



RHODE ISLAND'S SNAP E&T PROGRAM



LISC RI

RI SNAP E&T is a program of RI DHS managed by LISC RI

This handbook provides guidelines and a standard set of procedures to deliver services under Rhode Island's SNAP E&T program. It will be updated as needed.

Contact us at Local Initiatives Support Corporation (LISC). We are here to help.



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Supplemental Nutrition Assistance Program (SNAP)

The Supplemental Nutrition Assistance Program (SNAP) is a program of the U.S. Department of Agriculture's (USDA) Food and Nutrition Service (FNS).

It is part of the Nutrition Title of the Farm Bill. SNAP is the Nation's largest program for fighting domestic hunger. SNAP, a federally funded and state administered program, helps low-income individuals and families obtain a more nutritious diet by supplementing their income with basic food benefits issued on an electronic benefits transfer (EBT) card that may be used to buy food at grocery stores, supermarkets, convenience stores, and farmers markets. Eligibility and benefit amounts are tied to the Federal Poverty Level (FPL) and based on income, expenses, resources, and the number of individuals in a household.

In Rhode Island, SNAP is administered by the Rhode Island Department of Human Services (DHS). Individuals, couples and families may qualify for benefits if their gross income is less than 185% of the FPL. In 2022, for a family of four, this equates to an annual income of no more than \$55,500 or a monthly income of no more than \$4,625.

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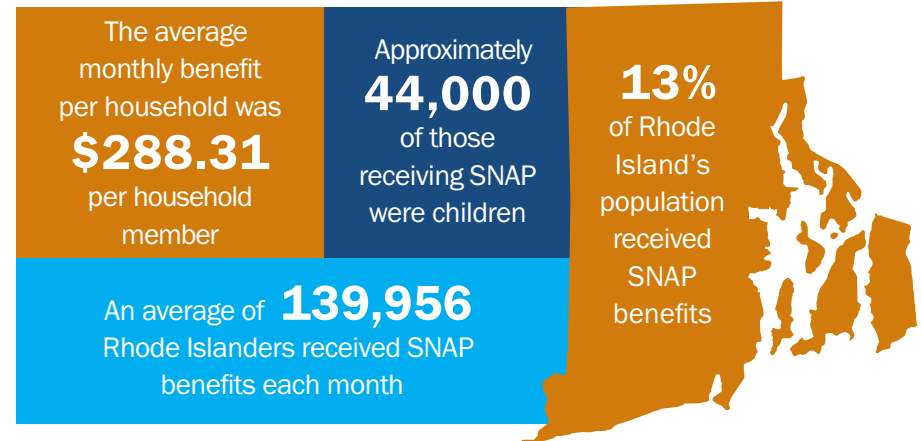
On October 1, 2023, for a family of four, this equates to

an annual income of no more than **\$55,500**

a monthly income of no more than **\$4,625**



In 2022:



- 13 percent of Rhode Island's population received SNAP benefits
- An average of 139,956 Rhode Islanders received SNAP benefits each month
- The average monthly benefit per household was \$288.31 per household member
- Approximately 44,000 of those receiving SNAP were children

More information about SNAP and other programs and services administered by RI DHS, can be found on [DHS's website](#).

Information is also available on [USDA's website](#).

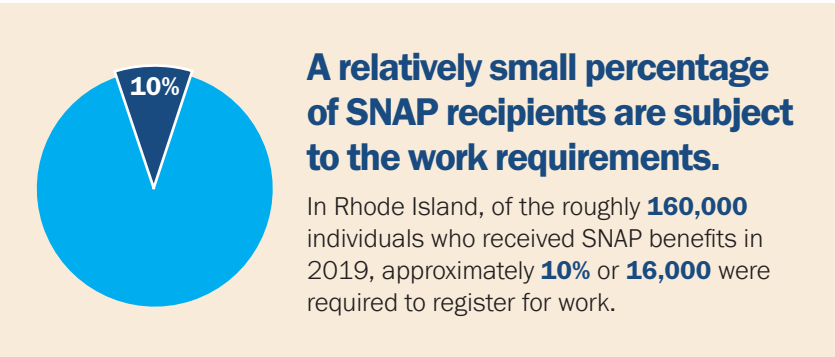
SNAP, Work Requirements and ABAWDs

Work Registrants

Unless someone is exempt from work requirements because of age, disability or another federally defined exemption, c.1, then they must register for work. A relatively small percentage of SNAP recipients are subject to the work requirements. In Rhode Island, of the roughly 160,000 individuals who received SNAP benefits in 2019, approximately 10% or 16,000 were required to register for work.

ABAWDs

Work registrants who are between the ages of 18-54 who are not disabled and have no children in their household are referred to as ABAWDs, or able-bodied adults without dependents. ABAWDs are subject to more stringent work requirements and can only get SNAP for three months in three years if they do not meet special work requirements. This is called the time limit.



To be eligible to receive SNAP benefits beyond the **time limit**, an ABAWD is required to work or participate in qualifying education and training activities for at least 80 hours per month or comply with a workfare program. The time limit on ABAWDs has been part of the law that governs the operation of SNAP since 1996.

States can request to temporarily waive the ABAWD time limit when unemployment is high or when there are more workers than available jobs. For many years, Rhode Island qualified for and chose to waive time limits statewide. As the economy has strengthened, areas within the State no longer qualify for a waiver. ABAWDs who are SNAP customers living in areas of the State where time limits are no longer waived need to take steps to meet the special ABAWD work requirements in order to maintain their benefits. **SNAP Employment and Training (SNAP E&T) provides ABAWDs the opportunity to fulfil the work requirements.**

Information about ABAWDs and Rhode Island's waiver status is available on **RI DHS's website**. You can also contact DHS. See DHS contact information on the first page.

¹ Exemptions include: Physically or mentally unfit for employment; Participating in RIW with a work requirement under the Temporary Assistance for Needy Families (TANF) program; Responsible for the care of a child under six or an incapacitated person; Receiving unemployment benefits; Participating in an alcohol or drug treatment rehabilitation program; Enrolled at least half time in any recognized school, training program, or institution of higher education; 7 or Already working at least 30 hours per week.

SNAP Employment and Training (SNAP E&T)

SNAP E&T was established by Congress through the Food Security Act of 1985.

The purpose of this program is to provide opportunities for non-exempt SNAP recipients to receive the education, training and support needed to successfully enter the workforce and reduce their reliance on SNAP benefits.

Funded by the federal government, SNAP E&T programs are designed and administered at the state and local level. Every state is required to operate an E&T program and receives an annual, formula-based grant from FNS for this purpose. Each year, states must submit an E&T State Plan to FNS for approval. A State's E&T Plan is a programmatic and budgetary document for the upcoming fiscal year. FNS works with state agencies to develop effective E&T programs that are in compliance with SNAP policy and regulations, however, states have a great deal of flexibility in terms of program design.

In Rhode Island, SNAP E&T is administered by DHS. Since 2011, DHS has contracted with LISC to develop and manage the program. LISC manages all of the day-to-day operations of the program and subcontracts with vetted community partners (service providers) to deliver E&T services to eligible SNAP recipients.

Through SNAP E&T, states are able to provide SNAP recipients with education, training, and support to have a significant impact on a participant's ability to focus on their training, complete the program and find meaningful work (*see the chart to the right for specific SNAP E&T services*). It is expected that programs align with the state workforce system, are responsive to labor market needs, and provide the skills and credentials employers are looking for.

SNAP E&T provides participants with a package of services determined prior to enrollment that help ensure participant success. The contents of this package include orientation (optional), an employability skills assessment, enrollment in an E&T component, the provision of a variety of supported reimbursements (participant reimbursements) to alleviate barriers to participation, case management and other services, especially employment coaching. Some providers also offer financial literacy, digital literacy and retention coaching. The Rhode Island program requires that all participants receive case management support through providers as well as DHS E&T staff.

It is important to understand that managing an E&T program requires a commitment from the provider and can be challenging, especially if the provider hasn't established clear procedures and protocol. Providers should have the financial capacity to account for the funds and submit accurate financial reporting. The provider should also have program capacity to dedicate staff to ensure consistent and accurate data management and reporting, maintenance of complete and compliant participant files, and management of the initial and monthly participant eligibility verification process.

Since SNAP E&T is a federally funded program, expenses must be treated as federal funds in the financial system of the organization. Each reporting period, an accounting of direct costs and the non-federal funds used to support them are submitted to LISC for reimbursement. The audit trail lies with the accounting of the non-federal funds. The disbursements providers receive are considered non-federal "cash" and do not need to be handled in the same way, unless they are being used as a source of non-federal funds to support the program.

LISC will provide as much technical assistance and support to assist providers whenever needed.

Through SNAP E&T, states provide SNAP recipients with:

- basic education
- skills training & credentialing
- work readiness training
- job search & job search training
- job retention services
- case management
- career counseling
- transportation
- dependent care assistance
- books, tools, certification fees

Education, training and support needed to successfully enter the workforce



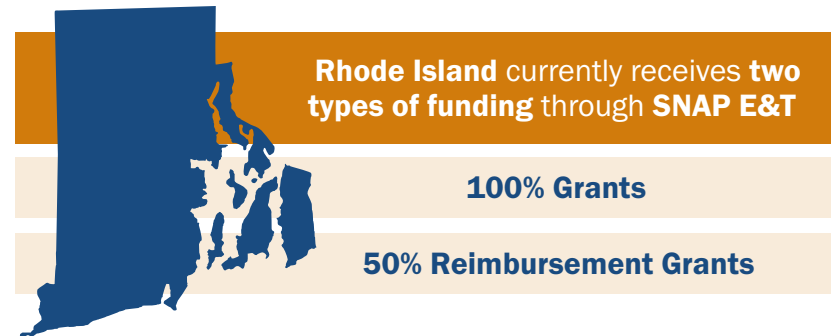
SNAP E&T Funding

SNAP E&T provides a combination of formula grants and reimbursements to states for qualifying expenses. Rhode Island currently receives two types of funding through SNAP E&T:

- **100% Grants:** All states receive annual, formula-based funding to plan and operate a SNAP E&T program. The amount of funding a state receives is based on the number of work registrants receiving benefits in that state. Rhode Island DHS grants its 100 percent allocation to LISC to operate the statewide program, which is used entirely for program administration only.
- **50% Reimbursement Grants:** States receive a 50 percent reimbursement for the costs of qualifying E&T services that are covered upfront with non-federal funding. **This is the funding available to Rhode Island service providers through the State's E&T program.** About 50 percent of funds are not capped. The amount of reimbursement dollars that can be accessed depends on the provider's availability of non-federal funds and the capacity they have to develop, operate and expand an E&T program.
- The other 50 percent of funding can be used for program administration and for participant reimbursements (supports). E&T rules mandate that participants receive these supports.

How the 50 Percent Funding Works

SNAP E&T can overlay onto existing services allowing states to build on programs that are already working, leverage state and private investments, minimize duplication of services and deliver services through the State's workforce system in coordination with Workforce Innovation and Opportunity Act (WIOA) and other federally funded programs.



Any type of non-federal funding that is not being used to match another federal grant is eligible for 50 percent reimbursement when expended on approved E&T services. CDBG is the only federal funds source that can be used to support an E&T support. It is important to confirm that any state funding used is not a federal pass-through (i.e. confirm that it is non-federal to the source).

In its simplest form, 50 percent reimbursement funding works as follows:

1. Appropriate non-federal funding is identified by the provider to fully cover the costs for planned E&T services. Providers are expected to fully fund their E&T program with non-federal funds.
2. Funds are expended providing E&T services to SNAP recipients who are verified as E&T eligible in every month of participation) and accounted for according to federal cost principles.
3. All expenses are invoiced for 50 percent reimbursement from FNS (provider invoices LISC, LISC invoices the State, the State invoices FNS).
4. LISC retains 5 percent of the reimbursement resulting in a 45 percent reimbursement to the provider.

Once received by the State, 50 percent reimbursement funds are considered cash. As cash, they can be used as the non-federal funds for additional E&T programming and reimbursement. This best practice is called "recycling".

Any type of non-federal funding that is not being used to match another federal grant is eligible for 50% reimbursement when expended on approved E&T services.



What can 50% reimbursement funds be used for?



As the non-federal funds to provide additional E&T services for 50% reimbursement (in this case only, funds must be accounted for according to federal cost principles)



To provide more robust supports for participants



To cover costs to hire a career navigator or job retention coach



To build administrative capacity to manage an E&T program



Provide participants with additional services. (e.g. stipends, incentives, mental health and substance abuse counseling)



Note: E&T costs submitted for reimbursement must be directly related to an approved component and be reasonable and necessary. A cost is reasonable if, in its nature and amount, it does not exceed that which a prudent person would pay under the circumstances prevailing at the time the decision was made to incur the cost. Necessary costs are incurred to carry out essential functions, cannot be avoided without adversely affecting program operation, and do not duplicate existing efforts. Providers are encouraged to reach out to LISC and DHS to discuss new and innovative Participant Reimbursement categories and general questions regarding reimbursements.

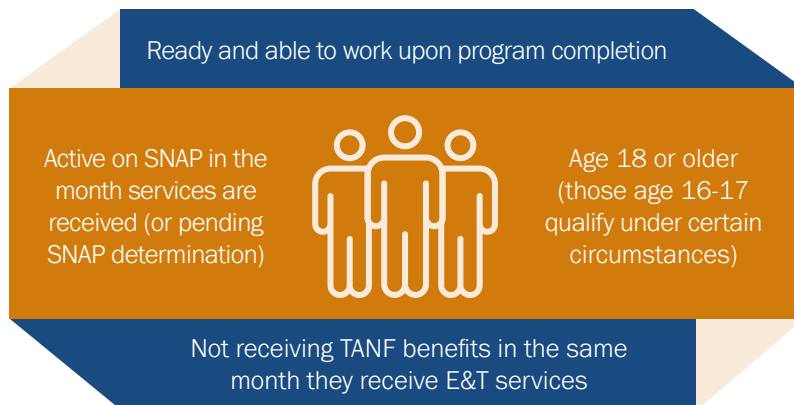
Participant Eligibility and Referral

Eligibility for participation in E&T requires an individual to be:

- Active on SNAP in the month services are received (or pending SNAP determination)
- Not receiving TANF benefits in the same month they receive E&T services
- Age 18 or older (those age 16-17 qualify under certain circumstances)
- Ready and able to work upon program completion

Note: *Individuals who have submitted an application for SNAP benefits and who otherwise meet the program eligibility requirements, may be enrolled in SNAP E&T and included in billing as SNAP pending. If an individual's application is denied, he or she is no longer eligible for E&T services and may no longer be included in billing. A determination of ineligibility does not affect billing and reimbursement for services provided during the period the individual was SNAP pending.*

Who is eligible for participation in E&T?



Service providers are encouraged to assist customers who appear to be eligible for SNAP to apply for benefits.

The DHS SNAP application can be found [here](#).

Checking Initial Eligibility of Potential E&T Participants

An individual may be referred to E&T in one of two ways: through a **Reverse Referral** coming from a service provider to DHS for eligibility verification, or a **Direct Referral** from DHS to a service provider.

In either case, DHS must initially confirm the individual's eligibility to receive E&T services and then monthly for every month an individual participates. E&T providers must follow the eligibility verification process outlined below for every individual they enroll in their E&T program and intend to bill for. DHS's protocols for eligibility verification follows below:

Reverse Referral

When a potential E&T participant is identified, prior to enrollment, a service provider must follow these steps:

1. Have the individual(s) complete and sign a DHS 511A (Appendix C).
2. Send the 511a to DHS using a secure email link to Patricia.laniere@dhs.ri.gov, valerie.mello@dhs.ri.gov and Sleonardi@lisc.org.
3. DHS staff will check the SNAP E&T eligibility of the potential participants and respond with their E&T eligibility within three to five business days.

Direct Referral from DHS

If a SNAP recipient expresses interest in a SNAP E&T program in conversation with a DHS employee, the participant may be referred directly to an E&T provider. A 511 will be sent to the appropriate SNAP E&T provider as verification of SNAP participation and eligibility for E&T participation. If a participant is deemed inappropriate for the chosen training, the class is full or there is another reason the participant will not be enrolling, the provider must complete a Provider Determination form and send it to DHS and LISC. Further guidance is available.

Monthly Eligibility Check (once an individual is enrolled)

1. E&T providers will complete the Eligibility Check List that includes all individuals participating in a component that month. This list must include the individual IDs (provided by DHS during initial check). This list should be sent to Jim Logan (jlogan@lisc.org), Sue Leonardi (sleonardi@lisc.org) and Kayla Arruda (karruda@lisc.org). LISC will send the consolidated list to DHS staff for review.
2. DHS staff will conduct an automated check that will verify the SNAP E&T eligibility of all the participants and will return the list to LISC within five business days.
 - LISC will disaggregate the list and return individual lists to each provider.

Note: *The Eligibility List includes participants' upcoming interim and recertification dates that E&T providers may choose to use to help participants avoid loss of benefits. ABAWD status will also be provided.*

Communicating About Current E&T or Potential E&T Participants Deemed Ineligible in the DHS Check

When an E&T provider receives a response that a participant is ineligible for E&T and wants to discuss the reason for ineligibility with DHS, they should contact Patty Ianiere at Patricia.Ianiere@dhs.ri.gov.

Incorrectly Entered Information on the Monthly Eligibility Check Lists

As DHS staff work the Monthly Eligibility Check lists, they will correct discrepancies in participant information, such as SSN and DOB, and provide the corrected information highlighted in yellow.

LISC will share the corrections with the appropriate E&T provider. It is important that the E&T provider make the corrections to their documents, so the incorrect billing information is not repeated the next month.

DHS will contact LISC if the identified errors are not corrected and resubmitted.

Points of Contact to Support the DHS E&T Eligibility Check Business Process

Patty Ianiere – Patricia.Ianiere@dhs.ri.gov

Valerie Mello – Valerie.mello@dhs.ri.gov

Sue Leonardi – Sleonardi@lisc.org

Jim Logan – Jlogan@lisc.org

Kayla Arruda – Karruda@lisc.org

SNAP E&T Program Elements



Orientation

Although not required, service providers are encouraged to conduct group orientations as a first step to enrollment in E&T. Orientations provide potential participants with an overview of the provider organization, program expectations, and the commitment needed to successfully complete the program.



Assessment

Prior to enrollment in an E&T component, an individual must receive an assessment. The assessment will determine if E&T is an appropriate program for an individual, what component(s) will best meet their interests and skill level, and what barriers to training the participant may be experiencing that participant reimbursements will alleviate and help the individual successfully complete the program and transition to work. Providers are required to maintain copies of all assessment documentation provided and completed by each participant in the participant's file. These files are subject to review by FNS. If a Provider concludes through assessment that the referral is not appropriate for their program, the Provider will contact LISC and DHS E&T staff for outreach and follow-up to assist in case management.

Providers have flexibility in terms of what tools and methods are used to conduct assessments. Some states use a one- or two-page form that the client completes. Others allow the E&T coordinator to objectively assess the client in-person. FNS provides the following list of skills and knowledge that should be evaluated, along with suggested assessment tools:

- Literacy Level (usually through a standardized test)
- Communication Skills (including English proficiency)
 - Standardized test, one-on-one interview
- Education Questionnaire, resume or one-on-one interview
- Employment History
 - Questionnaire, resume or one-on-one interview

- Employment-related, abilities and interests
 - Questionnaire, one-on-one interview, or online assessment
- Employment barriers and steps necessary to overcome barriers
 - Questionnaire or one-on-one interview

Providers may wish to have clients use the skills profiler tool to determine employment-related skills/abilities and career goals.



Individual Employment Plans

Individual employment plans (IEP) can be a valuable tool to document the information gathered from client assessments. While plans are not required, they are strongly encouraged to help track participant progress.

An Individual Employment Plan could include:

- Employment objectives
- Components, credentials and services needed to achieve these objectives
- An approximate timeline for completing education/training and services
- Weekly time commitment
- Services and supports client will receive
- Statement of client's responsibilities
- Signature of participant and appropriate service provider staff (e.g. employment counselor, case manager, intake specialist)



Career Pathway

A workforce development strategy used to support workers' transitions from education into and through the workforce. This strategy has been adopted at the federal, state and local levels in order to increase education, training and learning opportunities for America's current and emerging workforce.



E&T Components

Components are the foundation for E&T. Components are the classes a participant enrolls in to learn a skill, earn their GED, find a job after training or learn the soft skills needed to succeed in the workplace.

- Basic Education
- Vocational Training
- Work Readiness
- Supervised Job Search
- Job Search Training
- Job Retention



Co-enrollment

A participant may receive E&T services from more than one provider concurrently. Co-enrollment allows an individual to receive the most robust, and appropriate, services to meet their needs. There must be a degree of coordination between organizations to ensure that services are not duplicated. For example, vocational training can be at organization A, with organization B providing case management and participant reimbursements.



Basic Education

These components include Adult Basic Ed, GED, NEDP, ESOL and occasionally post-secondary education.



Vocational Education & Training

These components teach the hands-on skills needed for carpentry, healthcare, and culinary settings, among others, and includes foundational classroom learning. An industry-recognized credential should be earned at the completion of the training.



Work Readiness

Service providers must offer participants work readiness training, either as a standalone E&T component, or incorporated into another E&T component. Service providers lacking the ability to offer this content can partner with another provider and co-enroll the participant.



Supervised Job Search

This component requires participants to make inquiries to prospective employers. Participants are guided and assisted during their employment search. Searches take place at approved sites utilizing available technology.



Job Search Training

Enhances the job readiness of participants by teaching them job seeking techniques, increasing job search motivation and boosting self-confidence. This component may consist of job skills assessments, job placement services or other direct training or support activities.



Job Retention

E&T providers are required to offer a minimum of 30 days of job retention services and not more than 90 days. Examples of job retention services are employment coaching, case management and participant reimbursements, such as transportation and child care.



Case Management

E&T providers are required to provide case management to all participants. Case management may include comprehensive intake assessments, individualized service plans, progress monitoring, or coordination with service providers. Case management is not an E&T component.



Participant Reimbursements

SNAP E&T covers supports that help to address barriers identified during the assessment. Participant reimbursements are a required element of an E&T program and must directly relate to an individual's participation in an E&T component.

The following list of participant reimbursements are currently approved for Rhode Island providers. Supports not included on this list may be approved by FNS and providers should request such approval with a rationale. Providers are encouraged to contact LISC and DHS with ideas for new and innovative Participant Reimbursements that could benefit the program overall.

Item	Yes	Never	Notes
Automobile Ownership/Operator Taxes (tag, title, license)		X	
Automobile Purchase		X	
Books	X		Participants may receive assistance with textbooks, training materials, and other reasonable and necessary school supplies for training while actively participating in the education component.
Clothing	X		The general clothing limit is \$300 per participant per program year.
Course Registration Fees	X		Participants may receive assistance with incurred tuition, lab fees, and other education related costs necessary for training
Child Care Expenses	X		See note below
Driver's License	X		<i>Enhanced license</i> , only if it is required for an offered job position. May not include paying penalty fees or debts. \$65 limit per participant per program year. \$175 limit for Enhanced License per participant per program year.
Testing fee and standard license fee	X		
Drug/Alcohol Counseling or Therapy		X	
Drug Tests	X		Only if required for an offered job.
Employment Documentation	X		State IDs, birth certificates, BCI, and/or other documentation required. May be reimbursable after review.
Fingerprinting	X		Only if required for an offered job or background check.
Food Staples and Groceries		X	Including formula, diapers and other infant needs.
Housing and Utility Assistance	X		Funds for housing assistance is allowable after exhausting all other resources. We recommend limiting housing assistance to two months maximum per program year (October to September.)



Item	Yes	Never	Notes
Legal Services		X	
Loan Payments		X	Funds cannot be used to help participants pay outstanding debts, mortgages, or other repayment of loans, including: <ul style="list-style-type: none"> • Previous student loans • Past due fees • Penalties or fines
Medical Services (including emergency dental work, inoculations, eye examinations, eye glasses)	X		Funds for medical assistance are allowable after exhausting all other resources, including coverage through the Affordable Care Act. DHS/LISC approval required.
Mental Health Treatment		X	
Permits and Fees (union dues, test fees, licensing and bonding fees, background checks, driving abstracts)	X		Participants may receive funds to assist with the cost of testing and/or securing permits needed for training or to support job search activities. Bonding only refers to the extra insurance a prospective employer may need to have in to employ an ex-offender.
Personal Computers		X	Some providers offer laptop loaner program
Personal Hygiene	X		Participants may receive assistance with personal hygiene products and services (e.g. toothpaste, shampoo, body soap, haircuts, etc.) reasonable and necessary to meet the potential employer's appearance standards.
Reasonable Accommodation Supplies	X		Participants with disabilities may receive funding to assist with reasonable and necessary purchases of goods or services (including testing) that accommodate the individual's disability.
Relocation Expenses		X	
Student Activity Fees	X		Only if required to participate in class.
Training Materials	X		Only if required, reasonable and necessary.



Item	Yes	Never	Notes
Transportation Expenses (public transportation fare, gasoline, automobile repairs)	X		<p>The transportation limit for each participant is \$200 per month with a maximum limit of \$1,500 per program year. Transportation assistance may include:</p> <ul style="list-style-type: none"> • Bus passes • Private livery transportation (Uber/Lyft); • Necessary/non-maintenance vehicle repairs for a reasonable amount • Fuel for participants <p>Monthly limits can be exceeded for larger repairs; however, the yearly amount cannot be exceeded. DHS/LISC approval required. *No Tire Purchases</p>
Work and Training Tools (equipment, tools, safety clothing, uniforms)	X		<p>Must be required for immediate hire. Determine the need for these tools on a case-by-case basis. These costs do not fall under the clothing limit.</p>

Note: An individual participating in an approved E&T program can apply for Child Care at no cost. The service is authorized for a twelve-month period after the date of approval. Dependent care is allowable only when a participant cannot access subsidy through the DHS' Child Care Assistance Program (CCAP) and is capped at \$275 per week per participant.

Documenting Participant Reimbursements

Participant reimbursements must be documented and accounted for using the Individual Participant Reimbursement Form; one form per participant per month or the Participant Reimbursement Log. At the end of the month they must be given to finance staff for billing and retained on file as backup. The originals, or copies, are kept in the participants' files. The Participant Reimbursement form:

1. Documents the type of reimbursement an individual receives and provides a way to track and account for these supports.
2. Provides partial backup to the combined totals for each type of reimbursement reported on the financial report.





Additional Services

Case management and supportive services can assist a participant in making better choices when managing their money and selecting a career field. All SNAP E&T providers are required to offer case management services.

Employment Counselor/ Career Navigator

The purpose of SNAP E&T is to provide participants with services that will be effective in helping them find good jobs. There is an expectation that E&T providers will include employment counseling services in their programs.

Financial Coaching

Ensuring that SNAP E&T participants are provided with the knowledge on how to manage their money is important. Financial coaching gives them the tools they need to make smart decisions going forward.



Participant Files

Files (electronic or paper) containing the following documentation must be maintained for all SNAP E&T customers. All documents must be dated.

- Intake
- Assessment
- DHS 511a (complete with signatures)
- Component enrollment
- Monthly eligibility verification
- Supportive services received
- Any assessment during enrollment that indicates the need for a participant reimbursement
- Individual Participant Reimbursement forms (one per month)
- Case/progress notes while enrolled in a component
- Certifications/credentials earned
- Employment/apprenticeship/internship placement information





E&T Budgets

SNAP E&T budgets are submitted annually. These budgets include administration costs and participant reimbursement costs. Each component's administration cost is calculated separately.

Administration includes salary, fringe, and other than personnel (OTP) costs such as occupancy, telephone, and supplies. Participant Reimbursement costs are a separate line item in the budget from component administration. LISC provides technical assistance and budget guidance whenever needed

Component Budgets

Component budgets include the direct and indirect costs of your E&T program.

Allowable Costs

- Program staff (e.g. teachers, case managers, employment coaches, program managers)
- Administrative staff (e.g. accounting and finance staff, executive director, IT)
- Space costs (e.g. rent, utilities, maintenance, insurance)
- Equipment rental (equipment purchases must be pre-approved by LISC/DHS)
- Staff travel and training, as well as marketing and communications, must be directly associated with E&T
- Other costs (if you are unsure, ask LISC before including)
- Consultants (if you are unsure, ask LISC before including)

Disallowed Costs

The following costs are examples of disallowed costs and cannot be included in SNAP E&T budgets. Please contact LISC/DHS if you are unsure if an expense is allowed (this list is not exhaustive):

- Meals eaten away from home
- Advertising and public relations, unless to market E&T
- Alumni activities
- Commencement and convocations
- Executive lobbying
- Personal expenses not related to E&T component
- Interest, fund raising, and investment management fees
- Any and all political party expenses
- Pre-agreement costs, that is, all costs incurred prior to the grant award
- Scholarships and student aid
- Audit expenses, unless for an A-133 audit
- Bank fees

Note: The federal regulations pertaining to procurement standards are set forth in 2 CFR Part 200 (Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards). The standards included in 2 CFR 200.318 through 200.326 must be complied with when hiring consultants.

Indirect Costs

Indirect costs, such as occupancy costs, furniture, equipment leases, general office supplies, legal and A-133 auditing charges can be recovered in one of two ways; a Cost Allocation Plan (CAP) or a Negotiated Indirect Cost Rate Agreement (NICRA).

For the purposes of charging indirect costs, a Cost Allocation Plan must be developed with an auditor, codified in policy and approved by the Executive Director. The percentages in the Plan must be applied consistently throughout your budgets.

A copy of the Plan must be submitted with your SNAP E&T application.

A federally approved NICRA must be applied to all federal programs that an agency participates in. A copy of the NICRA must be submitted with your SNAP E&T application.

If your agency has neither a CAP nor a NICRA, indirect costs are not allowed; all costs must be treated as program costs (direct costs).

All organizations must provide a cost allocation plan either described on the final tab in the E&T Budget Workbook, or as an attachment to the application package (referenced on the Cost Allocation tab of the Budget Workbook).





Monthly Cost Allocation

All costs each month are calculated based on the current %SNAP. The %SNAP is calculated by dividing the total number of SNAP E&T participants by the total number of participants enrolled in the component. For example, if Work Readiness has 30 participants and 16 of them are a SNAP E&T participant, the calculation would be:

$$16/30 = 53\%SNAP$$

The Outcomes report calculates this automatically when the appropriate numbers are entered into the table at the bottom of the Total tab.

If a participant is enrolled in multiple components at the same time, please list them on the Outcomes report for **each enrollment**.

All costs each month are calculated based on the current %SNAP

%SNAP

=

$$\frac{\text{\# Total SNAP E\&T Participants}}{\text{\# Participants in Component}}$$

%SNAP is calculated by dividing the total number of SNAP E&T participants by the total number of participants enrolled in the component.

For example, if Work Readiness has 30 participants and 16 of them are SNAP E&T participants, the calculation would be:

$$16/30 = 53\%SNAP$$

Time and Effort Reporting

All employees working on SNAP E&T programs, per federal regulations, must have time and effort reports (timesheets) that reflect hours spent working on SNAP E&T each day. These reports must be signed by the employee and approved (signed) by the appropriate supervisor and coincide with regular pay periods.

After approval, the hours allocated to each SNAP E&T component must then be multiplied by the hourly rate and by the SNAP E&T percentage for that component for the month. This becomes the SNAP E&T salary expense for the period. Follow the same formula for calculating the fringe expense.

Because the SNAP E&T percentage will be different for every component, each component must be calculated separately. *A sample time and effort report with embedded formulas to assist you in completing this can be found in Appendix.*

LISC is also available for technical assistance.



Compliance Monitoring

Annual Review

LISC is required to conduct annual compliance reviews of all E&T provider programs. Since the review covers management of both programmatic and fiscal areas, both program and finance staff are required to attend. Financial records are reviewed to verify that the funds covering E&T services are non-federal and unmatched, and accounted for according to federal cost principles. Expenditures must be reasonable and necessary, included in the provider's approved E&T budget, and backed up with appropriate documentation. The review of program records will focus on participant case files to ensure required E&T procedures are being followed and case files are complete.

Prior to the compliance review, LISC will send the provider a letter with a list of the documentation that will be reviewed. If there are findings during



the visit, a corrective action plan is drafted. LISC will provide technical assistance and resources, as needed, to bring the program into compliance.

If a provider fails to make the recommended updates/changes within the agreed timeframe, LISC may place future disbursements on hold until the changes are made or depending on the seriousness of the issue(s), deny future SNAP E&T contracts.

State and Federal Audits

All E&T service providers are subject to auditing by RI DHS and/or FNS.

Reporting

The financial and program (data) reporting schedule follows:

Report	Due Date	Where to Send
Financial Report	20th of each month for the previous month's information	To: sleonardi@lisc.org cc: jlogan@lisc.org cc: karruda@lisc.org
Outcomes Report	10th of the month for the previous month's data	To: sleonardi@lisc.org cc: jlogan@lisc.org cc: karruda@lisc.org
Eligibility Report	7th of the month for the current month's data	To: jlogan@lisc.org cc: sleonardi@lisc.org cc: karruda@lisc.org
Narrative	20 th of the month following the end of each quarter	To: sleonardi@lisc.org cc: jlogan@lisc.org cc: karruda@lisc.org

Monthly reporting package includes:

1. Financial Reporting Workbook
 - a. Complete Excel version
 - b. Signed/dated pdf of Consolidated tab
2. Time and effort reports
3. General Ledger
4. Payroll register
5. Invoices/payment information for any OTP expense over \$1,000
6. Participant Reimbursements

Incomplete reporting packages will be returned and may delay your disbursement. LISC will contact you if errors are found and provide guidance on how to correct them.

This grant allows for a 10% expense overage on a line item, if another line item is underspent by the same amount. Admin, Transportation/Other and Dependent Care cannot be used in this scenario. This only applies to Salary/Fringe and OTP.

Financial Report

Contact LISC for the report personalized for your organization

Outcomes Report

Eligibility List

Quarterly Narrative Template

Participant Reimbursement Form

Participant Reimbursement Log

Civil Rights/Non-Discrimination

USDA's Food and Nutrition Service (FNS) requires recipients of federal funds to comply with FNS 113-1. FNS 113-1 describes the need to comply and enforce the "prohibition against discrimination in all FNS nutrition programs and activities, whether federally funded in whole or not."

Additionally, "training is required so that people involved in all levels of administration of programs that receive Federal financial assistance understand civil rights related laws, regulations, procedures and directives."

In order to comply with this rule, E&T service providers' frontline staff and their supervisors must take an approved civil rights training annually. The training is available online and will be announced annually. It is advised that all relevant staff complete this training within the first few weeks of E&T programming.

FNS 113-1: Civil Rights Compliance and Enforcement

Outreach and Marketing

Service providers are encouraged to market and outreach for their specific programs using marketing materials that LISC and DHS have developed. Materials include a brochure, general program poster, website poster and website 'business cards', all of which are in English and Spanish. The RI SNAP E&T website www.risnapet.org can also be translated to English and Spanish.

In accordance with federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, this institution is prohibited from discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation), religious creed, disability, age, political beliefs, or reprisal or retaliation for prior civil rights activity.

Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication to obtain program information (e.g., Braille, large print, audiotope, American

Sign Language), should contact the agency (state or local) where they applied for benefits.

Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339.

To file a program discrimination complaint, a Complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form which can be obtained online at: <https://www.usda.gov/sites/default/files/documents/ad-3027.pdf>, from any USDA office, by calling (833) 620-1071, or by writing a letter addressed to USDA. The letter must contain the complainant's name, address, telephone number, and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted to:

1. **mail:**
Food and Nutrition Service, USDA
1320 Braddock Place, Room 334
Alexandria, VA 22314; or
2. **fax:** (833) 256-1665 or (202) 690-7442; or
3. **email:** FNSCIVILRIGHTSCOMPLAINTS@usda.gov

This institution is an equal opportunity provider.



Subcontractor Liability

All service providers must have appropriate [liability] insurance to conduct all business that relates to DHS services. For example, if the subcontractor offers direct transport for clients, the vehicle and driver must be insured properly.



Resources

RI Department of Human Services (DHS): [RI DHS Website](#)

RI SNAP E&T: [RI SNAP E&T Website](#)

USDA E&T Toolkit: [USDA SNAP E&T Toolkit](#)

SNAP to Skills (S2S): SNAP to Skills is a project of USDA's FNS designed to provide states with the technical assistance, tools and resources they need to build more effective and job-driven SNAP E&T programs. The S2S website serves as the hub for information about SNAP E&T. USDA has contracted with Seattle Jobs Initiative to implement S2S. Users can access information about the SNAP to Skills project, SNAP E&T tools and resources, policy briefs, and stories from successful SNAP E&T programs.

USDA SNAP to Skills

National Skills Coalition (NSC): National Skills Coalition is a broad-based coalition working toward a vision of America that grows its economy by investing in its people so that every worker and every industry has the skills to compete and prosper. NSC engages in policy-based organizing, advocacy and communications. [National Skills Coalition](#)

Q and A

Program

1. How detailed do the attendance records need to be?

The attendance records must show the day(s) and time(s) the participant attended class for each component. The instructor may take attendance, or students may sign in/out, but it should be the same for the entire component.

2. Can a participant just receive participant reimbursements?

No. Participant reimbursements must be directly tied to an individual's enrollment in the program.

Financial

1. What is payroll allocation?

Payroll allocation is the process of showing the amount of each staff person's salary/fringe apportioned to each component. This is done on an hourly or % FTE basis.

2. Does the General Ledger need to be separated by funding source?

Yes. The General Ledger should show all expenses allocated to the different non-federal funding sources.

3. Do all items on the E&T budget need to be tracked by % SNAP E&T in the GL?

Yes.

Compliance

1. If changes are needed as a result of a compliance review, how long is given to make the necessary corrections?

If the changes are related to the organizational policies and procedures, usually three months is allowed for the updates and subsequent approvals. If the changes are more serious in nature, such as time and effort reporting or financial tracking, changes must be made as quickly as possible. LISC will provide technical assistance if it is needed.

2. Are there any repercussions if changes suggested by the compliance review are not implemented?

Yes. LISC may hold disbursements or delay the signing of a new contract until suggested changes are implemented.

Billing

1. What items are included when full backup is required?

Time sheets, payroll register, General Ledger, Component Financial report, Consolidated Detail Financial report, Individual Participant Reimbursement form(s), all invoices and cancelled checks.

2. What items are included when limited backup is required?

Component Detail and Consolidated Financial report, Individual Participant Reimbursement form(s), General Ledger, time sheets, payroll register, and invoices and cancelled checks for invoices over \$1,000.





Putting Healthy Food
Within Reach

USDA
Supplemental
Nutrition
Assistance
Program



LISC RI

RI SNAP E&T is a program of
RI DHS managed by LISC RI

Nondiscrimination Statement:

<https://www.fns.usda.gov/civil-rights/usda-nondiscrimination-statement-snap-fdpir>