- ▶ Participant reimbursements must be closely tracked (receipts kept, etc.)
- ▶ Demonstrate funds used are non-federal
- ▶ Data Collection and Reporting
- ▶ Assessment and Case Management

MPI operates under a formal written agreement with VIDHS to provide SNAP E&T services to SNAP participants. Services may begin as early as the date SNAP eligibility is approved but must start no later than the 1st day of the month after the month SNAP eligibility is approved. Under VIDHS administration, MPI provides the following services:

ORIENTATION AND ASSESSMENTS

- Orient participants to the SNAP E&T program.
- Assess the participant's literacy level and refer the participant to local literacy programs when appropriate.
- Complete an individual assessment and an Employability Plan (EP) for each participant.
- Identify the need for and coordinate support services such as transportation, purchase of equipment or tools.

DEVELOPMENT OF THE SELF-SUFFICIENCY PLAN-The Self-Sufficiency Plan is the product of negotiations between the clients and MPI. The Self-Sufficiency Plan is subject to renegotiation throughout the client's receipt of SNAP benefits. Initial and ongoing assessments produce information that allows the worker to provide reasonable guidance to the client to attain his goals as part of the plan. MPIs must explore family situations, education, work history, skills, aptitudes, attitude toward work, employment potential, possible social services, or other support systems. Individual circumstances may require exploration.

- Implement the participant's SSP, whether through direct service provision or referral to other agencies for services that are needed, so that the participant can successfully complete the plan and find employment. Monitor participant's performance and participation.
- Modify the participant's SSP as necessary.

EMPLOYMENT PLAN - Job Development and the subsequent placement of individuals in employment is the focus of SNAP E&T voluntary Program. MPI will have knowledge of the local economic base and develop and maintain a job openings base and participate in various employment related activities and initiatives. MPI must communicate with private employers and related organizations and maintain a good working relationship within this group. Job development and placement efforts must be coordinated closely with the local DOL.

NOTIFICATION

- Provide notices to the E&T participant and VIDHS when the participant has failed to attend. No sanctions are imposed on E&T voluntary participants. VIDHS will contact voluntary participants who may not be attending the program after enrollment to inquire why the lack of participation. VIDHS will do this for tracking & monitoring purposes.

- Provide VIDHS with information that may affect a participant's SNAP E&T exemption status, program eligibility, or benefit amount. MPI must notify VIDHS anytime a participant's employment status changes.

COORDINATION AND PROGRAM RECORDS

- Coordinating with VIDHS regarding program activities and outcomes, expenditures, individual participant services and progress, and participant sanctions.
- Maintain needed program files and documentation and record relevant participant data on as necessary. When a participant changes service MPI must make program documents and information available. VIDHS retains ownership of any SNAP E&T document for which it has reimbursed the cost. This declaration must be incorporated in any service contract between VIDHS and MPI.

2. If the STATE uses an MIS system, describe the E&T related data that is tracked and stored in those systems (e.g. referrals, noncompliance with program requirements, MPI determinations, etc.), and whether the system(s) interact with each other.

N/A

3. Describe how the STATE agency shares new policies, procedures, or other information with the intermediary or other E&T partners.

VIDHS shares information on new policies and procedures by implementing these practices:

1. Meet with divisional leaders to ensure the policies and procedures being created are feasible for individual departments & agencies.
2. Determine the best format of policies for the targeted audience.
3. Make Policies and Procedures easily accessible to the intermediary & or partners.
4. Set deadlines for each policy and procedure to be acknowledged.
5. Determine the best way to measure the understanding intermediary or other partners have of policies and procedures.

4. Describe the STATE agency's process for monitoring E&T partners' program and fiscal operations. Include plans for direct monitoring such as visits, as

well as indirect monitoring such as reviewing program data, financial invoices, etc.

STATE PROCESS & METHODOLOGY

- Director of JOBS/E&T will be responsible for annual and formal monitoring reviews.
- Oversight and monitoring will focus on VIDHS systems to ensure that acceptable standards for fiscal accountability, program administration, procurement, and integrated service delivery are established and in practice.
- In addition to the annual monitoring and required formal monitoring reviews, oversight and programmatic reviews will be conducted year-round via program management and Program Integrity staff to ensure compliance with applicable administrative requirements—specifically identification of system strengths, weaknesses, and required corrective actions.
- VIDHS monitors and evaluates the reporting data of wages provided by the DOL in accordance with the national reporting measures identified in CFR 273.7 (d). DHS coordinates with the DOL to collect participant data through the VIDHS quarterly report. This information is reconciled with the VI CARIBS data to provide information for the annual report.

5. Describe how the STATE agency evaluates the performance of partners in achieving the purpose of E&T (assisting members of SNAP households in gaining skills, training, work, or experience that will increase their ability to obtain regular employment and meets STATE or local workforce needs).

VIDHS will evaluate the performance of MPI quarterly by the following:

- Director of JOBS/E&T will be responsible for annual and formal monitoring reviews.
- Facilitate the client's understanding of the rationale, purpose and procedures associated with case management services referred to by V.I. Department of Human Services.
- Developing a third-party partnership strategy and implementation plan
- Building a system for data tracking, reporting and analysis.
- Securing third-party partnerships.
- Building a participant referral system
- Obtain relevant information from the client and meaningful collateral sources to assess the client's current situation and identify any immediate needs, including but not limited to the safety and well-being of the client in his or her employment & educational skills.

- VIDHS will review the appropriate assessment instruments to gather information and initiate a process of shared decision making and goal setting focused on the client's strengths, needs, abilities, and preferences.
- VIDHS will review analyzed and synthesize assessment data by MPI to identify problems/opportunities that would benefit from case management intervention.
- VIDHS will review assessment conducted by MPI throughout the life of the case to identify emerging needs and maintain case relevance.
- VIDHS will review assessments conducted by MPI for Literacy & Numeracy skills, Basic English Skills Test, Interests/ Aptitudes/ Personality Assessments and Career Scope Interest Profiler
- VIDHS will review translation outcomes into functional domains, prioritize needs under each domain into immediate, short-term, and long-term categories, and identify appropriate case management interventions.
- VIDHS will review track, monitor, and report participant's attendance program activities.
- VIDHS will review developed MPI's written case management plan that reflects assessment outcomes; prioritized and mutually agreed upon needs, measurable goals, and objectives, including timeframes; and case management strategies.
- VIDHS will review MPI's ongoing assessment and collaboration with the client and meaningful collateral sources/others to review and update initial and on-going case management plan to reflect emerging needs and maintain relevance.
- VIDHS will review developing professional networks to identify and maintain information about available community resources to meet client needs.
- VIDHS will review formal and informal referrals identified in the case management plan for employment gains.
- VIDHS will review ongoing monitoring activities, including contact with the client, and MPI to assess the effectiveness of the case plan strategies and measure progress on achieving case plan outcomes.
- VIDHS will review MPI's use of effective facilitation and problem-solving techniques to improve communication and relationships between all stakeholders and to reconcile potentially differing points of view.
- VIDHS will review MPI's advocacy to the E&T clients to promote individual choice and self-determination.
- VIDHS will review MPI assistance with the E&T clients to develop a Self-Sufficiency Plan and Employment Plan.

- VIDHS will review MPI's use of best practices for written documentation to record all relevant case management services activity and information in a clear, concise, observable/objective, professional and timely manner.
- VIDHS will review MPI's practices to protect the client's right to privacy and confidentiality according to laws and other governing rules when preparing and handling records, especially regarding the communication of client information with third parties.
- VIDHS will review to ensure MPI obtains written consent to release information from the client and/or legal guardian according to agency protocols and administrative rules.

VIII. Screening for Work Registration

STATE agency eligibility staff must screen for exemptions from work registration, per 7 CFR 273.7(a).

- a) Describe how the STATE agency screens applicants to determine if they are work registrants.

The work registration status of each household is conducted during the eligibility interview, at initial certification and recertification. The VIDHS Eligibility Specialist explains the work registration and work opportunities to each applicant. The client is screened for all exemptions listed at 7 CFR 273.7(b), and if they don't meet any other exemptions, they are work registered, which is documented in the case record.

- b) How does the STATE agency work register non-exempt individuals? For example, does the STATE agency make a notation in the file, do individuals sign a form, etc.?

Nonexempt individuals will be work-registered during the recertification or certification process by signing the Work Registration/ E&T Training Participation Form.

- c) At what point in the certification process does the STATE agency provide the written explanation and oral notification of the applicable work requirements?

A written notice and oral explanation must also be provided to the household when a previously exempt household member or new household member becomes subject to these work requirements, at new/reopen applications and at recertification.

IX. Screening for Referral to E&T

The STATE agency must screen each work registrant to determine if it is appropriate, based on STATE specific criteria, to refer them to the E&T program per 7 CFR 273.7 (c)(2). STATE agencies may operate program components in which individuals elect to participate, per 7 CFR 273.7(e)(4).

- a) List the STATE-specific criteria eligibility workers use to screen individuals to determine if it is appropriate to refer them to the STATE's SNAP E&T program. (Note: This question is not asking about criteria that may be unique to each provider.)

During the recertification and/or application process Eligibility workers will ask applicants whether they would like to participate in SNAP E&T, and if the client says yes, they will check off "Yes" on the SNAP E&T referral form.

- b) Describe the process for screening during the certification and recertification process. Include the staff involved in the screening, how the staff conduct the screening, and when the screening occurs.

During interview at the recertification and/or certification process, Eligibility Specialist will ask pertinent questions like ages of children, employment status, information on other HH members, and discuss the benefits of the E&T Program to determine if the individual can be referred to the Program.

- c) (If applicable) Describe the process for screening upon receipt of a request for referral to E&T from an E&T provider (reverse referral). Include the staff involved in the screening, how the staff conduct the screening, and when the screening occurs.

MPI staff will complete an employability or similar assessment of the individual to determine if the organization's services are a good match for the individual's needs. If there is a good match to MPI's services, and those services are approved, MPI will communicate with the VIDHS staff to determine if the individual is a SNAP participant and if they can participate in E&T. Assessment will be completed within the first 30 days after referral is sent to MPI.

- d) How and when are participants informed about participant reimbursements? In the case of mandatory participants, how and when does the State agency ensure individuals are exempted from mandatory E&T if the costs of participant reimbursements exceed any State agency cap or are not available?

E&T voluntary participants are advised of reimbursement at time of certification and recertification and when referral is made to MPI is made to the program. Voluntary participants are fully informed about the program & expectations before they're referred to participate. E&T voluntary participants' needs are assessed and identified during

the interview by MPI. MPI will indicate the participants' needs for reimbursement on the referral form sent to VIDHS. Participants are reimbursed for allowable costs that have been incurred, verified by MPI, and submitted to VI DHS for payment by the fifteenth day of the following month. VIDHS processes reimbursement request within five days and mail disbursement check to participant, once the necessary requisition and purchase order has been, approved, converted, and processed. Participants are reimbursed for transportation expenses, child-care, uniforms, books, tools, etc.,

X. Referral to E&T

In accordance with 7 CFR 273.7(c)(2), the STATE agency must refer participants to E&T.

- a) What information does the STATE provide to E&T participants when they are referred and how is the referral communicated (e.g. information about accessing E&T services, case management, dates, contact information)?

VIDHS REFERRAL PROCESS

- a) Individual applies or recertifies for SNAP.
- b) Application is completed by SNAP worker.
- c) VIDHS worker reviews the application and schedule appointment.
- d) Interviews are conducted via phone or in person.
- e) VIDHS screens the individual for work registration exemptions.
- f) Individual is work registered or identified as NOT work registrant.
- g) During the interview, the worker will ask clients if they wish to participate in the SNAP E&T Program.
- h) Case is approved- VIDHS staff screens individuals beyond work registrant barriers and is referred to MPI for further processing.
- i) MPI assesses the participants and refers them to an assigned Case Manager and at least one E&T component, which includes Supervised Job Search
- j) Participant will also receive the necessary information as it relates to reimbursement.

E&T participants are provided with orientation and a focus is placed on Supervised Job Search. MPI will assist in the delivery of service to meet the goals of the SNAP E&T program. MPI will assess the clients' knowledge and skills while working collaboratively with the client to make informed decisions about the appropriate course of action. MPI will enter into mutual agreement with the clients detailing the process to achieving self-sufficiency, monitor the client's progress, determine changing needs, identifying needs for supportive services, and appropriate follow-up action based on the client's performance. Each client will be assigned a case manager. MPI is responsible for working & creating both an Employment Plan (EP), which is a short-term plan that identifies how many job searches a participant has conducted, etc., and a Self-Sufficiency Plan (SSP – long term plan) for the E&T

participant. (The EP is the result of assessing everyone's career goals, skills, abilities, family obligations and any other job relatable assets and barriers and include steps that will help the participants overcome identified career barriers while supporting the participant's strengths and goals). These plans must be shared & reviewed periodically (quarterly) with both clients & VIDHS staff to monitor implementation with fidelity.

Participants Files- MPI must document all E&T activities and services provided to SNAP E&T participants. Files must be kept for all SNAP E&T participants. The files may be kept in paper & electronic formats and are reviewed as part of the monitoring visits. Assessments- All SNAP recipients must be assessed prior to placement into the E&T program. Assessment will include an in-depth evaluation of employability skills coupled with counseling on how and where to search for employment.

- b) If a State receives and approves a referral request from an E&T Provider (reverse referral), how does the State communicate to the SNAP participant that they are in SNAP E&T and about their rights to receive participant reimbursements, etc.?

MPI staff will complete an employability or similar assessment of the individual to determine if the organization's services are a good match for the individual's needs. If there is a good match to MPI's services, MPI will communicate with the DHS SNAP E&T Project Director/Asst. Director to determine if the individual is a SNAP participant and if they can participate in E&T. Once the approval is granted by DHS, MPI will provide the SNAP E&T participant with a brochure indicating the process for reimbursements. MPI will explain and assist the participant in completing the necessary reimbursement documents and forward to DHS Director/Asst. Director.

- c) After referral, describe what the E&T participant must do next. For instance, if the participant must report for an orientation describe who conducts the orientation, where the orientation occurs (e.g. in-person, log-in to a computer program, telephone interview with a case manager), and what happens during the orientation. If the next step varies throughout the STATE, describe the most common next step.

After referral, the E&T participant must contact MPI to conduct a telephone interview with a case manager who will provide a scheduled appointment date to report on site to the designated location. MPI can also contact the participant to get him/her started on the Program.

- d) How is information about the referral communicated within the STATE agency? For instance, is the information entered into an MIS by the eligibility worker and reviewed by an E&T specialist?

- VIDHS provides information to the participant about participating in the SNAP voluntary E&T program.
- Once the case is approved by VIDHS staff the E&T client is referred to MPI.

- Eligibility workers will provide their supervisors a daily list of clients who want to volunteer in the E&T Program.
- On a weekly basis, VIDHS E&T staff, Director, or designee, will compile all names of clients from each district, who are willing to participate in E&T and email to MPI, protected via the JOBS Director.
- E&T participants are contacted by MPI, who will arrange appointments for orientation and assessments, preferably via phone.
- MPI will provide VIDHS with information that may affect a participant's SNAP E&T exemption status or program eligibility. MPI must notify STATE via email, phone call or using digital platform such as Zoom or TEAMS anytime a participant's employment status changes.

COORDINATION AND PROGRAM RECORDS

- MPI will be coordinating with VIDHS regarding program activities and outcomes, expenditures, individual participant services, and progress.
- Both VIDHS & MPI maintain the necessary program files and documentation and record relevant to participant as necessary. When a participant changes to a different program or there is a change in provider, MPI must make program documents and information available to the new provider. VIDHS retains ownership of any SNAP E&T documents for which it has reimbursed the cost. This declaration must be incorporated in any service contract between VIDHS and MPI.

- e) How is information about the referral communicated to E&T providers, as applicable? If the STATE works with E&T providers outside the STATE agency, how does the E&T provider know a SNAP participant has been referred to them?

A weekly referral contact list will be emailed to MPI by DHS staff to ensure that the handoff of the referral is done timely, containing all pertinent point of contact information, documented by the frontline worker.

XI. Assessment

As a best practice, SNAP participants should be assessed after referral to ensure they receive targeted E&T services.

- a) Does the STATE require or provide an assessment?

Yes (*Complete the remainder of this section.*)

No (*Skip to the next section.*)

- b) If yes, describe the processes in the STATE, if any, to provide E&T participants with an assessment (e.g. who conducts the assessment, when are participants assessed, what tools *are* used, and how are the results shared with STATE agency staff, MPIs, and/or participants)

MPI will conduct the assessment as follows:

Assessment will be an ongoing process to determine each client's goals, skills, needs and challenges. Assessment begins at registration and continues until case management stops. An in-depth assessment is necessary to discover the client's abilities to meet goals and to develop an ongoing plan to overcome them. The assessment must focus on information useful to both the client and MPI in evaluating the client's abilities. Changes in the client's circumstance will necessitate revision of the terms of the Self-Sufficiency Plan to assist the recipient in becoming successful. The assessment process will include a series of interviews and conversations with the client. It may also include educational and/or aptitude or interest testing and interpretation.

MPI sends appointment letters to the clients to register & complete on-line assessment. MPI meets with clients and conducts in-depth assessment & Case Management to determine placement in appropriate E&T activity. The participant can also speak with MPI and if information comes to light during that time, MPI is expected to share this information with VIDHS.

XII. Case Management Services

The STATE E&T program must provide case management services to all E&T participants. In accordance with 7 CFR 273.7(c)(6)(ii), STATE agencies are required to include specific information about the provision of case management services in the E&T STATE plan.

- a) What types of E&T case management services will the STATE agency provide?
Check all that apply.

Comprehensive intake assessments

Individualized Service Plans

Progress monitoring

Coordination with service MPIs

Reassessment

Other. Please briefly describe: Click or tap here to enter text.

- b) Describe how case management services are delivered in your STATE. For instance, in one model case management is provided by E&T specialists who provide

assessments and other services after participants are referred to E&T. In other instances, case management is integrated into the component. If your STATE uses more than one model, describe the one or two most common ways of delivering case management services.

Case Management services will be integrated into the component and delivered by MPI.

- c) Using the table below, describe how E&T case managers coordinate with other staff and services. Coordination can involve tracking E&T participation, sharing information that may be relevant to participation in E&T (e.g. information related to good cause or a work exemption), and referral to additional services.

Communication/Coordination with:

SNAP eligibility staff:	Communication can be done via in-person, email, phone, or mail for tracking, sharing of other information on the participant, relevant to E&T.
STATE E&T staff:	Communication can be done via in-person, email, phone, or mail for tracking, sharing of other information on the participant, relevant to E&T.
Other E&T MPIs:	MPI will provide case management to participants in person or via other forms of electronic meeting platforms such as Zoom, TEAMS, etc.
Community resources:	

- d) Describe how the STATE agency will ensure E&T participants receive targeted case management services through an efficient administrative process, per 7 CFR 273.7(c)(6)(ii).

CASE MANAGEMENT ACTIVITY:

VIDHS will review MPI implementation of effective case management practices & services which are designed to support the participant progress through the E&T program. VIDHS will ensure that case management services are intended to help, not hinder participation in E&T. This will be achieved through establishing a rapport with MPI, conducting bi-weekly meetings and reviewing participants' progress through the E&T program. VIDHS will ensure that case management meetings and provision of services serve a purpose in advancing the success of the E&T participant. As a best practice, MPI will provide case management services soon after referral is done and as needed throughout a participant's progression through the E&T program. Regular engagement with case management services ensures the participant is well-supported to successfully complete the program. MPI will also

assist the participant to achieve self-sufficiency. To accomplish this, MPI assess the client's knowledge and skills and work with the client to make informed decisions about the appropriate course of action. Additionally, MPI will enter into a mutual agreement with the clients detailing the process to achieving self-sufficiency, monitor the client's progress, determine changing needs, need for supportive services, and appropriate follow-up action based on the client's performance.

- Monitors compliance progress to achieve self-sufficiency.
- MPI must develop a plan to schedule educational, aptitude, and interest testing as appropriate and available. Upon receipt of test results, MPI records the information and schedule interviews with the participant, as soon as possible, to discuss the test results.
- The Case Manager is responsible for completing a release of information for each client.
- Clients who indicate substance abuse problems will be referred for evaluation and counseling prior to scheduling vocational testing. (Determination of a substance abuse problem is based on Statements made by the client, not by MPI).

DEVELOPMENT OF THE SELF-SUFFICIENCY PLAN- The Self-Sufficiency Plan is subject to renegotiation throughout the client's receipt of SNAP benefits. Initial and ongoing assessments produce information that allows the Worker to provide reasonable guidance to the client to attain goals as part of the plan. MPI must explore family situations, education, work history, skills, aptitudes, attitude toward work, employment potential, possible social services, or other support systems. Individual circumstances may require exploration.

JOB DEVELOPMENT- Job Development and the subsequent placement of individuals in employment is a focus of SNAP E&T Program. MPI will have knowledge of the local economic base and develop and maintain a job openings base and participate in various employment related activities and initiatives. MPI will communicate with private employers and related organizations and maintain a good working relationship within this group. Clients must register with the Job Service office and keep applications current. The results of career-oriented testing are shared with the MPI & VIDHS.

A Release of Information Form must be signed by the client prior to sharing information. The completed form must be placed in the case record. To increase the resources available to the client, contacts are established and maintained with the Division of Family Assistance, Department of Education, Community Action

agencies and other public and private organizations that could offer activities or support.

Assessments- Assessment is the ongoing process of determining each client's goals, skills, needs, and challenges. Assessment begins at registration and continues until case management stops. An in-depth assessment is necessary to discover the client's abilities to meet goals and to develop an ongoing plan to overcome them. The assessment will focus on information useful to both the client and MPI in evaluating the client's abilities. As the client's circumstances change, it is necessary to change the terms of the Self-Sufficiency Plan to assist the recipient in becoming successful.

- The assessment process includes a series of interviews and conversations with the client. It may also include educational and/or aptitude or interest testing and interpretation of this information.
- The following items are devoted to work activities, follow-up actions, and contain information necessary for MPI to assist the client in becoming self-sufficient and in developing opportunities.
- The participant and MPI determine the best means to achieve self-sufficiency, accept personal responsibility, and to meet the work obligation.
- MPI establishes for the client reasonable and appropriate requirements related to the client's capability to perform the tasks on a regular basis, including physical capacity, skills, experience, family responsibilities and residence. Reasonable and appropriate requirements must be based on the client's proficiencies and skills as assessed.

XIII. Conciliation Process (if applicable)

In accordance with 7 CFR 273.7(c)(3), STATE agencies have the option to offer a conciliation period to noncompliant E&T participants. The conciliation period provides mandatory E&T participants with an opportunity to comply before the STATE agency sends a notice of adverse action. The conciliation process is not a substitute for the determination of good cause when a client fails to comply.

a) Does the STATE agency offer a conciliation process?

Yes (*Complete the remainder of this section.*)

No (*Skip to the next section.*)

b) Describe the conciliation process and include a reference to STATE agency policy or directives.

N/A

c) What is the length of the conciliation period?

N/A

XIV. Disqualification Policy for General Work Requirements

This section applies to the General Work Requirements, not just to E&T, and should be completed by all STATES, regardless of whether they operate a mandatory or voluntary E&T program.

All work registrants are subject to SNAP work requirements at 7 CFR 273.7(a). A nonexempt individual who refuses or fails to comply without good cause, as defined at 7 CFR 273.7(i)(2), (i)(3), and (i)(4), with SNAP work requirements will be disqualified and subject to STATE disqualification periods. Noncompliance with SNAP work requirements include voluntarily quitting a job or reducing work hours below 30 hours a month, and failing to comply with SNAP E&T (if assigned by the STATE agency).

a) What period before application does the STATE agency use to determine voluntary quit and/or reduction in work effort without good cause per 7 CFR 273.7(j)(1)?

30 days

60 days

Other: Click or tap here to enter text.

b) For all occurrences of non-compliance discussed below, must the individual also comply to receive benefits again?

Yes

No

c) For the first occurrence of non-compliance per 7 CFR 273.7(f)(2)(i), the individual will be disqualified until the later of:

One month or until the individual complies, as determined by the STATE agency

Up to 3 months

d) For the second occurrence of non-compliance per 7 CFR 273.7(f)(2)(ii), the individual will be disqualified until the later of:

- Three months or until the individual complies, as determined by the STATE agency
 - Up to 6 months
- e) For the third or subsequent occurrence per 7 CFR 273.7(f)(2)(iii), the individual will be disqualified until the later of:
- Six months or until the individual complies, as determined by the STATE agency
 - Time period greater than 6 months
 - Permanently
- f) The STATE agency will disqualify the:
- Ineligible individual only
 - Entire household (if head of household is an ineligible individual) per 7 CFR 273.7(f)(5)(i)

XV. Good Cause

In accordance with 7 CFR 273.7(i), the STATE agency is responsible for determining good cause when a SNAP recipient fails or refuses to comply with SNAP work requirements. Since it is not possible for FNS to enumerate each individual situation that should or should not be considered good cause, the STATE agency must take into account the facts and circumstances, including information submitted by the employer and by the household member involved, in determining whether or not good cause exists.

- a) Describe the STATE agency process to determine if a non-exempt individual has good cause for refusal or failure to comply with a SNAP work requirement. Include how the STATE agency reaches out to the SNAP participant, employers, and E&T providers (as applicable), as well as how many attempts are made to reach out to the SNAP participant for additional information.

Non-exempt individuals are advised by the worker at certification or recertification about their failure to comply with SNAP work requirements. Determination will be made by worker and supervisor if childcare, disability. Employability also plays a role in determining good cause.

- b) What is the STATE agency's criteria for good cause?

VIDHS criteria for good cause could be if the participant faces an unexpected need for transportation or childcare services. Good cause criteria can also be applied if this hardship reoccurs with the participants.

- c) Please describe the STATE agency's process to determine good cause if there is not an appropriate and available opening for an E&T participant.

If there is not an appropriate and available opening for an E&T participant, that individual will be placed on a waiting list and can resume participation in SNAP E&T activities once the situation is resolved and space becomes available.

XVI. Provider Determinations

In accordance with 7 CFR 273.7(c)(18) a STATE agency must ensure that E&T providers are informed of their authority and responsibility to determine if an individual is ill-suited for a particular E&T component.

- a) Describe the process used by E&T providers to communicate provider determinations to the State agency.

A meeting will be arranged with both the MPI and VIDHS to communicate if an individual is ill-suited for a component. Recommendations will be made by both parties to determine the next step, and availability of another component better suited for the participant.

- b) Describe how the State agency notifies clients of a provider determination. Please include the timeframe for contacting clients after receiving a provider determination.

VIDHS will call or email or send a letter to the participant within 2-5 days of the agency receiving the MPI determination information.

XVII. Participant Reimbursements

In accordance with 7 CFR 273.7(d)(4), State agencies are required to pay for or reimburse participants for expenses that are reasonable, necessary, and directly related to participation in E&T. State agencies may impose a maximum limit for reimbursement payments. If a State agency serves mandatory E&T participants, it must meet all costs associated with mandatory participation. If an individual's expenses exceed those reimbursements available by the State agency, the individual must be placed into a suitable component or must be exempted from mandatory E&T.

Table E.I. Estimates of Participant Reimbursements

<p>I. Estimated number of E&T participants to receive participant reimbursements. This is an unduplicated count. If an individual participates in more than one month, they would only be counted once.</p> <p><i>State agencies should take into consideration the number of mandatory E&T participants projected in Table H – Estimated Participant Levels in the Excel Workbook, and the number of mandatory E&T participants likely to be exempted, if the State agency cannot provide sufficient participant reimbursements.</i></p>	50
<p>II. Estimated number of E&T participants to receive participant reimbursements per month. This is a duplicated count. This calculation can include the same individual who participates in more than one month.</p>	50
<p>III. Estimated budget for E&T participant reimbursements in upcoming FY.</p>	\$20,000.00
<p>IV. Estimated budget for E&T participant reimbursements per month in upcoming FY. (Row III/12)</p>	\$1,667.00
<p>V. Estimated amount of participant reimbursements per E&T participant per month. (Row IV/Row II)</p>	\$33.34 (1,667/50)

Participant Reimbursement Details

Complete the table below with information on each participant reimbursement offered/permitted by the STATE agency (do not indicate information for each provider). A description of each category is included below.

- Allowable Participant Reimbursements.** Every STATE agency must include childcare and transportation in this table, as well as other major categories of reimbursements (examples of categories include, but are not limited to: tools, test fees, books, uniforms, license fees, electronic devices, etc.). Mandatory STATES must meet all costs associated with participating in an E&T program, or else they must exempt individuals from E&T.
- Participant Reimbursement Caps (optional).** STATES have the option to establish maximum levels (caps) for reimbursements available to individuals. Indicate any caps on the amount the STATE agency will provide for the participant reimbursement.

- **Who provides the participant reimbursements?** Indicate if the participant reimbursement is provided by the STATE agency, a provider, an intermediary, or some other entity. The STATE agency remains ultimately responsible for ensuring individuals receive participant reimbursements, even if it has contracted with another entity to provide them.
- **Method of disbursement.** Indicate if the participant receives the participant reimbursement *in advance* or as a *reimbursement*. Also indicate if the amount of the participant reimbursement is an *estimated amount* or the *actual amount*.

Table E.II. Participant Reimbursement Details

The following table should be completed with details that reflect the STATE agency’s policies on allowable reimbursements. If the response varies by E&T MPI, include examples to illustrate this variation. Expenses must be listed in the STATE plan and approved by FNS to be allowable.

Allowable Participant Reimbursements	Participant Reimbursement Caps (optional)	Who provides the participant reimbursement?	Method of disbursement
Childcare		VIDHS	Check/direct deposit
Transportation		VIDHS	Check/direct deposit
Books		VIDHS	Check/direct deposit
Tools		VIDHS	Check/direct deposit
Uniforms		VIDHS	Check/direct deposit

- a) If providing dependent care, specify payment rates for childcare reimbursements, established in accordance with the Child Care and Development Block Grant (CCDBG) and based on local market rate surveys. If alternative dependent care is provided by the STATE agency in lieu of reimbursement, describe these arrangements.

Voluntary E&T participants can receive up to \$450.00 per child per month and \$400.00 per child for pre-school children. (These figures were provided by DHS’s Childcare & Regulatory Division).

- b) If dependent care agencies have a waiting list or otherwise cap the number of enrolled dependents, how will the STATE agency ensure E&T participants with dependent care needs receive dependent care?

An agreement will be reached, hopefully before the end of calendar year 2024, between the DHS E&T Program and the DHS Office of Child Care and Regulatory Services to ensure that E&T participants get the required dependent care services.

XVIII. Work Registrant Data

The SNAP general work requirements are described at 7 CFR 273.7(a). Individuals who do not meet an exemption from the general work requirements, as listed in 7 CFR 273.7(b)(1), are subject to the general work requirement and must register for work. In accordance with 7 CFR 273.7(c)(10), the STATE agency must submit to FNS the number of work registrants in the STATE as of October 1st. This information is submitted on the first quarter E&T Program Activity Report.

- a) Describe the process the STATE agency uses to count all work registrants in the STATE as of the first day of the new fiscal year (October 1). Please provide information about how data is pulled from the eligibility system. For instance, how work registrants are identified and how counting is conducted.

There are codes in the CARIBS Eligibility system to identify work registrants' exemptions. The work registrant code is "01". On October 1st, CARIBS counts all the "01s" as of that day. For each month after (including October 2nd to the 31st) CARIBS select all cases with an "01" code that are new to the system and matches them with the months prior to make sure the application is new in the fiscal year.

- b) Describe measures taken to prevent duplicate counting.

Since only the Primary Master Index (PMI) file gets synchronized on all 3 districts, new fields will be added to this file to indicate when a client has been reported on the Line Item # 1 or Line Item # 2 of the FNS 583 report for the fiscal year. This will eliminate any duplicate reporting of clients within the fiscal year.

XIX. Outcome Reporting Measures

National Reporting Measures

Table E.III. National Reporting Measures

Source <i>[Check the data source used for the national reporting measures. Check all that apply]</i>	Employment & Earnings Measures	Completion of Education of Training
Quarterly Wage Records (QWR)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
National Directory of New Hires (NDNH)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
STATE Information Management System (MIS). <i>Indicate below what MIS system is used.</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Manual Follow-up with SNAP E&T Participants. <i>Answer follow-up question below.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Source <i>[Check the data source used for the national reporting measures. Check all that apply]</i>	Employment & Earnings Measures	Completion of Education of Training
Follow-up Surveys. <i>STATE agencies must complete the Random Sampling Plan section below, if follow-up surveys is used.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Other - Describe source: Click or tap here to enter text.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

- a) If a STATE MIS is used, please indicate the system (e.g., SNAP eligibility system, STATE’s Department of Labor MIS).

DHS Client Application Registration Issuance Benefits System (CARIBS) and DOL MIS System VIEWS (VI Electronic Workforce System)

- b) If a manual follow-up with SNAP E&T participants is conducted, describe the process for follow-up, including the contact method (e.g., verbal contact, email, or mail).

N/A

- c) If a STATE agency is not using Quarterly Wage Records (QWR) as the source for the national measures, describe the STATE agency’s plan to move toward using QWR including a timeline for completion.

N/A

STATE Component Reporting Measures

- d) Check all data sources used for the STATE-specific component measures.

- Quarterly Wage Records (QWR)
- National Directory of New Hires (NDNH)
- STATE Management Information System. *Indicate the MIS used below.*
- Manual follow-up with SNAP E&T Participants. *Answer follow-up question below.*
- Follow-up Surveys. *Answer follow-up question below.*

- e) If a STATE MIS is used, please indicate the system (e.g., SNAP eligibility system, STATE’s Department of Labor MIS).

DHS Client Application Registration Issuance Benefits System (CARIBS) and DOL MIS System VIEWS (VI Electronic Workforce System)

f) If a manual follow-up with SNAP E&T participants is conducted, describe the process for follow-up, including the contact method (e.g., verbal contact, email, or mail).

N/A

g) If follow-up surveys are used, please describe the sample frame. This description must include source, availability, accuracy, completeness, components, location, form, frequency of updates and structure.

N/A

h) If follow-up surveys are used, please describe the sample selection. This description must include the method of sample selection, procedures for estimating caseload size, computation of sampling intervals and random starts, as appropriate, and a time schedule for each step in the sampling procedure.

N/A

Using the table below, indicate the outcome measure that will be used for each component that the STATE agency will offer that is intended to serve at least 100 participants in the FY. Explain in detail the methodology for acquiring the component data. Please ensure the component names listed here match the component names in the FNS-583 report and [Section G: Component Detail](#).

Table E.IV. Component Outcome Measures

Component	Outcome Measure	Methodology including the timeframes being reported (e.g. denominator and numerator).
<i>Example: Supervised Job Search</i>	<i>Example: Number of people who obtain employment after completion of component.</i>	<i>Example: Numerator will include those participants who obtained employment after completing component during the period of 10-1-2019 to 9-30-2020 Denominator will include the number of participants that participated in supervised job search during the period of 10-1-2019 to 9-30-2020.</i>
N/A		

F. Pledge to Serve All At-Risk ABAWDs (if applicable)

The Act authorizes FNS to allocate \$20 million annually to STATE agencies that commit, or pledge, to ensuring the availability of education, training, or workfare opportunities that permit able-bodied adults without dependents (ABAWDs) to remain eligible beyond the 3-month time limit.

To be eligible for these additional funds (pledge funds), STATE agencies must pledge to offer and provide an opportunity in a work program that meets the participation requirements of 7 CFR 273.24 to every applicant and recipient who is in the last month of the 3-month time limit and not otherwise exempt. Individuals are exempt from the time limit if they meet an exception under 7 CFR 273.24(c), reside in an area covered by a waiver in accordance with 7 CFR 273.24(f), or who are exempted by the STATE under 7 CFR 273.24(g). ABAWDs who meet the criteria outlined in 7 CFR 273.7(d)(3)(i) are referred to as “at-risk” ABAWDs.

a) Is the STATE agency pledging to offer qualifying activities to all at-risk ABAWDs?

Yes (Complete the rest of this section.)

No (Skip to Section G: Component Detail.)

Table F.I. Pledge Assurances

Check the box to indicate that the STATE agency understands and agrees to comply with the following provisions, per 7 CFR 273.7(d)(3).	Check Box
The STATE agency will use the pledge funds to defray the costs of offering every at-risk ABAWD a slot in a qualifying component.	<input type="checkbox"/>
The cost of serving at-risk ABAWDs is not an acceptable reason for failing to live up to the pledge. The STATE agency will make a slot available and the ABAWD must be served even if the STATE agency exhausts all of its 100 percent Federal funds and must use STATE funds.	<input type="checkbox"/>
While a participating STATE agency may use a portion of the additional funding to provide E&T services to ABAWDs who are not at-risk, the STATE agency guarantees that at-risk ABAWDs are provided with opportunities by the STATE agency <u>each month</u> to remain eligible beyond the 3-month time limit.	<input type="checkbox"/>
The STATE agency will notify FNS immediately if it realizes that it cannot obligate or expend its entire share of the ABAWD allocated funds, so that FNS may make those funds available to other participating pledge STATES within the fiscal year.	<input type="checkbox"/>
The STATE agency will be ready on October 1 st to offer and provide qualifying activities and services each month an ABAWD is at-risk of losing their benefits beyond the 3-month time limit.	<input type="checkbox"/>

b) Where will the STATE agency offer qualifying activities?

Statewide

Limited areas of the STATE (*Complete questions c and d below.*)

c) Explain why the STATE agency will offer qualifying activities in limited areas of the STATE.

ABAWD waiver for parts of the STATE

Will use discretionary exemptions

Other: Click or tap here to enter text.

d) If the STATE agency will be offering qualifying activities only in limited areas of the STATE, please list those localities/areas.

N/A

e) How does the STATE agency identify ABAWDs in the STATE eligibility system?

N/A

f) How does the STATE agency identify ABAWDs that are at-risk?

N/A

g) When and how is the offer of qualifying activities made? Include the process the STATE agency uses to ensure that at-risk ABAWDs receive an offer of a qualifying component for every month they are at risk, including how the offer is made.

N/A

The next set of questions is intended to establish the STATE agency's overall capacity and ability to serve all at-risk ABAWDs during the fiscal year through the services available in SNAP E&T as well as through other qualifying activities available through other Federal or STATE employment and training programs. In addition to SNAP E&T components, qualifying activities for ABAWDs include programs that operate outside of SNAP E&T. Such as Optional Workfare programs, WIOA title I program, programs under Section 236 of the Trade Act of 1974, Veterans employment and training programs offered by the Department of Veterans Affairs or the Department of Labor, and Workforce Partnerships in accordance with 7 CFR 273.7(n).

h) What services and activities will be provided through SNAP E&T? (List the components and participant reimbursements.) This should be consistent with the

components detailed in Section G, as well as Section E-XIV regarding participant reimbursements.

N/A

- i) What services and activities will be provided outside of SNAP E&T? (List the operating program, such as title 1 of WIOA, services and activities.)

N/A

- j) To pledge, STATE agencies must have capacity to offer a qualifying activity to every at-risk ABAWD for every month they are at-risk. What is the STATE agency's plan if more ABAWDs than expected choose to take advantage of the offer of a qualifying activity? For instance, how will the STATE agency ensure the availability of more slots? What steps has the STATE agency taken to guarantee a slot through agreements or other arrangements with MPIs?

N/A

Table F.II. Information about the size of the ABAWD population

Question	Number
I. How many ABAWDs did you serve in E&T in the previous FY?	N/A
II. How many SNAP recipients are expected to be ABAWDs this fiscal year? This should be an unduplicated count. If an individual is an ABAWD at any time during the fiscal year, they would be counted only once. Note: This should be consistent with the projected number of ABAWDs shown on Table H row 11 in the Excel Workbook.)	N/A
III. How many ABAWDs will meet the criteria of an at-risk ABAWD? This should be an unduplicated count. If an individual is an at-risk ABAWD at any time during the fiscal year, they would be counted only once. (Note: This should be consistent with the projected number of at-risk ABAWDs shown on Table H row 14 in the Excel Workbook.)	N/A
IV. Number of at-risk ABAWDs averaged monthly? This should be annual total from line (III) divided by 12.	

Table F.III. Available Qualifying Activities

When considering all the qualifying activities that the pledging STATE agency intends to offer to at-risk ABAWDs, provide a projected estimate for each category below.

	Expected average monthly slots available to at-risk ABAWDs	Expected average monthly slots offered to at-risk ABAWDs	Expected monthly at-risk ABAWD participation for plan year
SNAP E&T	N/A		
All other programs outside of SNAP E&T	N/A		
Total slots across all qualifying activities	N/A		

Table F.IV. Estimated cost to fulfill the pledge

	Value
I. What is the projected total cost to serve all at-risk ABAWDs in your STATE?	N/A
II. Of the total in (I), what is the total projected administrative costs of E&T?	N/A
III. Of the total in (I), what is the total projected costs for participant reimbursements in E&T?	N/A

k) Explain the methodology used to determine the total cost to fulfill the pledge.

N/A

G. Component Detail

The goal of this section is to provide a comprehensive description of E&T program components and activities that the STATE agency will offer. A STATE agency's E&T program must include one or more of the following components: supervised job search; job search training; workfare; work experience or training; educational programs; self-employment activities; or job retention services. The STATE agency should ensure that the participation levels indicated in this section align with other sections of the STATE Plan, such as the projected participant levels in Section H – Estimated Participant Levels.

Complete the following questions for each component that the STATE agency intends to offer during the fiscal year.

I. Non-Education, Non-Work Components

Complete the tables below with information on each non-education, non-work component that the STATE agency intends to offer during the fiscal year. ***If the STATE does not plan to offer one of the components in the table, please leave the cells blank.*** For each component that is offered, the STATE should include the following information:

- **Summary of the STATE guidelines implementing supervised job search (applies to SJS only).** This summary of the STATE guidelines, at a minimum, must describe: The criteria used by the STATE agency to approve locations for supervised job search, an explanation of why those criteria were chosen, and how the supervised job search component meets the requirements to directly supervise the activities of participants and track the timing and activities of participants.
- **Direct link (applies to SJS only).** Explain how the STATE agency will ensure that supervised job search activities will have a direct link to increasing the employment opportunities of individuals engaged in the activity (i.e. how the STATE agency will screen to ensure individuals referred to SJS are job ready and how the SJS program is tailored to employment opportunities in the community).
- **Description of the component (applies to JST, SET, and Workfare).** Provide a brief description of the activities and services.
 - **For JR Only:** Provide a summary of the activities and services. Include a description of how the STATE will ensure services are provided for no less 30 days and no more than 90 days.
- **Target population.** Identify the population that will be targeted. Include special populations such as ABAWDs, Returning Citizens, Homeless, Older Disconnected Youth, etc.
- **Criteria for participation.** What skills, knowledge, or experience is necessary for participation in the component? For example, literacy or numeracy levels, recent labor market attachment, computer literacy etc.
- **Geographic area.** Where will the component be available (Statewide, regional, counties, localities not covered by ABAWD waivers, areas covered by American Job Centers, etc.).
- **E&T providers.** Identify all entities that will provide the service.
- **Projected annual participation.** Project the number of unduplicated individuals.
- **Estimated annual component costs.** Project only administrative costs

Table G.I. Non-Education, Non-Work Component Details: Supervised Job Search

Details	Supervised Job Search (SJS)
<p>Summary of the STATE guidelines implementing SJS</p>	<p>MPI has selected a location that follows ADA requirements. Voluntary E&T participants will be provided with coaching & weekly monitoring. Supervised Job Search is the component in which the participant will primarily engage and actively apply for work, building connections with prospective employers, and/or attending hiring events and other networking opportunities. Participants will conduct these activities at any location appropriate to the activity, including, but not limited to their home, job sites, public facilities, or at the SNAP E&T Provider locations. However, participants must report activities and hours through sign-in sheets, email records, phone, mobile app, or another VIDHS-approved method at least once per week. MPI must retain a record of dates and hours of job search activity as well as a summary of job search activities performed (including the date, time, activity type, positions applied for (if any), and any application barriers that may have arisen. MPI must establish, in consultation with the participant, individual goals for the number of applications or contacts made each month. This standard should consider the participant’s location and barriers. MPI must demonstrate through case notes or other means that they have engaged in regular meaningful communication with the participant about their job search. Supervised Job Search focuses on searching for and applying for jobs with direct supervision. SJS component will be made available for those individuals who are ready through gained skills to complete this. Case managers assigned will work with clients individually and in group sessions. A participant is assigned to SJS when: The four-week SJS has been completed and the participant will benefit in participating in SJS for additional weeks. Upon beginning this activity, the participant receives an orientation to SJS and immediately begins working with the case manager to access job information and to conduct job search activities. Participants must track their activities and hours through sign-in sheets, email records, phone, mobile app. MPI must retain a record of dates and hours of job search activity as well as a summary of job search activities performed (including the date, time, activity type, positions applied for (if any), and any application barriers that may have arisen).</p>

	MPI must establish, in consultation with the participant, individual goals for the number of applications or contacts made each month, and provide VIDHS of such, outlining the client's names and progress made. This standard should consider the participant's location and barriers.
Direct link	VIDHS will meet with MPI to review the E&T participants' progress & readiness for SJS. The E&T participants will be guided to research the latest employment trends, attend job/career fairs & employers in the territory. During SJS participants will meet one-on-one with a case manager at least once a week for an hour. Three times a week participant will conduct Supervised Job Search with the support of the case managers at MPI. All activities in the SJS will be geared towards increasing employment opportunities for the E&T participants. Supervised Job Search is an organized method of seeking work, which includes access to phone banks, job orders, and direct referrals to employers. It is overseen, reviewed, and guided by a case manager.
Target population	The target population will be for (50) individuals to participate in the E&T voluntary program. Participants who are ready with the needed skills will be scheduled for the SJS component, based on periodic assessment results. Those individuals who need additional support & services will receive them until they're deemed ready for SJS. The program will serve under employed, single parent household who volunteer to be in the program. Participants are referred after they are placed in the voluntary E&T program.
Criteria for participation	E&T participants must be able to have basic numeracy & literacy skills equivalent to 4 th grade.
Geographic area	Territory-wide to include St. Thomas, St. Croix, and St. John.
E&T providers	Missions Project Inc.
Projected annual participation	50
Estimated annual component costs	\$49,970.00

Table G.II. Non-Education, Non-Work Component Details: Job Search Training

Details	Job Search Training (JST)
Description of the component	N/A
Target population	N/A
Criteria for participation	N/A
Geographic area	N/A
E&T providers	N/A
Projected annual participation	N/A
Estimated annual component costs	N/A

Table G.III. Non-Education, Non-Work Component Details: Job Retention

Details	Job Retention (JR)
Description of the component	N/A
Target population	N/A
Criteria for participation	N/A
Geographic area	N/A
E&T providers	N/A
Projected annual participation	N/A
Estimated annual component costs	N/A

Table G. IV. Non-Education, Non-Work Component Details: Self-Employment Training

Details	Self-Employment Training (SET)
Description of the component	N/A
Target population	N/A
Criteria for participation	N/A
Geographic area	N/A
E&T providers	N/A

Projected annual participation	N/A
Estimated annual component costs	N/A

Table G.V. Non-Education, Non-Work Component Details: Workfare

Details	Workfare (W)
Description of the component	N/A
Target population	N/A
Criteria for participation	N/A
Geographic area	N/A
E&T providers	N/A
Projected annual participation	N/A
Estimated annual component costs	N/A

II. Educational Programs

Complete the tables below with information on each educational program component that the STATE agency intends to offer during the fiscal year. ***If the STATE does not plan to offer one of the components in the table, please leave the cells blank.*** For each component that is offered, the STATE should include the following information:

- **Description of the component.** Provide a summary of the activities and services.
- **Target population.** Identify the population that will be targeted. Include special populations such as ABAWDs, Returning Citizens, Homeless, Older Disconnected Youth, etc.
- **Criteria for participation.** What skills, knowledge, or experience is necessary for participation in the component? For example, literacy or numeracy levels, recent labor market attachment, computer literacy etc.
- **Geographic area.** Where will the component be available (Statewide, regional, counties, localities not covered by ABAWD waivers, areas covered by American Job Centers, etc.).
- **E&T State.** Identify all entities that will provide the service.
- **Projected annual participation.** Project the number of unduplicated individuals.
- **Estimated annual component costs.** Project only administrative costs.

- **Not supplanting:** Federal E&T funds used for activities within the education component must not supplant non-Federal funds for existing educational services and activities. For any education activities, provide evidence that costs attributed to the E&T program are not supplanting funds used for other existing education programs.
- **Cost parity:** If any of the educational services or activities are available to persons other than E&T participants, provide evidence that the costs charged to E&T do not exceed the costs charged for non-E&T participants (e.g. comparable tuition).

Table G.VI. Educational Program Details: Basic/Foundational Skills Instruction

Details	Basic/Foundational Skills Instruction (includes High School Equivalency Programs) (EPB)
Description of the component	N/A
Target population	N/A
Criteria for participation	N/A
Geographic area	N/A
E&T providers	N/A
Projected annual participation	N/A
Estimated annual component costs	N/A
Not supplanting	N/A
Cost parity	N/A

Table G.VII. Educational Program Details: Career/Technical Education Programs or other Vocational Training

Details	Career/Technical Education Programs or other Vocational Training (EPC)
Description of the component	N/A
Target population	N/A
Criteria for participation	N/A
Geographic area	N/A
E&T MPIs	N/A
Projected annual participation	N/A

Estimated annual component costs	N/A
Not supplanting	N/A
Cost parity	N/A

Table G.VIII. Educational Program Details: English Language Acquisition

Details	English Language Acquisition (EPEL)
Description of the component	N/A
Target population	N/A
Criteria for participation	N/A
Geographic area	N/A
E&T providers	N/A
Projected annual participation	N/A
Estimated annual component costs	N/A
Not supplanting	N/A
Cost parity	N/A

Table G.IX. Educational Program Details: Integrated Education and Training/Bridge Programs

Details	Integrated Education and Training/Bridge Programs (EPIE)
Description of the component	N/A
Target population	N/A
Criteria for participation	N/A
Geographic area	N/A
E&T providers	N/A
Projected annual participation	N/A
Estimated annual component costs	N/A
Not supplanting	N/A
Cost parity	N/A

Table G.X. Educational Program Details: Work Readiness Training

Details	Work Readiness Training (EPWRT)
Description of the component	N/A
Target population	N/A
Criteria for participation	N/A
Geographic area	N/A
E&T providers	N/A
Projected annual participation	N/A
Estimated annual component costs	N/A
Not supplanting	N/A
Cost parity	N/A

Table G.XI. Educational Program Details: Other

Details	Other (EPO): STATE agency must provide description
Description of the component	N/A
Target population	N/A
Criteria for participation	N/A
Geographic area	N/A
E&T providers	N/A
Projected annual participation	N/A
Estimated annual component costs	N/A
Not supplanting	N/A
Cost parity	N/A

III. Work Experience (WE)

Work experience is divided into two subcomponents per 7 CFR 273.7(e)(2)(iv): Work activity (WA) and Work-based learning (WBL). WBL activities like internships, apprenticeships, and on-the-job training, among others, may provide wages subsidized by the E&T program. In order to capture information about WBL activities that may be subsidized or unsubsidized by E&T, there are two sets of tables below for each kind of

WBL activity – the first group of tables are for activities not subsidized by E&T (e.g. Work-based learning – Internships) and the second group of tables are for activities subsidized by E&T (e.g. Work-based learning – Internships - Subsidized by E&T). Note that subsidized means programs where E&T funding is used to subsidize wages of participants. Subsidized in this context does not mean programs where participants receive a subsidized wage from another source.

Work Activity and Unsubsidized WBL Components

Complete the tables below with information on Work Activity and each unsubsidized WBL component that the STATE agency intends to offer during the fiscal year. ***If the STATE does not plan to offer one of the components in the table, please leave the cells blank.*** For each component that is offered, the STATE should include the following information:

- **Description of the component.** Provide a summary of the activities and services.
- **Target population.** Identify the population that will be targeted. Include special populations such as ABAWDs, Returning Citizens, Homeless, Older Disconnected Youth, etc.
- **Criteria for participation.** What skills, knowledge, or experience is necessary for participation in the component? For example, literacy or numeracy levels, recent labor market attachment, computer literacy etc.
- **Geographic area.** Where will the component be available (Statewide, regional, counties, localities not covered by ABAWD waivers, areas covered by the American Job Centers, etc.).
- **E&T Provider.** Identify all entities that will provide the service.
- **Projected annual participation.** Project the number of unduplicated individuals.
- **Estimated annual component costs.** Project only administrative costs.

Table G.XII. Work Experience: Work Activity

Details	Work Activity (WA)
Description of the component	N/A
Target population	N/A
Criteria for participation	N/A
Geographic area	N/A
E&T providers	N/A

Projected annual participation	N/A
Estimated annual component costs	N/A

Table G.XIII. Work Experience: Internship

Details	Internship (WBLI)
Description of the component	N/A
Target population	N/A
Criteria for participation	N/A
Geographic area	N/A
E&T providers	N/A
Projected annual participation	N/A
Estimated annual component costs	N/A

Table G.XIV. Work Experience: Pre-Apprenticeship

Details	Pre-Apprenticeship (WBLPA)
Description of the component	N/A
Target population	N/A
Criteria for participation	N/A
Geographic area	N/A
E&T providers	N/A
Projected annual participation	N/A
Estimated annual component costs	N/A

Table G.XV. Work Experience: Apprenticeship

Details	Apprenticeship (WBLA)
Description of the component	N/A
Target population	N/A
Criteria for participation	N/A
Geographic area	N/A
E&T providers	N/A

Projected annual participation	N/A
Estimated annual component costs	N/A

Table G.XVI. Work Experience: On-the-Job Training

Details	On-the-Job-Training (WBLOJT)
Description of the component	N/A
Target population	N/A
Criteria for participation	N/A
Geographic area	N/A
E&T providers	N/A
Projected annual participation	NA
Estimated annual component costs	N/A

Table G.XVII. Work Experience: Transitional Jobs

Details	Transitional Jobs (WBLTJ)
Description of the component	N/A
Target population	N/A
Criteria for participation	N/A
Geographic area	N/A
E&T providers	N/A
Projected annual participation	N/A
Estimated annual component costs	N/A

Table G.XVIII. Work Experience: Work-based learning - Other

Details	Work-based learning - Other (WBLO): STATE agency must provide description
Description of the component	N/A
Target population	N/A
Criteria for participation	N/A
Geographic area	N/A
E&T providers	N/A

Projected annual participation	N/A
Estimated annual component costs	N/A

Subsidized WBL Components

For assistance with developing the STATE's E&T SWBL budget, please refer to the optional SWBL tool on the Operating Budget Excel Workbook.

For all of the included subsidized components, the STATE agency attests to the following:	Check Box
Will pay the individual a wage at least equal to the STATE or Federal minimum wage, whichever is higher.	<input type="checkbox"/>
Operates in compliance with all applicable labor laws.	<input type="checkbox"/>
Will not displace or replace existing employment of individuals not participating in E&T.	<input type="checkbox"/>
Provides the same benefits and working conditions as non-E&T participants doing comparable work for comparable hours.	<input type="checkbox"/>

Complete the tables below with information on each subsidized WBL component that the STATE agency intends to offer during the fiscal year. ***If the STATE does not plan to offer one of the components in the table, please leave the cells blank.*** For each component that is offered, the STATE should include the following information:

- **Description of the component.** Provide a summary of the activities and services.
- **Target population.** Identify the population that will be targeted. Include special populations such as ABAWDs, Returning Citizens, Homeless, Older Disconnected Youth, etc.
- **Criteria for participation.** What skills, knowledge, or experience is necessary for participation in the component? For example, literacy or numeracy levels, recent labor market attachment, computer literacy etc.
- **Geographic area.** Where will the component be available (Statewide, regional, counties, localities not covered by ABAWD waivers, areas covered by the American Job Centers, etc.).
- **E&T Provider.** Identify all entities that will provide the service.
- **Projected annual participation.** Project the number of unduplicated individuals.
- **Estimated annual component costs.** Project only administrative costs.
- **Length of time the SWBL will run.** Indicate the maximum number of hour participants can receive SWBL (e.g. 300 hours). Indicated if there is variation in how many hours will be offered to participants.

- **What other administrative costs, if any, will be associated with the SWBL.**
Examples include workers compensation, payroll taxes paid by the employer, and costs, direct or indirect costs associated with training and administering the SWBL. able G.XIX. Subsidized Work Experience: Internship – Subsidized by E&T

Details	Internship – Subsidized by E&T (WBLI - SUB)
Description of the component	N/A
Target population	N/A
Criteria for participation	N/A
Geographic area	N/A
E&T providers	N/A
Projected annual participation	N/A
Estimated annual component costs	N/A
Length of time the SWBL will run	N/A
Other administrative costs associated with SWBL	N/A

Table G.XX. Subsidized Work Experience: Pre-Apprenticeship– Subsidized by E&T

Details	Pre-Apprenticeship– Subsidized by E&T (WBLPA- SUB)
Description of the component	N/A
Target population	N/A
Criteria for participation	N/A
Geographic area	N/A
E&T providers	N/A
Projected annual participation	N/A
Estimated annual component costs	N/A
Length of time the SWBL will run	N/A
Other administrative costs associated with SWBL	N/A

Table G.XXI. Subsidized Work Experience: Apprenticeship – Subsidized by E&T

Details	Apprenticeship – Subsidized by E&T (WBLA- SUB)
Description of the component	N/A
Target population	N/A
Criteria for participation	N/A
Geographic area	N/A
E&T providers	N/A
Projected annual participation	N/A
Estimated annual component costs	N/A
Length of time the SWBL will run	N/A
Other administrative costs associated with SWBL	N/A

Table G.XXII. Subsidized Work Experience: Transitional Jobs – Subsidized by E&T

Details	Transitional Jobs – Subsidized by E&T (WBLTJ - SUB)
Description of the component	N/A
Target population	N/A
Criteria for participation	N/A
Geographic area	N/A
E&T providers	N/A
Projected annual participation	N/A
Estimated annual component costs	N/A
Length of time the SWBL will run	N/A
Other administrative costs associated with SWBL	N/A

Table G.XXIII. Subsidized Work Experience: Work-based learning - Other - Subsidized by E&T

Details	Work-based learning - Other - Subsidized by E&T (WBLO - SUB): STATE agency must provide description)
Description of the component	N/A

Target population	N/A
Criteria for participation	N/A
Geographic area	N/A
E&T providers	N/A
Projected annual participation	N/A
Estimated annual component costs	N/A
Length of time the SWBL will run	N/A
Other administrative costs associated with SWBL	N/A

Estimated Participant Levels

Complete the Estimated Participant Levels sheet in the Excel Workbook projecting participation in E&T for the upcoming Federal FY. Use the numbers in the Excel Workbook as a reference to answer the question below.

- a) If less than 20% of E&T participants are expected to receive participant reimbursements, please provide an explanation.

N/A

I. Contracts/Partnerships

For each partner/contractor that receives more than 10% of the E&T operating budget, complete the table below. If all partners receive less than 10% of the budget, provide the information in the table for the five MPIs who receive the largest total amount of E&T funding. Partners are the entities that the STATE agency has contracted with or has agreements (MOUs or MOUAs) with for the delivery of E&T services. All partner contracts must be available for inspection by FNS as requested. (Note: All E&T partners and contracts will be included in the Contract and Partnership Matrix in the Operating Budget Excel Workbook.)

Table I.I. Contractor/Partner Details

Contract or Partner Name:	The Mission Project Inc.
Service Overview:	Case Management & Supervised Job Search
Intermediary:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Components Offered:	Supervised Job Search

Contract or Partner Name:	The Mission Project Inc.
Credentials Offered:	Yes
Participant Reimbursements Offered:	Yes
Location:	Territory-wide
Target Population:	50
Monitoring of contractor:	Monitoring will be conducted bi-weekly.
Ongoing communication with contractor:	All communication will be provided electronically and in person
Total Cost of Agreement:	\$49,970.00 (VI estimated cost for each 50 participants to be roughly \$1,000 for the FY)
Eligible for 75 percent reimbursement for E&T Services for ITOs:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
New Partner:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Table I.II. Contractor/Partner Details

Contract or Partner Name:	N/A
Service Overview:	
Intermediary:	<input type="checkbox"/> Yes <input type="checkbox"/> No
Components Offered:	
Credentials Offered:	
Participant Reimbursements Offered:	
Location:	
Target Population:	
Monitoring of contractor:	
Ongoing communication with contractor:	
Total Cost of Agreement:	
Eligible for 75 percent reimbursement for E&T Services for ITOs:	<input type="checkbox"/> Yes <input type="checkbox"/> No
New Partner:	<input type="checkbox"/> Yes <input type="checkbox"/> No

Table I.III. Contractor/Partner Details

Contract or Partner Name:	N/A
Service Overview:	
Intermediary:	<input type="checkbox"/> Yes <input type="checkbox"/> No
Components Offered:	

Contract or Partner Name:	N/A
Credentials Offered:	
Participant Reimbursements Offered:	
Location:	
Target Population:	
Monitoring of contractor:	
Ongoing communication with contractor:	
Total Cost of Agreement:	
Eligible for 75 percent reimbursement for E&T Services for ITOs:	<input type="checkbox"/> Yes <input type="checkbox"/> No
New Partner:	<input type="checkbox"/> Yes <input type="checkbox"/> No

Table I.IV. Contractor/Partner Details

Contract or Partner Name:	N/A
Service Overview:	
Intermediary:	<input type="checkbox"/> Yes <input type="checkbox"/> No
Components Offered:	
Credentials Offered:	
Participant Reimbursements Offered:	
Location:	
Target Population:	
Monitoring of contractor:	
Ongoing communication with contractor:	
Total Cost of Agreement:	
Eligible for 75 percent reimbursement for E&T Services for ITOs:	<input type="checkbox"/> Yes <input type="checkbox"/> No
New Partner:	<input type="checkbox"/> Yes <input type="checkbox"/> No

Table I.V. Contractor/Partner Details

Contract or Partner Name:	N/A
Service Overview:	
Intermediary:	<input type="checkbox"/> Yes <input type="checkbox"/> No
Components Offered:	

Contract or Partner Name:	N/A
Credentials Offered:	
Participant Reimbursements Offered:	
Location:	
Target Population:	
Monitoring of contractor:	
Ongoing communication with contractor:	
Total Cost of Agreement:	
Eligible for 75 percent reimbursement for E&T Services for ITOs:	<input type="checkbox"/> Yes <input type="checkbox"/> No
New Partner:	<input type="checkbox"/> Yes <input type="checkbox"/> No

J. Budget Narrative and Justification

Provide a detailed budget narrative that explains and justifies each cost and clearly explains how the amount for each line item in the operating budget was determined. Note that the E&T STATE plan is a public document and must be made available to the public upon request, so the budget should not identify individual names or salaries that are not subject to public disclosure requirements. STATE agencies should note that the direct costs noted below are exclusively those attributed to the STATE and local SNAP agencies.

Table J.I. Direct Costs

Salary/Wages: List staff positions in FTE and time spent on the project. Example: E&T Program Manager - \$60,000 x .50 FTE = \$30,000 5 E&T Counselors - \$25,000 x 1.00 FTEs x 5 = \$125,000	30% of salary (\$65,000 x .3FTE = \$19,500)
Fringe Benefits: If charging fringe and benefits to the E&T program, provide the approved fringe rate.	FICA/Medicare = 1,491.75 Health Ins. = 2,593.58 Workman's Comp = 150.79 Retirement = 4,582.50 Total <u>\$8,818.62</u>
Contractual Costs: All contracts and partnerships should be included in the "contracts and partnerships" matrix of the E&T STATE Plan Operating Budget Workbook. Briefly summarize the type of services contractors/partners will provide, such as direct E&T program services, IT services, consulting, etc.	Direct E&T program services

Non-capital Equipment and Supplies: Describe non-capital equipment and supplies to be purchased with E&T funds.	None
Materials: Describe materials to be purchased with E&T funds.	Laptops, docking stations & accessories; Printer and ink cartridges; office supplies; outsource of printing of E&T brochures/flyers (\$11,711.38)
Travel & Staff Training: Describe the purpose and frequency of staff travel charged to the E&T program. This line item should not include E&T participant reimbursements for transportation. Include planned staff training, including registration costs for training that will be charged to the E&T grant.	E&T Annual or Provider Conference, to include registration cost, airline tickets, hotel stay, transportation or inter-island travel. (\$10,000)
Building/Space: If charging building space to the E&T program, describe the method used to calculate space value.	None
Equipment & Other Capital Expenditures: Describe equipment and other capital expenditures over \$5,000 per item that will be charged to the E&T grant. (In accordance with 2 CFR 200.407, prior written approval from FNS is required.)	None

- a) **Indirect Costs.** Indirect costs (also called overhead costs) are allowable activities that support the E&T program but are charged directly to the STATE agency. If using an indirect cost rate approved by the cognizant agency, include the approval letter as an attachment to the E&T STATE plan.

None

- b) **Participant Reimbursements (Non-Federal plus 50 percent Federal reimbursement).** Participant reimbursements should include the total participant reimbursement amount from the contracts/partners matrix of the E&T STATE Plan Operating Budget Excel Workbook, as well as any participant reimbursements the STATE agency plans to provide.

\$20,000.00