![Pennsylvania DEPARTMENT OF HUMAN SERVICES logo]

DATE: 1/16/15

OPERATIONS MEMORANDUM   15-01-05

SUBJECT: Supplemental Nutrition Assistance Program (SNAP) Employment and Training Program Changes

TO: Executive Directors

FROM: Tom Strickler
              Director
              Bureau of Operations

Purpose

    To inform County Assistance Offices (CAOs) of the changes in the SNAP Employment and Training (E&T) Program, which includes changes in special allowance (SPAL) eligibility. These changes are effective immediately.

Background

    A recent audit by the Food and Nutrition Service (FNS) identified child care payments and SPALs were authorized for individuals who either did not qualify for SNAP E&T participation or were no longer participating in a SNAP E&T activity, therefore ineligible for SPALs.

Discussion

    Participation in SNAP E&T is voluntary (SNAP benefits are not affected if an individual stops participating or chooses not to participate) and is available to SNAP households that are not receiving TANF. SNAP E&T activities are designed to lead participants to employment and are either CAO-directed or offered through KEYS. The CAO is responsible for explaining the SNAP E&T program, coordinating participation and determining eligibility for SPALs.

    Updates are being made to the SNAP Handbook, Chapter 535, in response to the FNS audit. SNAP E&T changes are as follows:

SNAP SPAL ELIGIBILITY HAS CHANGED – SOME PEOPLE WILL NO LONGER QUALIFY:

IF	THEN
An individual has been authorized for Diversion and is within the Diversion period	The individual may not enroll in SNAP E&T or receive SNAP SPALs during the Diversion period. **7 CFR 273.7(d)(ii)(D)(2)**
CAO Actions:	

1. Check TANF benefit history before enrolling in SNAP E&T and issuing SNAP SPALS.
2. Do not issue SNAP SPALs to TANF or Diversion recipients, including those within the Diversion period.
3. When discussing Diversion as an alternative to TANF, explain ineligibility for SNAP E&T participation and SPALs.

Important: Continue to give the Diversion recipient a [Potential Eligibility for Child Care Subsidy](#) form (PA 1696) to take to CCIS. **Diversion child care policy remains unchanged.**

IF	THEN
An individual is the specified relative/caretaker of a TANF child, but does not receive TANF for themselves (known as a TANF child-only case)	The individual may enroll in SNAP E&T and receive SPALs to support participation, but the household is not eligible for child care through TANF or SNAP. **55 Pa Code 168.1(a) and 7 CFR 273.7(d) (4) (1).**
CAO Actions:	

1. Check the household's benefit information before enrolling in SNAP E&T and issuing SNAP SPALs.

2. Explain ineligibility for TANF and SNAP child care if the individual is the specified relative/caretaker of a TANF child but does not receive TANF for themselves.

3. Suppress the *715 – Letter of Potential Child Care Eligibility Notice* by de-selecting the check mark in the box titled 'Issue', when entering the SNAP E&T Activity (CSIETP) and ETP Project Enrollment (CSPREN) Screens in CIS. Prepare a

> manual PA-162 notice using **Attachment 1.**
>
> 4. Scan a copy of the completed PA-162 into the record, email a copy to the Bureau of Policy at ra-pwbop.detp@pa.gov, and mail the original to the SNAP E&T participant.
>
> **Important:** Households affected by this policy change may continue to receive SNAP child care through their next renewal if otherwise eligible. At which time, the PA-162 in **Attachment 1** must be sent notifying the household of child care ineligibility through TANF and SNAP.
>
> **Reminder:** Specified relatives who are disqualified from RESET (DS eligibility status) are not eligible for SNAP E&T or SNAP SPALs.

NEW SNAP E&T REQUIREMENTS FOR BOTH PARTICIPANT AND CAO:

IF	THEN
An individual is enrolled in SNAP E&T, which includes the request and receipt of SNAP SPALs	**The individual** shall provide verification of participation in their SNAP E&T activity to the CAO at least monthly*. The E&T Weekly Activity Verification Form (PA 1895) can be used for SNAP clients. **The CAO** must data-enter and document participation information in the client's record at least monthly.

CAO Actions:
1. Communicate verification requirements and establish a plan with the client. Record the plan and monthly due date on the Employment Development Plan (EDP) and in the narrative.
2. Explain ineligibility for SPALs and child care if ongoing participation verification is not received.
3. Scan verification items into the case record and data enter actual hours of participation into the E&T Activity Tracking Screen (CSIETP) promptly upon receipt, but no later than by the 10th day of the following month.

4. At least monthly:
    a. Data enter actual hours of participation into the E&T Activity Tracking Screen (CSIETP), and
    b. Scan verification items into the case record, and
    c. Enter a narrative into Case Comments about SNAP E&T participation

Important: SNAP E&T has a minimum requirement of 12 hours per month or as many hours as needed to successfully complete the activity recorded on the EDP.

*KEYS works directly with the KEYS participant and is responsible for data entering their participation information into CWDS on a weekly basis.

IF	THEN
SNAP E&T participation ends: • Participation verification is not received by the CAO; • The SNAP E&T Activity is completed; • The individual stops participating; • Participation status is unknown	**The individual** is terminated from the SNAP E&T program and is ineligible for SNAP SPALs including child care. **The CAO** must send the individual an Advance PA-162A Notice and close all ETP screens in CIS.

CAO Actions:

1. Send an Advanced Notice (PA-162A) discontinuing SNAP E&T / SPAL eligibility. Scan the notice into the record and enter a case comment narrating the action

2. Use the appropriate Activity Termination Code to close the ETP Activity Tracking (CSIETP) screen and the ETP Project Enrollment (CSPREN) screen after the expiration of the Advance Notice.

    ✓ SNAP – incomplete activity or failed to verify participation   Term Code 2
    ✓ SNAP – successful termination - obtained employment   Term Code 4
    ✓ SNAP – successful termination - activity completed   Term Code 5

Important: These codes will be used to report the success of SNAP E&T to FNS.

<u>Next Steps</u>

1. Ensure that the changes introduced in this OPS Memo are initiated upon receipt of this Memo.

2. Direct questions to the BOP – Division of Employment and Training Programs – Policy Unit at 717-787-1302.