

State of Delaware Department of Health and Social Services Division of Social Services

# SNAP E&T PLAN FY 2025

August 15, 2024 Revised October 3, 2024

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

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## A. Cover Page and Authorized Signatures

State: Delaware

State Agency Name: Delaware Health and Social Services, Division of Social Services

Federal FY: 2025

Date Submitted to FNS (revise to reflect subsequent amendments): August 15, 2024 / Revised October 3, 2024

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

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**Certified By:** 

Thomas Hall, Director

10/3/2024

Date

**Certified By:** 

Victor Ting, Chief of Administration

10/3/2024

Date

## **B.** Amendment Log

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

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

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

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

Table B.I. Amendment Log

## C. Acronyms

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

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

Acronym	Acronym Definition
ABAWD	Able-Bodied Adult without Dependents
AWW	ASSIST Worker Web
CDL	Commerical Driver's License
CNA	Certified Nursing Assistant
DOL	Delaware Department of Labor
DSS	Delaware Division of Social Services
DWDB	Delaware Workforce Development Board
E&T	Employment and Training
FNS	Food and Nutrition Service
FY	Fiscal Year
GA	General Assistance
ITO	Indian Tribal Organization
NPC	National Phlebotomy Certification
SNAP	Supplemental Nutrition Assistance Program
TANF	Temporary Assistance for Needy Families
USDA	United States Department of Agriculture
WIOA	Workforce Innovation and Opportunity Act

#### Table C.I. Acronyms

## **D. Assurances**

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

 Table D.I. Assurances

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

#### Table D.II. Additional Assurances

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

## E. State E&T Program, Operations, and Policy

#### I. Summary of E&T Program

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

Delaware Division of Social Services' (DSS) mission is, "To provide prompt, respectful and accurate services that promote the potential for self-sufficiency for all Delawareans".

Delaware provides a statewide, voluntary SNAP E&T program that supports SNAP recipients with skill development, training, and work experience opportunities that can lead to self-sustaining, regular employment.

The SNAP E&T program promotes the self-sufficiency of SNAP recipients by:

- Offering education and training to increase knowledge and skills;
- Assisting with job search methods;
- Removing barriers to sustained employment; and
- Increasing the employability of SNAP recipients.

SNAP E&T offers all participants program orientation, case management services, participant reimbursements, and components that enhance job search skills, increase basic and technical education, improve employment preparedness, and support job retention. Delaware's SNAP E&T providers develop individualized employment and education plans for each participant to evaluate an individual's needs and barriers before placement in an activity. DSS and the SNAP E&T providers work together to reduce individual and systemic barriers to employment and deliver trauma-informed services catered to the needs of each participant.

DSS and the SNAP E&T providers consult with Delaware's Workforce Development Board (DWDB), state agencies, employers, and community partners to ensure E&T services meet State and local workforce needs and are relevant for current and emerging employment sectors.

DSS does not directly deliver E&T services. Delaware contracts with Career Team as the primary E&T provider to deliver services for Delaware's SNAP E&T program. Delaware also contracts with two E&T third-party partners for specialized training services. The Food Bank of Delaware offers culinary and logistics warehouse programs, and the Ministry of Caring offers programs for Certified Nursing Assistant (CNA), Commercial Driver's License (CDL), and phlebotomy training. These thirdparty partner programs align with the needs of Delaware's labor market.

Delaware does not cap the number of participants who receive E&T services to support all SNAP recipients with their employment goals. Delaware's SNAP E&T program serves ABAWD and Non-ABAWD participants. All SNAP recipients who are also receiving benefits from the Temporary Assistance for Needy Families (TANF) program are referred to and will receive services from Delaware's TANF E&T program instead of SNAP E&T.

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

Delaware's SNAP E&T program is administered at the State level.

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

Not Applicable

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

Delaware's SNAP E&T program is available statewide in all three counties of Delaware. There are 18 DSS offices where individuals can apply for SNAP benefits and be referred for SNAP E&T services. Delaware has three E&T provider locations in New Castle County, one provider location in Kent County, one provider location in Sussex County, and one provider location that serves both Kent and Sussex Counties. E&T services are available to all zip codes in Delaware.

e) Provide a list of the components offered.

Delaware's SNAP E&T program offers the following components:

- Supervised Job Search SJS
- Job Search Training JST
- Job Retention Services JR
- Workfare WF
- Basic Education and/or Foundational Skills Instruction EPB
- English Language Acquisition EPEL

- Career and/or Technical Education Programs or Other Vocational Training EPC
- Work Readiness Training EPWRT
- Work-based learning, Internships WBLI
- Work-based learning, Internships, Subsidized by E&T WBLI-SUB

Delaware's SNAP E&T program offers orientation, case management services, and participant reimbursements to all participants along with these components.

- f) Provide the web addresses (URLs) of State E&T policy resources such as handbooks and State administrative code, if available.
  - <u>9000 Food Stamp Program (delaware.gov)</u>
  - <u>10000 Supplemental Nutrition Assistance Program Employment and Training</u> (SNAP E&T) (delaware.gov)

### II. Program Changes

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

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

Delaware's SNAP E&T RFP for the State's primary provider expires at the end of December 2024. The current RFP is awarded to Career Team. DSS is posting a new RFP for Delaware's primary SNAP E&T provider. The selected contractor will be required to prove how they will follow this plan along with all SNAP E&T program rules.

Ministry of Caring, one of the third-party partners, will provide phlebotomy training to SNAP E&T participants to add more variety and attract more participants to the program in FY 2025. Ministry of Caring's Training for Early Care & Education I & II (TECE I & II) training will not be reimbursed with SNAP E&T funds this federal fiscal year. The Ministry of Caring expressed a hardship in being able to manage the participants in the training, and they did not plan on funding it in the future.

Delaware is applying for an ABAWD waiver in FY 2025 for the city of Wilmington, Kent County and Sussex County. Delaware is also exploring using discretionary exemptions in the beginning of the federal fiscal year to give a transition period to ABAWDs that will still be subject to work requirements. DSS reviewed the anticipated number of SNAP E&T participants with all partners with the understanding that DSS would be applying for an ABAWD waiver that would cover most of the state.

Delaware will continue to explore adding additional third-party partners to the SNAP E&T program in order to serve more participants.

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

DSS will annually review data to determine if Delaware is eligible for an ABAWD waiver. The potential waived areas will be shared with all SNAP E&T partners. This will help determine the projected number of participants for each upcoming federal fiscal year. The projected number of participants in FY 2024 did not take the ABAWD waiver into consideration, which led to a surplus of funds for SNAP E&T.

#### III. Consultation and Coordination with the Workforce Development System

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

#### Consultation

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

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

Delaware's SNAP E&T Administrator is a participating member of the Delaware Workforce Innovation and Opportunity Act (WIOA) Leadership Team. This team works in conjunction with Delaware's Workforce Development Board (DWDB) and the Delaware Department of Labor (DOL).

During a meeting with WIOA Leadership team on April 17, 2024, the SNAP E&T Adminstrator shared the program's goal to increase participants and to grow in Kent and Sussex counties specifically. A member of the WIOA Leadership team suggested a potential partner that was also recommended by Career Team. DSS is currently in early discussions for the partner to become a new third-party partner. In addition to sharing SNAP E&T program goals, the SNAP E&T Administrator shared the total number of SNAP E&T participants with WIOA from the last three years per their request. WIOA requested this to get a better understanding of the program's current levels as we work on increasing participation.

WIOA is working on updating its referral process. There have only been early conversations so far, but the goal is to make it easier for different state agencies and organizations to refer to WIOA and receive data from WIOA.

To meet State and local workforce needs, DSS has identified through DOL the indemand and emerging industries that have growth potential. Food service continues to be on the list as well as occupations in healthcare. DSS focuses on contracting with E&T vendors that can provide training to participants for in-demand occupations. DSS contracts E&T services through community-based programs that coordinate with WIOA and Title I funded programs that provide occupational skills training, adult basic education training, and other supportive services to unskilled adults entering Delaware's labor force. Delaware's E&T contracted vendors use the State's WIOA preferred training providers list to coordinate trainings for participants.

b) Consultation with employers: If the State agency consulted with private employers or employer organizations in lieu of the State workforce development board, document this consultation and explain the determination that doing so was more effective or efficient. Include with whom the State agency consulted and the results of the consultation.

DSS did not consult with employers for the FY 2025 SNAP E&T Plan.

#### Coordination

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

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

DSS will continue to collaborate with WIOA as they work on updating their referral process. DSS will determine how the updates can be best utilized in the SNAP E&T program.

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

DSS is committed to maximizing its use of existing employment and training resources. DSS will not duplicate employment and training services funded by other programs. For this reason, Delaware's SNAP E&T program coordinates participant services with existing employment and training services and programs funded through the Workforce Innovation and Opportunity Act (WIOA), as well as programs funded through the Delaware Private Industry Council, Delaware Department of Labor (DOL), and Delaware Department of Education. Under a joint agreement, Delaware's Workforce Development Board (DWDB) and DOL administer the funds available to the State through Title I of WIOA.

Delaware's SNAP E&T Administrator is a participating member of Delaware's WIOA Leadership Team. This team works in conjunction with DWDB and DOL. The WIOA Leadership Team is informed of and responsive to the demands of local area employers and the emerging in-demand industry sectors and occupations in the State. The SNAP E&T Administrator uses the information from the WIOA Leadership Team and DOL to align the E&T State Plan with emerging, in-demand industry sectors and occupations and coordinates programming so that SNAP E&T does not duplicate services. This impacts Delaware's planning for new E&T third-party partners.

The SNAP E&T vendor, Career Team, refers participants to WIOA programs, training, and opportunities available through the One-Stop and Title I programs as appropriate. Career Team registers all SNAP E&T participants in Delaware JobLink, an internetbased system managed by DOL that identifies employment opportunities, training opportunities, and resources under WIOA. All SNAP E&T participants referred to WIOA or other providers receive SNAP E&T orientation and case management services from Career Team. Career Team coordinates with WIOA service providers to make sure attendance hours are reported for SNAP E&T participation.

The following are examples of WIOA services to which SNAP E&T participants have been referred:

- Vocational rehabilitation services
- Apprenticeship programs
- Career, technical, and vocational education programs
- Wilmington Job Corps
- APEX (expungement)
- Bonding program
- Banking program
- e) **WIOA Combined Plan:** Is SNAP E&T included as a partner in the State's WIOA Combined Plan?
  - □ Yes
  - $\boxtimes$  No
- f) TANF/GA Coordination: Describe how the State agency is coordinating with TANF/GA programs, services, partners, and/or activities. Describe any TANF/GA special initiatives targeting specific populations and any actions taken to coordinate with these efforts.

Delaware's SNAP E&T Administrator works closely with the TANF/GA Senior Administrator to stay informed of TANF and GA employment and training services and partnerships. Both program administrators participate on Delaware's WIOA Leadership Team and coordinate with Delaware's Workforce Development Board (DWDB) and the Delaware Department of Labor (DOL).

DSS has an integrated application process and data system that determines eligibility for SNAP, TANF, GA, Medicaid, Child Care Assistance, Refugee Services, TANF E&T, and SNAP E&T. This creates a coordination of services within these programs. Delaware's eligibility system is programmed to refer SNAP recipients who volunteer for E&T to the SNAP E&T program. A SNAP recipient receiving TANF will always be referred to the TANF E&T program. Delaware's eligibility system is programmed to assign TANF E&T before assigning SNAP E&T in its hierarchy.

Coordination between SNAP and TANF is also accomplished with the E&T vendor, Career Team. Career Team provides E&T services for TANF and SNAP recipients and reports participation information to DSS for both programs. E&T referrals sent to Career Team from the State's eligibility system specify if the client is a SNAP ABAWD, a SNAP Non-ABAWD, or a TANF client. Each referral is screened, and the vendor also ensures that participants receiving SNAP and TANF are enrolled in the TANF E&T program only. SNAP recipients not receiving TANF will only receive SNAP E&T services.

Delaware's E&T system is monitored by the SNAP E&T administrator and the DSS Information Systems Unit to ensure that E&T referrals are being directed to the appropriate program.

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

DSS coordinates employment and training services for SNAP recipients eligible for Delaware's Refugee Resettlement Program with the State's Refugee E&T vendor, Jewish Family Services. This vendor provides case management, English as a second language, enculturation, employment preparation, interviewing skills, communication skills, job placement, job retention, and other supportive services for SNAP recipients eligible for benefits as refugees or asylees.

DSS also coordinates with the Division of Child Support Services (DCSS) for E&T services for SNAP recipients in their Fatherhood Program. The Delaware Fatherhood Program is designed to assist parents find jobs, gain employment skills, sustain employment, and achieve economic stability. Participation in the program can help to establish or rebuild healthy family relationships and make a positive impact on the lives of children.

#### **IV.** Consultation with Indian Tribal Organizations (ITOs)

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

- a) Did the State agency consult with ITOs in the State?
  - □ Yes, ITOs in the State were consulted. (Complete the rest of this section.)
  - □ No, ITOs are located in the State but were not consulted. (*Skip the rest of this section.*)
  - ⊠ Not applicable because there are no ITOs located in the State. (Skip the rest of this section.)

- b) Name the ITOs consulted.
- c) **Outcomes:** Describe the outcomes of the consultation. Provide specific examples of how the State agency incorporated feedback from ITOs into the design of the E&T program (e.g., unique supportive service, new component, in-demand occupation).
- d) **Enhanced reimbursement:** Will the State agency be seeking enhanced reimbursement for E&T services (75%) for ITO members who are residents of reservations, either on or off the reservation?

 $\Box$  Yes

 $\Box$  No

#### V. Utilization of State Options

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

- a) The State agency operates the following type of E&T program (select only one):
  - □ Mandatory per 7 CFR 273.7(e)
  - $\boxtimes$  Voluntary per 7 CFR 273.7(e)(5)(i)
  - $\hfill\square$  Combination of mandatory and voluntary
- b) The State agency serves the following populations (*check all that apply*):

□ Applicants per 7 CFR 273.7(e)(2)

- $\boxtimes$  Exempt members of zero benefit households that volunteer for SNAP E&T per 7 CFR 273.10(e)(2)(iii)(B)(7)
- Categorically eligible households per 7 CFR 273.2(j)

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

 $\Box$  Yes

🛛 No

#### VI. Characteristics of Individuals Served by E&T

State agencies are required to include information about the categories and types of individuals they plan to exempt from mandatory E&T participation (7 CFR 273.7 (c)(6)(iv)), as well as the characteristics of the population they plan to place in E&T (7 CFR 273.7 (c)(6)(v)).

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

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

All work registrants in Delaware are exempt from E&T participation.

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

Annually, before the SNAP E&T Plan is completed, the SNAP policy team and DSS leadership review the SNAP E&T program, the services offered, and exemptions from E&T.

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

- $\boxtimes$ Homeless
- ⊠ Veterans
- $\boxtimes$  Students
- $\boxtimes$  Single parents
- ⊠ Returning citizens (aka: ex-offenders)
- ⊠ Underemployed
- $\boxtimes$  Those that reside in rural areas
- ☑ Other: Any SNAP recipient who wants to volunteer to participate in E&T

#### **VII.** Organizational Relationships

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

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

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

Delaware's Division of Social Services (DSS) is the State Agency that administers the SNAP E&T program.

The SNAP E&T Administrator in the DSS Policy and Program Development Unit is responsible for program planning, policy development, budget management, E&T provider procurement, vendor contracts, vendor performance monitoring, and program data reporting. The SNAP E&T Administrator works closely with the SNAP Senior Administrator, TANF/GA Senior Administrator, and DSS Policy Chief on E&T program development.

SNAP eligibility staff statewide are responsible for processing SNAP applications and recertifications, interviewing clients, entering information into the ASSIST Worker Web (AWW) system for eligibility determinations, screening and referring clients to E&T, and informing clients of work requirements, time limits, exemption rules, and available E&T services. During the interview, eligibility staff obtain information to determine if the applicant is a work registrant, ABAWD, or has an exemption. AWW identifies work registrant status, ABAWD status, and exemptions from work requirements once all client information is entered into the eligibility system. SNAP eligibility staff verbally review with the applicant the ABAWD and work registrant requirements, available E&T services and locations, rights and responsibilities, and available participant reimbursements. SNAP applicants who are work registrants or ABAWDs are also provided this information in writing. During the certification or recertification process, a system referral is generated to the SNAP E&T vendor, Career Team, for SNAP recipients who choose to volunteer to participate with SNAP E&T.

Delaware does not operate an E&T program unit or separate E&T units at the county level. DSS SNAP eligibility offices do not provide any E&T services or participant reimbursements. All SNAP E&T service delivery is handled by contracted E&T providers.

Career Team, Delaware's primary SNAP E&T provider, is responsible for receiving and reviewing SNAP participant referrals, conducting outreach, providing orientation, case management, participant reimbursements, and components, and tracking and reporting participation hours to the State using the E&T system in AWW. Career Team oversees these functions for all SNAP E&T participants, including participants enrolled with an E&T third-party partner.

Delaware contracts with E&T third-party partners to provide specialized training opportunities for SNAP E&T participants. The third-party partners coordinate with Career Team on outreach, orientation, case management, participant reimbursements, and participation tracking and reporting. Career Team also tracks and reports third-party partner participation hours to the State using the E&T system in AWW.

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

Delaware does not operate an E&T program unit or separate E&T units at the county level.

Within the DSS Policy and Program Development Unit, there is a SNAP E&T Administrator, SNAP Senior Administrator, and the DSS Policy Chief, who oversee SNAP and SNAP E&T policy and programming. The SNAP policy team provides policy guidance on an ongoing basis to DSS eligibility staff on SNAP and SNAP E&T. E&T policy guidance is delivered through administrative notices, policy briefs, desk guides, job aids, and formal training. The SNAP policy team attends weekly meetings with leadership staff from DSS operations and conducts presentations for eligibility staff on E&T topics as requested or when E&T policies or procedures change.

SNAP certification and E&T referrals are performed by DSS eligibility staff at 18 DSS locations throughout the State. SNAP eligibility staff refer clients to E&T and inform clients of work requirements, time limits, exemption rules, and available E&T services as outlined in SNAP E&T policy. DSS eligibility staff may contact the DSS Policy and Program Development Unit at any time with policy questions by sending an email to the policy resource mailbox. The SNAP E&T Administrator responds to all SNAP and SNAP E&T policy questions sent to the mailbox. DSS eligibility staff communicate directly with the SNAP E&T vendors about participant referrals, participation compliance, and participant reimbursements.

- c) Describe the State's relationships and communication with intermediaries or E&T providers (if applicable):
  - 1. Describe how the State agency, intermediaries, E&T partners, share participant data and information. Include the names of any MIS systems (or other modes of communication) used.

Communications and data sharing between the State Agency and E&T vendors are multifaceted.

The primary method for sharing E&T data is through Delaware's eligibility system, which includes an integrated E&T subsystem. Career Team, Delaware's primary E&T vendor, has access to the ASSIST Worker Web (AWW) E&T system and can view and enter case comments and case alerts in the eligibility system.

During the certification and recertification process, all SNAP E&T referrals are sent through the AWW system to Career Team for SNAP recipients who choose to volunteer with E&T. Career Team assigns the referral to a case manager, and the AWW system is updated to show the referral was assigned. Career Team enters SNAP E&T activities and hours into the E&T subsystem for all SNAP participants weekly. Non-compliance with E&T requirements is communicated to DSS from Career Team through the AWW system. AWW will generate a case alert for eligibility staff, and Career Team will enter a non-compliance case comment and send an email to DSS. If necessary, manual E&T referrals can be sent to the DSS Policy and Program Development Unit's resource mailbox to be forwarded to Career Team.

DSS has two E&T third-party partners, Food Bank of Delaware and Ministry of Caring. These partners do not have access to the AWW system and coordinate with Career Team for participant referrals, reporting SNAP E&T activities and hours in the E&T subsystem, and communicating non-compliance with E&T requirements. Career Team enters all third-party partner participation data into the AWW system weekly. Career Team and the third-party partners communicate directly with one another by phone or email to coordinate services for E&T participants. Career Team provides orientation and case management services for all participants enrolled with a third-party partner. The third-party partners will refer their participants who are newly enrolled in SNAP E&T to Career Team to complete orientation. The third-party partners and WIOA/Title I programs send weekly participation reports to Career Team with the activities, number of hours, and compliance status. Career Team enters this information into the AWW E&T subsystem. If a participant drops out or stops participating, this information is sent to Career Team so they can re-engage the participant and alert DSS of non-compliance.

The SNAP E&T vendors communicate with DSS for provider determinations. Provider determinations are often avoided because Career Team works with all participants to find the activity that best fits the participant's needs and interests. Participants enrolled with a third-party partner who would benefit from reassignment to a new activity will be referred back to Career Team. The Career Team case manager meets with the participant and reviews and revises the employment plan. The participant will then be assigned to a new component or activity. Career Team shares this new evaluation to DSS using case comments, which generates an alert to DSS eligibility staff for review. If Career Team believes that a participant is not suited for SNAP E&T activities or other activities are not available, this information and the reasons are entered into AWW case comments, and a system alert is sent to DSS eligibility staff. Eligibility staff will review the information and determine if the participant meets an exemption. The outcome of the decision is case commented, and an alert is generated to Career Team. If the participant is exempt, Career Team will disenroll the participant from SNAP E&T. The SNAP E&T Administrator may also provide input on provider determinations for more complex situations.

The SNAP E&T Administrator holds monthly calls with each SNAP E&T provider to discuss performance, program updates, and E&T policy and procedure information. The SNAP E&T Administrator also conducts at least two monitoring visits per fiscal year to evaluate E&T service delivery, fiscal and program policies, and participant tracking and case files. The SNAP E&T providers must submit to DSS monthly participation data with each invoice. The invoices are checked against AWW to ensure only open SNAP participants are receiving E&T services and that costs comply with the vendor's contract and E&T policy.

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

Delaware's ASSIST Worker Web (AWW) eligibility system includes an integrated E&T subsystem. The eligibility and E&T systems interact, and SNAP cases are automatically updated to determine compliance with SNAP and ABAWD work

requirements, time limits, and exemptions. AWW also generates E&T reports from data entered in the E&T system.

Career Team, Delaware's primary E&T vendor, has access to the AWW E&T system and can view and enter case comments and case alerts in the eligibility system for SNAP participants. All SNAP E&T referrals are sent through the AWW system to Career Team for SNAP recipients who choose to volunteer with E&T. Career Team assigns the referral to a case manager, and the AWW system is updated to show the referral was assigned. If necessary, due to a system issue, manual E&T referrals can be sent to the DSS Policy and Program Development Unit's resource mailbox to be forwarded to Career Team to enter into the E&T system.

Career Team enters SNAP E&T activities and hours into the E&T subsystem for all SNAP participants weekly. This includes participants enrolled through E&T with a third-party partner or another employment or training program (e.g., WIOA).

Non-compliance with E&T requirements is communicated to DSS from Career Team through AWW. AWW will generate a case alert for eligibility staff to act on, and Career Team will enter a non-compliance case comment and send an email to DSS.

Provider determination communications are completed through AWW, and case comments are added by Career Team, which alerts DSS eligibility staff of the action for their review.

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

The DSS SNAP E&T Administrator holds monthly calls with each SNAP E&T provider to discuss performance, program updates, and E&T policy and procedure information. DSS provides training and technical assistance to the E&T providers as needed for new policies, when policies and procedures change, or when a performance issue is identified. Training may be conducted one-on-one or as a group with all providers. The SNAP E&T Administrator also holds an annual onboarding session in the beginning of each federal fiscal year to review SNAP E&T program rules and goals for the current year.

4. Describe the State agency's process for monitoring E&T partners' program and fiscal operations. Include plans for direct monitoring such as visits, as well as indirect monitoring such as reviewing program data, financial invoices, etc.

The DSS SNAP E&T Administrator conducts at least two monitoring visits per fiscal year to evaluate E&T service delivery, fiscal and program operations, and participant tracking and case files. A monitoring tool is used to evaluate vendor performance and identify areas of non-compliance or areas that may benefit from a recommended change. DSS issues written notice of non-compliance to E&T providers that require

the provider to develop corrective actions to fix the issue. DSS monitors corrective actions until they are completed and conducts follow-up monitoring to ensure the corrective actions are effective.

The DSS SNAP E&T Administrator also performs indirect monitoring through monthly review of vendor invoices, financial documentation, and participation data. Each E&T provider must submit monthly invoices that include the names of SNAP participants, the activity they participated in, and any related charges or participant reimbursements. These invoices must include documentation verifying participation and actual costs. The invoices and backup documentation are checked against AWW to ensure only open SNAP participants are receiving E&T services and that costs comply with the vendor's contract and E&T policy. Career Team, Delaware's primary E&T provider, submits quarterly and annual participation data that is reviewed to monitor program operations and performance.

Delaware also reviews the E&T program and financial operations through the State Management Evaluation process as required by FNS.

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

DSS evaluates the performance of SNAP E&T providers by requiring monthly, quarterly, and annual reporting used to measure participation rates and employment rates. The SNAP E&T Administrator will review participation rates quarterly with SNAP E&T providers. DSS also uses the national E&T reporting measures and state priorities to evaluate if the E&T providers are achieving the purpose of SNAP E&T. SNAP E&T outcome expectations and reporting measures are incorporated into the contracts for all SNAP E&T providers.

### **VIII. Screening for Work Registration**

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

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

Delaware's eligibility system, ASSIST Worker Web (AWW), is programmed with the criteria for work registration outlined in 7 CFR 273.7(a). AWW identifies all SNAP recipients ages 16 through 59 and determines if they are work registrants or meet the work registration exemption criteria in 7 CFR 273.7(b)(1). As DSS eligibility staff enter criteria related to work registration and exemptions into AWW, the system will identify

the work registrant or work registration exemption status. AWW also determines ABAWD and ABAWD exemption statuses for SNAP applicants.

DSS eligibility staff will review and data enter in AWW the SNAP application and interview information gathered from the client. This includes asking the client about their household circumstances, current employment status, ability to work, and participation in an employment or training program. Possible work registration exemptions are explored with the client. Based on this information, AWW will determine if the individual is a work registrant or is exempt from work registration requirements. The eligibility staff will review the system information for accuracy, making sure exemptions are applied or removed correctly.

The eligibility staff will review available E&T services with SNAP applicants to determine if the applicant would like to volunteer with E&T and if a referral to the E&T program is appropriate based on the client's situation. DSS encourages work registrants to volunteer with E&T and register on the Delaware JobLink website managed by the Delaware Department of Labor (DOL). Work registrants who choose to participate in E&T are referred through AWW to Career Team, Delaware's primary E&T provider.

If a SNAP applicant is exempt from work registration, the exemption reason is explained to the client. For SNAP applicants who are exempt because of employment, the voluntary quit and reduction in work hours policy and sanctions are reviewed with the client.

DSS eligibility staff screen SNAP recipients for work registrant status and exemption changes at recertification using the same process outlined above.

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

Individuals who are identified as work registrants complete the work registration process by reviewing and signing a form. During the SNAP interview, eligibility staff review with the SNAP applicant DSS Form 355 "Food Benefit Employment and Training Work Registrant and ABAWD Notification." The form explains the work registration requirements and exemptions, the ABAWD requirements and exemptions, the E&T program, Career Team, and Delaware JobLink.

If the interview is conducted in person, Form 355 is read to and signed by the work registrant. If the interview is conducted by telephone, Form 355 is read to the work registrant, and a work registration case comment is entered in AWW. A copy of Form 355 is given to work registrants upon request.

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

During certification and recertification interviews, DSS eligibility staff orally explain to SNAP applicants the work registrant and ABAWD work requirements, exemptions, available E&T services and locations, rights and responsibilities, and participant supports and reimbursements.

DSS also provides this information in writing to SNAP applicants who are work registrants and ABAWDs. The SNAP Work Rules Notice is mailed to work registrants and ABAWDS upon approval of SNAP eligibility. The SNAP Work Rules Notice is system-generated at the time the SNAP approval notice is generated. The SNAP Work Rules notice explains the work requirements for all non-exempt household members.

#### IX. Screening for Referral to E&T

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

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

DSS eligibility staff screen all SNAP applicants between the ages of 16 through 59 for referral to the SNAP E&T provider. During the SNAP interview at certification and recertification, E&T programs and services are discussed with SNAP applicants to determine interest in SNAP E&T participation. DSS eligibility staff review the client's status as a work registrant or ABAWD, as well as pertinent information about the client's ability to work and participate in an E&T program. Possible E&T exemptions and participation barriers are evaluated to determine if the client should be referred to the E&T program. All ABAWDs who are not working are automatically referred for E&T services. If a non-ABAWD client may have significant challenges with ongoing participation or the available E&T activities are not suitable for the client, a client will not be referred to the E&T program at that time. SNAP recipients may request a referral to E&T services at certification, during the certification period, and at recertification.

DSS eligibility staff screen reverse referrals received from the SNAP E&T providers. E&T providers submit reverse referrals with the client's consent to DSS via email. Before submitting a reverse referral to DSS, E&T providers are to assess if the individual is a good fit for their program. The E&T provider will assist the individual with applying for SNAP online if they're not already receiving SNAP. If the individual is eligible for SNAP, they are screened for work registrant, ABAWD, and E&T status. If a participant agrees to volunteer with E&T, they will be referred in AWW to the SNAP E&T provider. If an individual is not eligible for SNAP or does not agree to volunteer with E&T, they will not be referred for SNAP E&T services. b) Describe the process for screening during the certification and recertification process. Include the staff involved in the screening, how the staff conduct the screening, and when the screening occurs.

DSS eligibility staff screen for referral to E&T services at certification, recertification, and during the certification period when requested by a client or when a client reports a change that affects their work registrant or ABAWD status.

The ASSIST Worker Web (AWW) eligibility system identifies all SNAP recipients ages 16 through 59 and determines if they meet the work registration exemption criteria stated in 7 CFR 273.7(b)(1). AWW also identifies all SNAP recipients ages 18 through 52 (through age 54 starting October 1, 2024) and determines if they meet the ABAWD exemption criteria stated in 7 CFR 273.24(c). Anyone who is not exempt from ABAWD requirements or who elects to volunteer for E&T is referred for SNAP E&T services. AWW is programmed with the criteria to refer ABAWD and voluntary participants to SNAP E&T services.

DSS eligibility staff screen all SNAP applicants between the ages of 16 through 59 for referral to SNAP E&T. During the SNAP interview at certification and recertification, E&T programs and services are discussed with SNAP applicants to determine interest in SNAP E&T participation. DSS eligibility staff review the client's status as a work registrant or ABAWD, as well as pertinent information about the client's ability to work and participate in an E&T program. Possible E&T exemptions and participation barriers are evaluated to determine if the client should be referred to the E&T program. All ABAWDs who are not working are automatically referred for E&T services. If a non-ABAWD client may have significant challenges with ongoing participation or the available E&T activities are not suitable for the client, a client will not be referred to the E&T program at that time.

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

DSS eligibility staff screen reverse referrals received from the SNAP E&T providers. E&T providers submit reverse referrals with the client's consent to DSS via email. Before submitting a reverse referral to DSS, E&T providers are to assess if the individual is a good fit for their program. The E&T provider will assist the individual with applying for SNAP online if they're not already receiving SNAP. If the individual is eligible for SNAP, they are screened for work registrant, ABAWD, and E&T status. If a participant agrees to volunteer with E&T, they will be referred in AWW to the SNAP E&T provider. If an individual is not eligible for SNAP or does not agree to volunteer with E&T, they will not be referred for SNAP E&T services.

d) How and when are participants informed about participant reimbursements? In the case of mandatory participants, how and when does the State agency ensure

individuals are exempted from mandatory E&T if the costs of participant reimbursements exceed any State agency cap or are not available?

DSS eligibility staff inform SNAP applicants about the availability of participant reimbursements at certification, recertification, and during the certification period if E&T is discussed. The eligibility staff review with the client that SNAP E&T will assist with barriers to participation, including assistance with transportation and any other expenses necessary for employment and training participation.

The SNAP E&T vendors also discuss participant reimbursements during the initial outreach contact and at orientation to determine if an individual needs a participant reimbursement to begin participation with E&T. E&T vendors assess participant reimbursement needs as part of ongoing case management services.

## X. Referral to E&T

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

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

The following information is provided to clients orally and in writing at application and recertification when they are referred to SNAP E&T:

- Referral classification as a work registrant, ABAWD, or ABAWD required to participate in E&T before receiving SNAP due to having an expired ABAWD clock due to the ABAWD time limit rules.
- E&T participation requirements based on the classification as a work registrant, ABAWD, or ABAWD with pre-participation requirements.
- Work registrant and ABAWD exemptions.
- Work registration job quit and reduction of work hours rules and sanctions.
- Screening process to volunteer for SNAP E&T
- Types of E&T services and components available.
- Types of barrier reductions and participant reimbursements and how to request reimbursements.
- Contact information and locations of the SNAP E&T providers.
- How to schedule an orientation to begin participation.
- b) If a State receives and approves a referral request from an E&T provider (reverse referral), how does the State communicate to the SNAP participant that they are in SNAP E&T and about their rights to receive participant reimbursements, etc.?

For reverse referrals, DSS communicates to the SNAP participant about SNAP E&T and their rights to receive participant reimbursements at the time the referral is sent for E&T services.

The following information is provided to clients orally and in writing when they are referred to SNAP E&T:

- Referral classification as a work registrant, ABAWD, or ABAWD required to pre-participate in E&T due to the ABAWD time limit rules.
- E&T participation requirements based on the classification as a work registrant, ABAWD, or ABAWD with pre-participation requirements.
- Work registrant and ABAWD exemptions.
- Work registration job quit and reduction of work hours rules and sanctions.
- Screening process to volunteer for SNAP E&T
- Types of E&T services and components available.
- Types of barrier reductions and participant reimbursements and how to request reimbursements.

The E&T provider that made the reverse referral will also explain to the participant the E&T program, participation requirements, and participant reimbursements.

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

Delaware's primary E&T provider, Career Team, conducts outreach to referred individuals by phone and mail to schedule an orientation with participants. If Career Team successfully contacts the individual, the participant is scheduled for an orientation at the Career Team location in the county where the individual resides. Orientation may be completed in person or virtually, depending on the needs of the participant.

Career Team conducts orientation for all SNAP E&T participants. The orientation provides an overview of the E&T program, participation requirements, and participant reimbursement options. Following orientation, which is 3-4 hours, the participant will complete an assessment, develop an individualized employment plan that includes at least one component, and meet their E&T case manager.

d) How is information about the referral communicated within the State agency? For instance, is the information entered into an MIS by the eligibility worker and reviewed by an E&T specialist? SNAP E&T referrals are entered by DSS eligibility staff in the ASSIST Worker Web (AWW) eligibility system. AWW automatically sends referrals to the SNAP E&T provider. E&T referrals and participation information are maintained in AWW. Eligibility staff, E&T provider staff, and the DSS SNAP E&T Administrator monitor referrals and participation using the AWW E&T subsystem.

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

ASSIST Worker Web (AWW) automatically sends referrals to the SNAP E&T provider. Delaware's primary SNAP E&T provider, Career Team, has access to AWW and the E&T system. Once the referral is received by the SNAP E&T provider through AWW, the referral is assigned to an E&T provider case manager. The case manager enters all activities and hours in the AWW E&T subsystem.

Career Team will communicate participant referrals via email to the E&T third-party partners.

#### XI. Assessment

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

a) Does the State require or provide an assessment?

⊠Yes (Complete the remainder of this section.)

□ No (Skip to the next section.)

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

Delaware's primary SNAP E&T provider, Career Team, completes assessments with all SNAP E&T participants as part of the orientation process. Career Team evaluates an individual's needs and barriers before placement in an activity.

SNAP E&T participants complete a comprehensive assessment that collects general information about demographics, educational attainment, basic skills, literacy, work experience, and public benefits. It also identifies objective and subjective barriers to work, such as disabilities, criminal background, family composition, housing circumstances, child care needs, and transportation needs. The assessment includes an in-depth evaluation of employability skills and counseling on how and where to

search for employment. The assessments used include: Food Benefit Program Assessment, Career Orientation Inventory, and When I Grow Up. Participants complete electronic, paper, and oral assessments with a Career Team E&T case manager.

#### XII. Case Management Services

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

- a) What types of E&T case management services will the State agency provide? *Check all that apply.* 
  - ⊠ Comprehensive intake assessments
  - ☑ Individualized Service Plans
  - ⊠ Progress monitoring
  - $\boxtimes$  Coordination with service providers
  - ⊠ Reassessment

⊠Other. Please briefly describe: Career Team, Delaware's primary SNAP E&T vendor, provides traditional case management using a trauma-informed approach. Career Team has integrated knowledge about trauma into policies, procedures, practices, and settings. They combine human interaction with comprehensive resources and assessment tools to help participants identify and resolve internal conflicts and insecurities.

b) Describe how case management services are delivered in your State. For instance, in one model case management is provided by E&T specialists who provide assessments and other services after participants are referred to E&T. In other instances, case management is integrated into the component. If your State uses more than one model, describe the one or two most common ways of delivering case management services.

Participants are assigned a Career Team case manager upon enrollment in SNAP E&T services. Each case manager will manage a blended portfolio of low, medium, and high-intensity clients to ensure that high-intensity clients receive weekly touchpoints and lower-intensity clients receive at least bi-weekly or monthly touchpoints to review progress, update individual service strategies, and facilitate any modifications based on changes in circumstances (e.g., barriers, completion of E&T components, and job placement). Case managers track and enter activities, participation hours, non-compliance, and changes in enrollment status into the ASSIST Worker Web (AWW) E&T system for their caseloads.

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

Communication/Coordination with:

SNAP eligibility staff:	E&T provider case managers primarily communicate with SNAP eligibility staff through the ASSIST Worker Web (AWW) eligibility system. E&T case managers send alerts and case comments in AWW. SNAP eligibility staff and E&T case managers also communicate by email and phone.
State E&T staff:	E&T provider case managers communicate either directly or through their leadership with State E&T staff. Communications are in the form of emails, phone calls, and monthly meetings.
Other E&T providers:	E&T provider case managers communicate with one another using emails or phone calls.
Community resources:	E&T provider case managers communicate with community partners using emails or phone calls.

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

E&T provider case managers deliver client-centered case management and services, including: outreach, intake, and assessment; referrals to community partners; barrier reduction support; individualized career planning; connection to basic education, prevocational services, work experiences, and workforce preparation activities; and facilitation to other resources such as financial literacy classes and out-of-area job search/relocation resources.

Case managers will provide follow-up services for participants who obtain employment, including job retention services and employment verification. Case managers will assist as needed in activities relevant to documentation and quality assurance and ensure connection to and continuity of services.

Delaware's SNAP E&T provider, Career Team, uses a customer-centered, traumainformed approach to service delivery that features inclusivity, cultural humility, and transparency in data (i.e., analyses by demographics to identify disparities in populations or places). This effort includes developing an understanding of factors influencing inequities, such as access to technology and baseline numeracy, literacy, and computer literacy skills. This approach includes hiring program personnel that reflect the participant populations – including options to implement a peer support model to create an environment in which participants can relate. Career Team utilizes culturally competent, linguistically relevant, and evidence-based strategies for case management services.

#### XIII. Conciliation Process (if applicable)

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

a) Does the State agency offer a conciliation process?

□ Yes (Complete the remainder of this section.)

⊠No (Skip to the next section.)

- b) Describe the conciliation process and include a reference to State agency policy or directives.
- c) What is the length of the conciliation period?

#### **XIV. Disqualification Policy for General Work Requirements**

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

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

- a) What period before application does the State agency use to determine voluntary quit and/or reduction in work effort without good cause per 7 CFR 273.7(j)(1)?
  - ⊠ 30 days
  - $\Box$  60 days
  - $\Box$  Other: Click or tap here to enter text.
- b) For all occurrences of non-compliance discussed below, must the individual also comply to receive benefits again?
  - $\boxtimes$  Yes
  - $\Box$  No
- c) For the first occurrence of non-compliance per 7 CFR 273.7(f)(2)(i), the individual will be disqualified until the later of:
  - ☑ One month or until the individual complies, as determined by the State agency
  - $\Box$  Up to 3 months
- d) For the second occurrence of non-compliance per 7 CFR 273.7(f)(2)(ii), the individual will be disqualified until the later of:
  - Three months or until the individual complies, as determined by the State agency
  - $\Box$  Up to 6 months
- e) For the third or subsequent occurrence per 7 CFR 273.7(f)(2)(iii), the individual will be disqualified until the later of:
  - Six months or until the individual complies, as determined by the State agency
  - $\Box$  Time period greater than 6 months
  - □ Permanently
- f) The State agency will disqualify the:
  - $\boxtimes$  Ineligible individual only

 $\Box$  Entire household (if head of household is an ineligible individual) per 7 CFR 273.7(f)(5)(i)

#### XV. Good Cause

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

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

DSS eligibility staff are responsible for determining good cause when a work registrant refuses or fails to comply with a SNAP work requirement. Good cause includes circumstances beyond the individual's control and is evaluated on a case-by-case basis. In determining whether good cause exists, DSS (and the E&T provider in certain situations) will consider the facts and circumstances, including information submitted by the household member involved and the employer.

Households are given at least ten days to return documentation of good cause if requested. The primary responsibility for providing verification rests with the household. If it is difficult or impossible for the household to obtain documentary evidence in a timely manner, DSS will assist the household in obtaining the needed verification. Acceptable sources of verification include, but are not limited to, the previous employer, employee associations, union representatives, and grievance committees or organizations. Whenever DSS cannot obtain documentary evidence, a collateral contact may be used. DSS is responsible for obtaining verification from acceptable collateral contacts provided by the household.

If the household and DSS are unable to obtain requested verification from these or other sources because the cause for non-compliance with work requirements resulted from circumstances that for a good reason cannot be verified (such as a resignation from employment due to discrimination practices, unreasonable demands by an employer, or the employer cannot be located), the household member will not be sanctioned.

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

DSS eligibility staff are responsible for determining good cause when a work registrant refuses or fails to comply with a SNAP work requirement. Good cause includes circumstances beyond the individual's control and is evaluated on a case-by-

case basis. In determining whether good cause exists, DSS (and the E&T provider in certain situations) will consider the facts and circumstances, including information submitted by the household member involved and the employer. Examples of a good cause reason include, but are not limited to:

- Illness of the work registrant.
- Illness of another household member requiring the presence of the work registrant.
- Unavailability of transportation.
- Unavailability of an appropriate component or opening in an E&T program.
- Lack of adequate child care if the child is age 6 through 11.
- Discrimination by an employer based on age, race, sex, color, disability, religious beliefs, national origin, or political beliefs.
- Unreasonable work demands or conditions, such as working without being paid.
- Enrollment at least half-time in any recognized school, training program, or institution of higher education that requires the work registrant to leave employment.
- Acceptance by another household member of employment or enrollment at least half-time in any recognized school, training program, or institution of higher education in another county, which requires the household to move and thereby requires the work registrant to leave employment.
- Resignations by persons under the age of 60 who are recognized by the employer as retirement.
- Employment that becomes unsuitable as defined in DSS policy.
- Acceptance of employment, but because of circumstances beyond the control of the work registrant, subsequently either does not materialize or results in employment of less than 30 hours a week, or weekly earnings of less than the federal minimum wage multiplied by 30 hours.
- Leaving a job in connection with patterns of employment in which workers frequently move from one employer to another, such as migrant farm labor or construction work.
- c) Please describe the State agency's process to determine good cause if there is not an appropriate and available opening for an E&T participant.

When determining if good cause exists for the unavailability of an appropriate component or opening in an E&T program, DSS eligibility staff will consider Career Team's recommendations and any facts or circumstances submitted by the participant. E&T vendors must explore all available resources, such as referrals to third-party partners or WIOA programs, prior to determining that there is not an appropriate and available opening for an E&T participant. Career Team will make a recommendation to DSS that good cause exists if Career Team is unable to find an appropriate or available E&T activity for the participant.

# **XVI. Provider Determinations**

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

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

Career Team must notify DSS of a provider determination within ten days of the date the determination is made and inform DSS of the reason for the provider determination. DSS allows Career Team to move a participant from the initial component to another component where the individual is likely better suited without the State agency needing to act on the provider determination. Currently, Career Team informs DSS of the participant's enrollment in a new component by entering information in the E&T system via case comments. DSS allows Career Team to use this option. The third-party partners inform Career Team if a participant is not successfully completing their program for Career Team to perform outreach and reassess which component would be a better fit for the participant. DSS eligibility staff review case comments and will contact Career Team as needed to discuss the provider determinations.

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

DSS will notify an E&T participant verbally or by telephone of a provider determination within ten days of receiving notification from Career Team and document the contact in the participant's case file. DSS eligibility staff will review case comments from Career Team and refer individuals to an appropriate E&T component, as needed. Within the fiscal year, DSS will implement a letter to notify E&T participants in writing of a provider determination.

In the notification, DSS explains the following:

- The purpose of a provider determination
- The result of the provider determination and which action was taken by the State:
  - 1. The individual is being referred to an appropriate E&T component;
  - 2. The individual was reassessed and determined to be exempt;
  - 3. The individual is being referred to an appropriate workforce partnership, if applicable; or
  - 4. The individual is being referred to another work program or workforce partnership outside of SNAP E&T and is exempt.
- That the individual is not being sanctioned as a result of the provider determination

• For ABAWDs: That countable months will accrue towards their three-month participation time limit the next full benefit month after the month during which the State agency notifies the ABAWD of the provider determination, unless the ABAWD fulfills the work requirements in accordance with 7 CFR 273.24, or the ABAWD has good cause, lives in a waived area, or is otherwise exempt.

# **XVII. Participant Reimbursements**

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

#### Table E.I. Estimates of Participant Reimbursements

I.	Estimated number of E&T participants to receive participant reimbursements. This is an unduplicated count. If an individual participates in more than one month, they would only be counted once.	1,915
numi Table Work partie	e agencies should take into consideration the ber of mandatory E&T participants projected in e H – Estimated Participant Levels in the Excel book, and the number of mandatory E&T cipants likely to be exempted, if the State agency of provide sufficient participant reimbursements.	
II.	Estimated number of E&T participants to receive participant reimbursements per month. This is a duplicated count. This calculation can include the same individual who participates in more than one month.	160
III.	Estimated budget for E&T participant reimbursements in upcoming FY.	\$208,500
IV.	Estimated budget for E&T participant reimbursements per month in upcoming FY. (Row III/12)	\$17,375
V.	Estimated amount of participant reimbursements per E&T participant per month. (Row IV/Row II)	\$109

# Participant Reimbursement Details

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

- Allowable Participant Reimbursements. Every State agency must include child care and transportation in this table, as well as other major categories of reimbursements (examples of categories include, but are not limited to: tools, test fees, books, uniforms, license fees, electronic devices, etc.). Mandatory States must meet all costs associated with participating in an E&T program, or else they must exempt individuals from E&T.
- Participant Reimbursement Caps (optional). States have the option to establish maximum levels (caps) for reimbursements available to individuals. Indicate any caps on the amount the State agency will provide for the participant reimbursement.
- Who provides the participant reimbursements? Indicate if the participant reimbursement is provided by the State agency, a provider, an intermediary, or some other entity. The State agency remains ultimately responsible for ensuring individuals receive participant reimbursements, even if it has contracted with another entity to provide them.
- **Method of disbursement.** Indicate if the participant receives the participant reimbursement *in advance* or as *a reimbursement.* Also indicate if the amount of the participant reimbursement is an *estimated amount* or the *actual amount*.

## Table E.II. Participant Reimbursement Details

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

Allowable	Participant	Who provides the	Method of disbursement
Participant	Reimbursement	participant	
Reimbursements	Caps (optional)	reimbursement?	
Transportation Transportation assistance necessary for E&T attendance, completion of E&T activities, and employment.	\$50.00 per participant per month Costs that exceed the reimbursement cap may be reimbursed with DSS approval.	All SNAP E&T Providers - the E&T providers coordinate to ensure there is no duplication of reimbursements.	In advance as an estimated cost – bus passes and gas cards

Allowable Participant	Participant Reimbursement	Who provides the participant	Method of
Reimbursements	Caps (optional)	reimbursement?	disbursement
Fees Reimbursable fees include testing for employment or education (e.g., GED test fees) and other fees directly related to training or	\$200.00 per participant per month Costs that exceed the reimbursement cap may be reimbursed with DSS approval.	All SNAP E&T Providers - the E&T providers coordinate to ensure there is no duplication of reimbursements.	In advance as a direct payment to the supplier or reimbursement for the verified actual cost
employment. Clothing Uniforms, clothing, and shoes that are appropriate and necessary for interviewing and employment.	Up to \$150.00 per participant per fiscal year Costs that exceed the reimbursement cap may be reimbursed with DSS approval.	All SNAP E&T Providers - the E&T providers coordinate to ensure there is no duplication of reimbursements.	In advance as a direct payment to the supplier or reimbursement for the verified actual cost
Equipment Equipment, safety equipment, tools, books, or other supplies required to participate in training or employment.	Up to \$250.00 per participant per fiscal year Costs that exceed the reimbursement cap may be reimbursed with DSS approval.	All SNAP E&T Providers - the E&T providers coordinate to ensure there is no duplication of reimbursements.	In advance as a direct payment to the supplier or reimbursement for the verified actual cost
Physical Exam Authorized when a participant is required to undergo a physical exam to participate in training or employment and such exam is not available through a public health facility or is not covered by Medicaid.	Up to \$150.00 per participant per fiscal year Costs that exceed the reimbursement cap may be reimbursed with DSS approval.	All SNAP E&T Providers - the E&T providers coordinate to ensure there is no duplication of reimbursements.	In advance as a direct payment to the supplier or reimbursement for the verified actual cost
Eye Exams and Eyeglasses	\$350.00 per participant per fiscal year	All SNAP E&T Providers - the E&T providers coordinate	In advance as a direct payment to the

Allowable Participant Reimbursements	Participant Reimbursement Caps (optional)	Who provides the participant reimbursement?	Method of disbursement
Authorized when the assessment indicates the participant's vision is impaired, or when the individual needs glasses to continue in a component or employment. The reimbursement does not include contact lenses unless they are medically necessary. This service is authorized only when it is not available through a public health facility or is not covered by Medicaid.	Costs that exceed the reimbursement cap may be reimbursed with DSS approval.	to ensure there is no duplication of reimbursements.	supplier or reimbursement for the verified actual cost
Child Care Child care assistance is available through the DSS Purchase of Care program for SNAP recipients with children who require child care to participate with SNAP E&T. The types of care provided include part-time care, full- time care, before/after school care, and extended care.	Payment rates for child care reimbursements are established in accordance with the Child Care and Development Block Grant and based on local market rate surveys.	DSS pays an agreed state rate to licensed child care providers in Delaware for SNAP E&T participants. No SNAP E&T funds are used for child care.	Reimbursemen t paid to the supplier for the verified actual cost

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

Child care assistance is available through the DSS Purchase of Care program for SNAP recipients with children who require child care to participate with SNAP E&T. The payment rates are established by the Child Care and Development Block Grant (CCDBG) and based on local market rate surveys. Child care is authorized for participants on a part-time or full-time basis, depending on the E&T participation hours. Participants can choose from any of the licensed child care providers who participate in the DSS Purchase of Care program. Current reimbursement rates are available at:

DSS Services: Child Care - Delaware Health and Social Services - State of Delaware

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

The DSS Purchase of Care program does not have a waiting list for child care slots.

# XVIII. Work Registrant Data

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

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

The ASSIST Worker Web (AWW) eligibility system determines work registrant status for SNAP recipients based on case information input by eligibility staff. AWW automatically identifies all SNAP recipients ages 16 through 59 and determines if they meet any of the work registration exemption criteria in 7 CFR 273.7(b)(1). If a SNAP recipient does not have an exemption, AWW will identify and code that individual as a work registrant on the E&T Requirement Status screen. This process is completed at application, recertification, and when a change is reported that affects work registrant status.

Each month, AWW compiles the number of new work registrants for the systemgenerated E&T participation report. This report identifies all SNAP recipients coded as work registrants who received benefits through September and had an open SNAP case as of October 1st of the new fiscal year. DSS uses the AWW E&T participation report to identify all work registrants in the state as of October 1st of the new fiscal year.

b) Describe measures taken to prevent duplicate counting.

The SNAP work registrants who are identified as of October 1st of the fiscal year are flagged in the system. When the AWW E&T participation report runs to identify new work registrants for the first quarter, the report will not include any work registrants who were identified on October 1st. The new work registrants counted for the first quarter are then flagged in the system. When the report is run for the second quarter, the report identifies all new work registrants who were not previously flagged. The new work registrants counted for the second quarter are included in the report and then flagged in the system. This process continues for the third and fourth quarters of the fiscal year.

# XIX. Outcome Reporting Measures

#### **National Reporting Measures**

#### Table E.III. National Reporting Measures

Source	Employment	Completion
[Check the data source used for the national	& Earnings	of Education
reporting measures. Check all that apply]	Measures	of Training
Quarterly Wage Records (QWR)	🛛 Yes 🗆 No	🗆 Yes 🖾 No
National Directory of New Hires (NDNH)	⊠Yes □ No	□ Yes ⊠No
State Information Management System (MIS). Indicate	⊠Yes □ No	⊠Yes □ No
below what MIS system is used.		
Manual Follow-up with SNAP E&T Participants. Answer	□Yes ⊠ No	🗆 Yes 🖾 No
follow-up question below.		
Follow-up Surveys. State agencies must complete the	□Yes ⊠ No	□Yes ⊠No
Random Sampling Plan section below, if follow-up		
surveys is used.		
Other - Describe source: Participant data from the E&T providers	□Yes ⊠ No	⊠Yes ⊡No

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

ASSIST Worker Web (AWW) E&T subsystem

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

#### Not Applicable

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

Not Applicable

## **State Component Reporting Measures**

- d) Check all data sources used for the State-specific component measures.
  - $\boxtimes$  Quarterly Wage Records (QWR)
  - □ National Directory of New Hires (NDNH)
  - State Management Information System. Indicate the MIS used below.

□ Manual follow-up with SNAP E&T Participants. *Answer follow-up question below.* 

- □ Follow-up Surveys. Answer follow-up question below.
- e) If a State MIS is used, please indicate the system (e.g., SNAP eligibility system, State's Department of Labor MIS).

ASSIST Worker Web (AWW) E&T subsystem

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

Not Applicable

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

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

#### Not Applicable

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

	Methodology including the	
		timeframes being reported (e.g.
Component	Outcome Measure	denominator and numerator).
Example: Supervised Job Search	Example: Number of people who obtain employment after completion of component.	Example: Numerator will include those participants who obtained employment after completing component during the period of 10- 1-2019 to 9-30-2020
		Denominator will include the number of participants that participated in supervised job search during the period of 10-1- 2019 to 9-30-2020.
Supervised Job	The number and	Numerator: The number of
Search	percentage of participants	participants who gained
	who gained unsubsidized	unsubsidized employment after
	employment after	completing Supervised Job Search
	completing Supervised Job	during the period of 10/1/2024
	Search.	through 9/30/2025 unduplicated.
		Denominator: The number of
		participants who participated in
		Supervised Job Search during the

#### Table E.IV. Component Outcome Measures

Component	Outcome Measure	Methodology including the timeframes being reported (e.g. denominator and numerator).
Component		period of 10/1/2024 through
		9/30/2025 unduplicated.
Job Search	The number and	Numerator: The number of
Training	percentage of participants who gained unsubsidized	participants who gained unsubsidized employment after
	employment after	completing Job Search Training
	completing Job Search	during the period of 10/1/2024
	Training.	through 9/30/2025 unduplicated.
		Denominator: The number of
		participants who participated in Job
		Search Training during the period
		of 10/1/2024 through 9/30/2025
		unduplicated.
Job Retention	The number and	Numerator: The number of
	percentage of participants	participants who retained
	who retained employment	employment for 90 days after
	for 90 days after receiving	receiving E&T services during the
	E&T services and	period of 10/1/2024 through
	acquiring employment.	9/30/2025 unduplicated.
		Denominator: The number of
		participants who participated in Job
		Retention during the period of
		10/1/2024 through 9/30/2025
		unduplicated.
Workfare	The number and	Numerator: The number of
	percentage of participants	participants who gained
	who gained unsubsidized	unsubsidized employment after
	employment after	completing Workfare during the
	completing Workfare.	period of 10/1/2024 through
		9/30/2025 unduplicated.
		Denominator: The number of
		participants who participated in
		Workfare during the period of
		worklare during the period of

		Methodology including the timeframes being reported (e.g.	
Component	Outcome Measure	denominator and numerator).	
		10/1/2024 through 9/30/2025	
		unduplicated.	
Work Readiness	The number and	Numerator: The number of	
Training	percentage of participants	participants who gained	
	who gained unsubsidized	unsubsidized employment after	
	employment after	completing Work Readiness	
	completing Work	Training during the period of	
	Readiness Training.	10/1/2024 through 9/30/2025	
		unduplicated.	
		Denominator: The number of	
		participants who participated in	
		Work Readiness Training during	
		the period of 10/1/2024 through	
		9/30/2025 unduplicated.	

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

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

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

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

□ Yes (Complete the rest of this section.)

No (Skip to Section G: Component Detail.)

#### Table F.I. Pledge Assurances

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

- b) Where will the State agency offer qualifying activities?
  - □ Statewide
  - □ Limited areas of the State (Complete questions c and d below.)
- c) Explain why the State agency will offer qualifying activities in limited areas of the State.
  - □ ABAWD waiver for parts of the State
  - □ Will use discretionary exemptions
  - $\Box$  Other: Click or tap here to enter text.
- d) If the State agency will be offering qualifying activities only in limited areas of the State, please list those localities/areas.

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

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

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

- h) What services and activities will be provided through SNAP E&T? (List the components and participant reimbursements.) This should be consistent with the components detailed in Section G, as well as Section E-XIV regarding participant reimbursements.
- i) What services and activities will be provided outside of SNAP E&T? (List the operating program, such as title 1 of WIOA, services and activities.)
- j) To pledge, State agencies must have capacity to offer a qualifying activity to every at-risk ABAWD for every month they are at-risk. What is the State agency's plan if more ABAWDs than expected choose to take advantage of the offer of a qualifying activity? For instance, how will the State agency ensure the availability of more slots? What steps has the State agency taken to guarantee a slot through agreements or other arrangements with providers?

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

١.	Question How many ABAWDs did you serve in E&T in the previous FY?	Number
11.	How many SNAP recipients are expected to be ABAWDs this fiscal year? This should be an unduplicated count. If an individual is an ABAWD at any time during the fiscal year, they would be counted only once. Note: This should be consistent with the projected number of ABAWDs shown on Table H row 11 in the Excel Workbook.)	
111.	How many ABAWDs will meet the criteria of an at-risk ABAWD? This should be an unduplicated count. If an individual is an at-risk ABAWD at any time during the fiscal year, they would be counted only once. (Note: This should be consistent with the projected number of at-risk ABAWDs shown on Table H row 14 in the Excel Workbook.)	

	Question	Number
ĪV.	Number of at-risk ABAWDs averaged monthly? This should be annual total from line (III) divided by 12.	

### Table F.III. Available Qualifying Activities

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

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

#### Table F.IV. Estimated cost to fulfill the pledge

		Value
Ι.	What is the projected total cost to serve all at-risk ABAWDs in your State?	
11.	Of the total in (I), what is the total projected administrative costs of E&T?	
111.	Of the total in (I), what is the total projected costs for participant reimbursements in E&T?	

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

# G. Component Detail

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

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

# I. Non-Education, Non-Work Components

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

- Summary of the State guidelines implementing supervised job search (applies to SJS only). This summary of the State guidelines, at a minimum, must describe: The criteria used by the State agency to approve locations for supervised job search, an explanation of why those criteria were chosen, and how the supervised job search component meets the requirements to directly supervise the activities of participants and track the timing and activities of participants.
- Direct link (applies to SJS only). Explain how the State agency will ensure that supervised job search activities will have a direct link to increasing the employment opportunities of individuals engaged in the activity (i.e. how the State agency will screen to ensure individuals referred to SJS are job ready and how the SJS program is tailored to employment opportunities in the community).
- **Description of the component (applies to JST, SET, and Workfare)**. Provide a brief description of the activities and services.
  - For JR Only: Provide a summary of the activities and services. Include a description of how the State will ensure services are provided for no less 30 days and no more than 90 days.

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

Details	Supervised Job Search (SJS)
Summary of the State guidelines implementing SJS	All SNAP E&T participants are initially assigned job- seeking activities that will enhance their employability unless they are working at least 80 hours per month or are starting vocational training within 30 days of orientation. E&T participants may start Supervised Job Search after completing orientation and assessment.
	Supervised Job Search consists of various activities, including employability assessment, interviewing skills, mock interviews, resume development, communication skills, navigating the web training, career exploration, job seeking skills, job leads, job placement, and job search. Registration in the Delaware Department of Labor's Delaware JobLink employment and training system is required for all SNAP E&T participants. This component may be completed in person at a SNAP E&T vendor location or virtually. Participation in the component is tracked weekly.
	The maximum duration of this component is two months for Non-ABAWDs and one month for ABAWDS. If unsuccessful, the E&T case manager will determine whether the job search activity should continue or whether another component is more appropriate.
	Supervised Job Search is monitored by the E&T vendor. All participants are required to sign in and out of the E&T vendor's system and maintain a job search log. The system tracks the time spent in the component daily, and hours are documented each week and approved by the case manager. Job search activities are verified through weekly meetings with the participant, attendance documentation for job fairs, confirmation of job application submissions, and follow-up calls made to employers.
Direct link	The E&T case managers assess participants to determine if the individual has the skills to participate in Supervised Job Search. If the participant needs more assistance, the participant will attend Job Search Training to address their needs. The E&T vendor assists each participant with enrolling in Delaware JobLink, which is a free online platform that connects job seekers, employers, training

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

	providers, and employment event coordinators in Delaware. The E&T vendor also holds job fairs with employers who are currently hiring to ensure the Supervised Job Search component is tailored to current employment opportunities.
Target population	ABAWDs, Non-ABAWDs, Returning Citizens, 18-25 year olds
Criteria for participation	The participant's assessment shows readiness for work comparable to the type of job, and the participant tests at a 4th-grade level or above on the CASAS test. Participants not meeting this condition will be referred for Adult Basic Education.
Geographic area	Statewide
E&T providers	Career Team
Projected annual participation	125
Estimated annual component costs	\$25,000

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

Details	Job Search Training (JST)
Description of the component	Job Search Training consists of enhancing job-seeking techniques, increasing job search motivation, assessing job skills, developing resumes, and registering on the Delaware Department of Labor's Delaware JobLink employment and training system. Participation in the component is tracked weekly.
Target population	ABAWDs, Non-ABAWDs, Returning Citizens, 18-25 year olds
Criteria for participation	The participant tests at a 4th-grade level or above on the CASAS test. Participants not meeting this condition will be referred for Adult Basic Education.
Geographic area	Statewide
E&T providers	Career Team

Projected annual participation	100
Estimated annual component costs	\$21,000

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

Details	Job Retention (JR)
Description of the component	Job Retention services are offered for at least 30 days and up to 90 days to E&T participants who gain employment after participating in another E&T component through Career Team or another E&T partner. The participant's case manager tracks the 30 to 90-day period. Job retention services include case management, optional workplace navigation courses, job placement intervention, and reimbursements for documented expenses related to employment (e.g., required uniforms, clothing for employment, equipment, supplies, tools, testing fees, and transportation). Job Retention services are provided in person at a SNAP E&T vendor location or by phone. Participation in the component is tracked weekly.
Target population	ABAWDs, Non-ABAWDs, Returning Citizens, 18-25 year olds
Criteria for participation	The participant is placed in a job from participation in an E&T component.
Geographic area	Statewide
E&T providers	Career Team
Projected annual participation	126
Estimated annual component costs	\$25,200

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

Details	Self-Employment Training (SET)
Description of the	Not Applicable
component	
Target population	
Criteria for participation	
Geographic area	
E&T providers	
Projected annual	
participation	
Estimated annual	
component costs	

Details	Workfare (W)
Description of the component	Workfare allows individuals to gain work experience and useful workplace skills at a supervised work site. In lieu of wages, workfare participants receive compensation in the form of their household's monthly SNAP allotment. The hours of participation are calculated by the amount of the monthly SNAP allotment divided by the minimum wage. Workfare may be combined with supervised job search, job search training, or other components.
	Workfare is available to ABAWD participants only. If a participant has not obtained employment after completing Supervised Job Search, the participant is offered a workfare slot at a local public or private non-profit agency, such as a government facility or a charitable organization. Participation in the component is tracked weekly.
Target population	ABAWDs
Criteria for participation	The participant is an ABAWD, meets the specific work requirements for the Workfare placement, and tests at a 4th-grade level or above on the CASAS test. Participants not meeting this condition will be referred for Adult Basic Education.
Geographic area	Statewide
E&T providers	Career Team
Projected annual participation	100
Estimated annual component costs	\$16,000

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

# II. Educational Programs

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

- **Description of the component**. Provide a summary of the activities and services.
- **Target population**. Identify the population that will be targeted. Include special populations such as ABAWDs, Returning Citizens, Homeless, Older Disconnected Youth, etc.
- **Criteria for participation.** What skills, knowledge, or experience is necessary for participation in the component? For example, literacy or numeracy levels, recent labor market attachment, computer literacy etc.
- **Geographic area**. Where will the component be available (statewide, regional, counties, localities not covered by ABAWD waivers, areas covered by American Job Centers, etc.).
- **E&T providers**. Identify all entities that will provide the service.
- **Projected annual participation**. Project the number of unduplicated individuals.
- Estimated annual component costs. Project only administrative costs.
- Not supplanting: Federal E&T funds used for activities within the education component must not supplant non-Federal funds for existing educational services and activities. For any education activities, provide evidence that costs attributed to the E&T program are not supplanting funds used for other existing education programs.
- **Cost parity**: If any of the educational services or activities are available to persons other than E&T participants, provide evidence that the costs charged to E&T do not exceed the costs charged for non-E&T participants (e.g. comparable tuition).

Details	Basic/Foundational Skills Instruction (includes High School Equivalency Programs) (EPB)
Description of the component	Basic Education & Foundational Skills include academic instruction and education services below the post- secondary level, which increase an individual's ability to read, write, and perform mathematics or other activities necessary for the attainment of a secondary school diploma or its recognized equivalent, transition to post- secondary education and training, and obtainment of employment.
	This component includes Adult Basic Education (ABE), basic literacy, and high school equivalency (GED). Delaware does not pay for tuition for associate degrees or higher academic degrees.
	SNAP E&T provides referrals to education programs, case management, and supportive services for this component. Participation in the component is tracked weekly.
Target population	ABAWDs, Non-ABAWDs, Returning Citizens, 18-25 year olds
Criteria for participation	The participant meets the specific requirements for the education program.
Geographic area	Statewide
E&T providers	Referred by Career Team to external providers
Projected annual participation	5
Estimated annual component costs	\$1,250
Not supplanting	DSS does not fund any basic education providers in the SNAP E&T program. SNAP E&T vendors refer participants to available basic education programs. SNAP E&T funds are not used in lieu of other federal or non-federal funds. Other available funding sources are always used before SNAP E&T funds.
Cost parity	Educational costs are reviewed annually to ensure costs charged to E&T participants are not greater than costs charged to non-E&T participants.

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

	Career/Technical Education Programs or other
Details	Vocational Training (EPC)
Description of the component	Career/Technical Education consists of formal training that provides individuals with the skills and knowledge necessary to further education and prepare for careers in current or emerging employment sectors. The following training programs are aligned with the needs of Delaware's labor market: culinary arts/food services, HVAC, plumbing, construction, CNA, CDL, medical billing and coding, computer applications, sales, warehouse logistics, and customer service. Career Team will assist a participant with finding and attending the training program identified in the participant's employment plan. If one of the E&T third- party partners does not provide the training, Career Team will assist the client with applying for a training program and obtaining funding.
	SNAP E&T provides technical training programs, referrals to other Career/Technical Education programs, case management, and supportive services for this component. Participation in the component is tracked weekly.
	SNAP E&T Third-Party Partner Training Programs:
	<b>Food Bank of Delaware – Culinary Training:</b> The Culinary School, a certified trade school by the Delaware Department of Education, offers a 14- week program that prepares adults for entry-level jobs in the culinary and food service industry. Students are taught skills that are highly desirable to employers in the food industry and are placed in jobs in the industry that provide job security and economic sustainability. The training culminates with a two-week subsidized internship at a food service company, restaurant, or catering company. Students can obtain the ServSafe® Manager Certification.
	Food Bank of Delaware – Warehouse/Logistics Training: Logistics, Operations, General Warehousing, and Inventory Control (LOGIC) is an 11-week training program that prepares students for careers in the

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

warehousing/logistics industry. In addition to job skills training, participants attend daily life skills presentations and activities to help them become familiar with employer expectations and develop skills that will allow them to secure and maintain employment. Students have the opportunity to receive their OSHA 10 General Industry Certificate and their Forklift Certification during the program. The final two weeks of the program are spent in a subsidized internship at a partner employer.

#### Ministry of Caring – CNA Training:

The CNA certificate program is designed for students desiring training to become certified nursing assistants. This program prepares the student, upon graduation, to sit for the Delaware State Nursing Assistant Certification Examination and for an entry-level position as a nursing assistant. Students complete classroom instruction in Nursing Assistant Theory and Skills (104 hours) and Nursing Assistant Clinical training (80 hours). Students are required to participate in a clinical learning experience at an approved nursing facility under the supervision of an instructor.

#### Ministry of Caring – CDL Training:

The Class A CDL Driving program is designed to provide students with the basic skills to become safe, well-prepared commercial drivers employed in the transportation industry. The CDL instruction includes two classes, Introduction and Basic Operation (80 hours) and Road and Range (80 hours). Through a combination of classroom presentation and hands-on practice, students will be prepared to take the CDL knowledge and skills tests. Upon passing this exam, graduates will be qualified to enter entry-level employment in the transportation industry.

#### Ministry of Caring – Phlebotomy Training:

The phlebotomy program is a unique blend of lectures and labs to get students experienced with a variety of venipuncture techniques. The classes are kept small, up to 15 students, to give each student ample attention and practice. The three-day training is approved by the National Registry of

	Allied Health Professionals (NRAHP). It teaches students about blood collection and safety in the field. After class completion, students will take an in-class practical exam one-on-one with an instructor. After students pass their practical exam, they will take the written portion of the National Phlebotomy Certification (NPC), which will allow them to practice phlebotomy in most states.
Target population	ABAWDs, Non-ABAWDs, Returning Citizens, 18-25 year olds, Homeless
Criteria for participation	The participant meets the specific requirements for the education program.
	Food Bank of Delaware Training Criteria:
	<ul> <li>18 years of age or older.</li> <li>Have a high school diploma or GED diploma or be seeking to obtain one.</li> <li>Have reading and math skills at or above an 8th grade level.</li> <li>Be available to be in class from 9:00 am to 4:00 pm Monday through Friday.</li> <li>Have a strong desire to gain and maintain employment in the food service or warehouse/logistics industry.</li> <li>Be able to read, speak, and comprehend English in a fast-paced environment.</li> <li>Lift 40 pounds and stand up to 6-8 hours daily with or without reasonable accommodations.</li> <li>See well enough to read at 2.5 feet with or without reasonable accommodations.</li> <li>Do not have convictions for certain violent or sexually exploitive crimes. Information about criminal convictions will be used to provide more effective job placement and other services.</li> <li>Pass a pre-admission drug test and random tests during training.</li> </ul>
	Ministry of Caring Training Criteria:
	<ul> <li>Have a high school diploma, GED, or higher.</li> <li>Pass a drug screening.</li> <li>Pass a criminal background check.</li> </ul>

	<ul> <li>Have an active driver's license for at least two years and a good driving record (CDL only).</li> <li>Pass a physical screening (CDL only).</li> </ul>
Geographic area	Statewide
E&T providers	Referred by Career Team to external providers Food Bank of Delaware Ministry of Caring
Projected annual participation	Total - 75 • Career Team - 20 • Food Bank of Delaware - 20 • Ministry of Caring - 35
Estimated annual component costs	Total - \$274,279 Career Team - \$20,000 Food Bank of Delaware - \$125,604 (\$62,802 federal cost) Ministry of Caring - \$128,675 (\$64,337.50 federal cost)
Not supplanting	SNAP E&T funds are not used in lieu of other federal or non-federal funds. Other available funding sources are always used before SNAP E&T funds.
Cost parity	Educational costs are reviewed annually to ensure costs charged to E&T participants are not greater than costs charged to non-E&T participants.

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

Details	English Language Acquisition (EPEL)
Description of the	Participants are empowered to learn English as a second
component	language (ESL) through a comprehensive range of services tailored to their unique needs.
Target population	Participants with limited English proficiency
Criteria for participation	Participants who have identified English as their second language and need English language instruction to obtain or retain employment or participate in an education or training program.
Geographic area	Statewide
E&T providers	Referred by Career Team to external providers

Projected annual participation	17
Estimated annual component costs	\$4,250
Not supplanting	SNAP E&T funds are not used in lieu of other federal or non-federal funds. Other available funding sources are always used before SNAP E&T funds.
Cost parity	Educational costs are reviewed annually to ensure costs charged to E&T participants are not greater than costs charged to non-E&T participants.

# Table G.IX. Educational Program Details: Integrated Education andTraining/Bridge Programs

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

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

Details	Work Readiness Training (EPWRT)
Description of the component	<ul> <li>Work Readiness Training provides skills and work readiness assessments and educational remediation services that prepare individuals for the workforce. This component includes: <ul> <li>Career EDGE Curriculum</li> <li>Career EDGE Professional Development Toolkit</li> </ul> </li> </ul>

	<ul> <li>Personality Type Assessments</li> <li>Interest Profiler</li> <li>Career Planning Assessment</li> <li>Participation in the component is tracked weekly.</li> </ul>
Target population	ABAWDs, Non-ABAWDs, Returning Citizens, 18-25 year olds
Criteria for participation	The participant tests at a 4th-grade level or above on the CASAS test. Participants not meeting this condition will be referred for Adult Basic Education.
Geographic area	Statewide
E&T providers	Career Team
Projected annual participation	50
Estimated annual component costs	\$10,000
Not supplanting	SNAP E&T funds are not used in lieu of other federal or non-federal funds. Other available funding sources are always used before SNAP E&T funds.
Cost parity	Educational costs are reviewed annually to ensure costs charged to E&T participants are not greater than costs charged to non-E&T participants.

# Table G.XI. Educational Program Details: Other

Details	Other (EPO): State agency must provide description
Description of the	Not Applicable
component	
Target population	
Criteria for participation	
Geographic area	
E&T providers	
Projected annual	
participation	
Estimated annual	
component costs	
Not supplanting	

# III. Work Experience (WE)

Work experience is divided into two subcomponents per 7 CFR 273.7(e)(2)(iv): Work activity (WA) and Work-based learning (WBL). WBL activities like internships, apprenticeships, and on-the-job training, among others, may provide wages subsidized by the E&T program. In order to capture information about WBL activities that may be subsidized or unsubsidized by E&T, there are two sets of tables below for each kind of WBL activity – the first group of tables are for activities not subsidized by E&T (e.g. Work-based learning – Internships) and the second group of tables are for activities subsidized by E&T (e.g. Work-based learning – Internships - Subsidized by E&T). Note that subsidized means programs where E&T funding is used to subsidize wages of participants. Subsidized in this context does not mean programs where participants receive a subsidized wage from another source.

# Work Activity and Unsubsidized WBL Components

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

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

### Table G.XII. Work Experience: Work Activity

Details	Work Activity (WA)
Description of the	Not Applicable
component	
Target population	
Criteria for participation	
Geographic area	
E&T providers	
Projected annual	
participation	
Estimated annual	
component costs	

# Table G.XIII. Work Experience: Internship

Details	Internship (WBLI)
Description of the	Ministry of Caring – CNA Training:
component	Students enrolled in the Ministry of Caring's CNA program are required to participate in a two-week clinical learning experience at an approved nursing facility under the supervision of an instructor.
Target population	ABAWDs, Non-ABAWDs, Homeless
Criteria for participation	Completion of the Ministry of Caring's CNA training.
Geographic area	New Castle County
E&T providers	Ministry of Caring
Projected annual participation	20
Estimated annual component costs	Costs for this component are included in the career/technical education component costs for the CNA training.

Details	Pre-Apprenticeship (WBLPA)
Description of the component	Not Applicable
Target population	
Criteria for participation	
Geographic area	
E&T providers	
Projected annual participation	
Estimated annual component costs	

# Table G.XV. Work Experience: Apprenticeship

	Apprenticeship (WBLA)
Details	
Description of the	Not Applicable
component	
Target population	
Criteria for participation	
Geographic area	
E&T providers	
Projected annual	
participation	
Estimated annual	
component costs	

	On-the-Job-Training (WBLOJT)
Details	
Description of the	Not Applicable
component	
Target population	
Criteria for participation	
Geographic area	
E&T providers	
Projected annual	
participation	
Estimated annual	
component costs	

# Table G.XVII. Work Experience: Transitional Jobs

	Transitional Jobs (WBLTJ)
Details	· · · · · ·
Description of the	Not Applicable
component	
Target population	
Criteria for participation	
Geographic area	
E&T providers	
Projected annual	
participation	
Estimated annual	
component costs	

	Work-based learning - Other (WBLO): State agency
Details	must provide description
Description of the	Not Applicable
component	
Target population	
Criteria for participation	
Geographic area	
E&T providers	
Projected annual	
participation	
Estimated annual	
component costs	

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

#### Subsidized WBL Components

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

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

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

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

Details	Internship – Subsidized by E&T (WBLI - SUB)
Description of the	Food Bank of Delaware – Culinary Training:
component	Students enrolled in the Food Bank of Delaware's
	Culinary program are required to participate in a two-
	week internship at a food service company, restaurant,
	or catering company. Students complete 60 hours over
	two weeks for the internship and earn \$15.00/hour. This
	internship operates in compliance with all applicable
	labor laws. Food Bank of Delaware works with other
	partners and employers to ensure that no individual
	outside of SNAP E&T is displaced. The internship
	program also provides the same benefits and working
	conditions as non-E&T participants doing comparable
	work for comparable hours. Internship goals include safe
	food handling practices, knife skills, the ability to read
	and follow a recipe using correct cooking methods and
	understanding employer expectations such as following
	directions and time management. During the two-week internship, students function as an employee at the
	employer partner site. Students are provided with an
	outline of the learning objectives as part of the internship.
	The two-week internship follows an articulated and
	documented syllabus for students and on-site supervisor
	of the employer partner to follow. Feedback is given to
	the student by the on-site supervisor at the employer
	partner site daily, and this feedback is also shared with
	Food Bank of Delaware daily. The components of this
	syllabus are communicated by the employer partner to all
	students throughout the internship. The culinary
	internship was designed with the input of industry
	professionals. Food Bank of Delaware also continues to
	gather feedback from employer partners about their
	needs to update the internship as needed. During this
	internship, students act as line or prep cooks. Employers
	and industry professionals serve as guest speakers and
	share their work experience in this two-week period.
	Participant reimbursements/support services are
	provided to students that incur expenses that would keep
	them from engaging in the internship. These expenses
	must be reasonable, necessary, and directly related to
	participating in the culinary internship. The goal of the
	internship is to secure regular, unsubsidized
	employment. The majority of graduates are hired by
	industry employer partners instead of the work site
	employer. If participants have not secured unsubsidized

 Table G.XIX. Subsidized Work Experience: Internship – Subsidized by E&T

employment by the final two weeks of the program, they participate in the subsidized internship until a job placement is secured or the final two weeks have been completed.
Food Bank of Delaware – Warehouse/Logistics Training: Students enrolled in the Food Bank of Delaware's LOGIC program are required to participate in a two-week internship at a partner employer. Students complete 60 hours over two weeks for the internship and earn \$15.00/hour. This internship operates in compliance with all applicable labor laws. Food Bank of Delaware works with other partners and employers to ensure that no individual outside of SNAP E&T is displaced. Food Bank of Delaware also provides the same benefits and working conditions as non-E&T participants doing comparable work for comparable hours. Internship goals include safety precautions, equipment operation, warehouse operations, and understanding employer expectations such as following directions and time management. During the two-week internship, students function as an employee at the employer partner site. Students are provided with an outline of the learning objectives as part of the internship. The two-week internship follows an articulated and documented syllabus for students and on-site supervisor of the employer partner to follow. Feedback is given to the student by the on-site supervisor at the employer partner site daily, and this feedback is also shared with Food Bank of Delaware daily. The components of this syllabus are communicated by the employer partner to all students throughout the internship. The LOGIC internship was designed with the input of industry professionals. Food Bank of Delaware also continues to gather feedback from employer partners about their needs to update the internship as needed. During this internship, students act as warehouse associates. Employers and industry professionals serve as guest speakers and share their work experience in this two-week period. Participant reimbursements/support services are provided to
students that incur expenses that would keep them from engaging in the internship. These expenses must be reasonable, necessary, and directly related to participating in the LOGIC internship. The goal of the
internship is to secure regular, unsubsidized

	employment. The majority of graduates are hired by industry employer partners instead of the work site employer. If participants have not secured unsubsidized employment by the final two weeks of the program, they participate in the subsidized internship until a job placement is secured or the final two weeks have been completed.
Target population	ABAWDs and Non-ABAWDs
Criteria for participation	Completion of the Food Bank of Delaware's Culinary or LOGIC training.
Geographic area	Statewide
E&T providers	Food Bank of Delaware
Projected annual participation	20
Estimated annual component costs	\$22,320 (\$11,160 federal cost)
	\$15/hour x 60 hours = \$900 \$900 + 24% temp fees (\$216) = \$1,116 per student \$1,116 x 20 students = \$22,320
Length of time the SWBL will run	60 hours over two weeks
Other administrative costs associated with SWBL	Temporary agency fees

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

Details	Pre-Apprenticeship– Subsidized by E&T (WBLPA- SUB)
Description of the component	Not Applicable
Target population	
Criteria for participation	
Geographic area	
E&T providers	
Projected annual	
participation	
Estimated annual	
component costs	
Length of time the SWBL	
will run	
Other administrative costs	
associated with SWBL	

Details	Apprenticeship – Subsidized by E&T (WBLA- SUB)
Description of the	Not Applicable
component	
Target population	
Criteria for participation	
Geographic area	
E&T providers	
Projected annual	
participation	
Estimated annual	
component costs	
Length of time the SWBL	
will run	
Other administrative costs	
associated with SWBL	

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

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

Details	Transitional Jobs – Subsidized by E&T (WBLTJ - SUB)
Description of the component	Not Applicable
Target population	
Criteria for participation	
Geographic area	
E&T providers	
Projected annual participation	
Estimated annual component costs	
Length of time the SWBL will run	
Other administrative costs associated with SWBL	

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

Details	Work-based learning - Other -Subsidized by E&T (WBLO - SUB): State agency must provide description)
Description of the	Not Applicable
component	
Target population	
Criteria for participation	
Geographic area	
E&T providers	
Projected annual	
participation	
Estimated annual	
component costs	
Length of time the SWBL	
will run	
Other administrative costs	
associated with SWBL	

## **H. Estimated Participant Levels**

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

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

Not Applicable

## I. Contracts/Partnerships

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

Contract or Partner Name:	Career Team
Service Overview:	Career Team is Delaware's main SNAP E&T provider and receives all direct E&T referrals from DSS. Career Team provides outreach to all E&T referrals and provides orientation, assessment, and case management for all participants, including those enrolled with an E&T third-party partner. Career Team works with participants to develop an individualized employment plan and refers participants to services identified in their plan. Career Team tracks and enters activities for all E&T participants, including those enrolled with an E&T third-party partner, in the State's E&T system. Career Team coordinates with the E&T third-party partners on participant referrals, services, reimbursements, tracking, and reporting, as well as provider determinations.
	Career Team offers the following services statewide to all SNAP recipients who are referred to E&T:
	Orientation Career Team provides orientation services for all SNAP E&T participants, including participants assigned to a third-party partner. Orientation includes but is not limited to an overview of services available through Career Team and other E&T partners; participant's rights and

#### Table I.I. Contractor/Partner Details

Contract or Partner Name:	Career Team
	responsibilities; workfare objectives; types of assignments available; job search opportunities and requirements; reporting requirements (attendance and work hours); appeal process; SNAP eligibility rules, work requirements, and time limits; and good cause policy.
	Assessment and Case Management Career Team provides the following case management services for all SNAP E&T participants: • Comprehensive Intake Assessment • Individualized Service Plan • Progress Monitoring • Service Coordination • General Case Management Services
	Career Team evaluates an individual's needs and barriers before placement in an activity. The comprehensive assessment collects general information about demographics, educational attainment, basic skills, literacy, work experience, and public benefits. It also identifies objective and subjective barriers to work, such as disabilities, criminal background, family composition, housing circumstances, childcare needs, and transportation needs. The assessment includes an in-depth evaluation of employability skills and counseling on how and where to search for employment. The assessments used include: Food Benefit Program Assessment, Career Orientation Inventory, and When I Grow Up.
	<u>Components &amp; Services</u> Career Team plans, develops, and implements E&T services, including: • Supervised Job Search – SJS • Job Search Training – JST • Job Retention – JR • Workfare – WF

Contract or Partner Name:	Career Team
	<ul> <li>Basic Education &amp; Foundational Skills – EPB</li> <li>Career/Technical Education – EPC</li> <li>Work Readiness Training – EPWRT</li> <li>Participant Reimbursements</li> <li>Laptop Lending</li> <li>Tracking of all E&amp;T participation hours (including participation with third-party partners)</li> <li>Reporting of all E&amp;T participation hours (including participation with third-party partners) in the State's E&amp;T system</li> </ul>
Intermediary:	□ Yes ⊠ No
Components Offered:	<ul> <li>Supervised Job Search – SJS</li> <li>Job Search Training – JST</li> <li>Job Retention – JR</li> <li>Workfare – WF</li> <li>Work Readiness Training – EPWRT</li> <li>Career Team refers to external providers for:         <ul> <li>Basic Education &amp; Foundational Skills – EPB</li> <li>Career/Technical Education – EPC</li> <li>English Language Acquisition – EPEL</li> </ul> </li> </ul>
Credentials Offered:	Credentials, such as pre-apprenticeship construction and massage therapy certification, are determined by the education and training programs to which participants are referred by Career Team.
Participant Reimbursements Offered:	<ul> <li>Transportation</li> <li>Fees</li> <li>Clothing</li> <li>Equipment</li> <li>Physical Exams</li> <li>Eye Exams and Eyeglasses</li> </ul>
Location:	Statewide
Target Population:	All SNAP E&T Participants - ABAWDs and Non-ABAWDs

Contract or Partner Name:	Career Team
Monitoring of contractor:	DSS conducts at least two monitoring visits
	of the E&T provider during the fiscal year.
Ongoing communication with	DSS conducts monthly meetings with the
contractor:	E&T provider and also communicates by
	email, phone, and site visits.
Total Cost of Agreement:	Total - \$539,325
	Administrative Costs - \$347,825 (100%
	federal)
	Participant Reimbursements - \$191,500
	(50% federal)
Eligible for 75 percent reimbursement	□ Yes ⊠ No
for E&T Services for ITOs:	
New Partner:	□ Yes ⊠ No

Contract or Partner Name:	Food Bank of Delaware
Service Overview:	The Food Bank of Delaware is an E&T third- party partner. Through its Delaware Food Works program, the Food Bank of Delaware offers workforce training in food service and warehousing. The program's emphasis is on training and education that goes beyond job skills. By incorporating lessons on soft skills and employer expectations, the Delaware Food Works staff can address the underlying skills gaps that are often the root cause of participants' dependence on public assistance. The program provides tailored E&T services to each individual student and robust transportation assistance to provide participants with the best chance at success.
	Food Bank of Delaware offers the following services statewide to all SNAP recipients enrolled in their programs:
	<ul> <li><u>Components &amp; Services</u></li> <li>Job Retention – JR</li> <li>Career/Technical Education – EPC</li> <li>Internships, Subsidized by E&amp;T – WBLI-SUB</li> <li>Participant Reimbursements</li> <li>Assessment and Case Management</li> </ul>
	<u>Culinary Training</u> The Culinary School, a certified trade school by the Delaware Department of Education, offers a 14-week program that prepares adults for entry-level jobs in the culinary and food service industry. Students are taught skills that are highly desirable to employers in the food industry and are placed in jobs in the industry that provide job security and economic sustainability. The training culminates with a two-week subsidized internship at a food service company, restaurant, or catering company. Students can obtain the ServSafe® Manager Certification.

 Table I.II. Contractor/Partner Details

Contract or Partner Name:	Food Bank of Delaware
	<u>Warehouse/Logistics Training</u> Logistics, Operations, General Warehousing, and Inventory Control (LOGIC) is an 11-week training program that prepares students for careers in the warehousing/logistics industry. In addition to job skills training, participants attend daily life skills presentations and activities to help them become familiar with employer expectations and develop skills that will allow them to secure and maintain employment. Students have the opportunity to receive their OSHA 10 General Industry Certificate and their Forklift Certification during the program. The final two weeks of the program are spent in a subsidized internship at a partner employer.
Intermediary:	□Yes ⊠ No
Components Offered:	<ul> <li>Job Retention – JR</li> <li>Career/Technical Education – EPC</li> <li>Internships, Subsidized by E&amp;T – WBLI-SUB</li> </ul>
Credentials Offered:	Culinary Training: ServSafe® Manager Certification LOGIC: OSHA 10 General Industry Certificate and Forklift Certification
Participant Reimbursements Offered:	<ul> <li>Transportation</li> <li>Fees</li> <li>Clothing</li> <li>Equipment</li> <li>Physical Exams</li> <li>Eye Exams and Eyeglasses</li> </ul>
Location:	Statewide
Target Population:	All SNAP E&T Participants - ABAWDs and Non-ABAWDs
Monitoring of contractor: Ongoing communication with	DSS conducts at least two monitoring visits of the E&T provider during the fiscal year. DSS conducts monthly meetings with the
contractor:	E&T provider and also communicates by email, phone, and site visits.

Contract or Partner Name:	Food Bank of Delaware
Total Cost of Agreement:	Total - \$135,604 (50% covered by federal funds)
	Administrative Costs - \$125,604 (50% federal) Participant Reimbursements - \$10,000 (50% federal)
Eligible for 75 percent reimbursement for E&T Services for ITOs:	□Yes ⊠No
New Partner:	□ Yes ⊠ No

#### Table I.III. Contractor/Partner Details

Contract or Partner Name:	Ministry of Caring
Service Overview:	The Ministry of Caring is an E&T third-party partner. The Ministry of Caring is a 501(c)(3) nonprofit that delivers essential social services in New Castle County to clients who are low-income, no-income, or experiencing homelessness. An integral component of the Ministry's holistic response to poverty and homelessness is the Job Placement Center, a program that helps the difficult-to-employ develop employment and soft skills and obtain stable work. Staff work with clients on training enrollment, job search, interview preparation, life skills, transportation, and other supportive services. The Ministry has in place established employer relationships for potential job placement. The Ministry of Caring offers the following services in New Castle County to all SNAP recipients enrolled in their programs: <u>Components &amp; Services</u> • Career/Technical Education – EPC • Internships – WBLI • Participant Reimbursements • Assessment and Case Management CNA Training

Contract or Partner Name:	Ministry of Caring
	The CNA certificate program is designed for students desiring training to become certified nursing assistants. This program prepares the student, upon graduation, to sit for the Delaware State Nursing Assistant Certification Examination and for an entry- level position as a nursing assistant. Students complete classroom instruction in Nursing Assistant Theory and Skills (104 hours) and Nursing Assistant Clinical training (80 hours). Students are required to participate in a clinical learning experience at an approved nursing facility under the supervision of an instructor.
	<u>CDL Training</u> The Class A CDL Driving program is designed to provide students with the basic skills to become safe, well-prepared commercial drivers employed in the transportation industry. The CDL instruction includes two classes, Introduction and Basic Operation (80 hours) and Road and Range (80 hours). Through a combination of classroom presentation and hands-on practice, students will be prepared to take the CDL knowledge and skills tests. Upon passing this exam, graduates will be qualified to enter entry-level employment in the transportation industry.
	Phlebotomy Training The phlebotomy program is a unique blend of lectures and labs to get students experienced with a variety of venipuncture techniques. The classes are kept small, up to 15 students, to give each student ample attention and practice. The three-day training is approved by the National Registry of Allied Health Professionals (NRAHP). It teaches students about blood collection and safety in the field. After class completion, students will take an in-class practical exam with a one-on-one instructor. After students pass their practical exam, they will take the

Contract or Partner Name:	Ministry of Caring	
	written portion of the National Phlebotomy Certification (NPC), which will allow them to practice phlebotomy in most states.	
Intermediary:	□ Yes ⊠ No	
Components Offered:	<ul> <li>Career/Technical Education – EPC</li> <li>Internships – WBLI</li> </ul>	
Credentials Offered:	CNA, CDL, NPC	
Participant Reimbursements Offered:	<ul> <li>Transportation</li> <li>Fees</li> <li>Clothing</li> <li>Equipment</li> <li>Physical Exams</li> <li>Eye Exams and Eyeglasses</li> </ul>	
Location:	New Castle County	
Target Population:	All SNAP E&T Participants - ABAWDs and Non-ABAWDs	
Monitoring of contractor:	DSS conducts at least two monitoring visits of the E&T provider during the fiscal year.	
Ongoing communication with contractor:	DSS conducts monthly meetings with the E&T provider and also communicates by email, phone, and site visits.	
Total Cost of Agreement:	Total - \$135,675 (50% covered by federal funds) Administrative Costs - \$128,675 (50% federal) Participant Reimbursements - \$7,000 (50% federal)	
Eligible for 75 percent reimbursement for E&T Services for ITOs:	□ Yes ⊠No	
New Partner:	□ Yes ⊠ No	

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#### Table I.IV. Contractor/Partner Details

Contract or Partner Name:	Not Applicable
Service Overview:	
Intermediary:	□ Yes □ No
Components Offered:	
Credentials Offered:	
Participant Reimbursements Offered:	
Location:	
Target Population:	
Monitoring of contractor:	
Ongoing communication with contractor:	
Total Cost of Agreement:	
Eligible for 75 percent reimbursement for E&T Services for ITOs:	□ Yes □ No
New Partner:	□ Yes □ No

#### Table I.V. Contractor/Partner Details

Contract or Partner Name:	Not Applicable
Service Overview:	
Intermediary:	□ Yes □ No
Components Offered:	
Credentials Offered:	
Participant Reimbursements Offered:	
Location:	
Target Population:	
Monitoring of contractor:	
Ongoing communication with contractor:	
Total Cost of Agreement:	
Eligible for 75 percent reimbursement for E&T Services for ITOs:	□ Yes □ No
New Partner:	□ Yes □ No

## J. Budget Narrative and Justification

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

#### Table J.I. Direct Costs

Salary/Wages: List staff positions in FTE and time spent	\$0
on the project.	Deleware is not eleiming
Example: E&T Program Manager - \$60,000 x .50 FTE = \$30,000	Delaware is not claiming costs for this category.
5 E&T Counselors - \$25,000 x 1.00 FTEs x 5 = \$125,000	coold for this category.
<b>Fringe Benefits:</b> If charging fringe and benefits to the E&T program, provide the approved fringe rate.	\$0
	Delaware is not claiming costs for this category.
Contractual Costs: All contracts and partnerships	Career Team
should be included in the "contracts and partnerships"	\$539,325 /
matrix of the E&T State Plan Operating Budget	\$443,575 Federal
Workbook. Briefly summarize the type of services contractors/partners will provide, such as direct E&T	<ul><li>Reimbursement</li><li>Direct E&amp;T Services</li></ul>
program services, IT services, consulting, etc.	• Direct E&T Services
	Food Bank of Delaware
	\$135,604 / \$67,802
	Federal Reimbursement
	Direct E&T Services
	Ministry of Caring
	\$135,675 / \$67,837.50
	Federal Reimbursement
	Direct E&T Services
<b>Non-capital Equipment and Supplies:</b> Describe non-capital equipment and supplies to be purchased with	\$0
E&T funds.	Delaware is not claiming
	costs for this category.
<b>Materials:</b> Describe materials to be purchased with E&T funds.	\$0
	Delaware is not claiming
	costs for this category.

<b>Travel &amp; Staff Training:</b> Describe the purpose and frequency of staff travel charged to the E&T program.	\$0
This line item should not include E&T participant reimbursements for transportation. Include planned staff	Delaware is not claiming costs for this category.
training, including registration costs for training that will be charged to the E&T grant.	costs for this category.
<b>Building/Space:</b> If charging building space to the E&T	\$0
program, describe the method used to calculate space	
value.	Delaware is not claiming costs for this category.
Equipment & Other Capital Expenditures: Describe	\$0
equipment and other capital expenditures over \$5,000	
per item that will be charged to the E&T grant. (In accordance with 2 CFR 200.407, prior written approval from FNS is required.)	Delaware is not claiming costs for this category.

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

Indirect Cost Rates:

- DSS: None
- Career Team: 10%
- Food Bank of Delaware: 16.8%
- Ministry of Caring: 10%
- b) Participant Reimbursements (Non-Federal plus 50 percent Federal reimbursement). Participant reimbursements should include the total participant reimbursement amount from the contracts/partners matrix of the E&T State Plan Operating Budget Excel Workbook, as well as any participant reimbursements the State agency plans to provide.

\$208,500
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