



Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T) Standards and Guidelines

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1. Introduction

The SNAP E&T program is designed to assist SNAP recipients by improving their ability to obtain regular employment, increase their earnings, and reduce their dependency on public assistance.

Individuals apply for SNAP benefits through Texas Health and Human Services Commission (HHSC) and are referred to Workforce Solutions for assistance with employment.

These guidelines clarify who must participate with Workforce Solutions and who can choose to volunteer for specific benefits or services. They outline the procedures for participation, including documenting, verifying, and recording compliance, as well as the processes and timelines for penalizing those who don't cooperate.

It's essential for individuals to comply with federal and/or state laws to access certain public assistance benefits. The goal of requiring participation is to help public assistance recipients find employment, keep their jobs, increase their income, or secure better job opportunities.

Our services are available to all individuals and include job matching based on education and skills, professional advice on job search strategies, insights into local job markets, guidance on education and training, and assistance in securing financial support for job search activities, work, or education.

For individuals required to participate, there are specific requirements regarding the time spent on work readiness and work-related activities, instructions on effectively combining different activities, the need to demonstrate cooperation, and consequences for failing to meet requirements or prove compliance.

In cases of uncertainty, it is crucial for staff to document the action(s) taken and the justification in a case note for record-keeping and accountability purposes.

2. Requirements for Participation

2.1 Who Must Participate?

Individuals receiving or applying for SNAP benefits are required to participate with Workforce Solutions, unless excused by HHSC. Individuals excused by HHSC may volunteer to participate but must meet cooperation requirements.

Mandatory participants include:

- Individuals aged **18 but less than 53 years** of age who are employed less than 20 hours per week, unemployed or on temporary lay-off, categorized as “able-bodied adults without dependents” or ABAWD;
- Individuals aged **16 through 59 years** of age who are employed less than 30 hours per week, unemployed or on temporary lay-off, categorized as “general population” and called in by us; and
- ABAWDs or general population individuals who have completed a penalty for noncooperation and are now eligible to participate.

Individuals who may volunteer to participate (i.e., those exempt from work requirements) include:

- ABAWDs employed at least 20 hours per week;
- Individuals meeting federal SNAP exemptions;
- SNAP participants employed or self-employed at least 30 hours per week or earning at least \$217.50 per week (minimum wage multiplied by 30 hours);
- Students enrolled at least half-time in a degree or certificate program; and
- Other exempt general population customers.

2.2 How Do We Know Who Must Participate?

HHSC assigns specific work codes to individual SNAP recipients, which can be verified through the case management system on the HHSC Information Ribbon, or HHSC’s case management system, Texas Integrated Eligibility Redesign System (TIERS). This determines whether an individual must participate with Workforce Solutions.

- The case management system includes outreach pools for SNAP recipients. Individuals with mandatory HHSC work codes fall into the SNAP ABAWD pool and must participate with Workforce Solutions. Those in the SNAP General Population outreach pools with mandatory work codes must participate if called in.
- Individuals with mandatory work codes who voluntarily participate in SNAP E&T (not outreached by Workforce Solutions) must also meet participation requirements. Failure to participate as required initiates procedures for requesting a penalty by Workforce Solutions staff.

2.3 Who Do We Outreach?

We send outreach letters to mandatory SNAP recipients (ABAWD and General Population) who fall into the outreach pool, either by mail or email if an email address is on file. Additional outreach methods may include phone calls, text notifications, ***or internal messaging through the case management system, but only in addition to mailing a physical letter.***

Note: Outreach letters should be sent to all mailing addresses listed in the case management system. If a letter is returned, staff must document the return in case notes.

All outreach attempts must be documented in case notes and contain:

- Time, date, and location for the mandatory customer to report for activities,
- Name and contact number of a Workforce Solutions Office representative,
- Opportunity to provide a valid reason for non-attendance by the scheduled date, and
- Consequences for noncooperation.

2.4 Workforce Orientations

Individuals required or volunteering to participate with Workforce Solutions must attend a workforce orientation, either in person or virtually, as a condition to receive SNAP benefits. The orientation aims to familiarize participants with Workforce Solutions' services and activities to facilitate their job search and employment goals. The workforce orientation must include:

- ***Completion of the Wagner-Peyser application, Work Readiness Assessment, and SNAP Program Application in WIT***

Note: When customers are outreached, a registration-only account is created for the individual. Staff must work with the customer to complete their registration.

- ***Guidance on job search techniques and local labor market information***
- ***Job counseling and personalized assistance***
- ***Job search support and daily job referrals***
- ***Help with applications and résumés, including access to resource room facilities (computers, phone, fax)***
- ***Information on available support services upon securing employment***
- ***Determination of preferred communication methods and contact frequency with staff***
- ***Requirements for participation in allowable SNAP E&T activities, with expectations for immediate and ongoing engagement***

- ***Information on the consequences of nonparticipation for mandatory participants and good cause when an individual is unable to participate.***
- ***HHSC exemptions and benefits for exempt participants voluntarily engaging in SNAP E&T activities.***
- ***Information on the right to appeal adverse decisions made by Workforce Solutions.***

Staff must assess each participant to determine appropriate activities before placement in job search. If a participant is job-ready, staff must provide professional advice and resources for securing employment, including job search activities and referrals, and job readiness such as resume and interview assistance, if needed. If barriers like lack of a high school diploma are identified, staff must coordinate connections to Adult Basic Education (AEL) services.

Staff must also discuss the participant's long and short-term career goals to develop a collaborative Individual Employment Plan (IEP) that includes steps to overcome identified challenges, expected completion timelines, and action steps for employment. Staff can refer to Creating an Individual Employment Plan in WIT for detailed steps to document an IEP in WIT.

For ABAWD participants, staff must notify HHSC of initial SNAP E&T participation using the Work Requirement Verification form (Form H1822). ***Staff must fax the completed form to HHSC immediately following the SNAP orientation.*** Staff must enter a case note that includes:

- A statement indicating that Form H1822 was sent to HHSC,
- The date the form was submitted to HHSC, and
- A statement that Form H1822 and fax confirmation are stored in the document management system.

All allowable SNAP E&T activities are accessible to SNAP E&T participants immediately following the orientation, and as funding permits. Workforce Solutions staff should also leverage funding through co-enrollment in other allowable workforce programs, such as Workforce Innovation and Opportunity Act (WIOA) or partnerships with local organizations.

Staff must keep services open for all SNAP E&T participants (ABAWDs and General Population) until they obtain employment or are no longer eligible for the SNAP E&T program.

Staff must document the orientation in case notes and have the participant sign the IEP.

2.5 Reconsiderations

Occasionally, HHSC may assign an incorrect work code, or an individual may have special circumstances warranting an exemption from mandatory participation. When such issues arise or an individual reports qualifying for an exemption, we refer the case back to HHSC for reassessment.

Staff do not reassess eligibility for all SNAP recipients attending an orientation. However, if during a SNAP orientation an individual indicates eligibility for a federal exemption or if staff determines the individual is unsuitable for employment or training activities, ***they must within 24 hours of receiving the information:***

- Complete and fax Form H1817 to HHSC requesting reconsideration of the individual's work code;
- Provide the reason for the determination and recommendations for next steps in the "Comments" section of the 1817;
- Record the reconsideration request in the case management system under the Good Cause Ribbon;
- Document in case notes:
 - A statement that Form H1817 was sent to HHSC;
 - The date Form H1817 was sent to HHSC;
 - The reason for the reconsideration; and
 - A statement that a copy of the form and fax confirmation are maintained in the document management system;
- Enter completion dates for all goals and objectives in the customer's IEP; and
- Close all SNAP E&T services and support services unless the reconsideration is due to the individual entering full-time employment.
Leave the SNAP Program Application open in case the individual returns within 90 days.

Note: Staff must actively seek ways to involve individuals in SNAP E&T activities and submit Form H1817 to HHSC if they cannot participate.

If the reconsideration is for reasons other than employment of 30 hours or more per week, staff may determine whether an exempt individual can voluntarily participate in SNAP E&T activities (before closing the SNAP E&T Program Application) based on:

- A discussion with the exempt individual regarding whether they wish to voluntarily participate; and
- Available funding.

If HHSC does not process the reconsideration, an individual may reappear in the outreach pool 61 days after closing the SNAP E&T Program Application. Tracking Unit staff must first review the individual's HHSC and Benefits Information Ribbons in the case management system for work code updates before sending an outreach letter. If the case management system does not reflect a work code change, review the case information in TIERS or contact a local HHSC office by phone or e-mail to obtain the individual's work registration status. Depending on HHSC's response, the individual either resumes participation if the reconsideration is denied or does not resume if the reconsideration is pending or approved.

2.5.1. HHSC Regional Support Team

If HHSC does not change an individual's work code or take requested action, staff must contact HHSC's Regional Support Team, a centralized unit to handle such requests.

Before contacting the HHSC Regional Support Team, staff should follow these procedures:

- Continue submitting Form H1817 as appropriate
- Initiate penalties through WIT Sanction Ribbon if necessary
- Allow HHSC time (usually five business days) to process actions
- If HHSC does not act as requested, email oes_ccc_ic@hhsc.state.tx.us with the:
 - Customer's name
 - HHSC case #
 - Specific issue
 - When circumstances require immediate action, include "Need by (Date)" or "Urgent" in the subject line of email.
 - If there are multiple inquiries, email each issue separately.

Staff must document the communication with HHSC in case notes.

3. Participation Activities

3.1 What are the Activity Requirements?

SNAP E&T activities include job search, job readiness, education and training, and work activities to prepare participants for employment.

Staff must assess each individual to determine the most suitable activity(ies) based on their circumstances and may combine activities to meet participation requirements. ***For example, to facilitate a quick return to work or entry into the workforce for an individual with limited work history, staff may offer work experience opportunities to enhance employability. As participants engage in activities and complete actions and goals in their IEP, staff must update the Work Readiness Assessment and goals and objectives in the individual's IEP to address the removal of barriers during participation.***

For mandatory SNAP E&T participants ineligible to work in the U.S., staff must provide appropriate educational programs such as Adult Basic Education. If no suitable services are available, staff must initiate a good cause determination, documenting services offered in case notes.

Individuals tagged in SNAP E&T may cooperate by engaging in the following activities:

SNAP E&T Activities Classified for Cooperation
Job Search and Job Readiness Activities <ul style="list-style-type: none">• Supervised job search (counseling, online job search, hiring events, job development, job placement, etc.)• Self-directed job search (job fairs, interviews, applying for jobs, etc.)• Job skills training• Financial literacy
Non-Vocational and Vocational Education and Training <ul style="list-style-type: none">• Basic education (literacy, ABE/GED or High School Equivalency (HSE) preparation, English as a Second Language (ESL))• Occupational/vocational training• Other non-vocational education

Work

- Workfare (ABAWD only)
- Work experience
- TAA work programs

Note: Unsubsidized employment does not count towards cooperation unless combined with another activity. Hours of unsubsidized employment can be subtracted from required cooperation hours.

The following chart summarizes the basic time participation requirements for cooperation in SNAP E&T.

WORKFORCE SOLUTIONS BASIC PARTICIPATION REQUIREMENTS FOR COOPERATION	
Family Situation	Cooperation Requirement (Total average hours)
SNAP E&T	<p>ABAWD Mandatory and Exempt (Volunteer)</p> <p>30 hours/week</p> <ul style="list-style-type: none"> • If in Workfare, FLSA determines required hours. • If exempt volunteer and working 20 hours per week or more, additional hours in other activities up to a total of 30.
	<p>General Population Mandatory and Exempt (Volunteer)</p> <p>30 hours/week up to 120 hours per month, including hours in unsubsidized employment</p> <ul style="list-style-type: none"> • If exempt and working part-time, volunteer can participate in activities to reach a total of 30 hours per week (part-time work plus Workforce Solutions activities). • <u>If individual is employed 30+ hours per week (work code P):</u> <ul style="list-style-type: none"> ○ <u>accepts a job offer of at least 30 hours per week; and</u> ○ <u>is scheduled to begin work immediately, or within 30 calendar days of reporting the employment,</u> <p><u>they cannot volunteer to participate.</u></p> • If the individual’s job is not scheduled to begin immediately, but will begin within the next 30 days, they may voluntarily participate in SNAP E&T until the job begins. Tracking Unit staff must not initiate a penalty if the individual does not voluntarily continue participation in SNAP E&T.

Note: Participants must meet the minimum required hours in activities, however staff should encourage them to exceed these hours to account for weeks with split months or unforeseen circumstances preventing participation, such as short absences of one or two days.

3.2 What Are the Limits on Activities?

The maximum monthly participation for SNAP E&T is 120 hours encompassing all activities including work hours, regardless of compensation. Participants scheduled for more than 120 hours cannot be sanctioned for noncooperation once they meet the 120-hour requirement. This cap applies to both SNAP E&T ABAWD and General Population customers but does not apply to exempt customers who volunteer to participate.

Staff must assess participants' progress in their current activity monthly, deciding whether to continue or switch activities to meet employment goals. Staff must document the participant's progress in case notes and update the **Work Readiness Assessment** and goals and objectives in the IEP and as needed.

3.2.1. Job Search and Job Readiness Activities

Job search and job readiness activities prepare participants for employment and enhance employability through:

- Career counseling,
- Job development services,
- Job market information,
- Assistance with job applications, and
- Professional advice on work behaviors.

Participants must make weekly contact with a Workforce Solutions office based on their preferred method of contact and submit proof of their activities weekly in job search and/or job readiness. Staff must review the participant's job search logs and provide professional advice to improve job search efforts to obtain suitable employment.

ABAWD Specifics:

- ABAWDs participate in job search or job readiness activities only in conjunction with workfare.
- An ABAWD is limited to four weeks total in job search unless combined with another activity.
- An ABAWD may only participate in job search and job readiness activities once, following our initial job search tag, unless they did not complete the full four weeks.
- An ABAWD may exceed the four-week limit in job search only if the job search is in conjunction with another allowable activity and the job search is not more than half the time required for cooperation.
- An ABAWD working at least 20 hours per week and volunteering to participate cannot participate in workfare or job search to meet cooperation.

General Population Specifics:

- General Population participants are limited to four consecutive weeks of job search or job readiness and six weeks total in a federal fiscal year (October to September).
- Participants may exceed the four-week and six-week limits only if the job search is in conjunction with another allowable activity and the job search is not more than half the time required for cooperation.
- Participants who reach the annual limit on job search must participate in other allowable activities up to a total of 120 hours each month.

3.2.2. Education and Training Activities

Education and training activities encompass attending high school, adult basic education/GED or HSE preparation, literacy, and English language instruction, some basic skills/nonvocational training, and vocational/occupational training. For participants involved in these activities, staff must:

- ***Develop an IEP that includes goals, objectives and estimated timeframes for completion based on individual factors;***
- ***Assess monthly if the individual is progressing satisfactorily as reported by the educational institution and documenting the progress in case notes;***
- ***Record Measurable Skills Gains (MSG) as achieved (refer to Documenting Measurable Skills Gains)***
- ***Store verification/supporting documents in the participant's file in the document management system;***
- ***Provide counseling or coaching if the participant is not progressing satisfactorily and documenting:***
 - ***A conversation with designated staff from the institution***
 - ***A copy of the participant's grades or evaluation; or***
 - ***A letter or e-mail from designated staff at the institution.***

Participants may be co-enrolled in WIOA-funded education and training programs, which must relate to a high skill, high growth occupation listed on the statewide eligible training provider list (ETPL) by the Texas Workforce Commission (TWC). All WIOA activities must be tracked under SNAP E&T participation and WIOA funding.

Online learning options like courses through Metrix are encouraged to enhance work skills and count towards SNAP E&T participation hours. Staff must determine the appropriate service code based on the type of education/training:

- **214 – Literacy, Basic Skills/ABE or HSE Preparation (Adult/Dislocated Worker); or**
- **414 Literacy, Basic Skills/ABE or HSE preparation (Youth funded); or**
- **269 – Short-Term Work Readiness (Adult/Dislocated Worker); or**
- **459- Short-Term Work Readiness (Youth funded); education to enhance the customer’s employability;**
- **222- ESL – English as a Second Language(Adult/Dislocated Worker); or**
- **447—English as a Second Language (ESL)-Youth Funded**
- **300 Occupational/Vocational Training (ITA); or**
- **328 Occupational/Vocational Training (Non-ITA– training that provides technical skills and knowledge for a specific career and results in a certificate.**

For verification documentation, see the Documentation Requirements for Cooperation Chart.

Participants without a high school diploma or GED/HSE can enroll in educational services based on staff assessment. Those with a diploma or credential are ineligible for GED/HSE classes.

Individuals can also participate in job skills training, which is training or education required by an employer to provide the ability to obtain employment, advance or adapt to the changing demands of the workplace.

Participants can engage in entrepreneurial training to start a business, or help with enhancing a small business they already operate.

Individuals can participate in occupational training that prepares them for a specific trade, occupation, or vocation. In general, time in nonvocational or vocational training should be limited to facilitate the participant becoming employed full-time in a reasonably well-paying job. Hours in training can count towards cooperation for up to 24 months, if the training leads to a license or certificate, except a baccalaureate or graduate degree (i.e., a master’s or doctoral degree).

If the training results in a credential, it must be less than a baccalaureate or advanced degree for the time to count toward requirements. Staff must request a copy of the credential, store it in the participant’s file in the document management system, and update the information in WIT: Common Intake and Performance Outcomes.

3.2.3. Work Activities

Individuals can participate in work activities to meet cooperation requirements such as unsubsidized employment, subsidized employment, workfare (SNAP E&T ABAWDs only), or work experience.

Note: *Unsubsidized employment does not count for cooperation unless it is combined with another activity. Staff may, however, subtract the hours of unsubsidized employment from the number of required hours for cooperation.*

When assigning and tracking time in work activities, adherence to the federal Fair Labor Standards Act (FLSA) rules is crucial. All workfare and unpaid work experience activities are subject to FLSA limitations. Staff must stay updated on FLSA calculations to determine allowable hours for volunteer work each month. Activities covered under FLSA cannot be stacked.

A. Unsubsidized Employment

Unsubsidized employment is full-time or part-time work where wages are paid by an employer.

For SNAP E&T participants, full-time employment is considered:

- Employment of 30 hours per week or more, for which the individual receives wages or compensation from an employer or self-employment; or
- Weekly wages from an employer or self-employment that are at least equal to \$217.50 (30 hours per week multiplied by the federal minimum wage).

If — *during* participation in SNAP E&T— a SNAP recipient enters full-time employment, staff must:

- Complete and send Form H1817 to HHSC requesting reconsideration of the participant's work code;
- Record the reconsideration request in the case management system under the Good Cause Ribbon;
- Document in case notes:
 - A statement that Form H1817 was sent to HHSC;
 - The date Form H1817 was sent to HHSC;
 - The reason for the reconsideration; and
 - A statement that a copy of the form and fax confirmation are maintained in the document management system;

- Enter employment information in the case management system using the Add Employment Ribbon;

Note: Staff with privileges may access TWC’s RACF system to confirm employer details, including TWC UI Tax IDs. The Comptroller’s Office may also maintain other Texas Employer Tax IDs.

- Enter completion dates for all goals and objectives in the IEP related to SNAP E&T;
- Close all activities, services, and support services unless the individual requests to continue participating. ***Leave the SNAP Program Application open in case the individual returns within 90 days.***
- If the individual requests to continue participating, staff must add ***service code 600- Unsubsidized Employment/Employment Entry; and***
- ***651-SNAP E&T Job Retention*** and leave the SNAP E&T Program Application open for 30 days to enter any job retention services that may be requested.

Note: When SNAP E&T retention funds are not available, individuals may receive work-related support services through WIOA funds. Staff must work with the individual to determine eligibility to receive financial assistance paid for with WIOA funds.

If—*prior* to receiving SNAP E&T services—the SNAP recipient enters full-time employment, staff must:

- Complete and send Form H1817 to HHSC requesting reconsideration of the participant’s work code;
- Document in case notes:
 - A statement that Form H1817 was sent to HHSC;
 - The date Form H1817 was sent to HHSC;
 - The reason for the reconsideration; and
 - A statement that a copy of the form and fax confirmation are maintained in the document management system.
- Record the reconsideration request in the case management system under the Good Cause Ribbon;
- Enter employment information in the case management system using the Add Employment ribbon; and
- Not provide job retention services.

Note: For support services, an individual may receive assistance through WIOA funding.

Federal Exemption for Customers Who Become Employed Full-Time

A SNAP recipient is considered to be meeting the federal exemption (Work Code P)—and as such is exempt from SNAP E&T participation—if the individual accepts a job offer of at least 30 hours per week; and

- Is scheduled to begin work immediately or within 30 calendar days of reporting the employment;
- Is a migrant and seasonal farmworker under contract or similar agreement with an employer or crew chief to begin employment within 30 days; or
- ***Is homeschooling a child at least 30 hours per week, which is considered self-employment.***

If the SNAP recipient's job is not scheduled to begin immediately but will begin within the next 30 days, they may voluntarily participate in SNAP E&T activities until the job begins. Workforce Solutions staff must be aware that a penalty cannot be initiated if the individual does not voluntarily continue participation.

Part-Time Employment

Individuals employed part-time (less than 30 hours per week) must participate in additional SNAP E&T activities to meet participation requirements:

- ABAWDs working fewer than 20 hours per week (not meeting work requirements) must supplement with SNAP E&T activities to total 30 hours weekly;
- ABAWDs working 20 hours per week (meeting work requirements) and voluntarily participate must also engage in SNAP E&T activities to meet 30-hour weekly participation.

Note: ABAWDs meeting the work requirements cannot be enrolled in workfare activities.

B. Work Experience

Work experience is a paid or unpaid work assignment designed to move an individual into regular employment as quickly as possible. It provides an opportunity for participants to acquire skills, knowledge, and work habits necessary to gain employment and improves their employability, helping them obtain unsubsidized, full-time employment.

Staff must initiate job search assistance two weeks before a participant completes a work experience placement to help them secure permanent, suitable employment.

Note: *Work-based learning activities (apprenticeships, pre-apprenticeships, internships, and on-the-job training) are no longer allowable SNAP E&T activities, therefore, SNAP E&T funds must not be used to pay for these activities, and they do not count toward SNAP participation. If an individual participating in SNAP E&T can benefit from work-based learning, staff may co-enroll them in WIOA programs.*

C. Workfare

Workfare is a SNAP E&T activity designed to improve the employability of ABAWDs through actual employment experience and/or training in a public or private non-profit organization and help them transition into regular employment. As noted previously, an ABAWD who has not gone to work after four weeks of job search and job readiness activities must engage in workfare to cooperate.

Workforce Solutions staff will send the participant a Workfare Assignment Letter in the third week of job search to notify them of workfare assignments. The letters must include the following information:

- ***Where and when the participant is to report;***
- ***To whom the participant is to report;***
- ***A brief description of the duties to be performed; and***
- ***The number of hours to be worked.***

Workforce Solutions Career Offices are responsible for making sure enough workfare slots are available to serve all ABAWDs who require workfare placement. A workfare slot is defined as one opening that may be filled by one individual.

If no workfare slot is available, staff must work with the individual to participate in another appropriate and allowable activity. If there is no other appropriate or allowable activity, staff must submit a good cause recommendation. See steps to recommend good cause.

Non-Financial Agreements

Workforce Solutions Career Offices must have non-financial agreements in place with workfare providers and must review them annually to determine if there are enough slots to serve ABAWDs needing

placement. Workforce Solutions must have workfare opportunities in all thirteen counties we serve.

If Workforce Solutions or a workfare provider terminates an agreement, staff must immediately send an email to workforcepolicy@wrksolutions.net.

Note: Board staff will send an email to Choicestechnicalassistance@twc.texas.gov to notify TWC of the workfare agreement termination.

3.2.4. Fair Labor Standards Act (FLSA) Limitations

Below are the steps we follow to calculate FLSA limitations:

- For SNAP E&T ABAWD: Calculate the FLSA maximum hours by dividing the SNAP monthly benefit amount by the number of ABAWDs in the household, if more than one, and then divide the result by the federal minimum wage. Fractions of hours should be rounded down to the nearest whole number i.e. 27.58 = 27 hours.
- For SNAP General Population: Calculate the FLSA maximum hours by dividing the household SNAP monthly benefit amount by the federal minimum wage. Fractions of hours should be rounded down to the nearest whole number.
- Calculate the FLSA maximum hours allowed the first time you assign workfare or other volunteer work activities subject to FLSA limits.
- Discuss the maximum hours with the participant and make sure you arrange for additional activities if the FLSA maximum hours don't allow them to meet cooperation requirements in volunteer work.
- When a participant begins workfare or work experience, document FLSA maximum hours for the month in a case note.

Notes: *SNAP ABAWDs cannot combine another SNAP E&T activity with the workfare activity.*

Court-ordered community service is subject to FLSA limitations. Time spent in work required as part of an occupational skills training program may be counted as work experience but is not subject to FLSA limitations. i.e. nursing program clinical. Be sure to have a work experience agreement with the school making the work assignments.

- For subsequent months, verify SNAP benefit amounts each month a participant is engaged in a volunteer work activity (unpaid work experience, workfare, etc.).
 - If benefit amounts have changed from the previous month(s), recalculate the maximum hours and document in case notes as above. Discuss any changes with the participant.
 - If benefit amounts have not changed, document the FLSA maximum hours in case notes as above.
- Workforce Solutions Career Offices are responsible for assigning which staff carry out the above duties and for making sure FLSA calculations are accurate, timely, and correctly entered in case notes.
- Staff may not schedule participants for volunteer activities more than the allowed FLSA hours in any month. If a participant reports hours beyond the maximum allowed, let them know they are not required to volunteer over the maximum and hours beyond the maximum do not count toward cooperation. Document this in a case note.

Note: *DO NOT enter hours above the monthly FLSA maximum hours allowed.*

3.2.5. Sequence of Services

To ensure accurate documentation of services for SNAP E&T participants, staff must follow these steps in the case management system:

- ***First Rule: Begin with Service 153 – Workforce Services Orientation.***
- ***Second Rule: Enter both of the following services:***
 - ***203 – Comprehensive Objective Assessment,***
 - ***205 – Individual Employment Plan (IEP).***
- ***Third Rule: After entering 203 and 205, all other services designated for SNAP E&T are accessible, excluding Job Retention services.***
- ***Fourth Rule: Once Service 600 – Unsubsidized Employment is recorded, Job Retention services become available for entry.***

4. When Do We Excuse Required Participation?

Sometimes participants are unable to meet cooperation requirements for a reason that allows us to excuse them. Good cause is the name we give to a temporary excused absence from Workforce Solutions activities and cooperation requirements for an acceptable reason.

Staff must ensure that a good cause determination meets the following criteria:

- Based on individual or family circumstances;
- Determined through face-to-face or telephone contact;
- Applies to temporary periods preventing attendance at scheduled appointments or participation in ongoing activities;
- Promptly identified upon learning of the change in circumstances;
- Conditional on efforts to address barriers hindering participation;
- Monitored monthly with updates shared with HHSC if circumstances change;
- Extended in the case management system if issues persist after considering available resources;
- Limited to 12 consecutive months per occurrence if due to family violence;
- Used solely to temporarily excuse participants with valid reasons for non-participation, not for administrative purposes.

4.1. Good Cause Determinations

We can grant a participant in SNAP E&T good cause for reasons including, but not limited to:

- Temporary illness or incapacitation;
- Required appointments in a court of law;
- A need to care for a disabled family member in the home;
- A demonstrated lack of available transportation and distance for participation prohibits walking; or a demonstrated lack of a job within reasonable commuting distance;
 - We define a *reasonable commuting distance* to be two hours. In general, a distance is considered reasonable if it takes two hours or less to travel to the childcare provider and from there to the work site or from the work site to the childcare provider and back to the participant's home.
 - For participants who walk to a childcare provider and from there to work, a reasonable distance is considered to be under a total of 1 1/2 miles each way.
 - For individuals who travel by car or bus, a reasonable distance is considered to be two hours or less. Factors such as, the length of time on the bus, the frequency of bus runs, the number of bus connections,

(including wait times) and whether the individual receives rides in addition to others who are also dropped off or picked up must be taken into consideration.

- For individuals who own cars, a reasonable distance is considered to be two hours or less. Reasonable costs are considered to be affordable if the cost of gas, car maintenance and car insurance to travel to a childcare provider is no more than the individual's cost to travel to their work site, shopping centers (including grocery and department stores) or medical facilities.
- A demonstrated inability to find or obtain childcare which is necessary to allow the individual to participate.
- A lack of support services.
- An individual/family crisis or circumstance that precludes participation, such as substance abuse, mental health, or disability-related issues (as long as the participant engages in services to help resolve problems, such as counseling or treatment);
- A circumstance in which the participant is the victim of family violence;
- A receipt of a job referral resulting in an offer of work at a wage impermissibly below the federal minimum wage; or
- A work schedule conflict.

4.2. Guidelines for Determining Good Cause

Staff must assess a participant's situation through a direct conversation before granting good cause and at least monthly to extend a good cause determination. During good cause status, support services are discontinued, except for child care, unless support services are needed to address barriers that resulted in the good cause determination.

- If no reconsideration was requested, staff must keep the SNAP Program Application open and update case notes as necessary.
- ABAWDs claiming good cause must be informed that to continue benefits beyond the three months, they must engage in a SNAP E&T activity before the three-month time limit expires within a 36-month period.
- Staff may request a good cause determination for noncompliant SNAP recipients who are unable to participate due to personal circumstances or crises. This includes situations where mandatory work registrants fail to respond to SNAP E&T outreach letters or fail to meet participation requirements.

4.3. Documenting Good Cause in WIT

Staff must enter good cause under the Sanction tab and the information will automatically populate in the Good Cause ribbon.

Mandatory work registrants can claim good cause *before* or *after* a penalty has been initiated in the case management system, if the penalty has not been imposed by HHSC; that is, the 13-day Adverse Action period has not ended.

- If it is determined before the 13-day adverse action period has expired that an individual did not have good cause, staff must document the reason in case notes. No other action is needed.

Sometimes months after a penalty has been initiated, SNAP recipients contact career office staff to state that they had good cause. To ensure the SNAP E&T Program Application corresponds to the most recent penalty transaction, career office staff must enter good cause by the 30th day after the penalty is initiated (unless reason for good cause occurred after the 13-day adverse action period).

If a penalty was initiated, and career office staff attempts to enter good cause after the adverse action period (even if the penalty has not been imposed), HHSC will deny the request. If this occurs, career office staff must inform the individual that they will need to contact HHSC directly for a good cause determination.

4.3.1. Good Cause Actions Before a Penalty is Initiated

If—*before* a penalty has been initiated—a SNAP participant claims good cause after failing to respond to outreach or failing to participate in SNAP E&T, staff must notify HHSC of the circumstance and that the participant is asking for good cause.

Staff must identify whether the mandatory work participant:

- Can immediately resume participation after HHSC’s approval of good cause is received through the TIERS/WIT interface; or
- Needs more time to address the circumstances or situation.

If the participant needs more time, staff must:

- Receive approval from HHSC through the TIERS/WIT interface;
- Enter one of the available [good cause reasons](#);
- Evaluate good cause monthly to determine whether it still exists; and
- Determine when the individual can resume participation in SNAP E&T.

4.3.2. Good Cause Actions After a Penalty is Initiated

When HHSC receives a penalty, they will:

- Send a notice to the SNAP participant that includes an opportunity to provide good cause;
- If no good cause recommendation has been received from Workforce Solutions, HHSC will send the SNAP participant a letter informing them that their SNAP benefits will be denied; and
- Allow a 13-day adverse action period in which the individual can contact HHSC or Workforce Solutions to claim good cause and avoid denial of benefits.

If a noncompliant SNAP E&T participant contacts HHSC to indicate that they had good cause for not cooperating with SNAP E&T requirements and HHSC determines good cause, Workforce Solutions will be notified through the HHSC Information Ribbon in WIT.

If a noncompliant SNAP E&T participant contacts Workforce Solutions staff to indicate that they had good cause for not cooperating with SNAP E&T requirements and staff determines that the 13-day adverse action period has not expired, Workforce Solutions staff must reopen the SNAP Program Application, remove the exit reason, and enter the good cause determination on the Sanction tab.

If the good cause reason is due to a reason other than the above criteria, staff must:

- Select “19 – Penalty reviewed; good cause recommended” in the case management system under the Sanction Ribbon; Referral Reason; Good Cause Reason “Other;”
- Document in case notes the specific circumstances claimed as good cause by the SNAP participant; and
- Complete the SNAP E&T Noncompliance Report, Form H1816, and submit it to HHSC for review.
- On form H1816, the box in front of “*We explored good cause with the client. Good cause recommended.*” can be checked if you are recommending good cause or left unchecked if you are not recommending good cause.
- The comments section can be used to explain the reason the individual provided for noncooperation.

Note: *This good cause recommendation will be transmitted electronically to HHSC through the TIERSNIT interface to alert HHSC of the good cause claim.*

Example: Charlie Wonder missed his initial SNAP E&T appointment because his daughter was in the hospital. Charlie did not realize he missed the appointment until he received a notice of adverse action

from HHSC stating that his SNAP benefits would be denied in 13 days. He contacted the Workforce Solutions Office to report good cause. Because Charlie contacted the Workforce Solutions Office before the HHSC 13-day adverse action period expired, a Good Cause recommendation was sent through the case management system to HHSC for a determination. If HHSC denies the good cause recommendation, the SNAP E&T services must be closed immediately.

If—*after* the 13-day adverse action period has expired—it is determined that a participant had good cause, staff must:

- Refer the individual back to HHSC to reapply for SNAP benefits or to inquire about how HHSC can reinstate their benefits;
- Not make any type of good cause recommendation;
- Not send any type of penalty in error notice to HHSC; and
- Note the following in case notes:
 - The 13-day adverse action period
 - The date of referral to HHSC
 - The good cause information provided by the SNAP participant.

5. Reporting and Documenting Participation

5.1. How Do Participants Report Time?

Individuals who must cooperate with Workforce Solutions must demonstrate that they are engaging in activities for the required amounts of time. We have a set of specific rules for which participants and staff to follow about documenting (i.e., writing it down) and verifying time (i.e., supporting or proving the participant engaged in an activity for the reported length of time).

We count the actual time spent in most activities (job search and job readiness, education and training, and work), with the exception of self-employment. Tracking Unit staff records attendance in a clock format (hh:mm) in the case management system.

We require verification for time spent in all education/training and work activities for SNAP E&T participants, with the exception of verification of unsubsidized employment (full or part-time employment with wages paid by an employer) and self-employment.

5.1.1 Job Search & Job Readiness Activities

- Participants report their time to us using the Workforce Solutions Job Search Log or other acceptable documents.
- The signatures of Workforce Solutions staff on the completed Workforce Solutions Supervised Job Search Report form serve as documentation for time spent in supervised job search.
- A participant is required to deliver their Job Search Logs to their career office each week, on a specific day designated by the office staff, and in the agreed-upon manner between the individual and staff.
- Staff are responsible for reviewing a Job Search Log for completeness and accuracy and providing advice to the participant about their job search efforts.
- Based on guidance from TWC, participants cannot conduct online job search at home. TWC distinguishes between online job search and applying for a job online. A participant may apply for jobs online at home and document their application efforts on the Job Search Log.

5.1.2 Education and Work Activities

- For education/training, work experience, workfare, and employment, participants report their time and activity to us using the Workforce Solutions Verification of Hours form, paycheck stubs, online documentation sources, or other payroll documentation, attendance records from the service provider, a letter or email directly from the employer, or self-employment invoices, copies of checks, or receipts.

- A participant may fax, mail or hand-deliver Verification of Hours forms to their career office on or by the day office staff have specified to them that the forms or other documentation is due.

5.2. How Do We Review and Record Time?

Participants engaging in SNAP E&T are required to provide documentation for the time spent in any allowable activity.

5.2.1. Calculating and Recording Hours

- It is very important to accurately count and enter the correct cooperation hours for the week. The hours entered in WIT must exactly match the hours that are documented.
- Cooperation hours are recorded weekly from Sunday through Saturday. If the office staff believes the hours a participant has reported are false or inaccurate, staff will investigate before recording the hours and enter a case note to document the participant’s explanation.
- Partial hours can be entered in WIT and will not be automatically rounded at the end of the month. Enter partial hours using a clock format (hh:mm). Example: 1 hour and 15 minutes is entered as 1:15.

5.2.2. Calculation Scenarios

Straight Cooperation: If the participant completed all cooperation hours (with no excused absence or state-approved holiday hours), you may divide the total number of hours by seven when you don’t have verification for daily hours. If the ending calculation results in an even number, record the same number of hours for each day.

Note: *If you have documented hours by day, enter the daily totals.*

Example: Mark worked at Target 35 hours for the week, and you have a pay check showing 35 hours for the entire period. Divide 35 by seven and enter five hours for each day.

Activity: Unsubsidized Employment-35 hours

<i>Sun.</i>	<i>Mon.</i>	<i>Tues.</i>	<i>Wed.</i>	<i>Thurs.</i>	<i>Fri.</i>	<i>Sat.</i>
7/15	7/16	7/17	7/18	7/19	7/20	7/21
5	5	5	5	5	5	5

If the ending calculation results in a decimal format number, divide the total number by seven and record the daily average for 6 days of the week.

Adjust the hours for the remaining day to ensure that the total hours entered, exactly match the total hours documented.

Example: Beth worked at Hobby Lobby 31 hours for the week, and you only have a pay stub showing 31 hours for the entire period. Divide 31 by seven (4.428 rounded up to 4.43) and enter 4.43 hours for six days. Subtract 26.58 (4.43 times six) from 31 and enter the remaining 4.42 hours for one day.

Activity: Unsubsidized Employment-31 hours

<i>Sun.</i>	<i>Mon.</i>	<i>Tues.</i>	<i>Wed.</i>	<i>Thurs.</i>	<i>Fri.</i>	<i>Sat.</i>
7/15	7/16	7/17	7/18	7/19	7/20	7/21
4.43	4.43	4.43	4.42	4.43	4.43	4.43

If the week includes both supervised job search hours and self-directed job search recorded on the job search log, use the daily totals. Enter the daily total in WIT. It is not necessary to divide by 7.

Example: Carol reported 6 hours of supervised job search in a Workforce Solutions office on Monday. She reported 2 interviews – one for 2 hours and the other for 1 hour on Tuesday. She had a combined total of 7 hours job search on Wednesday, 8 hours of supervised job search in our office on Thursday. On Friday she had two interviews- one for 2 hours and one for 1 hour. She applied online to 5 companies totaling 1 hour and worked under our supervision in our office for 2 hours.

Activity: Job Search – 14 hours

<i>Sun.</i>	<i>Mon.</i>	<i>Tues.</i>	<i>Wed.</i>	<i>Thurs.</i>	<i>Fri.</i>	<i>Sat.</i>
7/15	7/16	7/17	7/18	7/19	7/20	7/21
0	0	3	7	0	4	0

Activity: Supervised Job Search – 16 hours

<i>Sun.</i>	<i>Mon.</i>	<i>Tues.</i>	<i>Wed.</i>	<i>Thurs.</i>	<i>Fri.</i>	<i>Sat.</i>
7/15	7/16	7/17	7/18	7/19	7/20	7/21
0	6	0	0	8	2	0

If the week includes an excused absence or state approved holiday or both, first subtract those days from the weekly seven days and divide the total number of hours left by the number of remaining days. Use this method when you don't have a verification of daily hours.

Example: Susan reported 24 hours of Workfare for the week. Her work location was closed for one day on Friday for a state approved holiday. If it had been open, she would have worked an additional six hours. Six hours should be recorded for the holiday on Friday. The remaining 24 hours would be divided by 6 days to calculate the average daily participation for the rest of the week (4 hours each day).

Activity: Workfare: 24 hours				Excused Absence: 6 hours		
<i>Sun.</i>	<i>Mon.</i>	<i>Tues.</i>	<i>Wed.</i>	<i>Thurs.</i>	<i>Fri.</i>	<i>Sat.</i>
7/15	7/16	7/17	7/18	7/19	7/20	7/21
4	4	4	4	4	6	4

If the participant is cooperating in 2 different activities and both activities are open for the entire week, divide the total number of hours by seven and record the daily average. Use this method when you don't have a verification of daily hours.

Example: Susan volunteered for 35 hours and worked for 20 hours.

Activity: Work Experience - 35 hours						
<i>Sun.</i>	<i>Mon.</i>	<i>Tues.</i>	<i>Wed.</i>	<i>Thurs.</i>	<i>Fri.</i>	<i>Sat.</i>
7/15	7/16	7/17	7/18	7/19	7/20	7/21
5	5	5	5	5	5	5

Activity: Unsubsidized Employment-20 hours						
<i>Sun.</i>	<i>Mon.</i>	<i>Tues.</i>	<i>Wed.</i>	<i>Thurs.</i>	<i>Fri.</i>	<i>Sat.</i>
7/15	7/16	7/17	7/18	7/19	7/20	7/21
2.86	2.86	2.86	2.86	2.86	2.84	2.86

If the participant is cooperating in 2 different activities and the activities begin or end during the week, enter the actual number of hours per day that they participated.

Example: Robert job searched for 28 hours (7 hours on Sunday, Tuesday, Thursday and Friday). He was hired by Burger King and worked a total of 16 hours on Friday and Saturday.

Activity: Job Search-28 hours

<i>Sun.</i>	<i>Mon.</i>	<i>Tues.</i>	<i>Wed.</i>	<i>Thurs.</i>	<i>Fri.</i>	<i>Sat.</i>
7/15	7/16	7/17	7/18	7/19	7/20	7/21
7	0	7	0	7	7	0

Activity: Unsubsidized Employment-16 hours

<i>Sun.</i>	<i>Mon.</i>	<i>Tues.</i>	<i>Wed.</i>	<i>Thurs.</i>	<i>Fri.</i>	<i>Sat.</i>
7/15	7/16	7/17	7/18	7/19	7/20	7/21
0	0	0	0	0	8	8

If one month ends and another month begins during the week, divide the total number of hours by seven and record the daily average in the appropriate month. Use this method when you don't have a verification of daily hours.

Example: Morgan volunteered for 35 hours July 29 through August 4. Divide 35 by seven and enter 15 hours for July (5 hrs. each day) and 20 hours for August (5 hrs. each day).

March Activity: Volunteer Work-20 hours

<i>Sun.</i>	<i>Mon.</i>	<i>Tues.</i>	<i>Wed.</i>	<i>Thurs.</i>	<i>Fri.</i>	<i>Sat.</i>
7/29	7/30	7/31	8/01	8/02	8/03	8/04
5	5	5	5	0	0	0

April Activity: Volunteer Work-15 hours

<i>Sun.</i>	<i>Mon.</i>	<i>Tues.</i>	<i>Wed.</i>	<i>Thurs.</i>	<i>Fri.</i>	<i>Sat.</i>
7/15	7/16	7/17	7/18	7/19	7/20	7/21

0	0	0	0	5	5	5
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5.2.3. Reporting Cooperation in WIT

- Enter participation hours in the SNAP E&T Application: Attendance ribbon, Attendance Tracker.
 - Select the appropriate year, and month from the drop-down menu
 - Actual Hour Entry Type; select Daily Only. This opens the Daily Actual Completed Hours (ACH) column for editing.
 - Select the link for the desired Activity/Provider
 - Enter the attendance hours in the format hh:mm (00:00)
- Click the Save Attendance button.

6. Penalties for Non-Cooperation

6.1. When and How Do We Penalize?

We impose penalties upon participants who have not cooperated with us. This includes (1) individuals who don't respond to one of our outreach letters and (2) individuals who don't cooperate with requirements.

We do not send non-cooperation letters to individuals we've tagged in SNAP E&T when they fail to cooperate. Instead, they are given a three-day compliance period (see definition below) following the date of noncooperation. During the compliance period, the individual is still considered compliant with the requirements of the SNAP E&T program and staff cannot penalize a participant during the compliance period.

Compliance period—a three-business day grace period that follows a SNAP participant's non-compliance with SNAP E&T program requirements. Holidays are excluded from the compliance period calculations. During the compliance period, the SNAP participant is still considered compliant with program requirements and is not subject to sanctions. Day one of the compliance period begins the day the individual failed to cooperate.

When we initiate a penalty, we start the process for denial of an individual's SNAP benefits.

Remember:

- We verify participation weekly to ensure that participants:
 - Comply with cooperation requirements as set forth in their IEP; or
 - Have good reason for not cooperating.
- There are different rules for discontinuing services for SNAP individuals who volunteer to work with us.
 - We don't initiate a penalty for exempt SNAP participants who volunteer to cooperate then later choose not to cooperate. We do immediately stop any Workforce Solutions financial aid.

6.2. No Response to an Outreach Letter or No Cooperation

Workforce Solutions mails outreach letters to SNAP recipients who are required to cooperate with us and haven't yet received an orientation.

We tailor the letter for each customer group, state the consequences for failing to respond, and give a timeframe for responding.

Customers must respond to our letter no later than ten (10) calendar days from the date of the letter. If the customer fails to respond on the tenth day, we allow them a three-day grace period (see compliance period above) to contact us.

Our procedures for initiating penalties when a customer doesn't respond to an outreach letter by the end of the grace period, are:

- On the fourth day from the date of our outreach letter, a Tracker checks the customer record in the case management system to determine if they responded to our letter. The Tracker looks for one of the following as evidence:
 - A record that the customer participated in an orientation;
 - A rescheduled orientation appointment; or
 - A record of Good Cause.

- If the customer hasn't responded, the Tracker initiates a penalty in the customer's record in the case management system on the fourth day following the three-day compliance period.

Example 1: An outreach letter was mailed to Mr. Smith directing him to attend an orientation by Wednesday, October 7th, but he failed to attend the orientation. Mr. Smith has until close of business on Friday, October 9th, to reschedule or communicate a good cause reason. If Mr. Smith has made no contact by close of business on Friday, October 9th, staff will initiate a penalty the following business day, Monday, October 12th.

Sun - 10/4	Mon - 10/5	Tues - 10/6	Wed - 10/7	Thurs - 10/8	Fri - 10/9	Sat - 10/10
			Customer missed orientation. Day 1 Compliance Period	Day 2 Compliance Period	Day 3 Compliance Period	

Sun - 10/11	Mon - 10/12 Sanction is initiated. Day 4	Tues - 10/13	Wed - 10/14	Thurs - 10/15	Fri - 10/16	Sat - 10/17
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Example 2: Mr. Smith attended a SNAP E&T orientation on Wednesday and decided he did not want to participate in the program. He notified staff on Friday. Unless Mr. Smith changes his mind and decides to stay in the program, staff must initiate a penalty by the close of business on the following Wednesday.

Sun - 10/4	Mon - 10/5	Tues - 10/6	Wed - 10/7 Customer attends orientation	Thurs - 10/8	Fri - 10/9 Customer notifies staff he will not participate in the program. Day 1 Compliance Period	Sat - 10/10
Sun - 10/11	Mon - 10/12 Day 2 Compliance Period	Tues - 10/13 Day 3 Compliance Period	Wed - 10/14 Sanction is initiated. Day 4	Thurs - 10/15	Fri - 10/16	Sat - 10/17

- If the customer provides a good cause reason, Workforce Solutions staff follows the procedures to enter the good cause determination.
- If the customer needs to reschedule their appointment, they must contact Workforce Solutions before the end of the three-day compliance period. Staff must enter in case notes:
 - The date of the rescheduled appointment; and
 - The reason for rescheduling the appointment.
- For any mandatory SNAP E&T customer who notifies Workforce Solutions Office staff that they do not wish to participate in the program, staff must document in case notes that they explained to the customer the consequences of noncooperation.

- Mandatory work registrants who notify Workforce Solutions Office staff that they will not fulfill their SNAP E&T requirements must be granted the same three-day grace period.
- Staff should consider granting good cause if the customer needs to reschedule their appointment more than 30 days out.

Note: *Customers can only reschedule their appointment once.*

- If the customer fails to attend the rescheduled appointment, the three-day compliance period will not start over, and the customer's noncompliance date will be the date of the rescheduled appointment.
- If the customer is found to be in non-compliance and does not have good cause, a sanction is initiated on the fourth day following noncooperation.
- By the fourth calendar day from the date of noncooperation, the SNAP E&T customer must meet one of the following conditions, or a penalty will be initiated:
 - the customer's appointment has been rescheduled,
 - the customer is fully participating, or the customer has claimed good cause.

Staff must take the following actions as appropriate:

- **ABAWD – Required to Cooperate (i.e., Mandatory):** Close all Workforce Solutions activities, services, IEP goals and objectives related to the SNAP Program, and initiates a sanction in the case management system.
- **ABAWD – Volunteer (i.e., Exempt):** Close all Workforce Solutions activities, services, IEP goals and objectives related to SNAP Program. **The Tracker does not initiate a penalty in the case management system.**
- **General Population with Work Requirements (i.e., Mandatory):** For this tag, we do not sanction customers who are scheduled for more than 120 hours in a month and have reached at least 120 hours for that month, unless the customer has not cooperated for the required 30 hours in a particular week in which the total monthly participation hours are less than 120. **This means we don't allow customers to "make up" cooperation hours later in the month.**

When we sanction these customers for non-cooperation, the Tracker closes all Workforce Solutions activities, services, IEP goals and objectives related to SNAP, and initiates a penalty. ***Leave the SNAP Program Application open in case the individual returns within 90 days.***

- **General Population Voluntary Customers (i.e., Exempt):** Close all Workforce Solutions activities, services, IEP goals and objectives related to SNAP. The Tracker does not initiate a penalty.

6.3. Recording Penalties in WIT

We use the Sanction Ribbon to initiate a penalty. We enter all penalties before 5:00 p.m. Penalties entered after 5:00 p.m. will show in the case management system as one day later.

Note: *A penalty cannot be initiated in the same month that the customer has good cause, another penalty has been initiated, another penalty is in effect (the customer's work code for the service month is "Failure to comply with participation requirements"), or another penalty is pending a response from HHSC.*

Also, a penalty cannot be initiated if the customer is ineligible (e.g., is not eligible for SNAP E&T tag) at the time of non-compliance.

6.4. How Do Individuals Come Back?

When a customer faces a penalty, they can regain their benefits and SNAP E&T status by following these steps:

- 1. Reapplication for Benefits: SNAP mandatory work registrants must reapply and be accepted for benefits before we can tag them in SNAP E&T again.***
- 2. ABAWD: If an ABAWD who has been sanctioned and is no longer receiving SNAP benefits wants to regain eligibility, they must:***
 - *Work 80 or more hours within a 30-day period (as monitored by HHSC);*
 - *Participate in and comply with Workforce Solutions services under WIOA or Trade Adjustment Assistance for 80 or more hours;*
 - *Combine work and participation in Workforce Solutions services; or*
 - *Qualify for an exemption.*
- 3. SNAP Recertification: During recertification, HHSC provides Form H1822 to each non-exempt registrant. The recipient must take this form to a Workforce Solutions Office for verification and then return it to HHSC.***
- 4. Our Role:***
 - *Assistance: We inform customers that we can help them with job search and employment needs.*
 - *Reopening Applications: If the customer returns within 90 days of closure, we reopen their SNAP Program Application. If it's been longer than 90 days, we assist them with a Wagner-Peyser Application and an Individual Employment Plan (IEP) in our case*

management system. We also provide job search or readiness assistance and track these services in the system.

- *Verification: After the customer engages in job search or a combination of job search and employment for at least 80 hours, we verify their participation by signing and returning Form H1822 to HHSC.*

Appendix A

Table 1: SNAP E&T Work Codes

Workforce Solutions Supplemental Nutrition Assistance (SNAP) Work Code Descriptions	Work Code	Reconsideration/Good Cause
Mandatory/Employed < 30 hours a week	2	
Mandatory/Not working	3	
Mandatory/Temporarily laid off from job	4	
Mandatory/Registered again after previously serving E&T penalty	R	
Child < 16 or age 16-17 who attends school at least half-time	A	
Three to nine months pregnant	D	
Physically or mentally unfit for employment; or Supplemental Security Income (SSI) applicant or recipient	E	
60 years of age or older	F	
Caring for a child under age 6 years old	G	
Required in home for care of a disabled person	H	
In drug addiction/alcoholic treatment	J	
Receiving/applying for UI benefits	N	
Employed 30 + hours/week; <i>Migrant and seasonal farmworker under contract to begin within 30 days; or Homeschooling child at least 30 hours per week (self-employment)</i>	P	
Choices mandatory or volunteered for Choices	Q	
Student exemption (age 18 or older); <i>or Refugee who is enrolled at least half-time in an English as a Second Language course or an E&T program administered by a refugee contractor.</i>	S	
Disqualified household member	T or Y	
Primary Wage Earner failed to comply with E&T services	U	
Too remote	X	

Appendix B

SNAP E&T Helpful Resources

Refer to The Workforce Hub

Workforce Case [Management](#) System (Workforce Hub)

SNAP E&T Menu

- SNAP Outreach Pool Desk Aid
- SNAP Sanctions Desk Aid
- SNAP Training Guide
- WFCMS Triage Calls Notes

Reports Menu

- **Reports Training Guide**

Appendix C

Table 3: List of Revisions

Note: The guide contains minor editorial changes that are not included on the List of Revisions.

July 2024

SECTION	REVISION
1. Introduction	Updated to include the goal of the SNAP E&T program and referral from HHSC to Workforce Solutions to help individual obtain employment
2.4. Workforce Orientations	Updated component requirements for workforce orientation Added guidance for staff to fax Form H1822 immediately following the orientation
2.5. Reconsiderations	Added guidance for staff to leave SNAP Program Application open in case individuals return within 90 days
3.2.2. Education and Training	Added guidance to record MSG and credential attainment in WIT Updated service codes for online learning courses
3.2.3. Work Activities	Updated service code for Job Retention Services Added homeschooling for at least 30 hours per week under federal exemptions Added guidance for staff to initiate job search assistance two weeks before a participant completes work experience placement Updated procedures for Workfare
3.2.5. Sequence of Services	Added section to align with data entry requirements in WIT
4.3. Documenting Good Cause in WIT	Added guidance for determining good cause and documenting good cause in WIT
5. Reporting and Documenting Participation	Updated guidance on counting actual time spent in most activities with the exception of self-employment Updated data entry for participation hours to clock format
6.5. How Do Individuals Come Back	Updated procedures for how individuals return following a penalty

SECTION	REVISION
2.7 What are Basic Requirements	Removed - Work-Based Learning activities of internship, pre-apprenticeship, apprenticeship, and on-the-job training from the list of allowable activities under SNAP E&T
	Added guidance on participants who are not eligible to work in the United States
2.8.3.3 Work Experience	<p>Added guidance regarding work-based learning activities no longer being allowed under SNAP E&T</p> <p>Suggested WIOA co-enrollment for customers participating in SNAP E&T who may benefit from work-based learning activities</p>
2.9.1.2 (E); Good Cause After Penalty; Page 21	Removed Temporary Interruption
Appendix; Table 1 - Page 37: SNAP Work Codes	<p>Added the following to Work Code P;</p> <ul style="list-style-type: none"> • Migrant and seasonal farmworker under contract to begin within 30 days; • Homeschooling child at least 30 hours per week (self-employment) <p>Added the following to Work Code S:</p> <ul style="list-style-type: none"> • Refugee who is enrolled at least half-time in an English as a Second Language course or an E&T program administered by a refugee contractor. <p>Added the following groups of exempt SNAP E&T individuals: Homeless individuals (HHSC has not provided work codes):</p> <ul style="list-style-type: none"> • Homeless individuals • Veterans • Individuals who are 24 years of age or younger and who were in foster care on the date of turning 18 years of age

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SECTION	REVISION
Section 2: Requirements for	
2.3 Workforce Orientation	Added guidance for staff to document in case notes the customer’s preferred method of contact
2.6 How We Outreach	Added instructions to send outreach letters to all mailing addresses in the TWC Case Management System
2.8.3 Work Activities	<p>Updated FLSA calculation for customers participating in SNAP E&T</p> <p>Updated guidelines for providing service under SNAP E&T retention funds</p> <p>Added guidance for establishing workfare slots for SNAP E&T ABAWDs</p>
2.9 When Do We Excuse Required Participation	Added guidance requiring staff to store a customer’s medical documentation in the document management system in a confidential file