

# Contents

## Contents

- Contents ..... 1**
- A. Cover Page and Authorized Signatures..... 4**
- B. Amendment Log ..... 6**
- C. Acronyms ..... 7**
- D. Assurances..... 8**
- E. State E&T Program, Operations, and Policy..... 10**
  - I. Summary of E&T Program..... 10
  - II. Program Changes..... 13
  - III. Consultation and Coordination with the Workforce Development System ..... 14
  - Consultation ..... 14**
  - Coordination..... 16**
  - IV. Consultation with Indian Tribal Organizations (ITOs) ..... 22
  - V. Utilization of State Options..... 24
  - VI. Characteristics of Individuals Served by E&T..... 25
  - VII. Organizational Relationships ..... 26
  - VIII. Screening for Work Registration ..... 31
  - IX. Screening for Referral to E&T ..... 33
  - X. Referral to E&T ..... 35
  - XI. Assessment..... 38
  - XII. Case Management Services..... 39
  - XIII. Conciliation Process (if applicable) ..... 42
  - XIV. Disqualification Policy for General Work Requirements ..... 43
  - XV. Good Cause ..... 44
  - XVI. Provider Determinations ..... 46
  - XVII. Participant Reimbursements..... 48
  - XVIII. Work Registrant Data ..... 51
  - XIX. Outcome Reporting Measures ..... 54
  - National Reporting Measures..... 54**
  - State Component Reporting Measures..... 55**
- F. Pledge to Serve All At-Risk ABAWDs (if applicable)..... 59**
- G. Component Detail ..... 66**

I. Non-Education, Non-Work Components ..... 66

II. Educational Programs ..... 75

III. Work Experience (WE) ..... 83

***Work Activity and Unsubsidized WBL Components* ..... 83**

**H. Estimated Participant Levels..... 88**

**I. Contracts/Partnerships ..... 89**

**J. Budget Narrative and Justification ..... 94**

**Minimum- and Full-Service Counties..... 96**

## Tables

Table B.I.	Amendment Log.....	4
Table C.I.	Acronyms.....	5
Table D.I.	Assurances .....	6
Table D.II.	Additional Assurances.....	7
Table E.I.	Estimates of Participant Reimbursements .....	46
Table E.II.	Participant Reimbursement Details .....	47
Table E.III.	National Reporting Measures.....	52
Table E.IV.	Component Outcome Measures.....	54
Table F.I.	Pledge Assurances .....	57
Table F.II.	Information about the size of the ABAWD population .....	62
Table F.III.	Available Qualifying Activities.....	62
Table F.IV.	Estimated cost to fulfill the pledge .....	63
Table G.I.	Non-Education, Non-Work Component Details: Supervised Job Search .....	66
Table G.II.	Non-Education, Non-Work Component Details: Job Search Training .....	68
Table G.III.	Non-Education, Non-Work Component Details: Job Retention.....	70
Table G.IV.	Non-Education, Non-Work Component Details: Self-Employment Training .....	71
Table G.V.	Non-Education, Non-Work Component Details: Workfare .....	72
Table G.VI.	Educational Program Details: Basic/Foundational Skills Instruction.....	74
Table G.VII.	Educational Program Details: Career/Technical Education Programs or other Vocational Training .....	76
Table G.VIII.	Educational Program Details: English Language Acquisition.....	78
Table G.IX.	Educational Program Details: Integrated Education and Training/Bridge Programs .....	79
Table G.X.	Educational Program Details: Work Readiness Training .....	79
Table G.XI.	Educational Program Details: Other .....	80
Table G.XII.	Work Experience: Work Activity .....	82
Table G.XIII.	Work Experience: Internship .....	83
Table G.XIV.	Work Experience: Pre-Apprenticeship.....	83
Table G.XV.	Work Experience: Apprenticeship .....	84
Table G.XVI.	Work Experience: On-the-Job Training .....	84
Table G.XVII.	Work Experience: Transitional Jobs .....	85
Table G.XVIII.	Work Experience: Work-based learning - Other .....	85
Table I.I.	Contractor/Partner Details.....	87
Table I.II.	Contractor/Partner Details.....	90

Table I.III. Contractor/Partner Details.....90  
 Table I.IV. Contractor/Partner Details.....91  
 Table I.V. Contractor/Partner Details.....91  
 Table J.I. Direct Costs .....92

## A. Cover Page and Authorized Signatures

State: Texas

State Agency Name: Texas Health and Human Services Commission

Federal FY: 2024

Date Submitted to FNS (revise to reflect subsequent amendments): August 15, 2023

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

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**Certified By:**



**8/15/2023**

\_\_\_\_\_  
Molly Lester  
Interim Deputy Executive Commissioner  
Access and Eligibility Services

\_\_\_\_\_  
Date

**Certified By:**



**8/15/2023**

\_\_\_\_\_  
Dan Becks  
Finance Operations Director III

\_\_\_\_\_  
Date

Finance and Contract Operations  
Access and Eligibility

## 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.

**Table B.I. Amendment Log**

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

## 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.

**Table C.I. Acronyms**

Acronym	Acronym Definition
ABAWD	Able-Bodied Adult without Dependents
AEL	Adult Education and Literacy
AIA	Agriculture Improvement Act of 2018
BCY	Board Contract Year
Board	Local Workforce Development Board
BSU	Business Service Unit
E&T	Employment and Training
FNS	Food and Nutrition Service
FY	Fiscal Year
GA	General Assistance
General Population	Non-ABAWDs
HHSC	Texas Health and Human Services Commission
IAC	Interagency Contract
ITO	Indian Tribal Organization
SNAP	Supplemental Nutrition Assistance Program
TAA	Trade Adjustment Assistance
TANF	Temporary Assistance for Needy Families
TIERS	Texas Integrated Eligibility Redesign System
TPR	Third-Party Reimbursement
TWIST	The Workforce Information System of Texas
UI	Unemployment Insurance
USDA	United States Department of Agriculture
WIOA	Workforce Innovation and Opportunity Act

## 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**

Check the box to indicate you have read and understand each statement.	Check Box
I. 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))	<input checked="" type="checkbox"/>
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)	<input checked="" type="checkbox"/>
III. State education costs will not be supplanted with Federal E&T funds. (7 CFR 273.7(d)(1)(ii)(C))	<input checked="" type="checkbox"/>
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))	<input checked="" type="checkbox"/>
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)	<input checked="" type="checkbox"/>
VI. Contracts are procured through appropriate procedures governed by State procurement regulations. (7 CFR 277.14)	<input checked="" type="checkbox"/>
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)	<input checked="" type="checkbox"/>
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))	<input checked="" type="checkbox"/>
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))	<input checked="" type="checkbox"/>



**Table D.II. Additional Assurances**

<p><b>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.</b></p>	<p><b>Check Box</b></p>
<p>I. 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))</p>	<p><input type="checkbox"/></p>
<p>II. The E&amp;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&amp;T State Plan which affect them; submit for comment all portions of the E&amp;T State Plan that affect the Indian Tribal Organization (ITO); if appropriate and to the extent practicable, include ITO suggestions in the E&amp;T State plan. (For States with Indian Reservations only.) (7 CFR 272.2(b)(2) and 7 CFR 272.2(e)(7))</p>	<p><input checked="" type="checkbox"/></p>

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

### I. Summary of E&T Program

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.

The SNAP E&T program in Texas promotes long-term self-sufficiency and independence by preparing SNAP recipients for employment through work-related education and training activities. The Texas Health and Human Services Commission's (HHSC) mission is to connect people with services and supports. 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.

1) Texas' work-first service delivery model allows SNAP E&T participants to test the labor market through job search, including workfare job search, with the focus on reaching their employment goals at the earliest opportunity. To help SNAP E&T participants reach their employment goals and employers fill jobs with increasingly integrated technology, TWC promotes services and provides skills enhancement, work experience, and training opportunities to SNAP E&T participants. Providing SNAP recipients with opportunities for training and skills development helps them improve employment outcomes, retain jobs, and achieve long-term self-sufficiency.

2) In-demand and emerging industries vary by local workforce development areas (workforce areas). Through a planning process, Boards identify demand and target occupations. TWC publishes the target occupations, which can be found at <https://twc.texas.gov/partners/target-occupations>.

Boards will use in-demand and emerging industries to prioritize training and make work experience opportunities available to SNAP E&T participants in each workforce area.

#### **Mini-Simplified SNAP**

Texas will continue operating a mini-simplified SNAP for FFY 24. 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. On average, there are about 10 recipients monthly that have the value of their SNAP benefits combined with the value of their TANF benefits.

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

The SNAP E&T program in Texas is administered at the state level by Texas HHSC through an Interagency Contract (IAC) with TWC.

TWC coordinates and collaborates with its 28 Boards and their contracted workforce service providers and community partners to provide E&T services to SNAP recipients. Collectively known as Texas Workforce Solutions, this network offers local access to integrated and statewide services to employers, workers, job seekers, and youth, including individuals with disabilities and other barriers to employment.

(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.

N/A

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.

The SNAP E&T program in Texas is operated statewide through the 28 Board workforce areas. Texas applies either a minimum- or full-service county designation to each county.

In minimum-service counties:

- Texas uses its ABAWD discretionary exemptions to exempt ABAWDs;
- all SNAP recipients may volunteer to participate in SNAP E&T and will have access to all services;
- outreach is not conducted;
- SNAP recipients are not sanctioned for failure to comply with SNAP E&T program requirements; and
- hours of participation may not exceed the hours required of mandatory work registrants residing in full-service counties.

In full-service counties:

- Boards are required to outreach all ABAWDs 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 notes 1 and 2 below);
- all mandatory work registrants who are outreached or who volunteer, including ABAWDs and General Population, have access to all services, including support services;

- mandatory work registrants who are outreached or currently participating in the SNAP E&T program are sanctioned (that is, SNAP benefits will be denied) for failure to comply with SNAP E&T program requirements without good cause;
- exempt SNAP recipients have access to all services, including support services, and may volunteer to participate in SNAP E&T but are not sanctioned for failure to comply with SNAP E&T program requirements; and
- an exempt recipient's participation hours may not exceed the hours required of mandatory work registrants.

To satisfy the ABAWD-pledge requirement to offer qualifying components to all at-risk ABAWDs, Texas outreaches all ABAWDs in full-service counties. At-risk ABAWDs are enrolled in E&T as described elsewhere in this plan.

The minimum- and full-service counties are listed at the end of this plan.

Provide a list of the components offered.

**Non-Education, Non-Work Components:**

- Supervised job search
- Job search training
- Job retention services
- Workfare (ABAWDs only)

**Educational Components:**

- Basic education services
- Vocational training

**Work Experience Components:**

- Work Activity

Work-based learning will be made available to SNAP E&T participants through co-enrollment in WIOA.

Provide the web addresses (URLs) of State E&T policy resources such as handbooks and State administrative code, if available.

**SNAP E&T Guide:**

<https://www.twc.texas.gov/files/partners/snap-et-guide-twc.pdf>

**Texas Administrative Code, Title 40, Part 20, Chapter 813:**

[https://texreg.sos.state.tx.us/public/readtac\\$ext.ViewTAC?tac\\_view=4&ti=40&pt=20&ch=813](https://texreg.sos.state.tx.us/public/readtac$ext.ViewTAC?tac_view=4&ti=40&pt=20&ch=813)

**Texas Works Handbook, Employment and Training:**

<https://www.hhs.texas.gov/handbooks/texas-works-handbook/a-1800-employment-services>

**Texas Works Handbook, ABAWD:**

<https://www.hhs.texas.gov/handbooks/texas-works-handbook/a-1900-federal-time-limits>

**Texas Works Handbook, Bulletins:**

<https://www.hhs.texas.gov/handbooks/texas-works-handbook/policy-bulletins>

## II. Program Changes

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

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.

HHSC and TWC will continue their collaboration to expand the third-party reimbursement program and will submit an amendment for new third-party reimbursement initiatives as they are developed with new partners.

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.

Texas will no longer offer any SNAP E&T funded unsubsidized work-based learning components. Boards will place SNAP E&T participants into work-based learning through co-enrollment in WIOA, as necessary and appropriate. Providing these services through WIOA has been determined to be more efficient and cost effective. Previously, Texas offered the unsubsidized work-based learning components, but they were not utilized by the boards. These services were provided through WIOA which means this adjustment will not increase or decrease co-enrollment.

### 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.*

**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).

The Texas Workforce Investment Council (TWIC) assist the governor and the legislature with strategic planning for and evaluation of the Texas workforce system. under the federal Workforce Innovation and Opportunity Act of 2014, TWIC serves as the state workforce development board. TWIC does not operate programs but rather uses an integrated, collaborative approach to facilitate planning and evaluation across workforce system partners, programs, and initiatives. Section 2308.104 of the Texas Government Code charges TWIC to develop a “single strategic plan that establishes the framework for budgeting and operation of the workforce system.” The Texas workforce system includes the following partners:

- The Governor’s Office of Economic Development and Tourism
- The Texas Association of Workforce Boards
- The Texas Department of Criminal Justice and its Windham School

- The Texas Education Agency
- The Texas Health and Human Services Commission
- The Texas Higher Education Coordinating Board
- The Texas Juvenile Justice Department
- The Texas Veterans Commission
- The Texas Workforce Commission

The HHSC Commissioner and TWC Executive Director serve as members of TWIC and attend quarterly council meetings where they contribute to discussion and decisions related to the Texas workforce system. In FY 2022, TWIC initiated the workforce system strategic planning process for FY 2024-2031. The annual report for FY 2022 can be found at the following link: [2022-Annual-Report.pdf \(texas.gov\)](#). All consultation is done through workforce system partners depending on the topic of consultation. The SNAP E&T Plan consultation is conducted between HHSC and TWC TWIC representatives to ensure the program is delivered through its statewide workforce development system and adheres to the single strategic plan as established by TWIC. Consultation is an ongoing process that occurs through email and virtual biweekly meetings between HHSC and TWC. HHSC staff will implement a formal process to consult with all members of TWIC by adding the SNAP E&T Plan as an agenda item to prepare for the upcoming year.

HHSC and TWC's Interagency Contract (IAC) outlines SNAP E&T administrative and operational responsibilities as determined through consultation to:

- coordinate programmatic administration and operation;
- make and manage programmatic decisions;
- oversee the SNAP E&T program; transfer administrative and operational knowledge; and
- ensure that all regulatory requirements are met.

HHSC's and TWC's priorities are to:

- improve coordinated case management to assist in transitioning SNAP recipients from public assistance to independence;
- provide coordinated services to SNAP recipients who are experiencing barriers to employment and address the barriers to assist SNAP recipients in finding and retaining employment;
- ensure coordinated interagency case management through local HHSC offices and through local Workforce Solutions Offices; and
- facilitate effective communication among HHSC, TWC, Boards, and Board contractors by:
  - 1) providing consistent messages to SNAP recipients regarding the importance of finding employment and adhering to program requirements; and
  - 2) identifying and mitigating barriers to finding and retaining employment.

HHSC and TWC conduct meetings on a biweekly basis to discuss SNAP E&T–related processes and issues. Boards and local HHSC staff conduct meetings on a regular basis based on the regional area. TWC and Boards conduct meetings on a regular basis. All areas communicate regularly to address changes, issues, and concerns as they arise.

**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.

N/A

## 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.*

**Special State Initiatives:** Describe any special State initiatives (i.e. Governor-initiated 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.

### HHSC/TWC TPR Collaboration

TWC and HHSC have formed a discussion group to explore strategies to increase participation not only at Capital Area but across the state. Some of the strategies the discussion group have considered include encouraging strong partnerships through increased outreach to potential partners, addressing challenges for current partners, and using assessment to ensure new partners are a strong fit within the E&T program.

In FY 24, HHSC and TWC will continue to collaborate to expand the TPR program across the state and will submit an amendment for new TPR programs as they are developed with new partners.

### Capital Area TPR Initiative

Workforce Solutions Capital Area (Capital Area) will continue to partner with the City of Austin (City) and Travis County (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 in the SNAP E&T program. The City and County will continue to fund a local Workforce



Education and Readiness Continuum (WERC) in Texas during the FFY 24 SNAP E&T State Plan program, with local (non-Federal) City and County funds, which will supply non-Federal funding for the provision of allowable SNAP E&T activities and support services to SNAP recipients participating in the initiative.

The WERC funding provides the match dollars. The originating source is State General Revenue but is passed down from the City and County through the Capital Area WERC contract.

The WERC program provides case management, short-term vocational training (less than six months), support services, and job search assistance.

Based on The Workforce Information System of Texas (TWIST) reports, the WERC program has served the following through the TPR initiative:

- BCY 2018: 15 SNAP recipients
- BCY 2019: 12 SNAP recipients
- BCY 2020: 20 SNAP recipients
- BCY 2021: 25 SNAP recipients
- BCY 2022: 10 SNAP recipients
- BCY 2023 to date: 2 SNAP recipients

Capital Area began developing Third Party Reimbursement (TPR) partnerships with community-based organizations (CBOs) in late 2019. The time spent with the CBOs has helped to build relationships. In FFY 24, Capital Area plans to develop TPR partnerships with more CBOs and will continue using strategies to increase participation, such as helping CBOs identify SNAP recipients already receiving services from their organization and providing the assistance needed for the CBOs to fully leverage the benefits of participation in a TPR agreement. Capital Area has also put out a Request for Information that they believe will help identify potential participants that TPPs are already serving and increase referrals to the program. No new outcomes from Capital Area's work with CBOs can be reported at this time.

Capital Area will not receive any advance payment from the City or County for the TPR initiative.

Capital Area will outreach and market SNAP E&T TPR services through their contractor C2 Global. The outreach will target mandatory work registrants from the pool of SNAP E&T mandatory recipients in TWIST and exempt recipients from a list provided by TWC.

Capital Area will continue to contract with C2 Global for the TPR initiative. C2 Global is responsible for:

- intake and assessment;
- verification of SNAP eligibility before enrolling the SNAP recipient into TPR services;
- all TPR case management activities;

- outreaching exempt and mandatory SNAP recipients identified to participate in the TPR initiative;
- enrolling eligible individuals in services;
- providing allowable SNAP E&T services and support services to exempt or mandatory participants;
- tracking and reporting all SNAP E&T TPR activities and support services in The Workforce Information System of Texas (TWIST) using special TWC-established codes created specifically for TPR; and
- submitting invoices to the Board for expenditures incurred.

Capital Area is responsible for:

- providing oversight and technical assistance to C2 Global for TPR;
- invoicing the City/County for services provided to SNAP recipients through the TPR initiative;
- submitting the TPR Certification of Expenditures form to TWC; and
- monitoring SNAP E&T TPR.

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.

Participants may receive services from multiple providers but not through Capital Area's TPR initiative. Capital Area would not be aware of participants receiving services from multiple providers if Capital Area is not working with that provider. Capital Area only pays for the services it sets up.

All contracts will be signed before the FY 24 TPR initiative is continued by Capital Area.

Capital Area also partners with Goodwill Central Texas to leverage 50 percent Federal SNAP E&T funds. These funds cover the costs of providing SNAP E&T services to exempt and mandatory SNAP recipients who are not currently served due to funding limitations in the SNAP E&T program. Goodwill Central Texas supplies non-Federal, private, nonprofit funding to provide allowable SNAP E&T activities and support services to SNAP recipients participating in the initiative. Goodwill Central Texas primarily leverages City/County funding provided through participation in the WERC program. Goodwill of Central Texas provides career training services and support services, including case management and assistance with class supplies. Goodwill has a newly assigned TPR staff member, and Capital Area anticipates that referrals to the TPR initiative will be increasing.

Goals for the TPR initiative include the following:

- C2 Global Services—goal of at least 20 individuals enrolled in TPR

for FY 24

- Goodwill Central Texas—goal of at least 5 individuals enrolled in TPR for FY 24
- Increasing the number of TPR partnerships.

Component and case management services include allowable SNAP E&T services such as vocational training, non-vocational training, support services, and job retention services, for no less than 30 and up to 90 days.

Capital Area's potential third-party providers (TPPs) have been expending federal American Rescue Plan Act of 2021 (ARPA) funds, which cannot be used as 50% match funds, and their pots of non-federal funds are too small to draw on. In FY 2024, the partners will have non-federal funds to enroll more participants in the program as ARPA funds will no longer be available. The maximum amount certified for cost match is being reduced for FY24 and cannot exceed \$250,000 (total for all TPR partners) with the following limitations placed on types of activities to be matched:

- \$216,000 in operations and services, including costs of vocational training; non-vocational training such as Adult Basic Education; basic skills and literacy; High School Equivalency (HSE); English as a Second language (ESL); case managed job search; job readiness; and staff time spent providing SNAP E&T services.
- \$34,000 in support services, including transportation expenses; driver's license fee; work-related expenses; education-related expenses; clothing suitable for job interviews or employment; licensing and bonding fees; vision needs; and short-term rental assistance.

TWC will provide technical assistance and monitoring throughout FY 24 for the TPR initiative.

SNAP E&T TPR participation reports can be generated in TWIST and capture data on all SNAP recipients participating in the TPR initiative.

HHSC is in the process of developing a SNAP E&T team with a major emphasis on development and expansion of the SNAP E&T TPR program. As this team is developed part of their duties will include TPR program guidance, technical assistance, and monitoring. These duties will be not only to TWC as direct contractor but also to their sub recipients of TPR. This will allow HHSC the opportunity to give guidance and technical assistance necessary to expand the number of participants served with current and future TPR providers. This will also include discussion of how local HHSC SNAP Eligibility Staff and TWC contractor staff interact in helping assure that SNAP participants are aware of and can be appropriately referred for SNAP E&T service components.

**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).

Texas Labor Code §302.021 and §302.062 established the job training, employment, and employment-related educational programs and functions consolidated under the authority of TWC.

Texas Government Code §2308.304 and §2308.312 defines the responsibility of each Local Workforce Development Board (Board) to develop, implement, and modify a plan for convening all relevant programs, identified as Workforce Solutions Office required-partner programs.

TWC and its 28 Boards, in addition to the Boards' contracted services providers and community partners, continue to adhere to the principle of full integration of core programs. This principle is also followed at TWC State Offices, where different programmatic teams are located in the same offices and work together on programs. In most comprehensive Workforce Solutions Offices, the following programs are physically co-located:

- WIOA Adult, Dislocated Worker, and Youth
- Wagner-Peyser Employment Service
- Wagner-Peyser Employer Service
- Vocational Rehabilitation
- Trade Adjustment Assistance
- Temporary Assistance for Needy Families employment and training
- SNAP E&T
- Subsidized childcare
- Veterans employment and training

The strategy of alignment, coordination, and integration of education and employment and training programs is underway. Customers have local access to the workforce system and statewide services at numerous Workforce Solutions Offices. Texas Workforce Solutions provides workforce development services that help workers find and keep good jobs and help employers hire the skilled workers they need to grow their businesses. Texas maintains an advantage in the provision of services to employers, job seekers, and special population groups, including low-income and basic skills-deficient individuals, as well as veterans, by the collocation of core programs.

Some SNAP recipients participate only in SNAP E&T, while others are co-enrolled in SNAP E&T and WIOA. Co-enrollment is coordinated by Workforce Solutions Office staff who have knowledge and understanding of the programs that are physically co-located in Workforce Solutions Offices. SNAP recipients participating in SNAP E&T may explore WIOA activities that provide them with the skills necessary to meet the

emerging demands of local businesses. SNAP recipients may enroll in WIOA career, training, or other job seeker services.

**WIOA Combined Plan:** Is SNAP E&T included as a partner in the State's WIOA Combined Plan?

Yes

No

**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.

HHSC and TWC implemented TANF Choices–related processes under a Coordinated Interagency Case Management memorandum of understanding to improve the transition of TANF recipients between local HHSC offices and Boards. TWC and HHSC's priorities are to:

- improve coordinated case management that will assist in transitioning TANF recipients from public assistance to independence;
- provide coordinated services to TANF recipients who are experiencing barriers to employment and address the barriers in order to assist TANF recipients in finding and retaining employment;
- ensure coordinated interagency case management through local 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 TANF recipients regarding the importance of finding employment and adhering to program requirements; and
  - (2) identifying and mitigating barriers to finding and retaining employment.

Additionally, TWC requires Boards to establish a local coordinated interagency case management plan to provide consistent and streamlined Choices services. As part of this plan, Workforce Solutions Office staff must communicate with HHSC on an ongoing basis.

If there is a change in an individual's status while participating in the Choices program, Boards must ensure that Form H2583, Choices Information Transmittal, is used to notify the HHSC Texas Works Advisor of this status change. Changes in status include the following:

- The customer has become employed.

- The customer has a medical condition documented in Form H1836A or Form H1836B.
- There are other changes that affect participation in the Choices program.

**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).

HHSC coordinates with TWC to provide the delivery of employment programs and to facilitate the development of a comprehensive, integrated service network that is locally managed, market driven, and high performing.

Through an integrated workforce system, TWC administers all core programs under WIOA (Title I Adult, Dislocated Worker, and Youth; Title II Adult Education and Literacy, Title III Wagner-Peyser, and Title IV Vocational Rehabilitation), as well as TAA, childcare, and employment programs under Title IV-A of the Social Security Act. These programs offer Texas job seekers employment and training services and necessary support services to help them gain employment and attain self-sufficiency. Eligible participants may receive services from one or more programs and childcare reimbursements through Child Care and Development Block Grant (CCDBG) funds.

Collaboration among TWC and agencies (including HHSC, the Texas Education Agency, and the Texas Veterans Commission) administering other programs were initiated through the development of memoranda of understanding.

Some individuals in reentry programs may be SNAP recipients and receive SNAP E&T services.

#### 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.*

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.)*

Name the ITOs consulted.

Eagle Pass (Maverick County) – Kickapoo  
 Livingston (Polk County) – Alabama-Coushatta  
 El Paso (El Paso County) – Ysleta del Sur Pueblo

**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).

On Nov. 18, 2022, Texas used information available on each tribe's website to contact the ITOs by phone and obtain updated contact information, no response was received. The following information was used to outreach tribes.

Kickapoo Traditional Tribe of Texas

- (830) 773-2105
- [kickapootexas.org](http://kickapootexas.org)
- contact: [irvin.garza@kttribe.org](mailto:irvin.garza@kttribe.org); [jevon.garza@kttribe.org](mailto:jevon.garza@kttribe.org); and [arturo.garza@kttribe.org](mailto:arturo.garza@kttribe.org)

Alabama-Coushatta Tribes of Texas

- (936) 563-1100
- [alabama-coushatta.com](http://alabama-coushatta.com)
- contact: [ac.tribalcouncil@actribe.org](mailto:ac.tribalcouncil@actribe.org)

Ysleta Del Sur Pueblo

- (915) 859-8053
- [www.ysletadelsurpueblo.org](http://www.ysletadelsurpueblo.org)
- Contact: [tribalcouncil@ydsp-nsn.gov](mailto:tribalcouncil@ydsp-nsn.gov)

On Aug. 2, 2023, HHSC sent an e-mail requesting review of the E&T state plan with no response received. HHSC used available contact information, including information provided by FNS to outreach the following:

- [battise.tina@actribe.org](mailto:battise.tina@actribe.org)
- [veronica.trevino@kttribe.org](mailto:veronica.trevino@kttribe.org)
- [rolivera@ydsp-nsn.gov](mailto:rolivera@ydsp-nsn.gov)

- [irvin.garza@ktttribe.org](mailto:irvin.garza@ktttribe.org)
- [jevon.garza@ktttribe.org](mailto:jevon.garza@ktttribe.org)
- [arturo.garza@ktttribe.org](mailto:arturo.garza@ktttribe.org)
- [bbarcena@lipanapache.org](mailto:bbarcena@lipanapache.org)
- [tribalcouncil@ydsp-nsn.gov](mailto:tribalcouncil@ydsp-nsn.gov)
- [ac.tribalcouncil@actribe.org](mailto:ac.tribalcouncil@actribe.org)

HHSC has requested FNS-Office of Tribal Affairs and regional staff assist Texas in outreaching tribes. For Alabama Coushatta, FNS is scheduling introductions with tribal leadership to initiate discussions about consultation, program opportunities and possible strategy development going forward.

**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?

- Yes
- 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.*

The State agency operates the following type of E&T program (*select only one*):

- Mandatory per 7 CFR 273.7(e)
- Voluntary per 7 CFR 273.7(e)(5)(i)
- Combination of mandatory and voluntary

The State agency serves the following populations (*check all that apply*):

- Applicants per 7 CFR 273.7(e)(2)
- 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)

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)?



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)).

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 SNAP recipients in minimum-service counties are given a discretionary exemption from mandatory E&T participation. SNAP recipients aged 50 as of Sept. 1, 2023 and 50 to 51 as of Oct. 1, 2023 will be granted a discretionary exemption from the work requirement until system modifications have been made.

Note: Un-outreached General Population SNAP recipients are not formally exempt, but they are not required to participate in E&T until they have been outreached by the SNAP E&T program. Texas uses the number of General Population SNAP recipients outreached for the E&T program as the "required to participate" number when completing the FNS-583 report.

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

The State will reevaluate these exemptions each year during SNAP E&T State Plan development.

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.

- ABAWDs
- Homeless
- Veterans
- Students
- Single parents
- Returning citizens (aka: ex-offenders)
- Underemployed
- Those that reside in rural areas
- Other: Texas targets an estimated 22% of its mandatory work registrants

## 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.

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.

In Texas, the E&T program is directly administered by HHSC Access and Eligibility Services (AES). HHSC AES is responsible for:

- establishing statewide E&T policy;
- managing the IAC with TWC (partner agency); and
- monitoring the program and fiscal operations of TWC.

Additionally, HHSC local-eligibility operations staff:

- determine eligibility for SNAP benefits statewide;
- screen applications and applicable information to determine the appropriateness for referral to the E&T Program;
- identify recipients appropriate for the E&T program through work registration or exemption status in TIERS; and
- refer SNAP recipients to Workforce Solutions Offices for SNAP E&T services through the HHSC TIERS/TWC TWIST daily interface, where they are given the opportunity to complete an assessment and are referred to the appropriate component.

**Note:** Workforce Solutions staff are more familiar with provider capacity and will assess and refer SNAP recipients to the appropriate component upon receiving the E&T referral through the automated daily interface from HHSC eligibility staff.

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

Local HHSC eligibility staff and Texas Workforce Solutions staff utilize separate case management systems; TWIST (TWC) and TIERS (HHSC). Both TIERS and TWIST communicate via an automated nightly and monthly interface to provide information related to work registration status, participants, E&T non-compliance, and good cause. Non-compliance is entered into TWIST within four days of the non-compliance date. The nightly interface transmits all entries between the TWC and HHSC systems.

As well as the automated interface, a manual process is in place to communicate possible exemptions, exceptions, and the provider determination process. The manual process requires Workforce Solutions staff to fax the appropriate form, which includes the client information, the specific reason for the request, any comments or additional information, and any documentation received from the customer to HHSC. The form is a request for HHSC to review the file based on the provided information, contact the client if needed, and complete the case action. HHSC notifies customers of all actions taken on their case based on the request.

On an administrative level, HHSC and TWC hold biweekly collaborative meetings as a consultation effort to discuss the SNAP E&T program.

Topics of discussion include:

- the SNAP E&T State Plan;
- the FNS Management Evaluation (ME) Review
- ideas for program improvements
- the transition of SNAP recipients from local HHSC offices to Workforce Solutions Offices; and
- any other topic as determined for the E&T Program.

This biweekly meeting also creates a regular opportunity for HHSC and TWC to ensure compliance with federal and state program requirements.

HHSC and TWC also work together to:

- improve coordinated case management to help SNAP recipients transition from public assistance to independence;
- provide coordinated services to SNAP recipients who are experiencing barriers to employment;
- ensure coordinated interagency case management through local HHSC offices and Workforce Solutions Offices; and
- facilitate effective communication among HHSC, TWC, Boards, and Board contractors by:
  - (1) providing consistent messages to SNAP recipients regarding the importance of finding employment and adhering to program requirements; and
  - (2) identifying and mitigating barriers to finding and retaining employment.

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.

Participant data and information are shared via the Texas Integrated Eligibility Redesign System/The Workforce Information System of Texas (TIERS/TWIST) interface.

Workforce Solutions Office staff also share certain information, such as work requirement verifications, reconsiderations, noncompliance reports, and good cause recommendations, with HHSC via fax.

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.

Local HHSC eligibility staff use TIERS to indicate the work registration status based on screening and assessment of client-provided information and verification sources. HHSC sends a daily electronic file through an HHSC TIERS/TWC TWIST interface of all SNAP recipients to TWC when SNAP is certified and when the SNAP recipient's work registration code changes. The daily electronic file contains indicators to designate if the SNAP recipient is mandatory or exempt to participate in E&T.

TWC uses information from this daily electronic file to outreach mandatory work registrants, which include ABAWDs and General Population SNAP recipients. HHSC sends TWC data on exempt SNAP recipients through the electronic file so that exempt SNAP recipients can volunteer to participate in the E&T program. TWC also uses the automated interface to notify HHSC of SNAP recipients' good cause recommendations and noncompliance with SNAP E&T program requirements.

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

HHSC issues policy, procedures, and other information through bulletins, email, and coordinated meetings.

TWC issues guidance and information through the SNAP E&T Guide, Workforce Development (WD) Letters, and regular calls with Board staff.

TWC and HHSC policy are available online for all parties.

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.

HHSC will oversee TWC's program and fiscal operations, including Third-Party Reimbursement (TPR) programs, by performing programmatic and fiscal monitoring reviews. HHSC will define data sources and utilize standard data collection methods so that findings are objectively verifiable to assure program activities are conducted in compliance with all applicable Federal laws, rules, and regulations.

HHSC will implement desk reviews of Texas Workforce Commission (TWC) to assess fiscal operations of the SNAP E&T contract.

HHSC will utilize TWC's "TWC SNAP Federal Cash Expenditure Summary" (summary report) as source documentation to determine the total population of cash draws and identify a sample set to test for compliance with applicable Federal laws, rules, and regulations. HHSC will coordinate with the local workforce boards included in the sample set to gather necessary supporting documentation to reconcile the cash draws between the TWC summary report, Cash Draw and Monthly Expenditure Reporting System (CDER) report and the local workforce board's ledger detailing cash draws with actual and estimated amounts along with the cash

management procedures. HHSC understands each local workforce board has implemented its cash management process differently, so the goal is to understand and document the respective processes and reconcile as much as possible to the summary report. HHSC will issue a sample selection letter requesting the local workforce boards to provide supporting documentation to reconcile actual and estimated amounts reported as cash draws during the period of review and the procedures used to determine the requested amounts. HHSC will determine whether the requested amounts from the local workforce boards are reconcilable and whether the cash management processes are appropriate. Upon completion of the review of the local workforce boards, HHSC will report any issues to TWC. As of September 2023, this process has been implemented and HHSC is currently collecting data from the local workforce boards to determine whether the requested amounts from the local workforce boards are reconcilable and whether the cash management processes are appropriate.

During future reviews, HHSC will select a sample of the local workforce boards to assess the allowability of a sample set of its expenditures, controls over its cash management processes, and whether costs are expended for their intended purpose. HHSC will review the local workforce boards' general ledger (which includes actual/expended amounts) to select a sample set, request for supporting documentation, and conduct testing. The sample selection letter requires the local workforce board to identify the expenditure type, and provide the necessary supporting documentation based on the identified expenditure types. Expenditure types include payroll, travel, materials and supplies, equipment, professional services and subcontractors, other, indirect costs, and would be validated based on a review of the provided supporting documentation. HHSC will use respective tools, based on the expenditure type, to conduct its testing. Upon completion of the review of the local workforce boards, HHSC will report any issues to TWC. HHSC's Quality Assurance Management Evaluation (ME) review ensures the agency is monitoring the financial and programmatic integrity of the contractors and that operations comply with the current Employment and Training/Able Bodied Adults without Dependents guidelines. Regional Quality Assurance Managers (RQAM) reviews procedures and validates compliance with programmatic and fiscal responsibilities according to contract guidelines and deliverable schedule, SNAP ET Guidance from USDA, Texas Administrative Code, E&T State Plan, and the Code of Federal Regulations. RQAM reviews responses and documents after receiving the completed questionnaire and all documents requested to ensure compliance. RQAM subsequently creates a list of follow-up questions for interviews conducted during on-site or virtual review based on responses and documents received. Documents and tools reviewed include current E&T State Plan, current FFY reports from HHSC and TWC, contract deliverables and reporting schedule, HHSC and TWC

monitoring tools, TWC annual monitoring plan, TWC board review of findings, FN-583, SF-425, and TWC general ledger for indicated sample period.

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).

The State agency evaluates the performance of partners through the management evaluation process. Regional Quality Improvement Managers (RQIM) conduct exit conferences providing preliminary performance standards based on results of on-site or virtual interviews and observations. RQIM submits review of findings via email within 60 days of exit conference and monitors due dates ensuring an effective and timely corrective action plan is submitted. RQIM monitors ongoing requirements related to all corrective action plans and submits closure to the plan upon successful completion of corrective action activities.

To support efficient and effective E&T operations, HHSC will:

- leverage the SNAP E&T program governance structure to provide oversight and support for program discussions and decision-making and ensure ongoing and successful coordination with TWC;
- evaluate TWC's oversight of Board activities through ongoing performance monitoring;
- conduct routine onsite visits and desk reviews to assess whether TWC, local workforce development board, and third-party reimbursement provider activities are reasonable and necessary to accomplish E&T goals and objectives;
- measure compliance with timeliness, completeness, and accuracy with deliverables and/or other applicable federal requirements;
- formerly report, at appropriate intervals, performance commendations, as well as observations, concerns and findings resulting from the agency's fieldwork testing; and
- initiate and oversee TWC's compliance with corrective actions for any identified deficiencies.

## VIII. Screening for Work Registration

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

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

During the SNAP application and recertification process, HHSC eligibility 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, disability impacts, eligible student status, and any disqualifications, such as a felony drug conviction or intentional program violations the individual may have. In addition, HHSC eligibility staff review other factors which may include, disability status, children residing in the home, employment status, current participation status in TANF employment services, or receipt of unemployment insurance benefits.

HHSC eligibility staff use this information to determine the individual's work registration status and inform the individual interviewed about the work registrant's rights and responsibilities, the work registrant's requirements, and the consequences for failure to comply. A written copy of these work requirements are also provided to each work registrant in the household at certification, recertification and when a household member becomes subject to SNAP work rules (such as adding a new member or a member turns age 18).

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.?

HHSC eligibility staff registers non-exempt work registrants by entering individual information into TIERS. Based on policies and procedures built into TIERS, TIERS uses information entered by eligibility staff to update E&T exemptions and work registration status. HHSC sends a daily electronic file through HHSC TIERS/TWC TWIST interface of all SNAP recipients to TWC when SNAP is certified or when the SNAP recipient's work registration code changes. The daily electronic file contains indicators to designate if the SNAP recipient is mandatory or voluntary to participate in SNAP E&T.

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

During application and recertification, HHSC eligibility staff determine the individual's work registration status and inform the individual interviewed about the work registrant's rights and responsibilities, the work registrant's requirement to provide proof of identity and work eligibility when requested by HHSC or SNAP E&T staff, and the consequences for failure to comply.

The Consolidated work notice is also provided to each work registrant in the household at certification, recertification and when a household member becomes



subject to SNAP work rules (such as adding a new member or a member turns age 18).. Correspondence History in TIERS captures a historical record in the case file each time the notice is provided to the household.

To ensure all SNAP households are aware of the SNAP E&T program, HHSC will ensure policy requires eligibility staff at certification and recertification to verbally inform all households about the opportunity to volunteer to participate in E&T and available services, including participant reimbursements. Staff will notate in the case file that the household containing an exempt SNAP recipient has been screened for SNAP E&T, provided TWC contact information and other available resources, is receiving SNAP benefits, and would be appropriate for SNAP E&T if they choose to volunteer. This policy change will be incorporated into Texas Works Handbook in the October 2023 revision.

## 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).*

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.)*

During the SNAP application and recertification process, HHSC eligibility staff reviews information provided by the applicant on his or her application and supporting documents and/or during the eligibility interview, such as the individual's citizenship/alien status, disability impacts, eligible student status, and any disqualifications, such as a felony drug conviction or intentional program violations the individual may have. In addition, HHSC eligibility staff review other factors delineated in 7 CFR 273.7(b)(1), which may include, disability status, children residing in the home, employment status, current participation status in TANF employment services, or receipt of unemployment insurance benefits.

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.

HHSC eligibility staff data enters the information collected during application and recertification into the state's automated system, which appropriately designates an individual's work requirement. Once determined a customer is required to participate in E&T or could potentially volunteer for E&T, a referral is submitted to the E&T provider through the automated electronic interface. Based on the contractual requirements between TWC and HHSC, eligibility staff determine that the E&T

program or other coordinated services provided by TWC are equipped to provide activities which support the goal of the client. This includes addressing all skill sets and having resources to assist with barriers to participation such as education level and language proficiency, ensuring placement for the SNAP recipient. All SNAP recipients are referred to E&T for participation or the opportunity to volunteer to participate.

To ensure all SNAP households are aware of the SNAP E&T program, HHSC will ensure policy requires eligibility staff at certification and recertification to verbally inform all households about the opportunity to volunteer to participate in E&T and available services, including participant reimbursements. Staff will notate in the case file that the customer has been screened for SNAP E&T, provided TWC contact information and other available resources, is receiving SNAP benefits, and would be appropriate for SNAP E&T if they choose to volunteer. This policy change was communicated to eligibility staff through a Texas Works Bulletin published in April 2023 and will be incorporated into the Texas Works Handbook in the October 2023 revision.

Based on ongoing conversations with participants, appropriateness is determined at any time during the certification process. When it is determined that a referral is not appropriate for reasons, such as residing too remotely with no available transportation or no available technology for virtual participation, then HHSC staff will explore good cause for the mandatory recipients. HHSC eligibility staff must grant good cause if a participant reports an allowable good cause reason.

**Note:** Workforce Solutions staff are more familiar with provider capacity and will assess and refer SNAP recipients to the appropriate component upon receiving a referral through the automated daily interface from HHSC eligibility staff.

*(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.

N/A

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?

Texas notifies participants about support services (participant reimbursements) verbally during the application and recertification process. Additionally, participants are again verbally notified at the E&T orientation and employment planning meetings

conducted by E&T staff. Texas includes written information regarding support services in the consolidated work notice.

When it is determined at application or recertification that the participant reimbursement needs exceed the monthly allowable expenses, HHSC staff will review the case for possible exemption from the E&T program.

Participants complete an assessment to determine the appropriate component and receive support services or other resources to address any barriers through the following process.

- The state agency screens people for participation in the E &T program as part of the eligibility process to determine if it is appropriate to refer to E&T and are mandatory participants before referring them to E&T.
- An assessment is completed by the E&T providers to determine the appropriate component and the participant reimbursement amount needed to participate.
- If the participant reimbursements are determined to exceed the monthly allowable expense to meet the needs for the assigned component, then they will be placed, if possible, in another suitable component in which the individual's monthly E&T expenses would not exceed the allowable reimbursable amount. This action is handled on a case-by-case basis and the E&T provider will screen the customer's case to meet the support services' needs.

If the participant reimbursements are determined to exceed the monthly allowable expense and no other support services are available to meet the person's needs, Workforce Solutions staff manually fax the communication form to HHSC indicating that the participant reimbursements will exceed allowable limits. HHSC staff will take case action to exempt the participant from SNAP E&T because adequate reimbursements are not available, or expenses exceed the reimbursement amount.

## X. Referral to E&T

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

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 consolidated work notice is provided to individuals required to participate in E&T. The form provides the requirement to respond to the E&T referral appointments. TWC sends an outreach letter to the individual with an E&T appointment to begin

participation, which includes the date of the appointment, the location, and a contact person with contact information.

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.?

In Texas, all exempt and non-exempt work registrants are referred to the E&T program. To ensure all SNAP households are aware of the SNAP E&T program, HHSC will ensure policy requires eligibility staff at certification and recertification to verbally inform all households about the opportunity to volunteer to participate in E&T and available services, including participant reimbursements. Staff will notate in the case file that the customer has been screened for SNAP E&T and other available resources, is receiving SNAP benefits, and would be appropriate for SNAP E&T if they choose to volunteer. This policy change was communicated to eligibility staff through a Texas Works Bulletin published in April 2023 and will be incorporated into the Texas Works Handbook in the October 2023 revision.

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.

Once referred, mandatory SNAP E&T participants who are outreached are scheduled for a SNAP E&T orientation. Orientations are conducted by Workforce Solutions Office staff. Some Boards offer online orientations.

After orientation, participants attend an employment planning meeting. During this meeting, Workforce Solutions Office staff conducts an assessment to determine the most appropriate allowable activity for the participant. Staff also provides participants with additional information on the SNAP E&T program, assigns them to an appropriate component, and may also provide them with information on career paths, career advancement, or how to find a new job. Staff generally has contact with participants once a week. Boards choose how to structure the orientation meeting, including the frequency of the meeting and what information will be provided in the meeting. During a client's participation in SNAP E&T, staff members use sound case management practices as a means of ensuring that the participant is achieving the goals outlined in their employment plan.

SNAP E&T participants are often placed in supervised job search (General Population) or job search followed by workfare (ABAWDs) to explore the labor market, but Workforce Solutions Office staff and the client may decide on another allowable and appropriate SNAP E&T activity that will help improve employment outcomes for the mandatory E&T participant. TWC is working with Boards to encourage them to place more E&T participants in training. Although job search,

including supervised job search, is the main component being used, Workforce Solutions Office staff offer training to SNAP recipients, as appropriate. Workforce Solutions Office staff must make every effort to provide SNAP recipients with appropriate training activities.

All SNAP E&T participants receive case management services. Case management actions may include:

- performing intake assessments and reassessments (as needed);
- creating individualized employment (service) plans;
- monitoring the participant's progress; and
- coordinating with education or training providers.

Case management involves:

- outreach;
- initial and ongoing assessment (including planning and setting goals);
- coordination with HHSC or other entities;
- referrals; and
- documentation, including:
  - HHSC eligibility determination;
  - assessment;
  - monitoring participation;
  - closure; and
  - records retention.

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?

HHSC eligibility staff enters information into TIERS to determine work registration status based on screening and assessment of client-provided information and verification sources at application, redetermination, and when there is a change to add a new household member. TIERS displays whether each member of the SNAP case is considered an ABAWD, their applicable work registration status, and exemptions on the TIERS Eligibility Summary page. This information is viewable prior to completing any action on a SNAP case. When a SNAP case is certified or when a SNAP recipient's work registration code changes, HHSC sends a daily electronic file (842) through an automated HHSC TIERS/TWC TWIST interface of all exempt and nonexempt work registrants to TWC.

Additionally, a manual process is in place to communicate possible exemptions and exceptions and to facilitate the provider determination process. The manual process requires Workforce Solutions Office staff to fax the appropriate form (which includes

the client information, the specific reason for the request, any comments or additional information, and any documentation received from the customer) to HHSC. The form is a request for HHSC to review the file based on the provided information, contact the customer if needed, and complete the case action. HHSC notifies customers of all action taken on their case based on the request.

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?

HHSC sends a daily electronic file through an automated HHSC TIERS/TWC TWIST interface of all SNAP recipients to TWC when SNAP is certified or when the SNAP recipient's work registration code changes. The daily electronic file contains indicators to designate if the SNAP recipient is mandatory or voluntary to participate in SNAP E&T.

TWC uses information from this daily electronic file to outreach mandatory work registrants, which include ABAWDs and, as funding permits, SNAP E&T General Population.

## XI. Assessment

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

Does the State require or provide an assessment?

- Yes (*Complete the remainder of this section.*)
- No (*Skip to the next section.*)

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)

Workforce Solutions Office staff gains information through verbal and written assessment tools administered to participants during employment planning meetings and communicates with participants as needed. The type of assessment varies by Board. Assessment information is documented in TWIST and used to determine appropriate components and services for each participant.

E&T providers discuss career advancement and career paths with SNAP recipients. These discussions include information on how an employed recipient can obtain a better job. E&T providers discuss this information during regular SNAP E&T meetings.

When developing the employment plan, E&T provider staff completes the Job Seeker Registration information in WorkInTexas.com to identify occupational options for the participant and provide information staff may use to place the participant in an appropriate component.

Assessments can include possible topics related to current skills, interests, barriers, and participant needs.

## 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.*

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
- Coordination with service providers
- Reassessment
- Other. Please briefly describe: Click or tap here to enter text.

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.

SNAP recipients who respond to outreach attend an orientation and receive case management services from Workforce Solutions Office staff. After the orientation, SNAP E&T participants attend an employment planning meeting with their case manager for an initial assessment, which includes the identification of any barriers to employment, and to discuss SNAP E&T services and activities. After the initial

assessment, case managers typically meet with SNAP E&T participants weekly. These case management actions are documented in TWIST.

The types of case management participants may receive include:

- assessing a SNAP recipient for appropriate placement in allowable activities;
- analyzing and gathering information;
- identifying a SNAP recipient's strengths and weaknesses;
- assisting with the removal of barriers to employment;
- developing and updating the recipient's employment plan;
- validating educational attainment and work experience;
- providing counseling and direction to individual work registrants;
- providing job readiness services to enhance employability;
- documenting all events impacting SNAP E&T services, including meetings and participation hours; and
- identifying employment opportunities that may help the SNAP recipient's progress toward independence from public assistance.

Workforce Solutions Office staff introduces the SNAP E&T program to SNAP recipients during an orientation and employment planning meeting. Boards choose how to structure the meeting and weekly contact, including the frequency of the meeting and what information is provided during the meeting; however, Boards must ensure that information on job retention services, support services, and the job retention period is communicated to recipients at the orientation or before the recipient begins participation in regular SNAP E&T services.

After orientation, participants meet at least weekly with a Workforce Solutions Office staff member for continuing case management services. Boards choose how to structure the weekly meetings. The Workforce Solutions Office staff member conducts an assessment during the meeting or shortly thereafter, which includes:

- an explanation of the benefits of participating in supervised job search;
- an overview of the SNAP E&T components and allowable activities, including WIOA and TAA activities, that may be available to the participant;
- an explanation of job readiness activities such as interviewing skills, the Job Seeker Registration page in WorkInTexas.com, job search techniques, and job referrals;
- help completing necessary forms;
- discussion of requirements for all SNAP E&T activities;
- discussion of expectations and the SNAP recipient's responsibilities;
- information about the local labor market;
- information on dates, times, and locations of SNAP E&T activities; and
- development of an employment plan.



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 case managers communicate participant data, tracking information, good cause, and noncompliance information to SNAP eligibility staff through the TIERS/TWIST interface. Certain other information is communicated to SNAP eligibility staff via fax.
State E&T staff:	E&T case managers communicate with TWC staff by entering SNAP E&T participant data and tracking information into TWIST and sending emails to TWC as needed.
Other E&T providers:	Coordination between E&T case managers and other E&T providers is accomplished through collaboration meetings, emails, or phone calls, based on the coordination needs.
Community resources:	Coordination with community resources is accomplished through collaboration meetings, emails, or phone calls, based on the coordination needs.

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).

<p>Employment planning meetings may include discussions on career advancement and career paths. Staff may also discuss this information with customers during ongoing participation in regular SNAP E&amp;T services.</p> <p>During the employment planning meetings, staff provides the SNAP recipient with an overview of SNAP E&amp;T, which includes:</p> <ul style="list-style-type: none"> <li>• an explanation of all SNAP E&amp;T activities and requirements for participating in SNAP E&amp;T;</li> <li>• an assessment to determine appropriate placement in an allowable activity; and</li> <li>• an explanation of the appeals process, the SNAP recipient’s right to appeal, materials and handouts with information on the right to appeal, and where to file an appeal.</li> </ul> <p>An appeal can be filed if a determination adversely affects the type and level of services provided.</p> <p>An assessment is completed during the employment planning meeting or shortly thereafter and includes:</p>
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- an explanation of the benefits of participating in all SNAP E&T activities;
- an overview of the SNAP E&T components and allowable activities, including WIOA and TAA activities, that may be available to the participant;
- an explanation of job readiness activities such as interviewing skills, the Job Seeker Registration page in WorkInTexas.com, job search techniques, and job referrals;
- help completing necessary forms;
- discussion of requirements for all SNAP E&T activities;
- discussion of expectations and the SNAP recipient's responsibilities;
- information on the local labor market;
- information on dates, times, and locations of SNAP E&T activities as assigned; and
- development of an employment plan.

Through the initial and ongoing case management and assessment, which includes planning and setting goals, Workforce Solutions Office staff assigns appropriate activities, such as work programs or other activities, and provides services to help SNAP E&T participants become employed and self-supporting. During each case management meeting, the staff member and participant review participation activity and goals, make changes as needed, and address any barriers to employment as they arise, in order to continually help the participant achieve their program goals. All case management services and outcomes are documented in TWIST.

### **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.*

Does the State agency offer a conciliation process?

Yes (Complete the remainder of this section.)

No (Skip to the next section.)

Describe the conciliation process and include a reference to State agency policy or directives.

What is the length of the conciliation period?

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## 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).*

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
- 60 days
- Other: Click or tap here to enter text.

For all occurrences of non-compliance discussed below, must the individual also comply to receive benefits again?

- Yes
- No

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
- Up to 3 months

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
- Up to 6 months

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
- Time period greater than 6 months
- Permanently

The State agency will disqualify the:

- Ineligible individual only
- 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.*

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.

The Texas Workforce Commission (TWC) collects good cause information from people who fail to comply with the E&T program and sends all good cause claims received to HHSC through an automated interface. Additionally, a person can contact HHSC to claim good cause for not complying with E&T requirements.

HHSC eligibility staff review good cause claims and determine whether the person had good cause for the noncompliance. A person has 10 calendar days to claim good cause after HHSC sends the Form H1818, Failure to Comply with SNAP Employment and Training, to the household. A person can also claim good cause during the adverse action period.

HHSC staff reviews the case facts and circumstances when evaluating a good cause claim. If the person has an allowable good cause reason staff do not impose the E&T sanction. If staff are unable to determine whether the person's claim meets the

definition of good cause or if the good cause claim is questionable, staff request more information from the household. If the person does not respond within 10 calendar days, staff deny the good cause claim and impose the E&T sanction.

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

Good Cause exists when circumstances beyond the applicant's control prevent them from complying with employment services requirements. Reasons for good cause are explored prior to establishing voluntary quit or imposing a SNAP E&T sanction.

Good cause includes, but is not limited to the following:

- unavailability of care for children 6 through 11 (based on the person's statement);
- discrimination by an employer based on age, race, sex, color, handicap, religious belief, national origin or political beliefs;
- work demands or conditions that make continued employment unreasonable (example: not being paid on time);
- the person is a survivor of family violence;
- unavailability of transportation;
- a change of job;
- illness of the person or another household member;
- at least half time enrollment in a recognized school, training program, or institution of higher education requiring the primary wage earner to quit a job;
- household emergency;
- a work schedule conflict that prevented the person from participating in E&T;
- relocation to another county or political subdivision because of another household member's employment or school enrollment;
- resignations by people under 60 years old that the employer recognizes as retirement;
- a job change that does not happen or results in employment of less than 20 hours a week, or weekly earnings of less than the federal minimum wage multiplied by 20 hours;
- a habitual job change (Example: migrant work or construction habitually require workers to move from one employer to another); or
- an unsuitable job. Employment is unsuitable if the:
  - wages are less than the highest of:
    - the applicable federal minimum wage; or
    - 80% of the federal minimum wage, if the federal minimum wage is not applicable; or
  - average hourly wage based on piece-rate is less than minimum wage;
  - household member must join, resign from, or not join a labor organization as a condition of employment; or
  - work is at a place subject to a strike or lock-out at the time of the offer with these exceptions:

- the strike was enjoined under Section 208 of the Labor-Management Relations Act (29 U.S.C. 178-Taft Hartley Act); or
- an injunction was issued under Section 10 of the Railway Labor Act (45 U.S.C. 160);
- degree of risk to health and safety is unreasonable;
- household member is physically or mentally unfit for the job;
- commuting time from the household member's home to the job is more than two hours a day (Taking a child to and from a childcare facility is not included);
- distance from home to the job is unreasonable because, after considering commuting time and costs, the person earns less than minimum wage;
- distance to the job prohibits walking and transportation is unavailable;
- working hours or nature of the employment interferes with the member's religious beliefs; or
- job is outside the person's usual line of work. (This applies only during the first 30 days of registration and does not apply if the person voluntarily quits a job.)

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.

HHSC eligibility staff would not know prior to referral if there was an available E&T component, this would be determined by E&T provider staff. When the E&T provider finds that there is no available and appropriate component for a participant, the E&T provider will submit a provider determination through the HHSC TIERS/TWC TWIST interface. Provider determination has been added to the current good cause recommendation process. Workforce Solutions Office staff will indicate a good cause recommendation of "Other" and submit it through the TWIST/TIERS interface. Additionally, a communication form will be faxed to HHSC to specify that the participant is not suited for any available E&T components. A task will be generated in TIERS for HHSC staff to review the documentation, contact the customer, review the provider determination information and options with the customer, and complete the case action, including a good cause approval.

HHSC eligibility staff would not know prior to referral if there was an available E&T component, this would be determined by E&T provider staff.

## **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.*

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

Workforce Solutions Office staff must carefully consider how to enable a customer's participation in E&T.

If a staff member determines that a SNAP recipient is not suited for any E&T component, the staff member must:

- complete and send communication to HHSC to request that the SNAP recipient's work registration status be reconsidered;
- record the reconsideration request into TWIST under the Good Cause tab;
- enter the appropriate information into TWIST Counselor Notes, such as:
  - a statement that communication was sent to HHSC;
  - the date that the communication was sent to HHSC; and
  - the reason for the good cause recommendation;
- close out all services, support services, and the SNAP E&T program detail;
- ensure that completion dates are entered in the employment plan; and
- keep a copy of the communication and fax confirmation on file at the Workforce Solutions Office.

If Workforce Solutions Office staff believes that an individual is not suited for any E&T services, staff must notify HHSC within 10 days. Staff members must use the "Comment" section of the communication form to provide the reason for the referral and to make recommendations for next steps. HHSC proceeds as it deems appropriate.

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

Workforce Solutions staff determine whether a component is a good fit for a participant. If a component is not a good fit for a participant, Workforce Solutions staff determine if there are any other available suitable components. If no other suitable components are available, Workforce solutions staff notify HHSC of the provider determination by faxing correspondence to HHSC and indicating the participant received a provider determination. Additionally, Workforce solutions staff indicate a good cause recommendation of 'Other and submit through the TWIST/TIERS interface.

Within 10 days, HHSC staff provide a verbal explanation of the provider determination to the participant, explore whether the participant may be eligible for an exemption based on physical or mental capacity, and provide contact information for TWC and HHSC. If staff cannot reach the participant, HHSC staff send correspondence to the participant. The explanation of a provider determination includes:

what a provider determination is, the next steps that will be taken because of the provider determination, and that the person is not being sanctioned as a result. When the customer is an ABAWD it is also explained that they will accrue countable months(in the next full benefit month after being notified of the provider determination) if they are not in a work activity, unless the ABAWD has good cause, lives in a waived area, or is exempted.

The good cause process is used to prevent the recipient from receiving an E&T sanction for non-compliance and accruing ABAWD federal time limit months which will begin counting the next full benefit month after notifying the ABAWD there are no available E&T components (unless meeting the work requirement or otherwise exempt). Although a good cause process is used, HHSC staff ensure TIERS documentation reflects a provider determination was made.

## 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**

<p>I. Estimated number of E&amp;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.</p> <p><i>State agencies should take into consideration the number of mandatory E&amp;T participants projected in Table H – Estimated Participant Levels in the Excel Workbook, and the number of mandatory E&amp;T participants likely to be exempted, if the State agency cannot provide sufficient participant reimbursements.</i></p>	<p>7,826 annually</p>
<p>II. Estimated number of E&amp;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.</p>	<p>1,047 monthly</p>
<p>III. Estimated budget for E&amp;T participant reimbursements in upcoming FY.</p>	<p>\$1,400,000 annually</p>



IV.	Estimated budget for E&T participant reimbursements per month in upcoming FY. (Row III/12)	\$116,667(rounded)
V.	Estimated amount of participant reimbursements per E&T participant per month. (Row IV/Row II)	\$111.43 monthly (rounded)

### 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 Reimbursements	Participant Reimbursement Caps (optional)	Who provides the participant reimbursement?	Method of disbursement
Gas cards or vouchers		Workforce Solutions Office staff	Varies by Board

<b>Allowable Participant Reimbursements</b>	<b>Participant Reimbursement Caps (optional)</b>	<b>Who provides the participant reimbursement?</b>	<b>Method of disbursement</b>
Bus passes		Workforce Solutions Office staff	Varies by Board
Automobile repairs		Workforce Solutions Office staff	Varies by Board
Mileage reimbursements (for personal vehicles)		Workforce Solutions Office staff	Varies by Board
Taxicab/rideshare services		Workforce Solutions Office staff	Varies by Board
Shuttle or van services		Workforce Solutions Office staff	Varies by Board
Purchase of tires or automobile batteries		Workforce Solutions Office staff	Varies by Board
Driver's license fees (including renewals)		Workforce Solutions Office staff	Varies by Board
High-school equivalency exams and books or training manuals		Workforce Solutions Office staff	Varies by Board
Uniforms, clothing, personal safety items, tools		Workforce Solutions Office staff	Varies by Board
Licensing or bonding fees		Workforce Solutions Office staff	Varies by Board
Vision needs		Workforce Solutions Office staff	Varies by Board
Short-Term Rental assistance		Workforce Solutions Office staff	Varies by Board
Child care		Workforce Solutions Office staff provides child care reimbursements funded by the Child Care and Development Block	Participants do not receive a reimbursement. The participant selects an eligible child

Allowable Participant Reimbursements	Participant Reimbursement Caps (optional)	Who provides the participant reimbursement?	Method of disbursement
		Grant (CCDBG). Childcare reimbursements do not come from SNAP E&T funds.	care provider. The child care provider is reimbursed for services provided using Child Care and Development Funds (CCDF).

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.

As described in TWC Chapter 809 Child Care Services rule §809.20, child care reimbursement rates are set locally by age group and type of care, with enhanced rates for quality-rated care. Local maximum reimbursement rate data is available in the [Texas Child Care Market Rate Survey \(2022\)](#).

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?

If child care becomes unavailable for a SNAP E&T participant, Workforce Solutions Office staff sends communication to HHSC to request good cause.

## **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.*

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 following steps must be taken to record the number of mandatory work registrants in the state on October 1 of the federal fiscal year:

- Compare unduplicated work registrants in September to unduplicated registrants in October.
- A work registrant must be listed in both September and October to be recorded as active on Line 1.
- Save the data set of all work registrants active on October 1, as a file called "NewWorkOct1SnapshotYYYY," which will form the foundation of a master file used to eliminate duplicates in all subsequent months of the FFY in Line 2.

The following steps must be taken to ensure that Line 1 registrants are not counted again during the federal fiscal year:

- Compare unduplicated work registrants in each subsequent month of the federal fiscal year to the NewWorkOct1SnapshotYYYY file.
- If a work registrant appears in NewWorkOct1SnapshotYYYY file and is active in a subsequent month, he or she is not recorded as a New Work registrant for the subsequent month.

Duplicates:

This item is unduplicated by clients' Social Security numbers; individuals may only be counted once for the federal fiscal year.

Source data: HHSC/TWIST monthly cut-off file "waec.vods\_foodstmp\_hist"

The following steps must be taken to record only work registrants that are new for each month of the federal fiscal year:

1. Compare unduplicated work registrants for each month of the federal fiscal year against all recorded work registrants in the previous months of the federal fiscal year, which also includes work registrants on Line1. Compare each new month to the historical file constructed for the new federal fiscal year, which is the NewWorkOct1SnapshotYYYYmaster file.
2. If a work registrant has not been recorded in any previous month, he or she is recorded as new the month of his or her first activity. That record is then added and saved to the NewWorkOct1SnapshotYYYY master file.

Example using month of January:

- Unduplicate the January work registrant file and compare it to the NewWorkOct1SnapshotYYYY master file.
- If a client's SSN is not already in the NewWorkOct1SnapshotYYYY master file, then that client would count in the January count for Line 2.

- Save the NewWorkOct1SnapshotYYYY master file, which would now contain the new record for those new clients served in January.
  - That new master file would be matched against subsequent work registrant files.
3. There is a special note for the Line 2 count for the month of October. When the NewWorkOct1Snapshot YYYY master file is created, it will contain work registrants listed as active in both September and October. Then the monthly work registrant file is unduplicated by the Social Security number (SSN) and compared to the NewWorkOct1Snapshot YYYY master file. At this point, the master file will contain only those work registrants active in both September and October. If a record from the October work registrant file is not in the NewWorkOct1Snapshot YYYY master file, then October is the first month of FFY in which that customer appears and would be counted as a new customer in the Line 2 October monthly count (the FFY Quarter 1 report, Line 2, Month 1). Then that customer record is added to the NewWorkOct1Snapshot YYYY master file and saved to be run in the new, updated NewWorkOct1Snapshot YYYY master file against subsequent new months.

Duplicates:

Since this item is unduplicated by SSN, individuals may only be counted once for the federal fiscal year.

Source data: HHSC/TWIST monthly cut-off file "waec.vods\_foodstmp\_hist"

Describe measures taken to prevent duplicate counting.

Using the method for counting mandatory work registrants described above (in Section XVII), individuals may be counted only once for the federal fiscal year.

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)*

Using the method for counting new SNAP work registrants described above (in Section XVII), individuals may only be counted once for the federal fiscal year.

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: HHSC standard monthly data set “waec.vods\_foodstmp\_hist,” db2\_warehouse)

## XIX. Outcome Reporting Measures

### National Reporting Measures

**Table E.III. National Reporting Measures**

Source <i>[Check the data source used for the national reporting measures. Check all that apply]</i>	Employment & Earnings Measures	Completion of Education of Training
Quarterly Wage Records (QWR)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
National Directory of New Hires (NDNH)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
State Information Management System (MIS). <i>Indicate below what MIS system is used.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Manual Follow-up with SNAP E&T Participants. <i>Answer follow-up question below.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Follow-up Surveys. <i>State agencies must complete the Random Sampling Plan section below, if follow-up surveys is used.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Other - Describe source: Click or tap here to enter text.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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

The Workforce Information System of Texas (TWIST). This system will be replaced with the new case management system ,WorkInTexas.com, in January 2024. These updates will not change reporting in the Outcome Measures Report.

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).

N/A

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.

N/A

### State Component Reporting Measures

Check all data sources used for the State-specific component measures.

- 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.*

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

TWIST

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).

N/A

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.

N/A

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.

N/A

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 [Section G: Component Detail](#).

**Table E.IV. Component Outcome Measures**

<b>Component</b>	<b>Outcome Measure</b>	<b>Methodology including the timeframes being reported (e.g. denominator and numerator).</b>
<i>Example:</i> Supervised Job Search	<i>Example:</i> Number of people who obtain employment after completion of component.	<p><i>Example:</i> Numerator will include those participants who obtained employment after completing component during the period of 10-1-2022 to 9-30-2023</p> <p><i>Denominator will include the number of participants that participated in Supervised Job Search during the period of 10-1-2022 to 9-30-2023.</i></p>
Supervised Job Search	The number and percentage of SNAP E&T participants who participated in Supervised Job Search and entered unsubsidized employment.	<p>The numerator is the number of SNAP E&amp;T participants who entered unsubsidized employment between 10-01-2023 to 9-30-2024. Unsubsidized employment is determined by administrative data.</p> <p>The denominator is SNAP E&amp;T participants who participated in the component between 10-01-2023 to 9-30-2024.</p>
Job Search Training	The number and percentage of SNAP E&T participants who participated in Job Search Training and entered unsubsidized employment.	<p>The numerator is the number of SNAP E&amp;T participants who entered unsubsidized employment between 10-01-2023 to 9-30-2024. Unsubsidized employment is determined by administrative data.</p> <p>The denominator is SNAP E&amp;T</p>



<b>Component</b>	<b>Outcome Measure</b>	<b>Methodology including the timeframes being reported (e.g. denominator and numerator).</b>
		participants who participated in the component between 10-01-2023 to 9-30-2024.
Job Retention	The number and percentage of participants who participated in Job Retention and retained employment in the quarter after the Job Retention services ended.	<p>The numerator is the number of SNAP E&amp;T participants who entered unsubsidized employment between 10-01-2023 to 9-30-2024, participated in Job Retention services, and retained employment in the quarter after the Job Retention services ended. Unsubsidized employment is determined by administrative data.</p> <p>The denominator is SNAP E&amp;T participants who received Job Retention services between 10-01-2023 to 9-30-2024.</p>
Basic Education	The number and percentage of SNAP E&T participants who participated in Basic Education and earned a high school diploma or GED during their participation in SNAP E&T.	<p>The numerator is the number of SNAP E&amp;T participants who earned a high school diploma or GED between 10-01-2023 to 9-30-2024.</p> <p>The denominator is SNAP E&amp;T participants who participated in the component between 10-01-2023 to 9-30-2024.</p>
Vocational Training	The number and percentage of SNAP E&T participants who were enrolled in Vocational Training and received a credential during their participation in SNAP E&T.	<p>The numerator is the number of SNAP E&amp;T participants who were enrolled in Vocational Training and received a credential during their participation from 10-01-2023 to 09-30-2024 .</p> <p>The denominator is SNAP E&amp;T participants who participated in the</p>

<b>Component</b>	<b>Outcome Measure</b>	<b>Methodology including the timeframes being reported (e.g. denominator and numerator).</b>
		component from 10-01-2023 to 9-30-2024.
Workfare	The number and percentage of SNAP E&T participants who participated in Workfare and entered unsubsidized employment.	<p>The numerator is the number of SNAP E&amp;T participants who entered unsubsidized employment between 10-01-2023 to 9-30-2024. Unsubsidized employment is determined by administrative data.</p> <p>The denominator is SNAP E&amp;T participants who participated in the component between 10-01-2023 and 9-30-2024.</p>
Work Experience	The number and percentage of SNAP E&T participants who successfully completed Work Experience and entered unsubsidized employment. Successful completion means fulfilling the requirements of the Work Experience program as determined by the provider.	<p>The numerator is the number of SNAP E&amp;T participants who successfully completed Work Experience and entered unsubsidized employment between 10-01-2023 to 9-30-2024. Successful completion of Work Experience is determined by administrative data.</p> <p>The denominator is SNAP E&amp;T participants who participated in the component between 10-01-2023 and 9-30-2024.</p>

## 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.

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.	<input checked="" type="checkbox"/>
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.	<input checked="" type="checkbox"/>
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.	<input checked="" type="checkbox"/>
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.	<input checked="" type="checkbox"/>
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.	<input checked="" type="checkbox"/>

Where will the State agency offer qualifying activities?

- Statewide
- Limited areas of the State (*Complete questions c and d below.*)

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
- Other: Click or tap here to enter text.

If the State agency will be offering qualifying activities only in limited areas of the State, please list those localities/areas.

All ABAWDs in full-service counties will be offered a qualifying activity. Texas will use its discretionary exemptions to exempt ABAWDs in minimum-service counties from the ABAWD time limit. ABAWDs in minimum-service counties may volunteer for services.

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

The eligibility staff update all eligibility information based on the application and client interview into TIERS. The TIERS system will check the ABAWD indicator when applicable on the TIERS Eligibility Summary screen and the TIERS individual inquiry page. Effective Oct. 1, 2023, Texas Works Bulletin 23-15 instructed staff to provide oral explanations of the work requirements, including situations where an interview is required (such as a No-Interview Waiver).

How does the State agency identify ABAWDs that are at-risk?

Tracking time limits for ABAWDs is automated. HHSC eligibility staff enters data, such as disability information, employment status, or participation in an employment services program, in TIERS. Based on policies and procedures built into TIERS, TIERS uses the entries to determine whether months should be counted toward the individual's three-in-36-month time limit, including the second three-month period. ABAWD countable months and the 36-month clock are displayed in TIERS on the individual inquiry page. TIERS tracks and displays in the case and inquiry screens each specific month that is considered a countable month toward the individual's time-limited eligibility. The ABAWD time limit months are tracked and displayed separately as months 1-6. This monthly designation allows staff to identify at-risk ABAWDs who are in the third month of eligibility.

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.

Boards outreach at-risk ABAWDs within 10 days of their appearing in the outreach pool and schedule at-risk ABAWDs for SNAP E&T activities within 15 days of the date of outreach.

Boards must conduct initial outreach through letters or phone calls. Automated contact, such as an outgoing voice-mail message, does not qualify.

Boards that send outreach letters must ensure that outreach letters are sent to all mailing addresses listed in TWIST.

SNAP E&T outreach attempts must be documented in TWIST Counselor Notes and must contain:

- time, date, and place to which the mandatory work registrant must report in order to begin SNAP E&T activities;
- name and telephone number of a contact person at the Workforce Solutions Office;
- an opportunity to provide a good cause reason on or before the scheduled appointment date, if the recipient is not able to attend; and
- consequences for noncooperation.

To comply with the federal requirement to offer all at-risk ABAWDs a position in a SNAP E&T qualifying component, Workforce Solutions Office staff outreaches all ABAWDs referred to E&T. The outreach must state that the day the at-risk ABAWD reports to the Workforce Solutions Office is the at-risk ABAWD's first day of participation.

Once the at-risk ABAWD has been outreached, is enrolled in the qualifying component, and begins participation, the ABAWD is engaged in ongoing participation, and weekly case management ensures that the participant remains in a qualifying component each month unless the ABAWD is sanctioned.

*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).*

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.

ABAWDs may be provided any of the following SNAP E&T services through case management:

- Job Retention
- Basic Education
- Vocational Training
- Workfare
- Work Experience
- Allowable participant reimbursements\*

\*ABAWDs may receive any type of support services listed in the Participant Reimbursement Details section of XVII. Participant Reimbursements, except Child Care Services.

While ABAWDs may not participate in standalone job search, ABAWDs may participate in four weeks of job search followed by Workfare, as part of the Workfare component.

During the ABAWD job search period, ABAWDs may participate in Job Search Training as long as the Job Search Training comprises less than half the time spent in the component.

The workfare provider and the Board or its designee are required to meet as needed to assess the activities conducted under this agreement and to make necessary adjustments to improve the results of the project. This gives Boards and providers the flexibility to add slots as they are needed.

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.)

WIOA services/activities:

- Career services, including:
  - Assessments (basic and specialized)
  - Job search
  - Provision of referrals
  - Development of employment plan
  - Work Experience
- Training services, including:
  - AEL services
  - Job readiness training

- Occupational skills training
- Registered apprenticeship
- On-the-job training
- Internship

TAA services/activities:

- Employment services
- Training

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?

The E&T provider may offer, as appropriate, the following components to ABAWDs:

- Job Search Training
- Job Retention
- Basic Education
- Vocational Training
- Workfare (to include four weeks of job search preceding the Workfare placement and Job Search Training)
- Work Experience

In accordance with 7 CFR 273.71c)(iii)(2), ABAWDs receive case management services.

ABAWDs participate in Job Search Training as part of the job search activities that precede Workfare.

ABAWD participation in Job Search Training must comprise less than half the time spent in job search.

Boards have established agreements with Workfare providers and will continue to establish agreements with Workfare providers to ensure that slots will be available for all ABAWDs who need a Workfare slot.

Workfare is only one of the component activities that Texas uses to provide services to its ABAWD customers. If a Workfare slot is not available to an ABAWD, the Board must place the ABAWD in another allowable activity.

If a Board does not have adequate E&T funding to serve an ABAWD, the Board must place the ABAWD in a WIOA activity or a TAA activity and/or decrease the number of General Population SNAP recipients it outreaches to accommodate all ABAWD SNAP recipients.

The E&T provider may:

- co-enroll ABAWDs in WIOA and use WIOA funds to pay for qualifying components for ABAWDs; and/or
- decrease the number of General Population participants (non-ABAWD) it outreaches.

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

Question	Number
I. How many ABAWDs did you serve in E&T in the previous FY?	11,866
II. 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 15 in the Excel Workbook.)	144,908
III. 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 18 in the Excel Workbook.)	137,870
IV. Number of at-risk ABAWDs averaged monthly? This should be annual total from line (III) divided by 12.	11,489

**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	4,021	4,021	1,054
All other programs outside of SNAP E&T	7,468	7,468	0
<b>Total slots across all qualifying activities</b>	<b>11,489</b>	<b>11,489</b>	<b>1,054</b>

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

	Value
I. What is the projected total cost to serve all at-risk ABAWDs in your State?	\$136,503,708
II. Of the total in (I), what is the total projected administrative costs of E&T?	\$13,650,371
III. Of the total in (I), what is the total projected costs for participant reimbursements in E&T?	\$840,000

Explain the methodology used to determine the total cost to fulfill the pledge.

Projected total cost to serve all at-risk ABAWDs in the State is: the cost per participant (\$990.09) multiplied by the number of at risk ABAWDs (137,870) = \$136,503,708. The number of at-risk ABAWDs is calculated by using the number of available slots multiplied by 12 (11,489 X 12=137,870).

The projected administrative cost is 10% of the total: \$13,650,371

We estimate spending about 60% of the total \$1,400,000 budgeted for participant reimbursements (\$840,000)

## 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

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

Details	Supervised Job Search (SJS)
<p>Summary of the State guidelines implementing SJS</p>	<p>Workforce Solutions Offices are the approved locations for Supervised Job Search. Workforce Solutions Offices have been selected as the state-approved supervised job search locations because they are part of the one-stop delivery system. Communities value their Workforce Solutions Offices because they provide critical assistance for employers looking for human resource assistance and for individuals looking for work or opportunities to grow in their careers.</p> <p>Supervised Job Search requires SNAP recipients participating in SNAP E&amp;T to test the labor market by participating in Supervised Job Search 30 hours per week. The Supervised Job Search component falls under the guidance of Workforce Solutions Office staff, thereby permitting staff members to directly supervise and track the timing of participants' activities. Staff ensures that Supervised Job Search includes:</p> <ul style="list-style-type: none"> <li>• tracking activities;</li> <li>• counseling;</li> <li>• providing information on available jobs;</li> <li>• providing assistance with completing job applications;</li> <li>• setting employment goals for job inquiries and follow-up; and</li> <li>• defining general workplace expectations.</li> </ul> <p>The duration of participation in Supervised Job Search is up to four weeks for all SNAP recipients and up to six weeks for non-ABAWDs. This varies by customer and depends on the customer's individual needs. E&amp;T participants are not required to complete the four weeks of Supervised Job Search activity before being placed in another activity. The number of Supervised Job Search weeks is dependent on the individual assessment and is specified in the employment plan.</p> <p>Participants may also be initially placed in an activity other than Supervised Job Search.</p>

	Staff at Workforce Solutions Offices enters into TWIST the timing and activities of the SNAP recipients participating in Supervised Job Search.
Direct link	<p>During the employment planning meeting, Workforce Solutions Office staff assesses each participant to determine appropriate component placement.</p> <p>At the initial assessment, staff may consider a participant's educational attainment and/or other factors to determine whether testing the labor market through Supervised Job Search (SJS) is appropriate.</p> <p>Participants in SJS use WorkInTexas.com (WIT), a comprehensive online job search resource and matching system. WIT is tailored to provide job seekers' information about employment opportunities in the community. Job searches performed in WIT allow the user to search for jobs by job type and location.</p> <p>Participants in SJS have weekly appointments with staff to:</p> <ul style="list-style-type: none"> <li>• provide job search logs;</li> <li>• review job leads in WIT; and</li> <li>• participate in group job readiness activities.</li> </ul> <p>Through ongoing case management, staff may reassign a participant to other activities such as training and work experience, as needed, to meet their employment goals. Through case management, support services are provided to help the participant become employed and self-sufficient.</p>
Target population	General Population recipients (that is, non-ABAWDs) and exempt SNAP recipients who volunteer for SNAP E&T services
Criteria for participation	Skills, knowledge, and experience are not necessary for participation in SJS. Participants in this component require some literacy skills; however, case managers help participants who require assistance with their job search. Job search experience is helpful but not required.
Geographic area	SJS may be provided in full-service counties and in minimum-service counties if SNAP recipients volunteer for SNAP E&T services.

E&T providers	Contracted Workforce Solutions Office staff in the 28 local workforce development areas (workforce areas)
Projected annual participation	9,300
Estimated annual component costs	\$8,848,428

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

Details	Job Search Training (JST)
Description of the component	<p>Job Search Training incorporates job readiness and includes employability assessments; job placement services; job development services focused on active engagement of employers; occupational exploration, including information on local emerging and in-demand occupations; training in techniques for employability; job search skills training; interviewing skills and practice interviews; assistance with applications and résumés; job fairs; life skills; guidance and motivation for development of positive work behaviors necessary for the labor market; and information on how to retain employment.</p> <p>The level of effort is dependent on customer needs and will vary by customer; however, participants usually spend about 10 hours per week engaged in this component.</p>
Target population	<p>General Population recipients, ABAWDs, and exempt SNAP recipients who volunteer for SNAP E&amp;T services</p> <p><b>Note:</b> 7 CFR 273.7(e)(2)(iii)(B) states that the State agency may establish a job search period of up to 30 days following certification prior to making a workfare assignment. This job search activity is part of the workfare assignment, and not a job search “program.”</p>
Criteria for participation	<p>Necessary skills will depend on the activity and <b>may</b> include:</p> <ul style="list-style-type: none"> <li>• basic literacy and numeracy skills;</li> <li>• computer skills; and</li> </ul>

	<ul style="list-style-type: none"> <li>• soft skills, such as interpersonal abilities, multicultural awareness, and communication skills.</li> </ul> <p><b>Note:</b> Criteria for participation will vary by activity.</p>
Geographic area	Job Search Training may be provided in full-service counties and in minimum-service counties if SNAP recipients volunteer for SNAP E&T services.
E&T providers	Contracted Workforce Solutions Office staff in the 28 workforce areas
Projected annual participation	696
Estimated annual component costs	\$662,205

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

Details	Job Retention (JR)
Description of the component	<p>Qualifying SNAP E&amp;T participants must receive Job Retention services if requested. Mandatory Job Retention means that Workforce Solutions Offices in each workforce area must offer Job Retention services to all qualified participants. Job Retention services will be offered for a minimum of 30 days and not more than 90 days to E&amp;T participants who gain employment after participating in another allowable E&amp;T component, as approved in this Plan .These services help SNAP recipients retain employment by improving basic skills; increasing employability; aiding progress up a career ladder; and enabling them to gain better employment. Job Retention services include case management, child care, and transportation assistance.</p> <p>Job Retention is tracked in TWIST, which ensures that the participant is provided services for no fewer than 30 days and no more than 90 days.</p>
Target population	Job Retention services may be provided to any SNAP recipient who participates in SNAP E&T and becomes employed.
Criteria for participation	The participant must be employed.
Geographic area	Job Retention services may be provided to any SNAP recipient in full- or minimum-service counties who participates in SNAP E&T and becomes employed.
E&T providers	Contracted Workforce Solutions Office staff in the 28 workforce areas
Projected annual participation	1,166
Estimated annual component costs	\$1,109,403



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

Details	Self-Employment Training (SET)
Description of the component	
Target population	
Criteria for participation	
Geographic area	
E&T providers	
Projected annual participation	
Estimated annual component costs	

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

Details	Workfare (W)
Description of the component	<p>A Workfare component designed to improve the employability of ABAWDs through actual employment experience or training, or both. Nonexempt ABAWDs perform work in a public service capacity as a condition of eligibility to receive the SNAP allotment to which their household normally is entitled. The job search activities that may precede a Workfare assignment are considered part of the Workfare component and do not have to be supervised. However, they do provide an opportunity for ABAWDs to test the labor market, receive job counseling and guidance, receive job leads, and transition into other activities as needed to reach their employment goals.</p> <p>The number of hours ABAWDs must work in a Workfare slot each month equals their household SNAP allotment amount divided by the number of ABAWDs in the SNAP household (when there are multiple ABAWDs in the household), which is then divided by the federal minimum wage. Level of effort is based on dividing the SNAP benefit amount by the federal minimum wage to obtain the amount of time per month the SNAP recipient will be required to participate in the SNAP E&amp;T activity.</p>
Target population	ABAWDs
Criteria for participation	<p>Necessary skills will depend on the Workfare site and <b>may</b> include:</p> <ul style="list-style-type: none"> <li>• basic literacy and numeracy skills;</li> <li>• computer skills; and</li> <li>• soft skills, such as interpersonal abilities, multicultural awareness, and communication skills.</li> </ul> <p><b>Note:</b> Criteria for participation will vary by Workfare site.</p>
Geographic area	Workfare will be available in full-service counties.
E&T providers	Contracted Workforce Solutions Office staff in the 28 workforce areas. A list of the providers is documented in a separate attachment.

Projected annual participation	10,016
Estimated annual component costs	\$9,529,681

## 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).

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

<b>Details</b>	<b>Basic/Foundational Skills Instruction (includes High School Equivalency Programs) (EPB)</b>
Description of the component	<p>Basic Education is a nonwork SNAP E&amp;T activity that provides educational programs or activities to improve basic skills and work readiness or otherwise improve employability. Educational activities (including postsecondary education) that directly enhance the employability of the SNAP recipient are allowable and include adult basic education, basic skills and literacy, English as a second language, postsecondary education that does not result in a baccalaureate or advanced degree, high school equivalency (HSE), and high school instruction. Participants in this component are expected to meet the participation requirements as determined by the educational institution or program; in general, participants spend about 12 hours per week engaged in this component.</p> <p>After assessing the SNAP recipient, Board staff look for an appropriate provider. Each placement is specific to the individual customer. Classes may be in person or virtual. The duration of the classes vary.</p>
Target population	General Population SNAP recipients, exempt SNAP recipients who volunteer for SNAP E&T services, and ABAWDs.
Criteria for participation	Based on an assessment by Workforce Solutions Office staff that the customer is in need of basic literacy
Geographic area	Basic Education may be provided in full-service counties and in minimum-service counties if SNAP recipients volunteer for SNAP E&T services.
E&T providers	Contracted Workforce Solutions Office staff in the 28 workforce areas
Projected annual participation	2,086
Estimated annual component costs	\$1,984,693
Not supplanting	TWC's SNAP E&T contract with Boards states that Boards "shall ensure that SNAP E&T funds expended on educational

	<p>services or activities supplement, not supplant, nonfederal funds for existing educational services and activities...”</p> <p>SNAP E&amp;T funds will be used to offer educational activities to E&amp;T participants who would not be otherwise entitled to participate and will be used where local providers have not otherwise obligated funding.</p> <p>TWC recommends that Boards include supplanting and cost parity requirements in their contracts with providers; however, inclusion in a contract does not count as evidence of cost parity or not supplanting.</p> <p>Contract monitoring and ME reviews conducted by both HHSC and TWC contain reviews of financial expenditures to validate compliance that E&amp;T funds used for educational components do not supplant nonfederal funds for existing educational activities.</p> <p>SNAP E&amp;T funds will be used to offer educational activities to E&amp;T participants who would not be otherwise entitled to participate and will be used where local providers have not otherwise obligated funding.</p>
<p>Cost parity</p>	<p>The SNAP E&amp;T grant is charged an amount equal to the tuition charged to non-E&amp;T participants for the same activity.</p> <p>TWC recommends that Boards include supplanting and cost parity requirements in their contracts with providers; however, inclusion in a contract does not count as evidence of cost parity or not supplanting.</p> <p>Contract monitoring and ME reviews conducted by both HHSC and TWC contain reviews to validate if educational services or activities are available to persons other than E&amp;T participants; costs charged to E&amp;T do not exceed the costs charged for non-E&amp;T participants. The monitoring process will include a comparison between the educational services provided to E&amp;T participants and non-E&amp;T participants.</p> <p>Evidence of cost parity is documentation, such as an invoice that shows that a SNAP recipient who is enrolled in a program is charged the same as a non-SNAP recipient who is enrolled in the same program.</p>

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

Details	Career/Technical Education Programs or other Vocational Training (EPC)
Description of the component	<p>Vocational Training is a SNAP E&amp;T activity that improves the employability of SNAP recipients by providing training in a skill or trade. This allows SNAP recipients to move directly into employment. Vocational Training incorporates occupational assessment and remedial and entry-level job skills training; short-term, prevocational, and entrepreneurial training; customized training; institutional skills training; upgrade training; and vocational education. Vocational Training must be related to the types of jobs available in the labor market; consistent with employment goals identified in the SNAP recipient’s employment plan, when possible; provided in either a classroom or work-based setting; and designed to provide a certificate upon successful completion. Participants in this component are expected to meet the participation requirements as determined by the educational institution or program. Level of effort is based on what the training provider requires for completing the program; in general, participants spend about 12 hours per week engaged in this component. Improving skills and providing opportunities for new skill development may improve employment outcomes and job retention for ABAWDs.</p> <p>After assessing the SNAP recipient, Board staff look for an appropriate provider. Each placement is specific to the individual customer. Classes may be in person or virtual. The duration of the classes vary by class.</p> <p>Examples of Vocational Trainings offered to SNAP E&amp;T participants by Boards include HVAC, CDL, Network Administrator, Medical Billing and Coding. Length of training and other details vary by provider.</p>
Target population	General Population SNAP recipients (that is, non-ABAWDs), exempt SNAP recipients who volunteer to participate in SNAP E&T services, and ABAWDs
Criteria for participation	<p>Necessary skills will depend on the activity and <b>may</b> include:</p> <ul style="list-style-type: none"> <li>• basic literacy and numeracy skills;</li> <li>• computer skills; and</li> </ul>

	<ul style="list-style-type: none"> <li>• soft skills, such as interpersonal abilities, multicultural awareness, and communication skills.</li> </ul> <p><b>Note:</b> Criteria for participation will vary by activity and Vocational Training provider.</p>
<p>Geographic area</p>	<p>Vocational Training may be provided in full-service counties and in minimum-service counties if the SNAP recipient volunteers to participate in the program.</p>
<p>E&amp;T providers</p>	<p>Contracted Workforce Solutions Office staff in the 28 workforce areas</p>
<p>Projected annual participation</p>	<p>318</p>
<p>Estimated annual component costs</p>	<p>\$302,502</p>
<p>Not supplanting</p>	<p>TWC’s SNAP E&amp;T contract with Boards states that Boards “shall ensure that SNAP E&amp;T funds expended on educational services or activities supplement, not supplant, nonfederal funds for existing educational services and activities...”</p> <p>SNAP E&amp;T funds will be used to offer educational activities to E&amp;T participants who would not be otherwise entitled to participate and be used where local providers have not otherwise obligated funding.</p> <p>TWC recommends that Boards include supplanting and cost parity requirements in their contracts with providers; however, inclusion in a contract does not count as evidence of cost parity or not supplanting.</p> <p>Contract monitoring and ME reviews conducted by both HHSC and TWC contain reviews of financial expenditures to validate compliance that E&amp;T funds used for educational components do not supplant nonfederal funds for existing educational activities.</p> <p>SNAP E&amp;T funds will be used to offer educational activities to E&amp;T participants who would not be otherwise entitled to participate and be used where local providers have not otherwise obligated funding.</p>

Cost parity	<p>The SNAP E&amp;T grant is charged an amount equal to the tuition charged to non-E&amp;T participants for the same activity.</p> <p>TWC recommends that Boards include supplanting and cost parity requirements in their contracts with providers; however, inclusion in a contract does not count as evidence of cost parity or not supplanting.</p> <p>Contract monitoring and ME reviews conducted by both HHSC and TWC contain reviews to validate if educational services or activities are available to persons other than E&amp;T participants; costs charged to E&amp;T do not exceed the costs charged for non-E&amp;T participants. The monitoring process will include a comparison between the educational services provided to E&amp;T participants and non-E&amp;T participants.</p> <p>Evidence of cost parity is documentation, such as an invoice that shows that a SNAP recipient who is enrolled in a program is charged the same as a non-SNAP recipient who is enrolled in the same program.</p>
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**Table G.VIII. Educational Program Details: English Language Acquisition**

Details	English Language Acquisition (EPEL)
Description of the component	
Target population	
Criteria for participation	
Geographic area	
E&T providers	
Projected annual participation	
Estimated annual component costs	
Not supplanting	
Cost parity	



**Table G.IX. Educational Program Details: Integrated Education and Training/Bridge Programs**

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

**Table G.XI. Educational Program Details: Other**

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

### 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 component	<p>The WA is available to all SNAP recipients who need help acquiring basic work skills and must:</p> <ul style="list-style-type: none"> <li>• occur in the workplace for a limited period;</li> <li>• occur in either the private for-profit, nonprofit, or public sectors; and</li> <li>• be paid or unpaid.</li> </ul> <p>The Work Activity is a type of paid or unpaid Work Experience that improves employability by providing participants opportunities to acquire skills, knowledge, and work habits necessary to obtain employment.</p> <p>TWC is working with Boards to increase participation in this component.</p> <p>Work Activity placements are tied to participant skills development needs and the needs of employers in the local Board area in sectors such as manufacturing, health care, information technology, and other skilled trades.</p> <p>Before the SNAP recipient enters the WA, Boards must ensure that Workforce Solutions Office staff determines that the WA is conducted in accordance with the Fair Labor Standards Act (FLSA).</p> <p>The level of effort for WA is the result of dividing the monthly SNAP benefit by the federal or state minimum wage (whichever is greater) to equal the number of hours of participation.</p>
Target population	Any SNAP E&T ABAWD or General Population recipient
Criteria for participation	<p>Necessary skills will depend on the activity and <b>may</b> include:</p> <ul style="list-style-type: none"> <li>• basic literacy and numeracy skills;</li> <li>• computer skills; and</li> <li>• soft skills, such as interpersonal abilities, multicultural awareness, and communication skills.</li> </ul> <p><b>Note:</b> Criteria for participation will vary by activity and WA provider.</p>
Geographic area	In full-service counties and in minimum-service counties if the SNAP recipient volunteers to participate in the program

E&T providers	Contracted Workforce Solutions Office staff in the 28 workforce areas
Projected annual participation	232
Estimated annual component costs	\$220,772

**Table G.XIII. Work Experience: Internship**

<b>Details</b>	<b>Internship (WBLI)</b>
Description of the component	
Target population	
Criteria for participation	
Geographic area	
E&T providers	
Projected annual participation	
Estimated annual component costs	

**Table G.XIV. Work Experience: Pre-Apprenticeship**

<b>Details</b>	<b>Pre-Apprenticeship (WBLPA)</b>
Description of the component	
Target population	
Criteria for participation	
Geographic area	
E&T providers	
Projected annual participation	
Estimated annual component costs	

**Table G.XV. Work Experience: Apprenticeship**

<b>Details</b>	<b>Apprenticeship (WBLA)</b>
Description of the component	
Target population	
Criteria for participation	
Geographic area	
E&T providers	
Projected annual participation	
Estimated annual component costs	

**Table G.XVI. Work Experience: On-the-Job Training**

<b>Details</b>	<b>On-the-Job-Training (WBLOJT)</b>
Description of the 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**

Details	Transitional Jobs (WBLTJ)
Description of the 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**

Details	Work-based learning - Other (WBLO): State agency must provide description
Description of the component	
Target population	
Criteria for participation	
Geographic area	
E&T providers	
Projected annual participation	
Estimated annual component costs	

## 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.*

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

NA



## 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.)

**Table I.I. Contractor/Partner Details**

<b>Contract or Partner Name:</b>	<b>TWC</b>
<b>Service Overview:</b>	TWC subcontracts with the Local Workforce Development Board that provides employment services
<b>Intermediary:</b>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<b>Components Offered:</b>	<ul style="list-style-type: none"> <li>* Case Management</li> <li>* Job Search Training</li> <li>* Supervised Job Search</li> <li>* Job Retention</li> <li>* Basic Education</li> <li>* Vocational Training</li> <li>* Workfare (ABAWDS)</li> <li>* Work Activity</li> </ul>
<b>Credentials Offered:</b>	HVAC, CDL, Network Administrator, Medical Billing and Coding
<b>Participant Reimbursements Offered:</b>	<ul style="list-style-type: none"> <li>* Gas Cards or Vouchers</li> <li>* Bus Passes</li> <li>* Automobile Repairs</li> <li>* Mileage Reimbursement (personal vehicles)</li> <li>* Taxicab/Rideshare Services</li> <li>* Shuttle or Van Services</li> <li>* Purchase of tires or automobile batteries</li> <li>* Driver's License Fees (including renewals)</li> <li>* High-School Equivalency Exams</li> <li>* Uniforms, clothing, tools, personal safety items</li> <li>* Licensing or Bonding Fees</li> <li>* Vision Needs</li> <li>* Short-Term Rental Assistance</li> <li>* Child Care</li> </ul>
<b>Location:</b>	State of Texas
<b>Target Population:</b>	ABAWDs and General Population SNAP recipients

<b>Contract or Partner Name:</b>	<b>TWC</b>
<b>Monitoring of contractor:</b>	<p>HHSC will oversee TWC’s program and fiscal operations, including Third Party Reimbursement (TPR) programs, by performing programmatic and fiscal monitoring reviews. HHSC will define data sources and utilize standard data collection methods so that findings are objectively verifiable to ensure program activities are conducted in compliance with all applicable Federal laws, rules, and regulations.</p> <p>HHSC will implement a strategy to identify and prioritize monitoring activities and establish a schedule to systematically track and report the status and progress of monitoring requirements conducted by the Texas Workforce Commission’s (TWC) Subrecipient Monitoring (SRM) group. HHSC monitoring activities will include, but not be limited to, onsite visits (direct) and desk reviews (indirect)</p> <p>As part of its programmatic monitoring, HHSC will review TWC’s service delivery system to determine if it is consistent with contract requirements, including outputs, outcomes, quality, and effectiveness of programs. Specifically, HHSC will review TWC’s program and fiscal monitoring reports of Board areas for compliance with process and outcome expectations, as identified in standards, rules, and contracts, to assess the quality of services provided and the degree to which the defined needs were met.</p> <p>HHSC has developed and implemented quarterly desk reviews to track E&amp;T expenditures from the TWC and E&amp;T service providers. Desk reviews consist of examining a sample of invoices and supporting documentation received during the previous quarter. HHSC will evaluate whether the expenses are allowable and</p>

<b>Contract or Partner Name:</b>	<b>TWC</b>
	<p>properly categorized to reflect the E&amp;T expense and funding source.</p> <p>If HHSC identifies deficiencies during the quarterly desk review, HHSC will implement TWC corrective action measures and monitor until TWC is compliant. In the event of misappropriation of funds, HHSC will recoup the funds from TWC.</p> <p>HHSC plans to have all TWC invoices and supportive documents uploaded to HHSC's SharePoint site for record keeping purposes. In accordance with HHSC record retention policy, all invoices and documents have a seven-year post contract closure retention. Maintaining records in this manner ensures availability of invoices and supportive documents for review upon request.</p> <p>HHSC and TWC will discuss monitoring updates during the regularly scheduled HHSC/TWC bi-weekly governance meetings.</p>
<b>Ongoing communication with contractor:</b>	HHSC and TWC conduct meetings on a regular basis.
<b>Total Cost of Agreement:</b>	\$24,057,684
<b>Eligible for 75 percent reimbursement for E&amp;T Services for ITOs:</b>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>New Partner:</b>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

**Table I.II. Contractor/Partner Details**

<b>Contract or Partner Name:</b>	
<b>Service Overview:</b>	
<b>Intermediary:</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Components Offered:</b>	
<b>Credentials Offered:</b>	
<b>Participant Reimbursements Offered:</b>	
<b>Location:</b>	
<b>Target Population:</b>	
<b>Monitoring of contractor:</b>	
<b>Ongoing communication with contractor:</b>	
<b>Total Cost of Agreement:</b>	
<b>Eligible for 75 percent reimbursement for E&amp;T Services for ITOs:</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>New Partner:</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No

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

<b>Contract or Partner Name:</b>	
<b>Service Overview:</b>	
<b>Intermediary:</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Components Offered:</b>	
<b>Credentials Offered:</b>	
<b>Participant Reimbursements Offered:</b>	
<b>Location:</b>	
<b>Target Population:</b>	
<b>Monitoring of contractor:</b>	
<b>Ongoing communication with contractor:</b>	
<b>Total Cost of Agreement:</b>	
<b>Eligible for 75 percent reimbursement for E&amp;T Services for ITOs:</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>New Partner:</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No

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

<b>Contract or Partner Name:</b>	
<b>Service Overview:</b>	
<b>Intermediary:</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Components Offered:</b>	
<b>Credentials Offered:</b>	
<b>Participant Reimbursements Offered:</b>	
<b>Location:</b>	
<b>Target Population:</b>	
<b>Monitoring of contractor:</b>	
<b>Ongoing communication with contractor:</b>	
<b>Total Cost of Agreement:</b>	
<b>Eligible for 75 percent reimbursement for E&amp;T Services for ITOs:</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>New Partner:</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No

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

<b>Contract or Partner Name:</b>	
<b>Service Overview:</b>	
<b>Intermediary:</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Components Offered:</b>	
<b>Credentials Offered:</b>	
<b>Participant Reimbursements Offered:</b>	
<b>Location:</b>	
<b>Target Population:</b>	
<b>Monitoring of contractor:</b>	
<b>Ongoing communication with contractor:</b>	
<b>Total Cost of Agreement:</b>	
<b>Eligible for 75 percent reimbursement for E&amp;T Services for ITOs:</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>New Partner:</b>	<input type="checkbox"/> Yes <input type="checkbox"/> 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**

<p><b>Salary/Wages:</b> List staff positions in FTE and time spent on the project.                  Example: E&amp;T Program Manager - \$60,000 x .50 FTE = \$30,000                  5 E&amp;T Counselors - \$25,000 x 1.00 FTEs x 5 = \$125,000</p>	<p>The salaries and FTEs in HHSC’s contract with TWC reflect direct services supporting the contractual activities of the program.</p> <p>HHSC Direct Service FTEs:</p> <table border="1" data-bbox="776 835 1416 1220"> <thead> <tr> <th>Position</th> <th>Salary</th> <th>FTE</th> </tr> </thead> <tbody> <tr> <td>Director II</td> <td>\$ 109,084.00</td> <td>1.0</td> </tr> <tr> <td>Program Specialist VII</td> <td>\$ 88,662.50</td> <td>1.0</td> </tr> <tr> <td>Program Specialist VI</td> <td>\$ 77,748.50</td> <td>1.0</td> </tr> <tr> <td>Program Specialist VI</td> <td>\$ 77,748.50</td> <td>1.0</td> </tr> <tr> <td>Program Specialist V</td> <td>\$ 68,289.50</td> <td>1.0</td> </tr> <tr> <td>Contract Specialist V</td> <td>\$ 82,980.00</td> <td>1.0</td> </tr> <tr> <td>Financial Analyst III</td> <td>\$ 82,980.00</td> <td>1.0</td> </tr> <tr> <td><b>Total</b></td> <td><b>\$ 587,493.00</b></td> <td><b>7.0</b></td> </tr> </tbody> </table>	Position	Salary	FTE	Director II	\$ 109,084.00	1.0	Program Specialist VII	\$ 88,662.50	1.0	Program Specialist VI	\$ 77,748.50	1.0	Program Specialist VI	\$ 77,748.50	1.0	Program Specialist V	\$ 68,289.50	1.0	Contract Specialist V	\$ 82,980.00	1.0	Financial Analyst III	\$ 82,980.00	1.0	<b>Total</b>	<b>\$ 587,493.00</b>	<b>7.0</b>
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<p><b>Fringe Benefits:</b> If charging fringe and benefits to the E&amp;T program, provide the approved fringe rate.</p>	<p>The estimated fringe rate is 31.83%. Based on the salaries shown above the Fringe benefits equal \$186,999.02.</p>																											
<p><b>Contractual Costs:</b> All contracts and partnerships should be included in the “contracts and partnerships” matrix of the E&amp;T State Plan Operating Budget Workbook. Briefly summarize the type of services contractors/partners will provide, such as direct E&amp;T program services, IT services, consulting, etc.</p>	<p>Includes provider contractual cost less Participant Reimbursement. \$22,657,684</p>																											
<p><b>Non-capital Equipment and Supplies:</b> Describe non-capital equipment and supplies to be purchased with E&amp;T funds.</p>	<p>This budget is for the purchase of items such as software, postage, and purchased contract services. \$3,500</p>																											
<p><b>Materials:</b> Describe materials to be purchased with E&amp;T funds.</p>	<p>None</p>																											

<p><b>Travel &amp; Staff Training:</b> Describe the purpose and frequency of staff travel charged to the E&amp;T program. This line item should not include E&amp;T participant reimbursements for transportation. Include planned staff training, including registration costs for training that will be charged to the E&amp;T grant.</p>	<p>The purpose of the travel will be to ensure staff are kept up to date on the program requirements and expectations. This cost can but is not limited to travel expenses, and registration fees. This expense does not contain any E&amp;T participant reimbursement cost. \$7,000</p>
<p><b>Building/Space:</b> If charging building space to the E&amp;T program, describe the method used to calculate space value.</p>	<p>None</p>
<p><b>Equipment &amp; Other Capital Expenditures:</b> Describe equipment and other capital expenditures over \$5,000 per item that will be charged to the E&amp;T grant. (In accordance with 2 CFR 200.407, prior written approval from FNS is required.)</p>	<p>None</p>

**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 Costs are estimated to be \$98,760.

**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.

This budget utilizes projections based on historical costs and projected expenditures. \$1,400,000

## Minimum- and Full-Service Counties

Board Name	County Name	FULL SERVICE	MINIMUM SERVICE
Alamo	Atascosa	✓	
Alamo	Bandera	✓	
Alamo	Bexar	✓	
Alamo	Comal	✓	
Alamo	Frio	✓	
Alamo	Gillespie	✓	
Alamo	Guadalupe	✓	
Alamo	Karnes	✓	
Alamo	Kendall	✓	
Alamo	Kerr	✓	
Alamo	Medina	✓	
Alamo	Wilson	✓	
Brazos Valley	Brazos	✓	
Brazos Valley	Burleson	✓	
Brazos Valley	Grimes	✓	
Brazos Valley	Leon	✓	
Brazos Valley	Madison	✓	
Brazos Valley	Robertson	✓	
Brazos Valley	Washington	✓	
Cameron County	Cameron	✓	
Capital Area	Travis	✓	
Central Texas	Bell	✓	
Central Texas	Coryell	✓	
Central Texas	Hamilton	✓	
Central Texas	Lampasas	✓	
Central Texas	Milam	✓	
Central Texas	Mills		✓
Central Texas	San Saba	✓	
Coastal Bend	Aransas	✓	
Coastal Bend	Bee	✓	
Coastal Bend	Brooks	✓	
Coastal Bend	Duval		✓
Coastal Bend	Jim Wells	✓	
Coastal Bend	Kenedy		✓
Coastal Bend	Kleberg	✓	
Coastal Bend	Live Oak		✓
Coastal Bend	McMullen		✓
Coastal Bend	Nueces	✓	
Coastal Bend	Refugio	✓	
Coastal Bend	San Patricio	✓	



Board Name	County Name	FULL SERVICE	MINIMUM SERVICE
Concho Valley	Coke	✓	
Concho Valley	Concho	✓	
Concho Valley	Crockett	✓	
Concho Valley	Irion	✓	
Concho Valley	Kimble	✓	
Concho Valley	Mason	✓	
Concho Valley	McCulloch	✓	
Concho Valley	Menard	✓	
Concho Valley	Reagan	✓	
Concho Valley	Schleicher	✓	
Concho Valley	Sterling	✓	
Concho Valley	Sutton	✓	
Concho Valley	Tom Green	✓	
Dallas	Dallas	✓	
Deep East Texas	Angelina	✓	
Deep East Texas	Houston	✓	
Deep East Texas	Jasper	✓	
Deep East Texas	Nacogdoches	✓	
Deep East Texas	Newton		✓
Deep East Texas	Polk	✓	
Deep East Texas	Sabine	✓	
Deep East Texas	San Augustine		✓
Deep East Texas	San Jacinto	✓	
Deep East Texas	Shelby	✓	
Deep East Texas	Trinity	✓	
Deep East Texas	Tyler	✓	
East Texas	Anderson	✓	
East Texas	Camp	✓	
East Texas	Cherokee	✓	
East Texas	Gregg	✓	
East Texas	Harrison	✓	
East Texas	Henderson	✓	
East Texas	Marion	✓	
East Texas	Panola	✓	
East Texas	Rains	✓	
East Texas	Rusk	✓	
East Texas	Smith	✓	
East Texas	Upshur	✓	
East Texas	Van Zandt	✓	
East Texas	Wood	✓	

Board Name	County Name	FULL SERVICE	MINIMUM SERVICE
Golden Crescent	Calhoun	✓	
Golden Crescent	DeWitt	✓	
Golden Crescent	Goliad	✓	
Golden Crescent	Gonzales	✓	
Golden Crescent	Jackson	✓	
Golden Crescent	Lavaca	✓	
Golden Crescent	Victoria	✓	
Gulf Coast	Austin	✓	
Gulf Coast	Brazoria	✓	
Gulf Coast	Chambers	✓	
Gulf Coast	Colorado	✓	
Gulf Coast	Fort Bend	✓	
Gulf Coast	Galveston	✓	
Gulf Coast	Harris	✓	
Gulf Coast	Liberty	✓	
Gulf Coast	Matagorda	✓	
Gulf Coast	Montgomery	✓	
Gulf Coast	Walker	✓	
Gulf Coast	Waller	✓	
Gulf Coast	Wharton	✓	
Heart of Texas	Bosque	✓	
Heart of Texas	Falls	✓	
Heart of Texas	Freestone	✓	
Heart of Texas	Hill	✓	
Heart of Texas	Limestone	✓	
Heart of Texas	McLennan	✓	
Lower Rio Grande Valley	Hidalgo	✓	
Lower Rio Grande Valley	Starr	✓	
Lower Rio Grande Valley	Willacy	✓	
Middle Rio Grande	Dimmit	✓	
Middle Rio Grande	Edwards	✓	
Middle Rio Grande	Kinney	✓	
Middle Rio Grande	LaSalle	✓	
Middle Rio Grande	Maverick	✓	
Middle Rio Grande	Real	✓	
Middle Rio Grande	Uvalde	✓	
Middle Rio Grande	Val Verde	✓	
Middle Rio Grande	Zavala	✓	

Board Name	County Name	FULL SERVICE	MINIMUM SERVICE
North Central	Collin	✓	
North Central	Denton	✓	
North Central	Ellis	✓	
North Central	Erath	✓	
North Central	Hood	✓	
North Central	Hunt	✓	
North Central	Johnson	✓	
North Central	Kaufman	✓	
North Central	Navarro	✓	
North Central	Palo Pinto	✓	
North Central	Parker	✓	
North Central	Rockwall	✓	
North Central	Somervell	✓	
North Central	Wise	✓	
North East	Bowie	✓	
North East	Cass	✓	
North East	Delta	✓	
North East	Franklin	✓	
North East	Hopkins	✓	
North East	Lamar	✓	
North East	Morris	✓	
North East	Red River	✓	
North East	Titus	✓	
North Texas	Archer	✓	
North Texas	Baylor	✓	
North Texas	Clay	✓	
North Texas	Cottle	✓	
North Texas	Foard	✓	
North Texas	Hardeman	✓	
North Texas	Jack	✓	
North Texas	Montague	✓	
North Texas	Wichita	✓	
North Texas	Wilbarger	✓	
North Texas	Young	✓	

Board Name	County Name	FULL SERVICE	MINIMUM SERVICE
Panhandle	Armstrong		✓
Panhandle	Briscoe		✓
Panhandle	Carson		✓
Panhandle	Castro	✓	
Panhandle	Childress	✓	
Panhandle	Collingsworth		✓
Panhandle	Dallam		✓
Panhandle	Deaf Smith	✓	
Panhandle	Donley		✓
Panhandle	Gray		✓
Panhandle	Hall		✓
Panhandle	Hansford		✓
Panhandle	Hartley		✓
Panhandle	Hemphill		✓
Panhandle	Hutchinson	✓	
Panhandle	Lipscomb		✓
Panhandle	Moore	✓	
Panhandle	Ochiltree	✓	
Panhandle	Oldham		✓
Panhandle	Parmer		✓
Panhandle	Potter	✓	
Panhandle	Randall	✓	
Panhandle	Roberts		✓
Panhandle	Sherman		✓
Panhandle	Swisher		✓
Panhandle	Wheeler		✓

Board Name	County Name	FULL SERVICE	MINIMUM SERVICE
Permian Basin	Andrews		✓
Permian Basin	Borden		✓
Permian Basin	Crane		✓
Permian Basin	Dawson	✓	
Permian Basin	Ector	✓	
Permian Basin	Gaines		✓
Permian Basin	Glasscock		✓
Permian Basin	Howard	✓	
Permian Basin	Loving		✓
Permian Basin	Martin		✓
Permian Basin	Midland	✓	
Permian Basin	Pecos	✓	
Permian Basin	Reeves	✓	
Permian Basin	Terrell		✓
Permian Basin	Upton		✓
Permian Basin	Ward	✓	
Permian Basin	Winkler		✓
Rural Capital	Bastrop	✓	
Rural Capital	Blanco	✓	
Rural Capital	Burnet	✓	
Rural Capital	Caldwell	✓	
Rural Capital	Fayette	✓	
Rural Capital	Hays	✓	
Rural Capital	Lee	✓	
Rural Capital	Llano	✓	
Rural Capital	Williamson	✓	
South Plains	Bailey	✓	
South Plains	Cochran		✓
South Plains	Crosby		✓
South Plains	Dickens		✓
South Plains	Floyd		✓
South Plains	Garza	✓	
South Plains	Hale	✓	
South Plains	Hockley	✓	
South Plains	King		✓
South Plains	Lamb	✓	
South Plains	Lubbock	✓	
South Plains	Lynn		✓
South Plains	Motley		✓
South Plains	Terry	✓	
South Plains	Yoakum		✓

Board Name	County Name	FULL SERVICE	MINIMUM SERVICE
South Texas	Jim Hogg	✓	
South Texas	Webb	✓	
South Texas	Zapata	✓	
Southeast Texas	Hardin	✓	
Southeast Texas	Jefferson	✓	
Southeast Texas	Orange	✓	
Tarrant County	Tarrant	✓	
Texoma	Cooke	✓	
Texoma	Fannin	✓	
Texoma	Grayson	✓	
Upper Rio Grande	Brewster	✓	
Upper Rio Grande	Culberson	✓	
Upper Rio Grande	El Paso	✓	
Upper Rio Grande	Hudspeth		✓
Upper Rio Grande	Jeff Davis		✓
Upper Rio Grande	Presidio	✓	
West Central	Brown	✓	
West Central	Callahan		✓
West Central	Coleman	✓	
West Central	Comanche	✓	
West Central	Eastland	✓	
West Central	Fisher		✓
West Central	Haskell	✓	
West Central	Jones	✓	
West Central	Kent		✓
West Central	Knox		✓
West Central	Mitchell	✓	
West Central	Nolan	✓	
West Central	Runnels	✓	
West Central	Scurry	✓	
West Central	Shackelford		✓
West Central	Stephens	✓	
West Central	Stonewall		✓
West Central	Taylor	✓	
West Central	Throckmorton		✓