State Employment and Training (E&T) Plan
Texas Workforce Commission
Federal Fiscal Year 2017

Part A: Cover Page and Authorized Signatures

State: Texas
State Agency: Texas Workforce Commission
Federal FY: 2017

Primary Contacts: *Complete the table with the name, title, phone, and e-mail address for State agency personnel who should be contacted with questions about the E&T plan. Add additional rows if needed.*

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Certified By:

<Signature of Authorized Person>

State Agency Director (or Commissioner) — Date 4/25/17

Certified By:

<Signature of Authorized Person>

State Agency Fiscal Reviewer — Date 4-25-2017

Part B: Assurances

Assurance Statements *Check box at right to indicate you have read and understand each statement.*	
1. The State agency is accountable for the content of the State E&T plan and will provide oversight of any sub-grantees.	☑
2. The State agency is fiscally responsible for E&T activities funded under the plan and is liable for repayment of unallowable costs.	☑
3. State education costs will not be supplanted with Federal E&T funds.	☑
4. 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.	☑
5. 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.	☑
6. 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. Contracts are procured through competitive bid procedures governed by State procurement regulations.	☑
8. Program activities are conducted in compliance with all applicable Federal laws, rules, and regulations including Civil Rights and OMB regulations governing cost issues.	☑
9. E&T education activities directly enhance the employability of the participants; there is a direct link between the education activities and job-readiness.	☑
10. Program activities and expenses are reasonable and necessary to accomplish the goals and objectives of SNAP E&T.	☑
11. The E&T Program is implemented in a manner that is responsive to the special needs of American Indians on Reservations. State shall: consult on an ongoing basis about portions of State Plan which affect them; submit for comment all portions of the State Plan that affect the ITO; if appropriate and the extent practicable, include ITO suggestions in State plan. (For States with Indian Reservations only)	☑

Part C: State E&T Program, Operations and Policy

Table 1: State E&T Program, Operations and Policy Overview	
Summary of the SNAP E&T Program	**1. Summary of SNAP E&T Program** **A. State Agency Mission:** The Texas Workforce Commission's (TWC) mission is to promote and support a workforce system that creates value and offers employers, individuals, and communities the opportunity to achieve and sustain economic prosperity. **B. SNAP E&T Program Scope:** In 1995, TWC received approval from the U.S. Department of Agriculture's Food and Nutrition Service (FNS) to waive the Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T) (formerly known as Food Stamp Employment and Training) program regulations to transfer the administration, policy-making, fiscal authority, and accountability to TWC. Texas implements its SNAP E&T program in accordance with 7 U.S.C. §2015(d)(4)(A). Texas' SNAP E&T program promotes long-term self-sufficiency and independence by preparing SNAP recipients for employment. The goal of SNAP E&T is to assist SNAP recipients in obtaining employment, including provision of work opportunities for 18- to 49-year-old Able-Bodied Adults Without Dependents (ABAWDs). As stated in Texas' Federal Fiscal Year 2016 (FFY'16) and prior years' SNAP E&T State Plans of Operations, TWC has sought all opportunities to create consistency between the Temporary Assistance for Needy Families (TANF) employment program called Choices and SNAP E&T. Federal law supports these endeavors. Specifically, 7 U.S.C. §2015(d)(4)(E) and §2015(d)(4)(J), and 7 C.F.R. §273.7(c)(2. This type of program design is referred to in Texas as the Work First Philosophy. Workforce Solutions Offices operate Choices and the SNAP E&T program under the following compatible work requirements: • Individuals may participate in any activities, including job search, work experience, education and training, and workfare (SNAP E&T ABAWDs only), as offered by 28 Local Workforce Development Boards (Boards). • Individuals may attend the same employment planning sessions and group job search seminars for either program. • Individuals may receive similar support services or participant

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	reimbursements to assist with participating in work activities. • Individuals who are unable to comply with their Choices or SNAP E&T work requirements may receive a good cause exception for circumstances beyond the individual's control. The Choices and SNAP E&T good cause criteria are the same. TWC continues to abide by federal law that prohibits the use of SNAP E&T funds for TANF recipients. Based on this, Boards are prohibited from using their SNAP E&T funds to pay for Choices services. **Apprenticeship Services** TWC supports apprenticeship services to assist registered apprentices for a career in skilled trades, crafts, and other industries. Apprenticeship combines supervised on-the-job training with job-related, classroom instruction to teach apprentices the practical and theoretical aspects of a highly skilled occupation. SNAP E&T participants may receive such services. Although TWC intends to continue offering training and educational activities to registered apprentices, TWC will not utilize federal SNAP E&T funds to support costs related to classroom instruction or work-based education in registered apprenticeship programs. Instead, TWC will grant funds to local public educational institutions using other federal and state funding sources (i.e., TANF, Workforce Innovation and Opportunity Act, State General Revenue (non-matching), etc. **Job Retention Services** In Texas, job retention services and support services are provided for up to 90 days to SNAP recipients who gain full-time employment during or after participation in SNAP E&T. Texas will continue to use the state's 15 percent ABAWD exemption allowance for minimum-service counties (full- and minimum-service county criteria is listed on pages 7-8). Boards may serve all SNAP recipients (mandatory work registrants and exempt recipients) who reside in one of the minimum-service counties if the recipients volunteer to participate in SNAP E&T. **Texas' SNAP E&T Policy Guidance** All of TWC's SNAP E&T policies and guidance used for the provision of services to SNAP recipients are outlined in the following: • Chapter 813 Supplemental Nutrition Assistance Program Employment and Training rules, codified in the Texas Administrative Code, Title 40, Part 20; • SNAP E&T Comprehensive Guide;

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	• Workforce Development Letters; and • Technical Assistance Bulletins.
Program Changes	**2. Texas' SNAP E&T Program Changes** **A. Third-Party Reimbursement** In Federal Fiscal Year 2017 (FFY'17), TWC will continue its Third-Party Reimbursement (TPR) initiative with the Capital Area Workforce Development Board (Capital Area) in Austin, Texas. TWC is the state level administrating agency for the TPR initiative. Capital Area will partner with the City of Austin and Travis County to leverage 50 percent federal SNAP E&T funds to cover the costs of providing SNAP E&T services to exempt and mandatory SNAP recipients not currently served due to funding limitations. The City of Austin and Travis County will supply nonfederal funding for the provision of allowable SNAP E&T activities and support services to SNAP recipients participating in the initiative. The source of the nonfederal funding is State General Revenue. Capital Area will not receive any advanced payment from the City or County for the TPR initiative. Capital Area will contract with their Workforce Solutions contractor C2 Global for the TPR initiative. C2 Global will be responsible for: • Intake and assessment; • Verification of SNAP eligibility before enrolling the SNAP recipient into TPR services. Texas Health and Human Services Commission (HHSC) staff determines eligibility for SNAP in Texas; • All TPR case management activities; • Outreach to exempt or mandatory recipients participating in the initiative. TWC will provide Capital Area with a listing of exempt recipients to outreach and market SNAP E&T TPR services. C2 Global will outreach mandatory work registrants from the pool of SNAP E&T mandatory recipients located in The Workforce Information System of Texas (TWIST); • The provision of allowable SNAP E&T services and support services to exempt or mandatory participants. (C2 Global may offer job search, education, training, or work experience services); • Tracking and reporting all SNAP E&T TPR activities and support

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	services in TWIST using special TWC-established codes created specifically for TPR; and • Submitting an invoice to the Board for expenditures incurred. Capital Area will be responsible for: • providing oversight and technical assistance to C2 Global for TPR. • invoicing the City/County for services provided to SNAP recipients; • submission of the ***TPR Certification of Expenditures*** form to TWC. TWC requires the Board to report the following: ➢ TPR –Administration (maximum allowed, 10%); ➢ TPR - Direct Program; ➢ TPR - Support Services Transportation; ➢ TPR - Support Services Other than Transportation; and ➢ Total Expenditures); and • Monitoring SNAP E&T TPR. All contracts will be signed before the FFY'17 TPR initiative is implemented by the Capital Area. TWC will provide technical assistance throughout the FFY'17 TPR project. TWC monitoring activities outlined in Part H: *Contractor Detail Addendum* will include Capital Area's TPR project. SNAP E&T TPR participation reports can be generated in TWIST. The reports capture data and participation information on all SNAP recipients participating in the TPR project. **B. HHSC and TWC Two-Way Automated Interface for Processing Disqualifications for Noncompliance with SNAP E&T Work Requirements** HHSC and TWC are programming a two-way SNAP E&T automated interface to be used in Federal Fiscal Year 2017 (FFY'17) for SNAP E&T noncompliance actions and sanction processes. The two-way SNAP E&T automated interface mitigates data inconsistencies for SNAP recipients who non-comply with SNAP E&T requirements and enables both agencies to effectively and efficiently track all SNAP E&T noncompliance actions. HHSC, Board, and Board contractor staff will receive guidance and will be trained on the new two-way SNAP E&T automated interface. The two-way automated interface is scheduled for release by the end of the first quarter in FFY'17.

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C. . County Expansion

In FFY'17 TWC and HHSC will begin a phased-in approach to Texas' county expansion project. In FFY'17 TWC will expand SNAP E&T services to SNAP recipients in the following 19 counties:

Aransas	Hutchinson	Refugio
Bailey	Jim Hogg	Scurry
Bandera	Karnes	Zapata
Brewster	Kendall	
Brooks	Lampasas	
Deaf Smith	Medina	
Garza	Milam	
Gillespie	Presidio	

The following policy changes and actions for the 19 counties are as follows:

- 19 counties will be designated by TWC and HHSC as full-service SNAP E&T counties. The full-service county criteria is outlined on page 10;
- TWC will notify Boards impacted by this change at least one month prior to implementation;
- HHSC will notify SNAP eligibility staff of the county changes at least one month prior to implementation;
- HHSC will notify all SNAP recipients impacted by this change of their requirement to register for work and participate in SNAP E&T if outreached;
- HHSC will send notification of the 3 out of 36-month time-limit and work requirements to all ABAWDs residing in the 19 minimum-service counties; and
- HHSC and TWC will provide technical assistance and support during this process.
- SNAP E&T service delivery priority will be given to ABAWDs with time limits.
- Boards will be required to outreach and offer ABAWDs a work opportunity within 10 days of appearance in TWC's automated system.
- The SNAP E&T General Population (non-ABAWDs) will be outreached based on available funding.

The anticipated monthly number of SNAP E&T ABAWD work registrants residing in the 19 counties is 1,480.

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	The anticipated monthly number of SNAP E&T General Population work registrants in the 19 counties is 4,461.
Workforce Development System	**3. Texas' Workforce Development System** Texas complies with 7 U.S.C.§2015(d)(4)(A)(ii) as amended by §817 of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996. The Texas workforce development system is composed of many workforce partnerships and business operations, including Boards, contracted service providers, and others in workforce development. Boards, using a competitive procurement process, contract with public or private companies, or nonprofit organizations, to operate Workforce Solutions Offices throughout the state. The Workforce Solutions Offices, which are overseen by the Boards, provide access to multiple services—including SNAP E&T—at one site and offer services to employers and job seekers that are tailored to meet the needs of the local workforce development area (workforce area). TWC aligns workforce development activities by establishing rigorous strategic planning requirements coupled with common performance accountability measures and requirements governing Texas' one-stop delivery system. TWC coordinates and collaborates with the 28 Boards and their contracted workforce service providers and community partners. Collectively known as Texas Workforce Solutions, this network offers local access to integrated and statewide services to all employers, workers, job seekers, and youth, including individuals with disabilities and other barriers to employment. Each component activity of Texas' SNAP E&T program is delivered through its statewide workforce development system. In Texas, SNAP recipients may receive any of the following SNAP E&T components: • Job search • Vocational training • Education • Work experience • Workfare (ABAWDs only) Other services include: • work services under the Workforce Innovation and Opportunity Act of 2014 (WIOA); and

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	• work services under Trade Adjustment Assistance (TAA). All services are delivered through Texas' statewide workforce development system. **Initial and Ongoing Assessment** One-stop providers (Workforce Solutions Offices) conduct initial and ongoing case management activities for SNAP recipients participating in SNAP E&T, including: • analyzing and gathering information; • identifying a SNAP recipient's strengths and weaknesses; • assisting with the removal of barriers; • developing and updating the recipient's employment plan; • validating educational attainment and work experience; • providing counseling and direction to individual work registrants; • making referrals to other agencies and programs, as appropriate; • developing jobs; • providing job-readiness services to enhance employability; • documenting all events impacting SNAP E&T services, face-to-face meetings, and participation hours; and • identifying employment opportunities that can help the SNAP recipient's progress toward independence from public assistance. **SNAP E&T Full- and Minimum-Service Counties** In FFY'17, Texas will continue applying the full- and minimum-service county designations. The current full- and minimum-service county criteria are as follows: **Full-Service Counties:** • Boards are required to outreach all ABAWDs in full-service counties within 10 days of receipt of an automated referral from HHSC. • Boards may, as funding allows, outreach SNAP E&T General Population work registrants. (See Note) • All mandatory work registrants (i.e., ABAWDs and General Population) have access to all services and support services. Mandatory work registrants are sanctioned (i.e., SNAP benefits will be denied) for failure to comply with SNAP E&T program requirements. • Exempt SNAP recipients can volunteer to participate in SNAP E&T. • Exempt recipients have access to all services and support services. • Exempt recipients are not sanctioned for failure to comply with SNAP E&T program requirements.

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	• Exempt recipients' hours of participation will not exceed the hours required of mandatory work registrants. All SNAP E&T services are available to mandatory and exempt recipients at all full-service county locations. **Note:** ***Additional Funds Request to Serve Non-ABAWDs*** Because of a reduction in Texas' SNAP E&T 100 percent federal grant and an anticipated reduction in Texas' ABAWD pledge state funding, Texas anticipates requesting additional 100 percent funds after October 1, 2016 for FFY'17 to provide SNAP E&T services to more SNAP E&T General Population (non-ABAWDs) participants. Texas has a very large mandatory work registrant population and has only been able to serve a fraction of the work registrants because of funding constraints. **Minimum-Service Counties:** • All SNAP recipients can volunteer to participate in SNAP E&T and will have access to all services and support services, at Board discretion. • Outreach is not conducted in these counties. • SNAP recipients are not sanctioned for failure to comply with SNAP E&T program requirements. • Hours of participation for recipients residing in these counties will not exceed the hours required of mandatory work registrants residing in full-service counties. Lists of the full- and minimum counties are on pages 35-36. In addition, the SNAP E&T Map attachment that displays the full- and minimum county designations is page 37. All SNAP E&T services are available to SNAP recipients who volunteer in the minimum-service counties. **A. Targeted and Emerging Industries in Texas** TWC examines the number of workers by industry as the basis for producing industry employment projections. TWC produces these industry employment projections and corresponding occupational employment projections to help job seekers (including SNAP recipients), policy makers, and company hiring managers better understand their regional labor markets. Occupational employment growth is based on industry growth and other variables, which include population growth and employers' changing skills requirements. Occupations found within these industries are growing and projected to experience the most employment growth.

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	Leveraging an integrated workforce system, TWC also strives to create a seamless approach that attracts and retains in-demand employers. TWC understands that an employer may not care which funding source or program is covering the service it is receiving. By creating specific Business Service Units (BSUs) at each Board, the workforce system rallies a group of dedicated individuals to meet employer needs and present employers with services in ways that are beneficial and easy to understand. BSUs are Boards' frontline business advocates, often having strong ties to the local business communities. Furthermore, because Boards predominantly comprise local business leaders, TWC taps a continuous flow of current and relevant information from employers. Board members are able to shape local policies and procedures to best fit the local marketplace. BSUs address the ever-increasing need for skilled workers in high-demand fields by offering job search assistance, skills training, and other workforce development services. Supported by state and federal funds, most basic services are provided free of charge to employers registered with the state and federal governments. Some Boards also provide certain services, including workshops and seminars, at nominal fees. BSUs within an integrated workforce system offer a unique opportunity to ensure that all workforce services are structured to ensure that the business needs are considered when delivering services to job seekers and consumers. Dedicated BSUs provide businesses access to customized service options that address their specific business needs. BSUs offer a range of services designed to help employers with hiring and training needs to maximize their competitiveness, including: • applicant recruitment, screening, and referral; • listing and maintaining job orders through WorkInTexas.com, TWC's online job-matching system; • assistance with and participation in job fairs; • information resources (e.g., labor market and business statistics, employment and labor law, unemployment insurance (UI)); • testing and prescreening job candidates; • basic employment skills training and referral to education and training providers; • customized training—including training through the state-funded Skills Development Fund—and on-the-job (OJT) skills training;

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	• assistance with and information on the Work Opportunity Tax Credit; and • rapid response and downsizing assistance in the event of closings or mass layoffs. **B. Career Pathways** Career Pathways delivers a comprehensive approach to career development by delivering fully on the student customer experience in education and training. Initiating a student into Career Pathways begins with understanding *why* the student is coming back to education, clarifying what the student's career goals are, and developing a program of study that accelerates completion toward those goals. Then, rather than delay a student's entry into workforce or career training through possible years of remediation, students in Career Pathways receive both educational and training elements contextually and concurrently, meaning the student is immediately immersed in a training environment. Additionally, students in Career Pathways are provided the support and career navigation needed to realistically achieve their short-term and long-term professional goals. TWC has committed to investing in the education of Texas students and the future of the Texas economy, and has established a bold and transformative vision for Texas by setting a *20x2020* goal: To have 20,000 adult learners enrolled in career pathways programs through partnerships among Texas employers, community and technical colleges, adult education and literacy providers, and Boards by 2020. Adult education and literacy providers are making strides in reaching this milestone, with career pathways first piloted in higher education in 2010, helping set the stage for transformation. In the first year at TWC, AEL served over 1,500 students in career pathways programs and is serving more than 3,000 in its second year. Texas has led the nation in setting career pathways, requiring implementation by all grantees and expanding through special initiatives. Additionally, WIOA establishes the programmatic and fiscal flexibility needed to fully achieve an integrated system across the core WIOA programs. In 2016–2017, Texas is set to serve nearly 6,000 students in career pathways programs, including new models such as Integrated Education and Training and Integrated English Literacy and Civics Education.

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Other Employment Programs	**4. Other Employment Programs** TWC coordinates the delivery of employment programs and has facilitated the development of a more comprehensive, integrated service network that is locally managed, market driven, and high performing. Through an integrated workforce system, TWC administers WIOA Title I, TAA, Employment Service (ES), child care, employment programs under Title IV-A of the Social Security Act (i.e., Choices, (TANF) employment program), and Adult Education and Literacy under WIOA Title II. These programs offer Texas job seekers employment and training services and necessary support services to help them gain employment and attain self-sufficiency. Cooperative agreements with agencies administering other programs, including HHSC, the Texas Education Agency (TEA), and the Texas Veterans Commission (TVC), are initiated through the development of memoranda of understanding. As stated on pages 3 and 4, Workforce Solutions Offices operate Choices and the SNAP E&T program under the following compatible work requirements: • Individuals may participate in any activities, including job search, work experience, education and training, and workfare (SNAP E&T ABAWDs only), as offered by 28 Local Workforce Development Boards (Boards). • Individuals may attend the same employment planning sessions and group job search seminars for either program. • Individuals may receive similar support services or participant reimbursements to assist with participating in work activities. • Individuals who are unable to comply with their Choices or SNAP E&T work requirements may receive a good cause exception for circumstances beyond the individual's control. The Choices and SNAP E&T good cause criteria are the same. Additionally, HHSC and TWC implement SNAP E&T and Choices-related processes under a Coordinated Interagency Case Management memorandum of understanding (MOU) to improve the transitioning of SNAP recipients between local HHSC offices and Boards. TWC and HHSC's priority is to: • improve coordinated case management that will assist in transitioning SNAP and TANF recipients from public assistance to independence; • provide coordinated services to SNAP and TANF recipients who are experiencing barriers to employment and addressing the barriers in order to assist the SNAP recipient in finding and retaining employment; • ensure coordinated interagency case management through local

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	HHSC offices and through local Workforce Solutions Offices; and • facilitate effective communication among TWC, HHSC, Boards, and Board contractors by: (1) providing consistent messages to SNAP and TANF recipients regarding the importance of finding employment and adhering to program requirements; and (2) identifying and mitigating barriers to finding and retaining employment. TWC and HHSC conduct quarterly meetings to discuss SNAP E&T–related processes and issues. Boards and local HHSC staff conduct meetings on a regular basis. **Vocational Rehabilitation Transfer to TWC** Currently, TWC has oversight authority for each of the core programs authorized by WIOA, with the exception of the vocational rehabilitation (VR) program, which is currently housed at the Texas Department of Assistive and Rehabilitative Services (DARS). However, on June 19, 2015, Governor Greg Abbott signed into law Senate Bill 208, which directs the transfer of several programs from DARS to TWC. Effective September 1, 2016, the General Vocational Rehabilitation program, Blind Vocational Rehabilitation program, and grant for Independent Living Services for Older Individuals Who Are Blind will transfer to TWC. The Rehabilitation Council of Texas (RCT) also transfers to TWC on September 1, 2016. RCT serves as the state rehabilitation council required under the federal Rehabilitation Act of 1973, as amended by WIOA. RCT consults on the preparation of the VR state plans and advises the agency administering VR programs on policy, the scope and effectiveness of VR services, and the development of state goals and priorities for the VR program. Both TWC and DARS have a demonstrated history of collaboration, ensuring that individuals in need of services receive the highest level of quality and attention, driving positive outcomes for system stakeholders. This collaboration will continue through the transition. As part of the transition process, the agencies will look for opportunities to enhance efficiencies and streamline operations, while meeting all federal requirements and improving overall employment outcomes. TWC and DARS have publicly committed to ensuring that there is no disruption of services to consumers, DARS employees transfer to TWC with no disruptions, and all federal requirements are met in order to maintain the

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	current level of federal funding support for the programs. **Simplified SNAP** Texas will continue operating a mini-simplified SNAP for FFY'17. This will allow TANF recipients participating in TANF work experience or community service programs to have the value of their SNAP benefits combined with the value of their TANF benefits. The policy allows TWC to deem a family as meeting its participation requirement based on the maximum hours allowed under the minimum wage requirements of the Fair Labor Standards Act.
State Options in SNAP E&T Participants.	**5. Option to Refer SNAP Applicants Prior to Eligibility Determination.** SNAP applicants in Texas are not referred to SNAP E&T prior to when an eligibility determination is made. The Texas HHSC staff determines eligibility for SNAP in Texas. Once certified, an electronic referral for SNAP E&T is generated through a daily interface to TWC. HHSC does not certify households that are categorically eligible with zero benefits. Individuals who meet these criteria would not be referred for SNAP E&T services.
Screening Process	**6. Screening Process** HHSC is responsible for determining if an applicant is a work participant. During the SNAP application process, HHSC staff reviews information provided by the applicant on his or her application and/or during the eligibility interview, such as the individual's citizenship/alien status, eligible student status, and any disqualifications, such as a felony drug conviction or intentional program violations the individual may have. Additionally, staff reviews other factors such as age, disability status, children residing in the home, employment status, and current participation in TANF employment services or receipt of UI benefits during the interview. HHSC staff data enters the information into the state's automated system, which appropriately designates an individual. HHSC uses the Texas Integrated Eligibility Redesign System (TIERS) to determine work registration status based on data entry of client-provided information. HHSC sends a daily electronic file through an automated interface of all SNAP recipients to TWC when SNAP is certified or when

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	the SNAP recipient's work registration code changes. TWC uses information from this daily electronic file to outreach mandatory work registrants. TWC also uses the automated interface to notify HHSC of SNAP recipients' noncompliance with SNAP E&T. HHSC reviews the noncompliance information from the automated interface to ensure the SNAP recipient was not exempt from work registration or denied at the time of noncompliance. HHSC staff data enters the penalty information in the TIERS *Non-Cooperation* page. TIERS uses *Non-Cooperation* page entries to track SNAP E&T penalties. When HHSC staff enters the noncompliance into TIERS, the system generates Form TF0001, Notice of Case Action, notifying the SNAP recipient of the noncompliance, the length of the disqualification, and action taken on the recipient's SNAP benefits. Work registration and penalty information is displayed in TIERS on the individual's inquiry pages.
Conciliation Process (*if applicable*)	**7. Not applicable.**
Disqualification Policy	**8. Disqualification and Sanction Policy** **A. Noncompliance - Sanction Time Periods** When a SNAP recipient fails to comply with SNAP E&T requirements without good cause, the primary wage earner (i.e., head of household) or disqualified household member is sanctioned as follows: • One month for the first noncompliance or until the individual agrees to comply, whichever is longer. • Three months for the second noncompliance or until the individual agrees to comply, whichever is longer. • Six months for a third or subsequent noncompliance or until the individual agrees to comply, whichever is longer. Information regarding non-cooperation is located in HHSC's Texas Works Handbook Section A-1841 and A-1842. SNAP E&T funds are not used to process any sanction actions related to failure to comply with SNAP E&T work requirements. **A.1. Good Cause for Noncompliance with SNAP Work Requirements**

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	TWC received correspondence from FNS on November 18, 2016 requesting that TWC and HHSC modify the good cause process. TWC and HHSC are currently working with FNS on the timeline for such changes which will need to include extensive coordination with HHSC. Currently, in accordance with the 1995 Texas waiver, Workforce Solutions Office staff is responsible for determining good cause related to noncompliance with SNAP E&T work requirements. SNAP recipients wishing to claim good cause for noncompliance with SNAP E&T requirements are referred by HHSC to the Texas Workforce Solutions Office during the HHSC adverse-action period. **A.2. Good Cause Claim for Failure to Respond to Outreach** Currently, when a SNAP recipient fails to respond to a SNAP E&T outreach notification—sent after the SNAP certification process takes place—Workforce Solutions Office staff discusses the circumstances with the SNAP recipient and determines whether the SNAP recipient had good cause for not responding to the outreach notification. **A.3. Good Cause Claim for Failure to Comply with SNAP E&T Requirements After Enrolling in SNAP E&T Activities** When a SNAP recipient fails to comply with SNAP E&T work requirements assigned in accordance with the SNAP recipient's SNAP E&T employment plan, Workforce Solutions Office staff considers the following: • Circumstances that prevented participation; • Whether barriers need to be addressed; and • A date the SNAP recipient can resume participation. **B. Failure to Comply with the Work Requirement under Title IV of the Social Security Act, or an Unemployment Compensation Work Requirement** An individual exempt from SNAP E&T work requirements, because he or she is subject to work requirements under TANF or unemployment compensation, who fails to comply with TANF or unemployment compensation work requirements will be treated as though he or she failed to comply with the SNAP E&T work requirements. HHSC is the federally recognized agency responsible for imposing a SNAP sanction when an individual fails to comply with TANF or

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	unemployment compensation work requirements. The primary wage earner (i.e., head of household) or disqualified household member is sanctioned as follows: • One month for the first noncompliance or until the individual agrees to comply, whichever is longer. • Three months for the second noncompliance or until the individual agrees to comply, whichever is longer. • Six months for a third or subsequent noncompliance or until the individual agrees to comply, whichever is longer. SNAP E&T funds are not used to process any sanction actions related to failure to comply with TANF or unemployment compensation work requirements.
Participant Reimbursements	**9. Participant Reimbursements** Participant reimbursement or support services are given in accordance with 7 C.F.R. §273.7(d)(4) and guidance from FNS entitled "Q&A Package on E&T Financial Policy," dated May 2006. Reimbursement or support will be provided to SNAP recipients who request assistance with obtaining or retaining employment. Boards have the flexibility to decide whether to limit or place a cap on participant reimbursements or support services. Reimbursement or support for job retention will be provided for up to 90 days. Texas provides reimbursement for expenses incurred, or in advance as payment for anticipated expenses in the coming month, that are reasonably necessary and directly related to participation in SNAP E&T for both ABAWDs and the SNAP E&T General Population and may include: Transportation such as: • bus tokens; • gas vouchers; • prepaid gas cards; • automobile repairs; • Toll road charges; • car pools; • mileage reimbursement (personal vehicles only); • taxicab services; • contracts with private entities, such as transit providers who provide shuttle or van services; • purchase of tires or automobile batteries (applicable to SNAP E&T

Table 1: State E&T Program, Operations and Policy Overview	
	mandatory customers only); and • driver license fees (includes renewals). Other work, training, or education-related expenses such as: • GED test payments, uniforms, personal safety items, or other necessary equipment, and books or training manuals; • suitable clothing for job interviews; • licensing and bonding fees for a work experience or workfare placement; • vision needs (such as eyeglasses, eye exam); and • housing assistance.* *Housing assistance is provided based on methods and amounts established in Boards' local policies and procedures. Housing assistance is limited to no more than two months in a 12-calendar-month period. Boards may provide support services to SNAP recipients to support the recipients' participation in the following allowable activities: • Job search • Vocational training • Non-vocational education • Work experience • Workfare (ABAWDs only) Information regarding support services is located in the Texas SNAP E&T Comprehensive Guide, Section B-200. TWC's Sub-Recipient Monitoring, Regulatory Integrity Division will conduct tests of transactions, fiscal and program controls for participant reimbursements.
Work Registrant Data	**10. Work Registrant Data** **Mandatory Work Registrants** The following method is used to record the number of mandatory work registrants for the year: 1. Combine the monthly Mandatory Work Registrant Reports into one single report. 2. This creates a dataset containing all Mandatory Work Registrants for the period of October–April. 3. Compare unduplicated work registrants for each month of the Federal Fiscal Year (FFY) against all recorded work registrants in the previous months of the fiscal year.

Table 1: State E&T Program, Operations and Policy Overview	
	4. If a work registrant has not been recorded in any previous months of the FFY, that registrant is recorded as new for the month of first activity. Duplicates: Using this method, individuals can only be counted once for the FFY. For example, if an individual was a work registrant for the months of October, November, and December, the individual is counted only once in the month of October. *Source data: Mandatory Work Registrant Report (MWRR)* **New SNAP Work Registrants** The following method is used to record only SNAP work registrants who are new for each month of the Fiscal Year: 1. Compare unduplicated SNAP work registrants for each month of the FFY against all recorded SNAP work registrants in the previous months, including those active on October 1. 2. If a SNAP work registrant has not been recorded in any previous month or on October 1, that registrant is recorded as new for the month of first activity. Duplicates: Using this method, individuals can only be counted once for the FFY. For example, if an individual was a SNAP work registrant for the months of October, November, and December, the individual is counted only once in the month of October. *Source data: The Health and Human Service Commission (HHSC) standard monthly dataset "waec.vods_foodstmp_hist," db2_warehouse*
Outcome Reporting Data Source and Methodology	**11. Outcome Reporting Data Source and Methodology** **TWC will report on the four national measures in January 2018. In addition to the national measures, TWC will report on the state measures as indicated below, and in Part E – Table 2: E&T Component Detail.** The following method is used to determine the number and percentage of E&T participants that are in unsubsidized employment during the second quarter after completion of participation in E&T **job search, education, vocational training, work experience, and workfare** services: • The denominator is the number of SNAP E&T participants who

Table 1: State E&T Program, Operations and Policy Overview	
	completed participation in activities listed above (SNAP E&T Exiters). • The numerator is the number of SNAP E&T Exiters who were employed in the second calendar quarter after exit. Employed means that actual wage records (UI Wage Records or Federal Employment Records) show earnings during the applicable time frame. *Note*: SNAP E&T Exiters are former SNAP E&T participants who did not receive a SNAP E&T qualifying component for at least 90 days. The following method is used to determine the number and percentage of E&T participants who successfully completed **education, training, work experience, and workfare** components*: • The denominator is the number of SNAP E&T participants who received a SNAP E&T education, training, work experience, or workfare component. • The numerator is the number of SNAP E&T participants who successfully completed activities listed above. *Note*: The percentage of all measures is calculated by dividing the numerator by the denominator. All measures are based on actual wage records. Actual wage records are updated after the end of each calendar quarter (January, April, July, and October) and require time to fully mature. Because of the frequency of updates, not all wage records will be captured or calculated until the end of the cycle. Wage information obtained through FEDES is available several months after the end of each calendar quarter.

Part D: Pledge to Serve All At-Risk ABAWDs (if applicable)

ABAWD and Pledge Information	
Is the State agency pledging to offer qualifying activities to all at-risk ABAWDs?	Yes. For FFY'17, TWC commits to offer a work opportunity to every ABAWD recipient residing in a full-service SNAP E&T county.
Information about the size & needs of ABAWD population	TWC estimates that there will be approximately 149,106 ABAWDs in Texas in FFY'17.
The counties/areas where pledge services will be offered	See full-service county table on page 35.
Estimated cost to fulfill pledge	Based on historical data analysis, Texas estimates spending approximately $228 monthly for each ABAWD (in full-service counties) to ensure that qualifying work activities are offered.
Description of State agency capacity to serve at-risk ABAWDs	TWC has a nightly automated interface with HHSC and receives a list of all individuals certified to receive SNAP benefits. ABAWDs residing in full-service counties are placed in an "outreach pool" in TWIST. TWC requires that all ABAWDs be outreached within 10 days of referral from HHSC. This ensures that at-risk ABAWDs are provided an opportunity to participate in SNAP E&T services. Funding priority for serving the ABAWD population first is specified in each Board's contract.
Management controls in place to meet pledge requirements	Outreach Reports are generated on a monthly basis in TWIST and used by TWC's Technical Assistance staff to determine whether or not ABAWDs from each Board were outreached and offered a work opportunity within 10 days of appearance in TWIST.
Description of education, training and workfare components State agency will offer to meet ABAWD work requirements	Because the primary goal of workfare is to improve employability and encourage individuals to move into regular employment, ABAWDs participate in the workfare component once outreached. The ABAWD participates in an upfront 30 days of job search

ABAWD and Pledge Information	
	associated with the workfare activity and then enters the work assignment after nonfinancial agreements are established between the public nonprofit entity. An ABAWD who is participating in job search associated with the workfare component, or who is participating in workfare can change to a different activity if Workforce Solutions Office staff determines during a reassessment that an education or training activity is more suitable or appropriate.

Part E - Table 2: E&T Component Detail

Non-Education, Non-Work Components							
Component	**Description**	**Geographic Area**	**Target Audience (e.g., Homeless, ABAWDs)**	**Anticipated Monthly Participants (Unduplicated Count)**	**Anticipated Monthly Cost***	**Provider (Contracted, SNAP Agency, or Both)**	**Reporting Measure(s) – if > 100 Participants**
Job Search	Job search incorporates job readiness, job search training, directed job search, and group job search assistance.	Job search will be conducted in full-service counties in the state. Job search will be conducted in minimum-service counties if SNAP recipients volunteer for SNAP E&T services.	SNAP E&T General Population recipients (i.e., non-ABAWDs), and exempt SNAP recipients who volunteer for SNAP E&T, may engage in a variety of job search activities.	**35,985**	$794,399.50	Contracted - Workforce Solutions Office staff in 28 local workforce development areas.	The number and percentage of SNAP E&T participants and former participants who are in unsubsidized employment during the second quarter after completion of participation in E&T
Job Search Training	Job search training is incorporated into the above job search description.			**N/A**	**N/A**	**N/A**	**N/A**
Job Retention Services	Provided for up to 90 days to individuals who participated in SNAP E&T and entered full- or part-time employment.	Provided to SNAP recipients in full-service counties who participated in SNAP E&T and entered full- or part-time employment.	Provided to any SNAP recipient who participates in SNAP E&T and becomes employed.	**59** ABAWDS—37 SNAP E&T General Population—22	$1,378.41	Contracted - Workforce Solutions Office staff in 28 local workforce development areas.	N/A

Education Components *(Education expenses must be justified)*							
Component	**Description and Justification**	**Geographic Area**	**Target Audience (e.g., Homeless, ABAWDs)**	**Anticipated Monthly Participants (Unduplicated Count)**	**Anticipated Monthly Cost***	**Provider (Contracted, SNAP Agency, or Both)**	**Reporting Measure(s) – if > 100 Participants**
Basic Education	Adult Basic Education, English as a Second Language, General Education Development, and	Provided in full-service counties and in minimum-service counties if the SNAP recipient volunteers.	Any SNAP E&T ABAWD or General Population recipient.	100 ABAWDs—45 SNAP E&T General Population—55*. The anticipated number of registered apprentices is included in this estimate. *While historical data reflects a count less than 100 participants, TWC anticipates that the number of FFY'17 will be 100 or more.	$2,290	Contracted—Workforce Solutions Office staff in 28 local workforce development areas.	The number and percentage of E&T participants and former participants who are in unsubsidized employment during the second quarter after completion of participation in SNAP E&T The number and percentage of SNAP E&T participants that successfully completed an educational component
Vocational Training	Component that improves the employability of participants by providing training in a skill or trade.	Provided in full-service counties and in minimum-service counties if the SNAP recipient volunteers.	Any SNAP E&T ABAWD or General Population recipient.	**294** ABAWDs—68 SNAP E&T General Population—226	$6,646.50	Contracted - Workforce Solutions Office staff in 28 local workforce development areas.	The number and percentage of SNAP E&T participants and former participants who are in unsubsidized employment during the

Education Components *(Education expenses must be justified)*							
							second quarter after completion of participation in E&T. The number and percentage of SNAP E&T participants that successfully completed a training component

Work Components							
Component	**Description**	**Geographic Area**	**Target Audience (e.g., Homeless, ABAWDs)**	**Anticipated Monthly Participants (Unduplicated Count)**	**Anticipated Monthly Cost***	**Provider (Contracted, SNAP Agency, or Both)**	**Reporting Measure(s) – if > 100 Participants**
Workfare	A work component in which ABAWDs are required to perform work in a public service or private nonprofit capacity as a condition of eligibility for SNAP.	Full-service counties.	ABAWDs	**34,265**	$825,126	Contracted - Workforce Solutions Office staff in 28 local workforce development areas.	The number and percentage of E&T participants and former participants who are in unsubsidized employment during the second quarter after completion of participation in SNAP E&T. The number and percentage of SNAP E&T participants that successfully completed workfare component
Work Experience	Defined in WIOA (identified in §680.170 of the WIOA notice of proposed rulemaking) as planned, structured, learning experiences that take place in a workplace for a limited period of time. The work experience	Full- or minimum-service counties.	Any SNAP E&T ABAWD or General Population Recipient.	**128** ABAWDS—38 SNAP E&T General Population—90	$2,897	Contracted - Workforce Solutions Office staff in 28 local workforce development areas.	The number and percentage of E&T participants and former participants who are in unsubsidized employment during the second quarter after

Work Components							
	may be paid or unpaid, and may occur in either the private for-profit or the public sectors.						completion of participation in SNAP E&T The number and percentage of SNAP E&T participants that successfully completed work experience component

The anticipated monthly cost included above for the E&T components includes both federal and state contractual costs for a total of $19,592,849.

Part F - Table 3: Estimated Participant Levels

A.	Anticipated number of work registrants in the State during the Federal FY (unduplicated count):	747,709
B.	Total number of planned State option exemptions from E&T Participation:	15,317
	List below planned State option exemption categories and the number of work registrants expected to be included in each during the Federal FY. 1. SNAP E&T Non-ABAWD population in 69 minimum-service counties. 2. 3. 4. 5. 6. 7. 8. 9. 10.	15,317 ________ ________ ________ ________ ________ ________ ________ ________
C.	Percent of all work registrants exempt from E&T **(B/A)**	2%
D.	Anticipated number of E&T mandatory participants **(A–B)**	732,392
E.	Anticipated number of voluntary E&T participants	513
F.	Anticipated number of ABAWDs in the State during the Federal FY.	196,760
G.	Anticipated number of ABAWDs in waived areas of the State during the Federal FY.	0
H.	Anticipated number of ABAWDs to be exempted under the State's 15 percent ABAWD exemption allowance during the Federal FY (69 counties minimum-service counties)	28,688
I.	Number of potential at–risk ABAWDs expected in the State during the Federal FY **(F–(G+H))**	168,072

Part G - Table 4: Partnerships/Contracts

For each partner/contractor that receives more than 10% of the E&T operating budget, complete

Name of Partner/Contract	Cost	% of E&T Operating Budget
Panhandle Regional Planning Commission	$ 285,792.00	1.2%
South Plains Regional WDB	$ 300,233.00	1.3%
Nortex Regional Planning Commission	$ 182,885.00	0.8%
North Central Texas Council Of Governments	$ 948,704.00	4.0%
Tarrant County WDB	$ 1,127,322.00	4.8%
Dallas County Local WDB INC	$ 1,748,134.00	7.4%
North East Texas WDB	$ 235,480.00	1.0%
East Texas Council Of Governments	$ 646,602.00	2.7%
West Central Texas Workforce Development	$ 252,828.00	1.1%
Upper Rio Grande WDB INC	$ 874,932.00	3.7%
Permian Basin Workforce Development Board	$ 251,859.00	1.1%
Concho Valley Workforce Development Board	$ 128,758.00	0.5%
Education Service Center Region 12	$ 266,096.00	1.1%
WorkSource-Greater Austin Area WDB	$ 541,596.00	2.3%
Rural Capital Area Workforce Development	$ 364,731.00	1.5%
Brazos Valley Council Of Governments	$ 195,244.00	0.8%
The Deep East TX Local Workforce Development Board	$ 378,826.00	1.6%
South East Texas Workforce Development Board	$ 403,486.00	1.7%

Name of Partner/Contract	Cost	% of E&T Operating Budget
Golden Crescent Workforce Development Board	$ 139,670.00	0.6%
Alamo Workforce Development +6INC	$ 1,629,056.00	6.9%
South Texas WDB	$ 300,509.00	1.3%
Coastal Bend Workforce Development Board	$ 556,288.00	2.3%
Lower Rio Grande WDB	$ 963,214.00	4.1%
Cameron County WDB	$ 493,337.00	2.1%
Workforce Solutions Texoma	$ 139,378.00	0.6%
Central Texas Cog	$ 390,522.00	1.6%
Middle Rio Grande Dev Council	$ 267,605.00	1.1%
Houston-Galveston Area Council	$ 3,449,053.00	14.6%
WorkSource-Greater Austin Area WDB – TPR Contract	$ 475,000.00	2.0%
Additional Funds to be Contracted	$ 1,655,709.00	7.0%
Total	$19,592,849.00	82.7%
*Local Workforce Development Board FY2017 contract totals are contingent upon the availability of State Match Funds.		

Part H: Contractor Detail Addendum

Partner/Contract Name	Gulf Coast Workforce Development Board -Houston-Galveston Area Council
Monitoring and communication with contractor (s)	Boards are required to supply to the Agency an audit that is in compliance with the Single Audit Act of 1984, as amended July 1996, 31 U.S.C., Chapter 75, OMB UG, and the State of Texas Single Audit Circular (UGMS, Part IV), as specified within any grant awarded and in effect at the time costs were incurred. Based on the Monitoring vs. TA Matrix that was created during the 2014 RPI process, currently SRM (Monitoring) conducts fiscal testing of transactions regarding the SNAP E&T program. Workforce Technical Assistance staff members conduct on-site reviews to ensure that Boards are in compliance with the following program requirements: • Eligibility • Outreach to clients is conducted • Compliance with employment plan (service delivery) • Activities are allowable • Participation hours in TWIST match documentation in case file • Support services (needed to participate) • Support services (documentation in TWIST to support) • Performance and outcomes, including employment outcomes, have been tracked and documented in TWIST • Performance and outcomes, including whether the penalty is initiated timely and appropriately; • Job retention services are provided as funding allows • Cases are referred back to HHSC once circumstances arise that could affect the customer's eligibility
Role of Contractor	*Gulf Coast Workforce Solutions Office staff:* • conducts employment planning meetings to provide SNAP recipients with an introduction to SNAP E&T services and activities; • develops an employment plan; • schedules appointments for and enrolls mandatory work registrants or exempt recipients who voluntarily participate in SNAP E&T activities; • assists with job search and job readiness activities; • arranges child care services as needed for the SNAP E&T General Population; • provides support services including reimbursement of transportation expenses, as needed;

Partner/Contract Name	Gulf Coast Workforce Development Board -Houston-Galveston Area Council			
	• develops workfare work sites for ABAWDs; • monitors participation in all SNAP E&T activities; • informs HHSC of an ABAWD's participation in SNAP E&T activities within two weeks of initial participation; • informs HHSC of employment, need for reconsideration of work registration status, and noncooperation with service requirements; • determines good cause for nonparticipation; and • enters all actions into TWIST (e.g., all appropriate documentation of services).			
Timeline	**Start**	October 1, 2016	**End**	September 30, 2017
Description of Activities/Services	Same as those listed in Table 1 pages 4 and 6.			
Funding	SNAP E&T Funding: • 100 Percent Federal SNAP E&T Grant • ABAWD Grant (i.e., Texas' Share of the $20 Million) • 50/50 Additional SNAP E&T Administrative Expenditures • 50/50 Participant expenses (i.e., transportation and other support services).			
Evaluation	(See monitoring and communication language on page 30).			

Part I - Table 5: Operating Budget

	State cost	Federal cost	Total
I. Direct Costs:			
a) Salary/Wages	$417,956	$431,269	$849,225
b) Fringe Benefits* Approved Fringe Benefit Rate Used __N/A____%	$192,073	$186,009	$378,082
c) Contractual Costs	$5,389,247	$14,203,602	$19,592,849
d) Non-capital Equipment and Supplies	$84,352	$67,838	$152,190
e) Materials	$2,418	$2,430	$4,848
f) Travel	$15,499	$15,617	$31,116
g) Building/Space	$10,107	$12,711	$22,818
h) Equipment & Other Capital Expenditures	$168	$1,941	$2,109
Total Direct Costs	$6,111,820	$14,921,417	$21,033,237
II. Indirect Costs:			
Indirect Costs*Approved Indirect Cost Rate Used:__ N/A__%	$94,541	$99,005	$193,546
Total Indirect Costs	$94,541	$99,005	$193,546
III. In-kind Contribution			
State in-kind contribution	N/A	N/A	N/A
IV. Participant Reimbursement (State plus Federal):			
a) Dependent Care	N/A	N/A	N/A
b) Transportation & Other Costs	$1,234,000	$1,234,000	$2,468,000
c) State Agency Cost for Dependent Care Services	N/A	N/A	N/A
V. Total Costs	$7,440,361	$16,254,422	$23,694,783

*** Attach an approval letter from the cognizant agency identifying the indirect cost rate being used.**

Part J - Table 6: Budget Narrative and Justification Table

Item	Narrative
I. Direct Costs:	
a) Salary/Wages	State level Workforce Development Division Staff costs as well as Agency Support Staff Costs
b) Fringe Benefits* Approved Fringe Benefit Rate Used _____%	32.4% of Staff Salary Costs for FICA, Employee Insurance, and Retirement
c) Contractual Costs	Local Workforce Development Board Allocations, Professional Service Contracts, Third Party Reimbursement Contracts, and Other Contracted Services
d) Non-capital Equipment and Supplies	Computer Rental, Postage, etc.
e) Materials	General Office Supplies, including paper, toner, etc.
f) Travel	Travel by TWC Sub-recipient Monitoring Department as well as Workforce Division Staff
g) Building/Space	Rent and Utilities
h) Equipment & Other Capital Expenditures	Allocated portion of Capital IT/Equipment
II. Indirect Costs:	Budgeted indirect costs as a result of our approved Cost Allocation Plan approved by the Department of Labor
III. State In-kind Contribution	N/A
IV. Participant Reimbursements	
a) Dependent Care	N/A
b) Transportation & Other Costs	Client Support Services provided by Local Workforce Development Boards, and Third Party Reimbursement Contracts
c) State Agency Cost for Dependent Care Services	N/A

Part K - Table 7: Summary of Federal Fiscal Year Costs

Funding Category	Approved Prior FY Budget *	Upcoming FY Budget
1. 100 Percent Federal E&T Grant:	$4,719,779	$5,920,835
2. Share of $20 Million ABAWD Grant (if applicable)	$8,992,806	$2,893,226
3. Additional E&T Administrative Expenditures	$10,746,688	$12,412,722
a. 50% Federal	$5,373,344	$6,206,361
b. 50% State	$5,373,344	$6,206,361
4. Participant Expenses:		
a. Transportation/Other	$2,268,000	$2,468,000
50% Federal	$1,134,000	$1,234,000
50% State	$1,134,000	$1,234,000
b. Dependent Care		
50% Federal	$0	$0
50% State	$0	$0
5. Total E&T Program Costs (= 1+2+3a+3b+4a+4b)	$26,727,273	$23,694,783
6. 100% State Agency Cost for Dependent Care Services	$0	$0
7. Total Planned Federal FY Costs (Must agree with Part I—Operating Budget		$16,254,422

***Include immediately preceding Federal FY's final approved budget figures for each spending category**

Geographic Coverage FFY'17

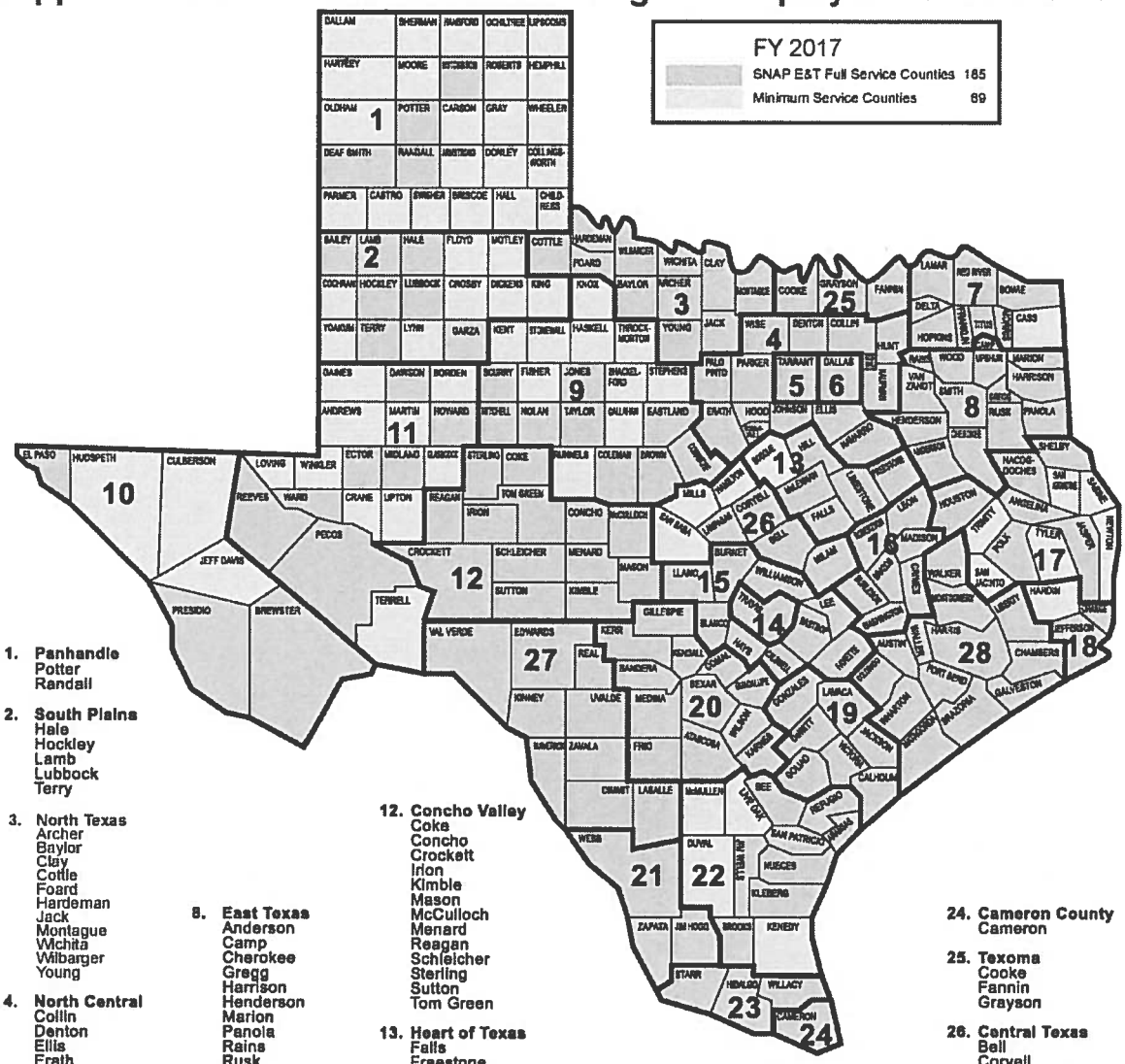
SNAP E&T services will be delivered in the following 185 full-service counties:

Anderson	Cottle	Hidalgo	Mason	Shelby
Angelina	Crockett	Hill	Matagorda	Smith
Aransas	Dallas	Hockley	Maverick	Somervell
Archer	Dawson	Hood	McCulloch	Starr
Atascosa	Deaf Smith	Hopkins	McLennan	Sterling
Austin	Delta	Houston	Medina	Sutton
Bailey	Denton	Howard	Menard	Tarrant
Bandera	DeWitt	Hunt	Midland	Taylor
Bastrop	Dimmitt	Hutchinson	Milam	Terry
Baylor	Eastland	Irion	Mitchell	Titus
Bee	Ector	Jack	Montgomery	Tom Green
Bell	Edwards	Jackson	Montague	Travis
Bexar	Ellis	Jasper	Morris	Upshur
Blanco	El Paso	Jefferson	Nacogdoches	Uvalde
Bowie	Erath	Jim Hogg	Navarro	Val Verde
Brazoria	Falls	Jim Wells	Nolan	Van Zandt
Brazos	Fannin	Johnson	Nueces	Victoria
Brewster	Fayette	Jones	Orange	Walker
Brooks	Foard	Karnes	Palo Pinto	Waller
Brown	Fort Bend	Kaufman	Panola	Ward
Burleson	Franklin	Kendall	Parker	Washington
Burnet	Freestone	Kerr	Pecos	Webb
Caldwell	Frio	Kimble	Polk	Wharton
Calhoun	Galveston	Kinney	Potter	Wichita
Cameron	Garza	Kleberg	Presidio	Wilbarger
Camp	Gillespie	Lamb	Rains	Willacy
Chambers	Goliad	Lamar	Randall	Williamson
Cherokee	Gonzales	Lampasas	Reagan	Wilson
Clay	Grayson	LaSalle	Real	Wise
Coke	Gregg	Lavaca	Red River	Wood
Coleman	Grimes	Lee	Reeves	Young
Collin	Guadalupe	Leon	Refugio	Zapata
Colorado	Hale	Liberty	Robertson	Zavala
Comal	Hardeman	Limestone	Rockwall	
Comanche	Harris	Llano	Rusk	
Concho	Harrison	Lubbock	San Patricio	
Cooke	Hays	Madison	Schleicher	
Coryell	Henderson	Marion	Scurry	

COUNTIES COVERED BY THE STATE'S 15 PERCENT EXEMPTION ALLOWANCE (Minimum-Service Counties)

Andrews	Gaines	McMullen	Trinity
Armstrong	Glasscock	Mills	Tyler
Borden	Gray	Moore	Upton
Bosque	Hall	Motley	Wheeler
Briscoe	Hamilton	Newton	Winkler
Callahan	Hansford	Ochiltree	Yoakum
Carson	Hardin	Oldham	
Cass	Hartley	Parmer	
Castro	Haskell	Roberts	
Childress	Hemphill	Runnels	
Cochran	Hudspeth	Sabine	
Collingsworth	Jeff Davis	San Augustine	
Crane	Kenedy	San Jacinto	
Crosby	Kent	San Saba	
Culberson	King	Shackelford	
Dallam	Knox	Sherman	
Dickens	Lipscomb	Stephens	
Donley	Live Oak	Stonewall	
Duval	Loving	Swisher	
Fisher	Lynn	Terrell	
Floyd	Martin	Throckmorton	

Supplemental Nutrition Assistance Program Employment and Training



1. **Panhandle**
   Potter
   Randall

2. **South Plains**
   Hale
   Hockley
   Lamb
   Lubbock
   Terry

3. **North Texas**
   Archer
   Baylor
   Clay
   Cottle
   Foard
   Hardeman
   Jack
   Montague
   Wichita
   Wilbarger
   Young

4. **North Central**
   Collin
   Denton
   Ellis
   Erath
   Hood
   Hunt
   Johnson
   Kaufman
   Navarro
   Palo Pinto
   Parker
   Rockwall
   Somervell
   Wise

5. **Tarrant County**
   Tarrant

6. **Dallas**
   Dallas

7. **North East Texas**
   Bowie
   Delta
   Franklin
   Hopkins
   Lamar
   Morris
   Red River
   Titus

8. **East Texas**
   Anderson
   Camp
   Cherokee
   Gregg
   Harrison
   Henderson
   Marion
   Panola
   Rains
   Rusk
   Smith
   Upshur
   Van Zandt
   Wood

9. **West Central**
   Brown
   Coleman
   Comanche
   Eastland
   Jones
   Mitchell
   Nolan
   Taylor

10. **Upper Rio Grande**
    El Paso

11. **Permian Basin**
    Dawson
    Ector
    Howard
    Midland
    Pecos
    Reeves
    Ward

12. **Concho Valley**
    Coke
    Concho
    Crockett
    Irion
    Kimble
    Mason
    McCulloch
    Menard
    Reagan
    Schleicher
    Sterling
    Sutton
    Tom Green

13. **Heart of Texas**
    Falls
    Freestone
    Hill
    Limestone
    McLennan

14. **Capital Area**
    Travis

15. **Rural Capital**
    Bastrop
    Blanco
    Burnet
    Caldwell
    Fayette
    Hays
    Lee
    Llano
    Williamson

16. **Brazos Valley**
    Brazos
    Burleson
    Grimes
    Leon
    Madison
    Robertson
    Washington

17. **Deep East Texas**
    Angelina
    Houston
    Jasper
    Nacogdoches
    Polk
    Shelby

18. **Southeast Texas**
    Jefferson
    Orange

19. **Golden Crescent**
    Calhoun
    DeWitt
    Goliad
    Gonzales
    Jackson
    Lavaca
    Victoria

20. **Alamo**
    Atascosa
    Bexar
    Comal
    Frio
    Guadalupe
    Kerr
    Wilson

21. **South Texas**
    Webb

22. **Coastal Bend**
    Bee
    Jim Wells
    Kleberg
    Nueces
    San Patricio

23. **Lower Rio Grande**
    Hidalgo
    Starr
    Willacy

24. **Cameron County**
    Cameron

25. **Texoma**
    Cooke
    Fannin
    Grayson

26. **Central Texas**
    Bell
    Coryell

27. **Middle Rio Grande**
    Dimmit
    Edwards
    Kinney
    La Salle
    Maverick
    Real
    Uvalde
    Val Verde
    Zavala

28. **Gulf Coast**
    Austin
    Brazoria
    Chambers
    Colorado
    Fort Bend
    Galveston
    Harris
    Liberty
    Matagorda
    Montgomery
    Walker
    Waller
    Wharton