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SNAP E&T Gaps Analysis

Spring 2016 Humphrey School of Public Affairs Capstone

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In the spring of 2016, a Humphrey School of Public Affairs capstone team conducted a gaps analysis study of the Supplemental Nutritional Assistance Program (SNAP) Employment & Training (E&T) programs of Hennepin & Ramsey counties in Minnesota. This analysis describes the demographics of the E&T population, identifies the points in the system where participants fall off of the program, and provides recommendations for aligning administrative and structural processes and resources.

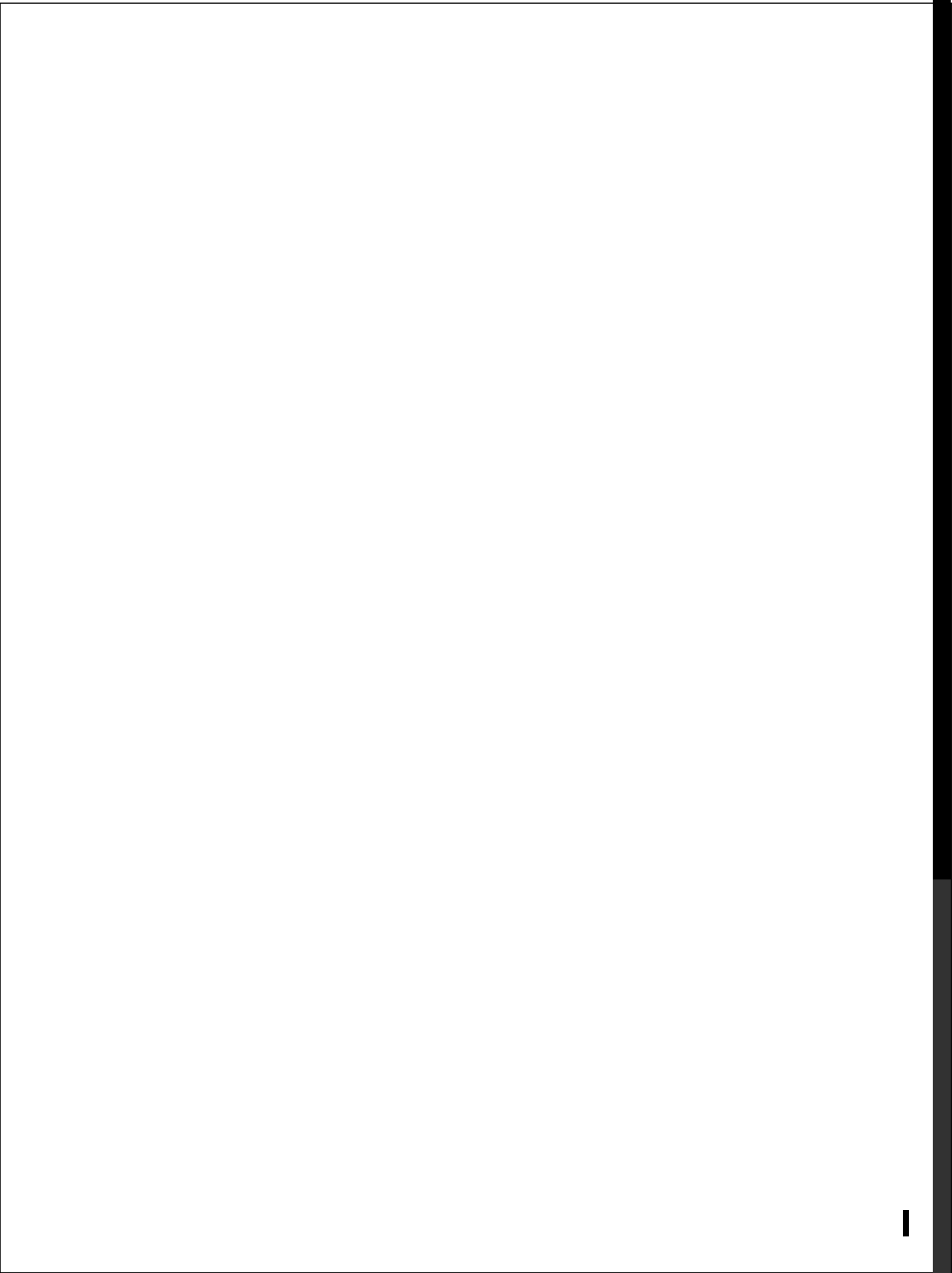


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Matrix of Themes, Findings, and Recommendations

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Themes	Gaps	Recommendations
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SNAP E&T Gaps Analysis - Executive Summary

Project Purpose:

The purpose of the capstone was to determine where in the Supplemental Nutrition Assistance Program - Employment & Training (SNAP E&T) service system are there gaps preventing participants from entering and completing the program.

Due to high unemployment rates during the Great Recession, Minnesota – like most states – qualified for a federal waiver from work exemptions for able-bodied adults without dependents (ABAWDs) receiving SNAP benefits, or food supports. In the fall of 2013 with its unemployment below 5 percent, Minnesota lost this federal waiver and for thousands of Minnesotans dependent upon food supports, this meant that they now had to meet work requirements under SNAP E&T or risk losing their food benefits after three months.

With several thousand participants falling off SNAP each year (i.e. losing food benefits due to program noncompliance), Hennepin and Ramsey counties are working to identify barriers to access to SNAP E&T services. From the perspectives of SNAP participants, the state, counties, and E&T service providers, there is an urgent need to address gaps in the current system. The term “gaps” is used to describe any obstacle that gets in the way of an eligible participant enrolling and completing SNAP E&T. Accordingly, the capstone team finds gaps of three critical types:

- 1) **Participant barriers** to accessing E&T services;
- 2) **Program flow barriers** in the complex implementation system for enrolling and moving participants among providers in the E&T system; and
- 3) **System-level alignment**, gaps, and confusion in this developing policy system.

The potential for SNAP E&T to connect some of Minnesota’s most vulnerable workers with the broader workforce development system is one of the program’s most promising features. SNAP E&T’s flexibility allows provision of resources for a population that is historically hard to serve. Significantly, at a time when the workforce development system is in the midst of a national transition to the Workforce Innovation and Opportunity Act (WIOA), SNAP E&T can be the bridge from dependence on food supports to gainful employment with self-sustaining wages. In essence, SNAP E&T has the potential to be an important on-ramp for those Minnesotans most in need of access to training and employment.

More generally, SNAP offers nutrition assistance to millions of eligible, low-income individuals and families and provides economic benefits to communities. The program is facilitated through the USDA's Food and Nutrition Service (FNS) where it works with State agencies, nutrition educators, neighborhood and faith-based organizations, to ensure that those eligible for nutrition assistance can make informed decisions about applying for the program and can access benefits. FNS also works with State partners and the retail community to improve program administration and ensure program integrity.

SNAP E&T is a program designed to provide employment, training, and related supportive services for individuals receiving SNAP benefits. Although there are three funding streams for SNAP E&T (100% funds, pledge funds, and 50% reimbursement funds), the uncapped nature of the 50% reimbursement funds has the largest potential to grow the program and increase access for participants. The flexibility of allowable

Where are the Gaps in the SNAP E&T Service System?

1. Where in the SNAP E&T service system are low-income people, especially ABAWDs, underserved in Hennepin & Ramsey counties? Where are the gaps in the service system?
2. What SNAP E&T services, as well as support services, are available for low-income people with significant barriers to employment?
3. What can be learned from other employment and training systems in the U.S. to improve SNAP E&T services in Hennepin & Ramsey counties?

services, means state programs can be designed to not only help participants gain the skills, training, work experiences necessary to obtain employment with self-sustaining wages, but can also be used to fund an array of support services necessary to put a participant on the path to employment.

In a show of momentum for expanding SNAP E&T in Minnesota, the legislature is currently considering making SNAP E&T a voluntary resource rather than a mandatory requirement for SNAP participants. Time and administrative costs are being exhausted to sanction participants off E&T programming, and people who need food benefits are losing them. This report does not take a position on whether the program should be made voluntary or not. Instead, the purpose of the report is to identify gaps in the system of service provision, and to make recommendations to improve the well-being of everyone who is involved.

The benefits of a robust and well-functioning SNAP E&T system are not limited to SNAP recipients, but also include the state economy and local communities. However, as the following analysis demonstrates, if Minnesota is to capitalize on the potential of SNAP E&T, a number of obstacles must first be addressed.

ABAWDs as the Key SNAP E&T Population

Although ABAWDs comprised only 2-3% of total SNAP enrollments in 2015, their mandated participation in E&T makes them the largest population of E&T enrollees. Therefore, this report focuses on this population. As of December 2015, there were 1,584 ABAWDs enrolled in SNAP in Ramsey County and 1,993 in Hennepin County¹.

Enrollment data over time illustrates an initial following the elimination of the federal waiver for ABAWD participation at the end of 2013. A steep decline in ABAWD participation in SNAP occurred over the next three months as these newly-mandated ABAWDs failed to complete E&T requirements and were removed from the program (as required after three months of noncompliance) or found ways to support themselves without SNAP. In contrast, before ABAWDs began falling off of the program after losing their waivers, they accounted for a much larger percentage of the SNAP population, nearly 10% in Hennepin County and 7% in Ramsey County.

Research Methodology

The research methodology for this analysis included:

- conducting a review of workforce development best practices and an 'environmental scan' of current and developing E&T practices;
- conducting 17 qualitative interviews with front-line service provider staff in combination with high level staff involved in the creation of E&T policies and procedures;
- analyzing quantitative data supplied from Hennepin and Ramsey counties as well as DEED's Workforce One database; and
- analyzing 32 survey responses by additional service providers around what barriers and capacities their organization currently hold for potentially providing E&T services.²

¹ Source: Hennepin County MAXIS data.

² Officially called a Solicitation of Interest, the survey was created by independent consultant Nick Maryns (InsightWorks LLC) administered through Hennepin County, and included two questions directly pertaining to the capstone analysis.

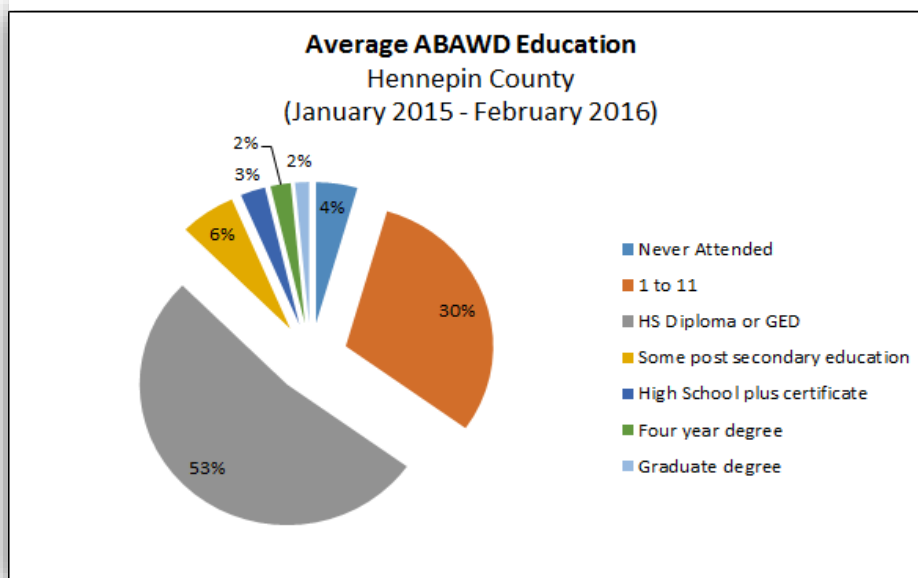
Participant Barriers to the E&T Service System & Employment

SNAP E&T participants face a variety of barriers preventing them from successfully enrolling in E&T and/or completing the program. The barriers most frequently identified were homelessness, lack of transportation, and low education and literacy (Figure 1). These barriers serve as reminders of the hardships that ABAWDs confront and that their immediate needs often take precedence over employment and training. SNAP participants may, and often do face multiple barriers to employment. Collectively, these individual barriers constitute a collective “gap” in the E&T service system. That is, because the labor market in Minnesota has continued to tighten, the remaining unemployed are some of the hardest to serve due to the number of personal barriers they face.

Prevalence of Low Education among ABAWDs

The ABAWD education is largely represented with rates of low education. Approximately 53% of the ABAWD population has a high school diploma, 30% had a first to eleventh grade, and 4% never attended school.

Figure 1. Average ABAWD Education



Pervasive Homelessness in the E&T Population

Homelessness is one of the most difficult problems to successfully address on a large scale within the E&T system. In Q1 2016, approximately one third of E&T enrollees were homeless (37% in Hennepin County, 32% in Ramsey County)³. In addition to the physical and emotional stress homelessness places on the participant, it often corresponds to a number of barriers, including a lack of a family support system, low education attainment, poor access to transportation, mental and physical illness, and more.

Increasing Rates of Ex-Offender Status in the E&T Population

The share of participants with criminal backgrounds in Hennepin County has increased since Q4 2013 and, as of Q1 2016, offenders make up roughly 35% of enrollment⁴. According to the research, many employers are reticent to hire ex-offenders which might contribute to the increase of ex-offenders in the program.

Not only do ex-offenders have limitations in employment, some are inadvertently recruited into E&T programs for careers that restrict those with criminal backgrounds from entering, rendering their training essentially useless. For example, a participant with a criminal background wanting to pursue a career in medicine might be enrolled in training, yet be unable to be hired in that field due to state laws preventing ex-offenders from working with patients. The research shows that service

³ Source: Hennepin County MAXIS data

⁴ Source: Hennepin County WorkForce I data

providers do not always have adequate information to direct clients to the services they need, a problem for both service providers and participants.

Transportation is Limited for the E&T Population

In Hennepin and Ramsey counties, ABAWDs appear to reside mainly in the urban area. In Hennepin County, ABAWDs are most heavily concentrated in North Minneapolis and the Phillips neighborhood of South Minneapolis, with smaller pockets of ABAWDs residing in the northern suburbs and neighborhoods south of downtown. In Ramsey County, ABAWDs are most heavily concentrated in downtown St. Paul, the Midway district, and the Payne-Phalen and Dayton's Bluff neighborhoods. This distribution of ABAWDs is consistent with the concentration of poverty in the county.

Poverty pervades the targeted E&T population of ABAWDs, making transportation a natural barrier for the population in general. Nearly all service providers interviewed described poor access to transportation is a major problem for SNAP E&T participants. Some service providers have bus passes available for participants but most of these passes are single-use and therefore not helpful for participants to consistently attend multiple trainings. Service providers expressed frustration at the lack of funding available for this particular problem, as it is so crucial to the success of participants in E&T programming.

Recommendation 1: Prioritize & Fund Support Services

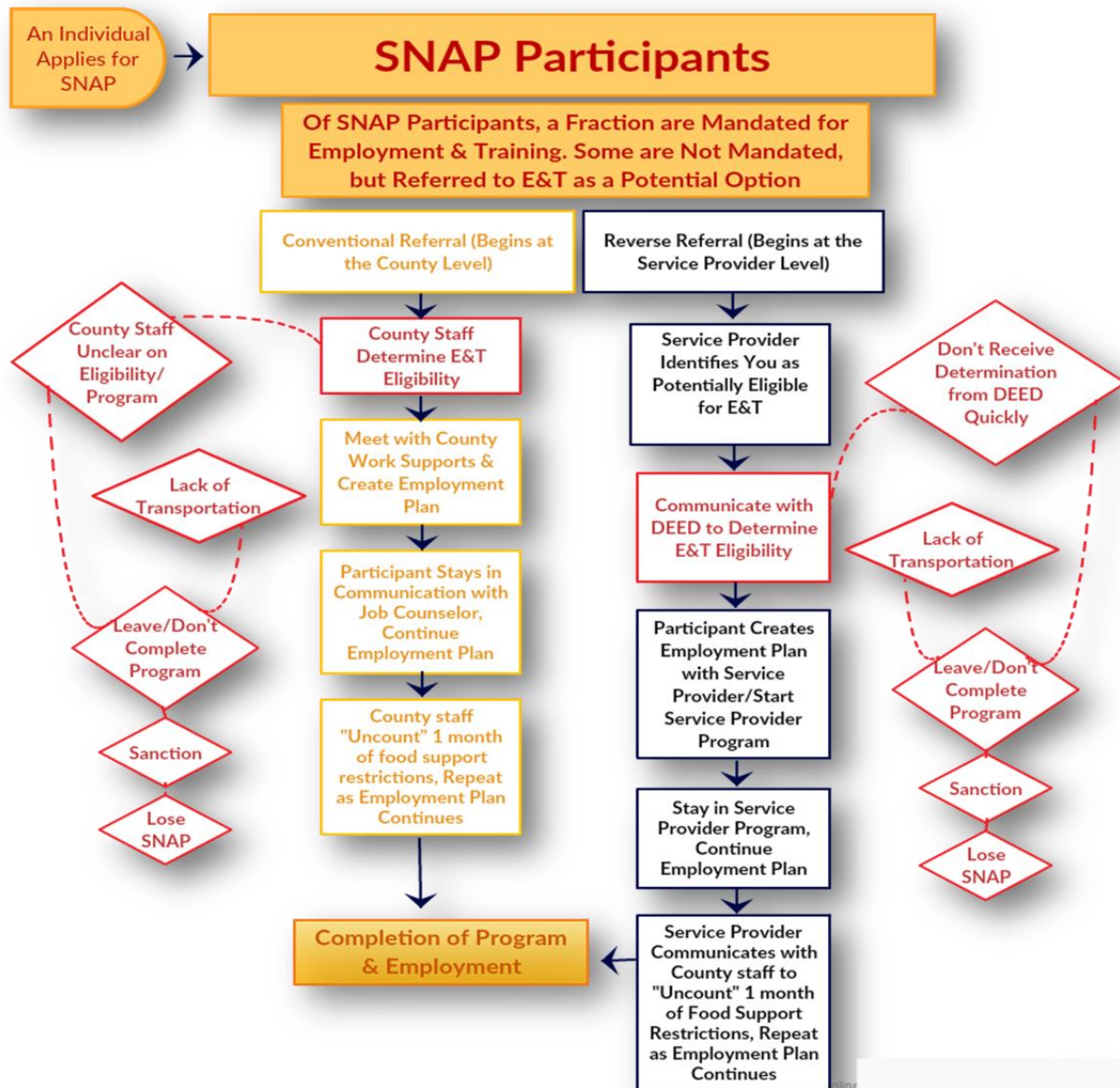
Given the consistency across the research that homelessness, lack of transportation, low education levels, and ex-offender status are the main barriers for participants to overcome, it is recommended that these barriers be prioritized, analyzed further, and funded directly and as thoroughly as possible.

Aligning support services with service provider employment and training programs is necessary for participants to access comprehensive services while securing and retaining employment, an imperative for the ABAWD population. Coordination and collaboration between service providers creates a further opportunity to strengthen connections with existing support services. Additionally, establishing these connections reduces the potential for duplicating or re-creating services that are already available. Service providers can also connect their SNAP E&T participants with social services provided by government agencies.

Complex Program Flow

The SNAP E&T participant population is particularly vulnerable as they move from crisis to crisis. Every additional step in the process of enrollment creates the potential for participants to fall off the program and miss out on crucial benefits and E&T opportunities. Disruptions within the process and between service providers and the counties have a large effect on participants moving on to the next stage in the E&T service system, meaning every step added has a considerable impact on the success of the participant and the E&T system as a whole.

Figure 2. Program Flow



Gap: A Fragmented Referral Process Creates Fall-Off Points

The fragmented SNAP E&T referral process is a major constraint, as a systematic process has not been established.

SNAP E&T service providers recognize the importance of an intake and referral process that guides participants to the services they need. This referral process can take place through 1) a conventional referral process, or 2) a reverse referral process, both of which are part of the SNAP E&T program design. In the conventional referral process (Figure 3), the process begins when a participant applies for SNAP benefits and through the interview screening is referred into E&T. For example, a person would apply for SNAP benefits (in person, online, or over the phone) and interview with a county financial worker, who would then make a referral to an approved E&T provider.

Figure 3. Conventional Referral Process: Beginning at the County Level⁵



Figure 4. Reverse Referral Process: Beginning at the Service Provider Level⁶



However, over the course of the research, two systemic challenges in the current conventional referral process emerged. First, because county financial workers do not know which employment service providers are approved E&T providers, they currently only refer participants to county job counselors for SNAP E&T orientation and the creation of employment plans. However, there is no reason a county financial worker could not refer a participant to a service provider other than county job counselors if a) the county financial worker knew which service providers were DEED verified E&T providers, and b) the service providers were able to provide orientation and standardized employment plans.

In contrast, the reverse referral process (and the process for eligibility verification that facilitates it) is a critical piece of SNAP E&T expansion. A reverse referrals system is essential because it has the potential to dramatically increase the number of access points for participants. Rather than a system in which every E&T participant is funneled through one organization (conventional referrals), a robust reverse referral system would allow participants to access the system through an array of E&T providers. Furthermore, this array of service providers has the potential to a) mitigate the transportation barrier previously identified, and b) increase access to specific populations by leveraging the knowledge of local service providers. Lastly, the importance of a strong system of reverse referrals is further evidenced by Washington State, where 80% of E&T participants were enrolled through reverse referrals.⁷

⁵ Funding Career Pathways: A Federal Funding Toolkit for State and Local/Regional Career Pathway Partnerships. CLASP. February 2016

⁶ Funding Career Pathways: A Federal Funding Toolkit for State and Local/Regional Career Pathway Partnerships. CLASP. February 2016

⁷ O'Callaghan, Susan, and Laura Rowley. Provider & Participant Recruitment. Proc. of SNAP to Skills, Berkeley.

Recommendation 2: Create a robust reverse referral system

In order to minimize participant disruptions in the program, eligibility verification should be streamlined. Recognizing that enrollment in E&T depends upon agency coordination across the policy field, streamlining it will require a collaborative approach that leverages the expertise of key organizations at each level within the policy field: the state, the counties, and local service providers.

Any collaborative group of decision makers should consider three approaches, outlined below, with the goal of a real time eligibility verification system that creates a seamless process for participants to enroll in SNAP E&T and receive the services they need.

- 1) Give approved E&T providers increased access to MAXIS and allow them to administer E&T orientation.
- 2) Increase capacity at the state level (DHS or DEED) to verify eligibility.
- 3) Invest resources in the counties to build a strong referral process.

Gap: Reimbursement Lag Time to Service Providers

SNAP E&T is designed to help service providers maximize their capacity through the 50 percent reimbursement funding option. However, the lag time between invoicing and receipt of payment has been considerable (as long as 6 months) and has proven to be a prohibitive barrier to entry for many service providers. Lag time in reimbursement serves as a disincentive for service provider participation in the E&T service system because the longer the lag in reimbursement the more liquidity a service provider must have on hand.

Furthermore, due to the uncertainty around reimbursement lag time, as well as confusion around what does and does not qualify as reimbursable, providing E&T services and activities requires service providers to assume an element of risk which can also be prohibitive. This lag time appears to be a consequence of the co-administration of E&T in Minnesota, with the delay occurring as each agency does its due diligence.

Recommendation 3: Simplify Fiscal Management

Structures need to be implemented that streamline fiscal administration to increase ease of access for service providers to receive 50 percent matching funding and ensure both DHS and DEED maintain their interests in the successful expansion and operation of SNAP E&T.

The purpose behind the design of SNAP E&T is to bridge food support benefits and employment services, which calls for coordination between state human service agencies and state workforce development agencies. In Minnesota, this means coordination between the Department of Human Services (DHS) and the Department of Employment and Economic Development (DEED). Resolving this challenge will require the in-depth knowledge and experience of DHS and DEED administrators. However, any remedy they propose should a) reduce reimbursement lag time, b) clarify where authority for SNAP E&T lies, c) reduce the administrative burden, d) help service providers better understand what activities are reimbursable, and e) ensure reimbursement aligns with incentives for increasing access for participants.

Gap: Data Management is Inconsistent

As the ABAWD population is traditionally highly mobile, collecting and tracking data on participants is difficult. While attempts have been made to organize and improve data management, there is still confusion and inconsistencies in the data collection process, tracking, and reporting. According to several service providers, staff often do not have the time or expertise to correctly use the WorkForce One system, resulting in incomplete or incorrect data on participants as well as administrative resources inefficiently spent.

Recommendation 4: Provide Additional Data Management Support

Provide additional data management training and technical support for service provider and county staff. Similar to what is already provided with SNAP enrollment, those providing E&T services should have access to regular trainings on data management, specifically on how to successfully navigate, utilize and collect information from WorkForce One.

Additionally, the forthcoming performance measure recently announced by USDA are one more reason to institute strong data practices. The four metrics states will be required to report on include:

- Number and percentage in unsubsidized employment in second quarter after completion
- Number and percentage in unsubsidized employment in fourth quarter after completion
- Median earnings for those in unsubsidized employment in second quarter after completion
- Number and percentage that completed a training, educational, work experience, or on-the-job training component⁸

Lack of Alignment in the Field

Congestion at the highest level (DHS and DEED) has disrupted connections with the lowest level (i.e. with direct service providers) and has inhibited the creation of more SNAP E&T partnerships with linkages to participants. A robust and expanded SNAP E&T program in Minnesota will require coordination between the state agencies responsible for oversight and administration of the program, and the local governments, community based organizations, and educational institutions ultimately responsible for delivering services to participants. The implementation challenge of connecting authorizing agencies at the state level with local organizations at the community level is not unique, but is particularly important in SNAP E&T due to the implications of third party matching and the process of reverse referrals.

Gap: Structural Confusion

Shared ownership of SNAP E&T between DHS and DEED has led to confusion that permeates down to county administration of the program. Both a challenge and an opportunity of SNAP E&T is coupling the knowledge and expertise of DHS and DEED. These state agencies need to have an administrative design that takes into account the counties role in processing eligibility for SNAP (as well as other income and work support programs) and their role needs to be clear and consistent across related programs. The opportunity of shared ownership is that SNAP E&T can be a bridge to employment for a population (SNAP recipients) that face numerous barriers to employment and can be hard to serve. However, bridging the human services of the state's largest agency with the workforce development focus of DEED, presents challenges of coordination and administration.

Recommendation 5.1: Clearly Define Administrative Roles

Clearly define and communicate the administrative structure for SNAP E&T in Minnesota, by delineating the roles and responsibilities of state agencies, counties and service providers. Recognizing that expanding access to employment and training services through SNAP will be a collaborative effort requiring coordination across the field, it is imperative to establish an efficient system of administration. Examples of questions this system must be able to answer include:

- The roles and responsibilities for state agencies, counties, and program partners, i.e. providers.
- Identification of the initial administrative resources required to effectively manage the program.
- Definition of the participant engagement process and "flow", as well as the supporting databases that will be utilized.
- Partnership organizational chart.

Recommendation 5.2: Create a Minnesota SNAP E&T Handbook

In order to increase the knowledge base and facilitate greater coordinated across the state for SNAP E&T programming, a Minnesota-oriented SNAP E&T Handbook should be created that allows service providers and county staff to more effectively work from the same instructions and goals. This handbook should be differentiated from the current SNAP E&T manual, incorporate processes and instructions pertaining specifically to E&T and the model of allowable and reimbursable activities. It should also incorporate a breakdown of information for community partners and local government to understand the basics of the federal law around SNAP E&T and processes of SNAP E&T functions throughout the state. An outline of sections that the handbook should be comprised of, but not limited to, can be found in the full report below.

⁸ [USDA FNS - 7 CFR Parts 271 and 273](#)

Essentially, a handbook would provide an opportunity for organizations across the policy field to (literally) get on the same page.

Gap: Lack of E&T Network among Providers

The current lack of coordination between service providers creates barriers for participants to access the services they need. If a service provider cannot direct participants to other organizations, participants may be slotted into programs that do not align with their employment goals and fail to address their life circumstances. If these linkages are not made immediately with both organizations connecting participants to services, many participants may drop out of the SNAP E&T program altogether. Lacking service provider coordination and communication, many participants “fall through the cracks.”

One of the strengths of the SNAP E&T program is the flexibility and range of employment and support activities available to participants. The broad range of eligible services also provides collaborative opportunities for organizations to integrate services which support participants. However, if these connections cannot be made, participants are effectively denied full access to a variety of programs which support their training and employment goals.

Recommendation 6: Develop & Distribute a Service Provider Catalogue

Develop and distribute a catalogue of SNAP E&T service providers and their programs to service providers and county financial workers. County staff and service providers currently do not have access to specific information on providers of SNAP E&T services. In the absence of this information, service providers are limited in their ability to direct participants to the services they need. A catalogue of service providers and their activities would also facilitate the creation of a network of SNAP E&T providers. The formation of a SNAP E&T network would potentially:

- Allow employment service providers to direct participants to services they need
- Foster communication and collaboration between ESPs to provide complimentary services to participants
- Create a forum for sharing best practices, opportunities and challenges

Conclusion

In the full report that follows, the gaps to the successful implementation and expansion of SNAP E&T are discussed in detail. These gaps are organized into the three themes: participant barriers, complex program flow, and lack of alignment in the field. The hope is that by defining the gaps in SNAP E&T, this report will help build common understanding among policy makers across the field as they continue to work towards the implementation of a more robust SNAP E&T system in Minnesota.

FULL REPORT

SNAP Employment & Training Gaps Analysis

By: Barnabas Birkeland, William Christenson, Dana Dumbacher,

Madeline Mitchell, and Neal Younghans⁹

Project Purpose:

With several thousand participants falling off SNAP each year (i.e. losing food benefits due to program noncompliance), Hennepin and Ramsey counties are working to identify barriers to accessing SNAP E&T services. From the perspectives of SNAP participants, the counties, and E&T service providers, there is an urgent need to address gaps in the current system. Accordingly, the capstone team was engaged to identify fall-off points. This analysis finds gaps of three critical types:

- 1) **Participant barriers** to accessing E&T services;
- 2) **Program flow barriers** in the complex implementation system for enrolling and moving participants among providers in the E&T system; and
- 3) **System-level alignment**, gaps, and coherence in this developing policy system.

These fall-off points could be anything from not having transportation to meet with an employment service provider, to a lack of understanding of the SNAP application and therefore a failure to enter E&T. Throughout the development of this report, it was discovered that more definition of the current system was necessary to effectively assess the constraints and barriers service providers and participants face.

The project began when Hennepin and Ramsey counties engaged the student capstone team from the Humphrey School of Public Affairs, along with independent consultant Nick Maryns (InsightWorks LLC) to examine the current SNAP E&T system. The consultant conducted a financial analysis of existing services and identified untapped reimbursement funds, while the capstone team conducted a gaps analysis of E&T services and supports in Hennepin and Ramsey counties. Although the two projects were conducted separately, the consultant and the capstone team communicated regularly and shared portions of their research along the way.

Research Questions: What are the Gaps in the E&T Service System?

Research Questions Pursued in this Study:

1. Where in the SNAP E&T service system are low-income people, especially Able-bodied Adults without Dependents (ABAWDs), underserved in Hennepin and Ramsey counties? Where are the gaps in this service system?
2. What SNAP E&T services, as well as support services, are available for low-income people with significant barriers to employment?
3. What can be learned from other employment and training systems in the US to improve SNAP E&T services in Hennepin and Ramsey counties?

However, because the terms “gaps analysis” and “underserved” could mean a number of things, the project explored “gaps” in SNAP E&T that could result from characteristics of potential participants, geographic limitations of participants relative to the services they need, and structural misalignment within the implementation system. What emerged over the course of the research was an emphasis on the structural misalignment.

⁹ Names of capstone team ordered alphabetically

The focus of the research became, “What in the implementation structure of SNAP E&T constrains services providers and prevents participants getting the services they need?”

Research Methodology:

As part of the analysis, the capstone team (a) performed a review of best practices in workforce development and SNAP E&T, (b) reviewed data on SNAP participants and service providers to determine where and how the E&T service system may be underperforming, causing participants to lose food benefits and access to E&T, (c) applied geospatial analysis to identify concentrations of SNAP participants (d) conducted 17 qualitative interviews with different nonprofit and government service staff to understand current policies, procedures, and challenges SNAP participants face in obtaining E&T, and (e) developed a set of recommendations to state and local policy makers about system improvements and coordination. These methodologies were used in conjunction with one another in order to triangulate the data in a comprehensive way and more adeptly analyze the varying aspects of Minnesota’s SNAP E&T system.

The capstone team performed a review of best practices in workforce development and SNAP E&T around the United States in order to gain a wide range of understanding of the policy field. This review of current literature informed the ways the following analysis focused on commonly known participant barriers as well as analyzing Minnesota’s SNAP E&T structure compared to those being currently implemented throughout the country. Following the best practices review, qualitative data was gathered from service providers and system implementers in order to identify constraints and barriers service providers and participants face within the system. In tandem with the qualitative analysis, a quantitative analysis was conducted to assess SNAP and SNAP E&T enrollment rates as well as the numbers of participants who are achieving success in the program. Incorporating best practices, quantitative and qualitative methods, this research seeks to provide a snapshot of the SNAP E&T service system within Hennepin and Ramsey counties.

Quantitative Analysis Methodology:

The quantitative analysis relied on data collected from MAXIS and Workforce One (WFI) to inform participant barriers and identify system inefficiencies. The data supplied was by Hennepin and Ramsey counties and DEED. The intent of the quantitative research was to identify where participants, specifically ABAWDs, were unsuccessful in navigating the SNAP E&T system. Data was solicited from both counties on SNAP and SNAP E&T participation rates. Alongside broad summary data of SNAP programs, both counties provided demographic data on race, age, sex, and education.

Ramsey County provided data on ABAWD demographics, including information on age, education, race, ethnicity, homelessness, and gender, among others. Ramsey also provided information on SNAP participants referred to E&T, including 5-digit zip codes of participants. DEED provided supplemental data on program exits and additional demographic information for Ramsey County.

Hennepin County data provided de-identified client-level data for ABAWDs, as well as ABAWDs who have been sanctioned. These datasets included information on participant age, gender, race, citizenship, education and zip code. DEED provided data on E&T referrals, program exits, and summary demographics.

As part of the data collection system, the counties keep data on those who have received sanctions from the program. Sanctions occur when a participant fails to comply with mandated activities (for example, failing to appear for orientation and scheduled meetings) and result in a participant’s SNAP benefits being temporarily suspended. The first case of non-compliance results in a one month loss of benefits, the second instance in a three month loss, and the third in a six month loss.¹⁰

Furthermore, these sanctions, rather than merely being a temporary suspension of food benefits, appear to result in the loss of food benefits indefinitely for the vast majority of participants. The quantitative analysis, using sanctions data, examined *who* was falling off the program, i.e. which populations were most likely to be sanctioned and/or lose their food benefits entirely. Although this data is not definitive in explaining why people are being removed from the program, it highlights parts of the population facing significant barriers to successful completion of E&T and subsequent employment.

Qualitative Analysis Methodology:

¹⁰ Minnesota’s Combined SNAP E&T Manual [6.15 - SANCTIONS FOR FAILURE TO COMPLY](#)

A wide range of qualitative data was obtained to understand how the current system functions and how participant barriers are addressed, or not addressed, within the system. This included a mix of in person interviews with key stakeholders with knowledge of SNAP E&T, as well findings from two questions included in a survey designed by the consultant and administered by Hennepin County.

Interviews

The capstone team conducted interviews with stakeholders in the current SNAP E&T system. In total, 17 interviews were conducted. These were conducted in phases, with the first phase consisting of the initial pilot program providers, as well as philanthropic partners. The qualitative method of a respondent-driven (“snowball”) sampling was used to have respondents from this first phase point the inquiry in the direction of subsequent interviewees that could add value to the data collection. This method was used in conjunction with the “elite interview method” — a method in which “people are chosen because of who they are or what position they occupy...rather than randomly or anonymously.”¹¹

Organizations were selected that concentrated on one part of the SNAP E&T work components. For example, one organization focuses on education and the English as a Second Language (ESL) components, while another specializes in housing needs. An effort was made to target at least one service provider per work component in this way. In sampling organizations, it was attempted to fully cover all of the different reimbursable components of E&T by utilizing this method.

As part of the selection method for choosing interviewees, service delivery within the urban core as well as the suburbs were also taken into consideration. The methodology was designed to sample from a variety of service providers while capturing information from both urban and suburban geographies.

For the interviews, an interview protocol was created (see Appendix A) to ensure that information from the front-line service staff was being captured and focused on barriers participants were experiencing as well as issues that were inter-organizational. Service provider staff were asked to explain their role in relation to the SNAP E&T program, describe the barriers facing their target populations, and identify service gaps in the SNAP E&T system.

Solicitation of Interest

As part of his financial analysis, the consultant designed a SOI and included two questions that pertained to the capstone project.¹² These included:

- “What are the barriers to your organization’s participation [in SNAP E&T]?”
- “Expanding SNAP E&T in Minnesota could potentially provide a new source of revenue (through the federal 50 percent reimbursement) that could be used to expand services where they are needed most. What kinds of gaps in services exist in the communities you serve? What kinds of needs are going unmet?”

The SOI surveyed organizations that were not interviewed but still considered important in the analysis due to the employment and training services and activities they provide and the participants they serve. Service provider responses were then gathered, coded, and analyzed.

Limitations of the Data

There were some aspects of the data that limited our analysis. In order to adjust for these limitations as effectively as possible, mixed methods of analysis were utilized to triangulate different perspectives within the SNAP E&T system, from the participants’ perspective to the high level system implementers. The use of these mixed methods attempted to fill the gaps in the data sources and the limitations of the data listed below.

The quantitative analysis faced limitations due to a variety of data collection challenges. First, Ramsey County has only operated E&T since January 2016, rendering very little participant data available for analysis. As only Q1 2016 was available from Ramsey County, there was no way to make longitudinal comparisons as is done with Hennepin County data in this report. Also, since there are so few participants, counts cannot be reported without violating data privacy standards so most numbers presented in this report are percentages. Second, due to limited access to county data on broader SNAP

¹¹ Hochschild J.L. [Conducting Intensive Interviews and Elite Interviews](#). Workshop on Interdisciplinary Standards for Systematic Qualitative Research [Internet]. 2009

¹² See Appendix C

participation, the quantitative analysis was focused on ABAWD demographic characteristics within SNAP E&T. Data provided on non-ABAWD SNAP participants was not as detailed or comprehensive as that on ABAWDs.

A third and significant limitation in the datasets is the lack of data tracking practices. When the Food Stamp program was reformed and became SNAP in 1997 there was no legislative requirement for collecting data on participants (aside from general demographic information and income questions as part of the intake process). To access the data that is collected, a county must query MAXIS which was designed simply to determine participant eligibility, not to track participant progress and collect further information. Additionally, MAXIS was not designed for easily accessible data pulls, making it difficult to access the information that is collected. Finally, it has been reported by data analysts that, due to lack of staff training and understanding of the data systems, the data that is entered into the systems is often unreliable or incomplete.

Background:

Due to high unemployment rates during the Great Recession, Minnesota — like most states — qualified for a federal waiver from the work requirements for able-bodied adults without dependents (ABAWDs) receiving SNAP benefits. In the fall of 2013, when its unemployment fell below 5 percent, Minnesota lost this federal waiver for ABAWDs. For thousands of Minnesotans dependent upon food supports, this meant they were now limited to three months of SNAP benefits in a 36 month period, unless they earned additional months. An ABAWD earns additional months “when they work or participate in work activities an average of 20 hours per week (80 per month).¹³ SNAP E&T expansion, therefore, is particularly focused on engaging this population.

While ABAWDs continue to lose their SNAP benefits for failing to comply with work requirements or participate in employment and training activities that would allow them to maintain their benefits, Minnesota’s economy has improved (with an unemployment rate of 3.7% in March 2016)¹⁴ and the labor market has continued to tighten. Furthermore, as Minnesota’s population ages and baby boomers retire, the demand for labor is set to grow significantly in the decade ahead, increasing the need for employment and training programs for Minnesota’s lowest skilled workers. Many of these workers fall under the ABAWD label and will be needed to meet the needs of Minnesota’s growing economy.

The potential for SNAP E&T to connect some of Minnesota’s most vulnerable workers with the broader workforce development system is one of the program’s most promising features. SNAP E&T’s flexibility allows provision of resources for a population that is historically hard to serve. Significantly, at a time when the workforce development system is in the midst of a major transition with the rollout of the Workforce Innovation and Opportunity Act (WIOA), SNAP E&T can be the bridge from dependence on food supports to gainful employment with self-sustaining wages. In essence, SNAP E&T has the potential to be an important on-ramp for those Minnesotans most in need of access to training and employment.

Momentum for expanding SNAP E&T has also increased. In the fall of 2015, leaders from across the field convened a planning group for expanding SNAP E&T. This effort began to pay off when Minnesota was selected by the United States Department of Agriculture, Food and Nutrition Services (USDA FNS) to be one of 10 states to receive technical assistance from Seattle Jobs Initiative, a nonprofit leader in SNAP E&T. This convening of state, county, and local representatives has also built political momentum in both the Minnesota State Legislature and in the Governor’s office. At the Capitol, legislation that would not only direct existing funding back into SNAP E&T, but also change the complexion of the program by converting it to a voluntary program (discussed below), is currently working its way through both houses. Additionally, Governor Dayton included SNAP E&T in his supplemental budget as part of the \$100 million he has allocated for addressing racial disparities¹⁵, a strong endorsement of the potential of SNAP E&T to support historically marginalized populations with barriers to employment.

In the most recent display of political support for SNAP E&T expansion, in March 2016, Portia Wu, Assistant Secretary U.S. Department of Labor Employment & Training Administration and Kevin W. Concannon, Under Secretary U.S. Department of Agriculture Food, Nutrition and Consumer Service, issued a joint letter, announcing their intention to increase coordination in expanding SNAP E&T and encouraging all states to do the same.¹⁶

¹³ Minnesota’s Combined SNAP E&T Manual [6.6 - ABLE-BODIED ADULTS WITHOUT DEPENDENTS \(ABAWDS\)](#)

¹⁴ “Databases, Tables & Calculators by Subject.” *Bureau of Labor Statistics Data*. Web. May 2016.

¹⁵ [Governor Mark Dayton’s FY2016-17 Supplemental Budget Recommendations](#)

¹⁶ Concannon, Kevin, and Portia Wu. “Partnering to Help Connect Low-Income Able-bodied Adults to the Public Workforce System.” Letter to Commissioners and Directors of the Supplemental Nutrition Assistance Program State Workforce Administrators, WIOA Liaisons, Workforce Development Boards, and American Job Centers. 31 Mar. 2016. MS. N.p.

Lastly, the Minnesota legislature is currently considering making SNAP E&T a voluntary resource rather than a mandatory requirement for SNAP participants. There are many benefits to having a robust and well-functioning SNAP E&T system for SNAP participants, the economy of our state, the counties, and service providers. However, as the following analysis demonstrates, there are also significant barriers and gaps at the participant, program implementation flow, and service system levels. And, time and administrative costs are being exhausted to sanction participants off E&T programming, and people who need food benefits are losing them. This report does not take a position on whether the program should be made voluntary or not. Instead, our premise is to identify and recommend remedies to gaps in the system of service provision, to improve the wellbeing of everyone who is involved.

The Minnesota SNAP E&T Policy Field:

Policy fields are the organizations that govern and influence a particular policy area. Policy field analysis is useful to identify and describe relationships, networks and sources of authority in a policy area.¹⁷ The SNAP E&T policy field includes federal, state and local governments as well as an array of service provider agencies and foundations. Although federal grants and regulations direct the administration of the program, states maintain a great degree of flexibility in designing their funding mechanisms and the emphases of programming.

The SNAP E&T policy field highlights the need to coordinate government entities and community partners. The USDA, engaged in food policy, provides SNAP E&T funds to the Minnesota Department of Human Services (DHS), which is a social service agency. DHS then transfers funds to the Department of Employment and Economic Development (DEED) which is responsible for economic and workforce development policy. DEED then coordinates with counties to determine participant eligibility and distribute reimbursement to service providers.

Service providers, including community-based organizations and community colleges, have a variety of missions, target populations, and available programs. They provide SNAP E&T participants with education, workforce services, housing assistance, mental health services, among others. Foundations are involved in the process in that philanthropic dollars allocated to service providers can be used for reimbursement matches. The process of distributing reimbursements and verifying participant eligibility requires coordination between DHS, DEED, counties, and service providers.

Policy field analysis is a useful tool to understand SNAP E&T and the variety of programs still in the process of implementation.¹⁸ Recognizing the variety of actors in the policy field is crucial to understanding the current complexities of the program and potential challenges for further program implementation.

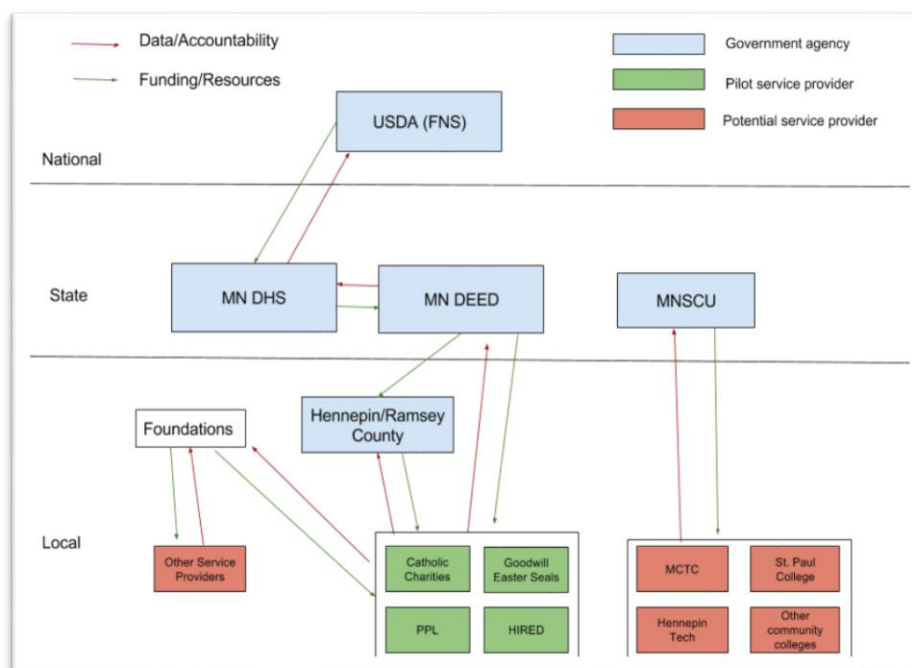
This developing policy field is an example of what happens when new 'boundary points' develop. Boundary points are dynamic areas within policy fields, for example a service providers meeting new challenges, or state agencies expanding their capacity. The key is to leverage expertise within boundaries in order to make new connections and increase adaptability and resiliency across the system.¹⁹

¹⁷ Stone and Sandfort. "Building a Policy Fields Framework to Inform Research on Nonprofit Organizations."

¹⁸ Stone, M. M., and J. R. Sandfort. "Building a Policy Fields Framework to Inform Research on Nonprofit Organizations." *Nonprofit and Voluntary Sector Quarterly* 38.6 (2009): 1054-075.

¹⁹ Quick and Feldman. "Boundaries as junctures: Collaborative boundary work for building efficient resilience." *Journal of Public Administration Research and Theory* 24.3: 673-695, 2014.

Figure 1. SNAP E&T Policy Field Map



Minnesota's SNAP E&T System Overview:

Due to the former ABAWD waiver, Minnesota's SNAP E&T program went underutilized for many years and is now in the process of further development to accommodate the influx of mandated participants. Currently, a limited number of service providers are contracted with DEED to pilot new programs that work with eligible participants and use SNAP E&T funding.

Along with these pilot programs, Hennepin and Ramsey counties have been working to increase capacity to better serve E&T participants. The counties determine participant eligibility for E&T and job counselors work with participants to develop employment plans and ensure they receive orientation.

Within SNAP E&T, a participant can be enrolled in two ways. In the language of the program they are commonly referred to as "Conventional Referrals" and "Reverse Referrals." Although the following sections go into more detail on each process, the primary distinction between the two is where a participant accesses SNAP E&T. In this sense, "conventional" means after applying for SNAP in the normal way, whereas "reverse" means they have first been identified by a service provider and referred into SNAP (Figures 2 and 3).

Conventional Referral Process

Residents seeking food assistance arrive at county service facilities where they apply for SNAP. County financial workers then determine their eligibility and refer them to job counselors. These job counselors are not necessarily located within the same building as the county financial workers and therefore a participant may need transportation to attend orientation and meet with said counselor.

Figure 2 - Conventional Referral Process: Begins at the County Level²⁰



After a participant attends orientation, they meet with their job counselor to discuss the requirements of the program and the different employment strategies that meet their needs. From there, it is up to the participant to comply with their employment plan and correspond with the job counselor. ABAWDs are limited to three months of SNAP benefits until they've demonstrated compliance with the prescribed work requirements. Participants must verify with their job counselor that they are in compliance to have their limited food benefit months "uncounted." This must continue on a monthly basis for the duration of the participant's compliance until their completion of the program and/or upon gaining employment.

Figure 3: Reverse Referral Process: Begins at the Service Provider Level²¹



Reverse Referral Process

The reverse referral process shown in Figure 3 is a second option for a participant to receive E&T services. A participant arrives at the service provider's location and at that point in time, the service provider will perform an intake assessment of the participant's needs. Following this conversation, the service provider will need to confirm that the participant is a SNAP participant or eligible for SNAP. In order to confirm this, the service provider must be in communication with DEED to inquire whether the participant is on SNAP or eligible to be on SNAP and therefore eligible for employment and training. Following confirmation from DEED, the service provider is then able to create an employment plan with the participant or fold them into a program the service provider already conducts and is in compliance with E&T's allowable components. Given that the participant successfully maintains compliance with the program or employment plan, the service provider will then be in communication with the county to inform them of the participant's continued compliance. The county is then responsible for "uncounting" months of benefits so that the participant's food benefits continue to be provided rather than limited to 3 months. This must continue on a monthly basis for the duration of the participant's compliance until their completion of the program and/or upon gaining employment.

Minnesota's SNAP E&T Participants

In 2014, Minnesota's SNAP participation declined for the first time since the start of the Great Recession. In December of 2014, there were approximately 232,828 Minnesota adults eligible for SNAP. Of those, 40% were in families with minor children, 42% were adults with disabilities, and 20% were seniors²². Furthermore, the financial analysis of existing services estimates that of the 32 service providers surveyed, they estimate that 75% of those they serve are either on SNAP or are likely eligible. This represents just over 32,000 individuals, of which about 91% are estimated to reside in Hennepin or Ramsey counties²³.

²⁰ Funding Career Pathways: A Federal Funding Toolkit for State and Local/Regional Career Pathway Partnerships. CLASP. February 2016

²¹ Funding Career Pathways: A Federal Funding Toolkit for State and Local/Regional Career Pathway Partnerships. CLASP. February 2016

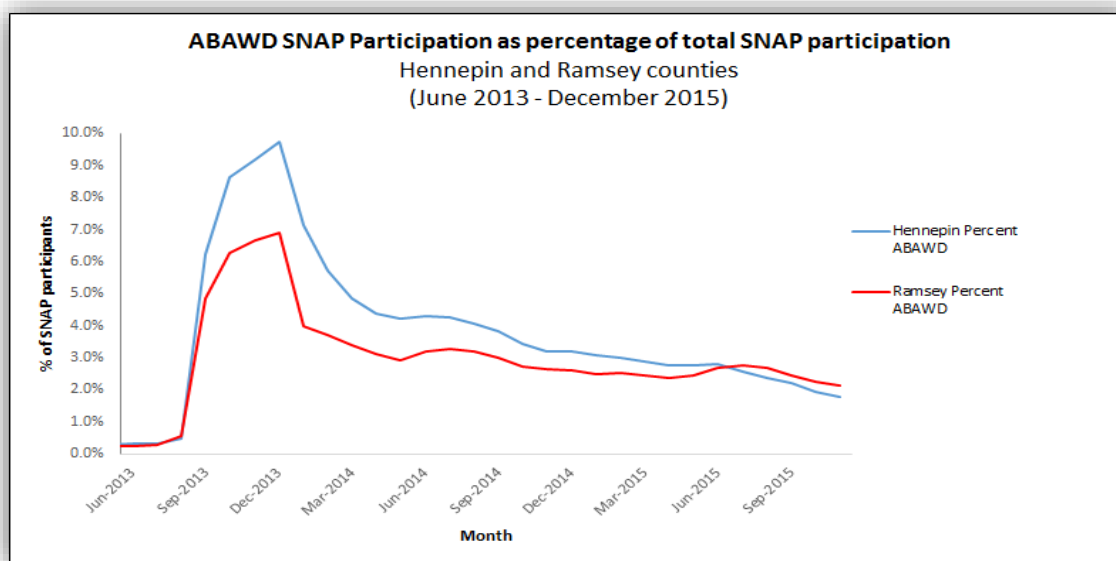
²² Minnesota Department of Human Services. *Characteristics of People and Cases on the Supplemental Nutrition Assistance Program*, December 2014.

²³ Maryns, N. (2016). Expanding SNAP Employment & Training: An Analysis of Funding Potential and Provider Capacity.

Although ABAWDs comprised only 2-3% of SNAP enrollments in 2015, their mandated participation in E&T makes them the largest population of E&T enrollees. In December of 2015, there were 1,584 ABAWDs enrolled in SNAP in Ramsey County and 1,993 in Hennepin County²⁴.

Enrollment data over time (Figure 3) illustrates an initial spike in ABAWD numbers following the elimination of the ABAWD waiver at the end of 2013. A steep decline in ABAWD participation occurs over the next three months as these newly-mandated ABAWDs either fail to complete E&T requirements and are removed from the program (as required after three months of non-participation) or find ways to support themselves without SNAP. In contrast, before ABAWDs began falling off of the program after losing their waivers, ABAWDs accounted for a much larger percentage of the SNAP population, nearly 10% in Hennepin County and 7% in Ramsey County (Figure 4).

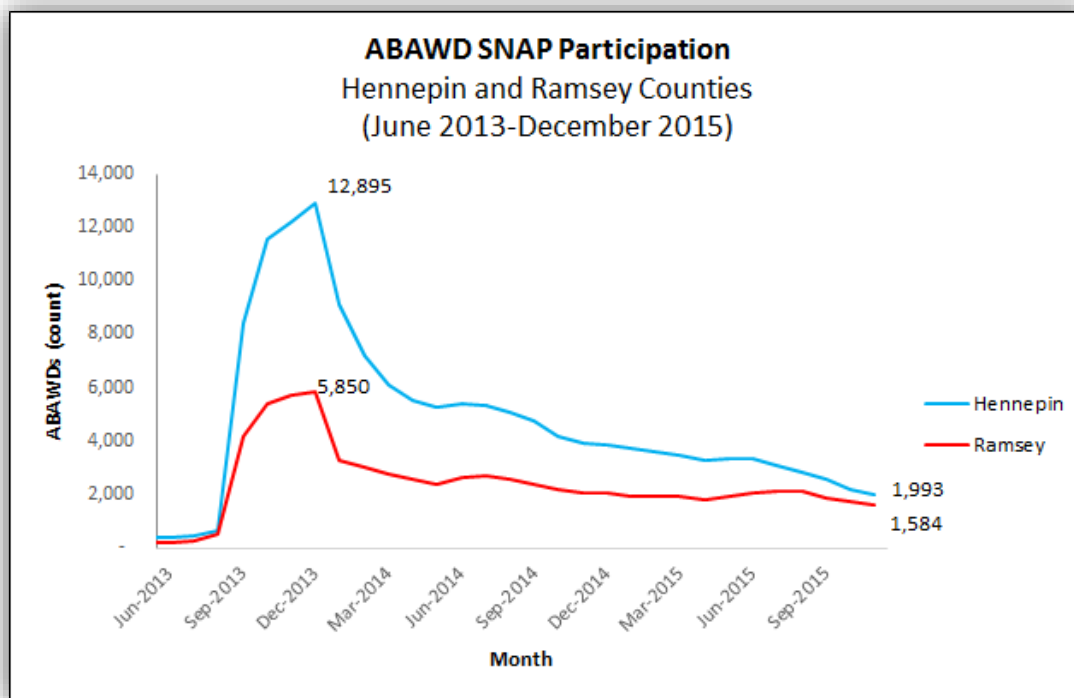
Figure 3. ABAWD SNAP Participation as percentage of total SNAP participation in Hennepin and Ramsey counties (June 2013-December 2015)



Source: Hennepin and Ramsey counties; MAXIS

²⁴ Source: Hennepin County MAXIS data & Ramsey County data

Figure 4. ABAWD SNAP Participation in Hennepin and Ramsey Counties (June 2013-December 2015)



Source: Hennepin and Ramsey counties; MAXIS

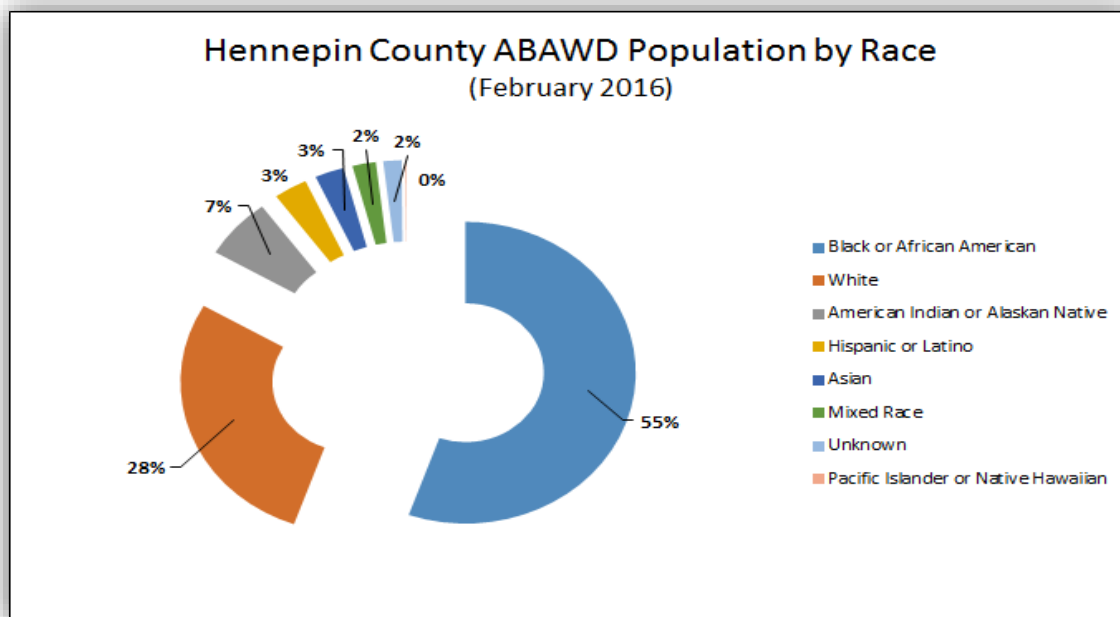
ABAWD Demographics - Race, Education, Age, and Gender

Overall, the ABAWD population in Hennepin County²⁵ does not mirror the broader racial demographic breakdown of Hennepin County. People of color are generally overrepresented in SNAP participation and therefore, the ABAWD SNAP participation. Approximately 55% of ABAWDs identify themselves as Black or African American, 28% as White, and 7% as Native American (Figure 5). By comparison, according to the 2014 Current Population Survey, Whites make up 77.4%, African Americans 13.2% and Native Americans roughly 1.2% of the population of Hennepin County. These racial demographics are consistent from November 2013 to February 2016 - even as the numbers of ABAWDs declined²⁶.

²⁵ Similar racial data not provided for Ramsey County

²⁶ Source: Hennepin County MAXIS data.

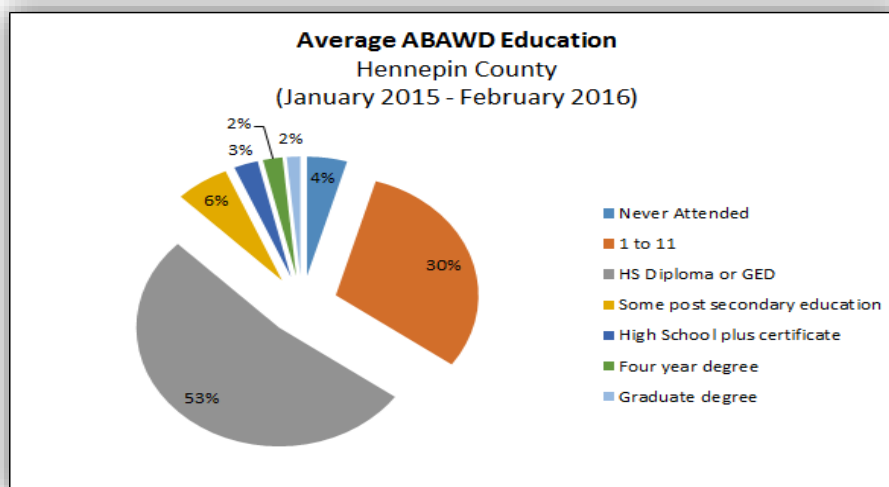
Figure 5. Hennepin County ABAWD Population by Race - February 2016



Source: Hennepin County; MAXIS

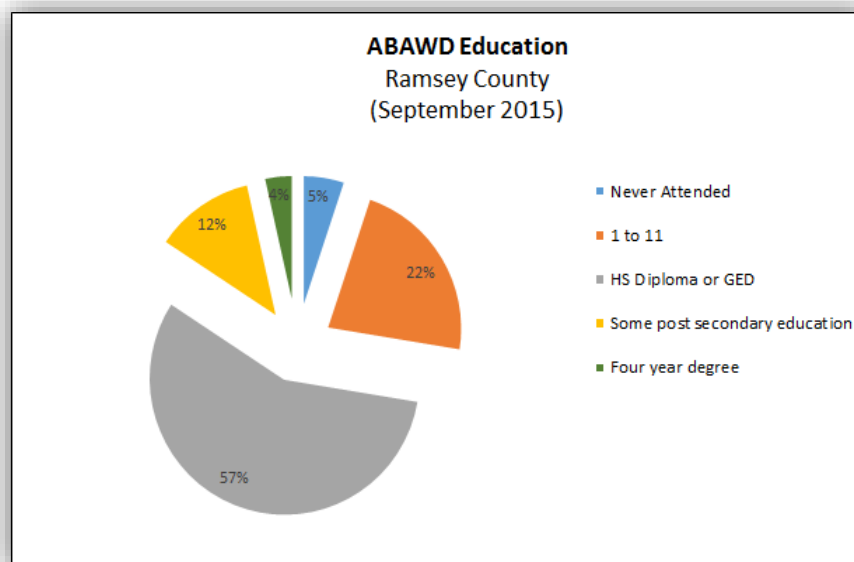
Between January 2015 to February 2016, an average of 53% of ABAWDs in Hennepin County were reported to have had a high school diploma, 30% had between a first and eleventh grade education (i.e. attended college, technical or other), and approximately 4% had no education (Figure 6). The distribution of education attained is consistent from November 2013 to February 2016 as the shrinking ABAWD enrollment does not isolate one education group.

Figure 6. Hennepin County Average ABAWD Education (January 2015-February 2016)



Source: Hennepin County; MAXIS

Figure 7. Ramsey County ABAWD Education

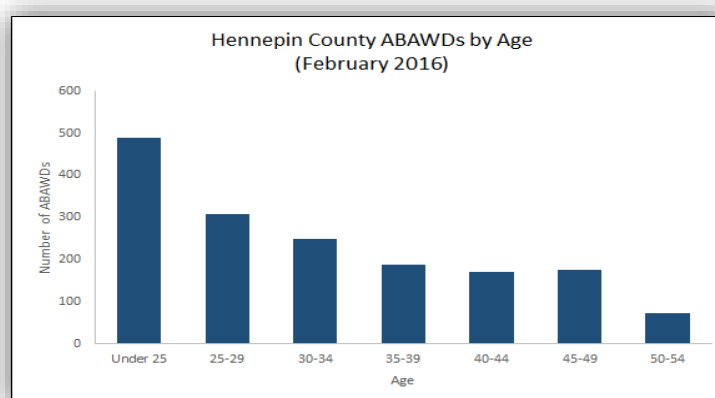


Source: Ramsey County; MAXIS

In September of 2015, approximately 57% Ramsey County ABAWDs had a high school diploma. There was a large distribution of ABAWDs who had under a high school diploma, with 22% reporting first to eleventh grade education (Figure 7). Roughly 12% of ABAWDs had some post-secondary education and 4% had a four year degree.

The distribution of ABAWD age demonstrates shows that younger people are making up a larger portion of recipients. In February of 2015, nearly 500 ABAWD snap recipients were under the age of 25. As age increases, participation in SNAP trends downward as the age category 25-29 has several hundred less participants than the under 25 category. This trend becomes more pronounced with 30-34 year olds with a total count of 250 participants.

Figure 8. Hennepin County ABAWDs by Age²⁷



Source: Hennepin County; MAXIS

²⁷ Similar Ramsey County data not provided.

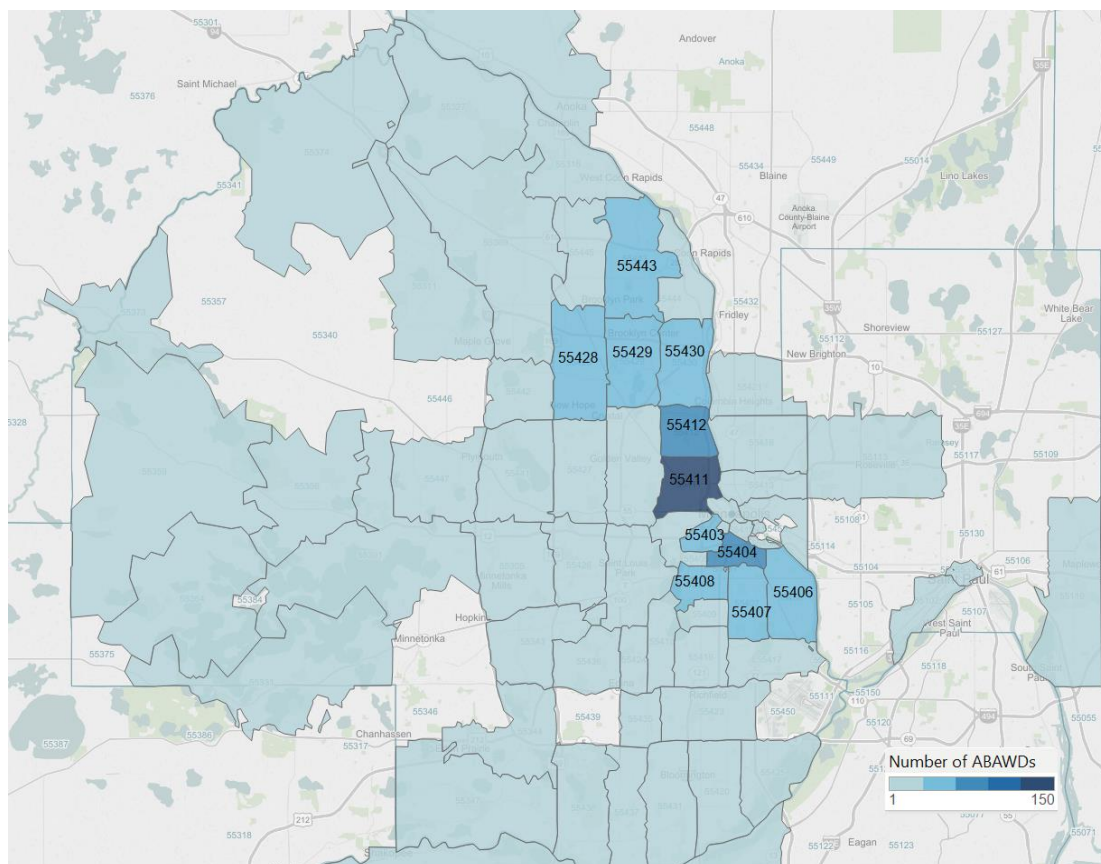
In both Hennepin and Ramsey counties, ABAWDs are primarily male. For February 2016, 63% of ABAWDs in Hennepin County were male and 37% were female. In Ramsey County, 57% were male and 43% were female.²⁸

Location of ABAWDs

In both Hennepin and Ramsey counties, ABAWDs appear to reside mainly in the urban areas of Minneapolis and St. Paul. In Hennepin County, ABAWDs are most heavily concentrated in North Minneapolis and the Phillips neighborhood of South Minneapolis, with smaller pockets of ABAWDs existing in the northern suburbs and neighborhoods south of downtown (Figure 9). This distribution of ABAWDs is consistent with the concentration of poverty in the county²⁹. In the data from Hennepin County, 569 of the 1,665 participant zip code entries were coded as 55440. This zip code is used as a general delivery mailing address if participants are in transition, homeless, or otherwise without a home address. These entries have been omitted as 55440 has no geographic boundaries.

Additionally, data appears to show some zip codes outside of Hennepin County. It is unclear whether this is an input error or an actual representation of participant residence. If the zip code is correct, it is also unclear why the participant is registered in Hennepin County rather than Ramsey.

Figure 9. ABAWD SNAP Enrollment in Hennepin County in February 2016³⁰



Source: Hennepin County; MAXIS

In Ramsey County, ABAWDs are most heavily concentrated in downtown St. Paul, the Midway district, and the Payne-Phalen and Dayton's Bluff neighborhoods (Figure 10). This distribution of ABAWDs, like that in Hennepin, is also consistent

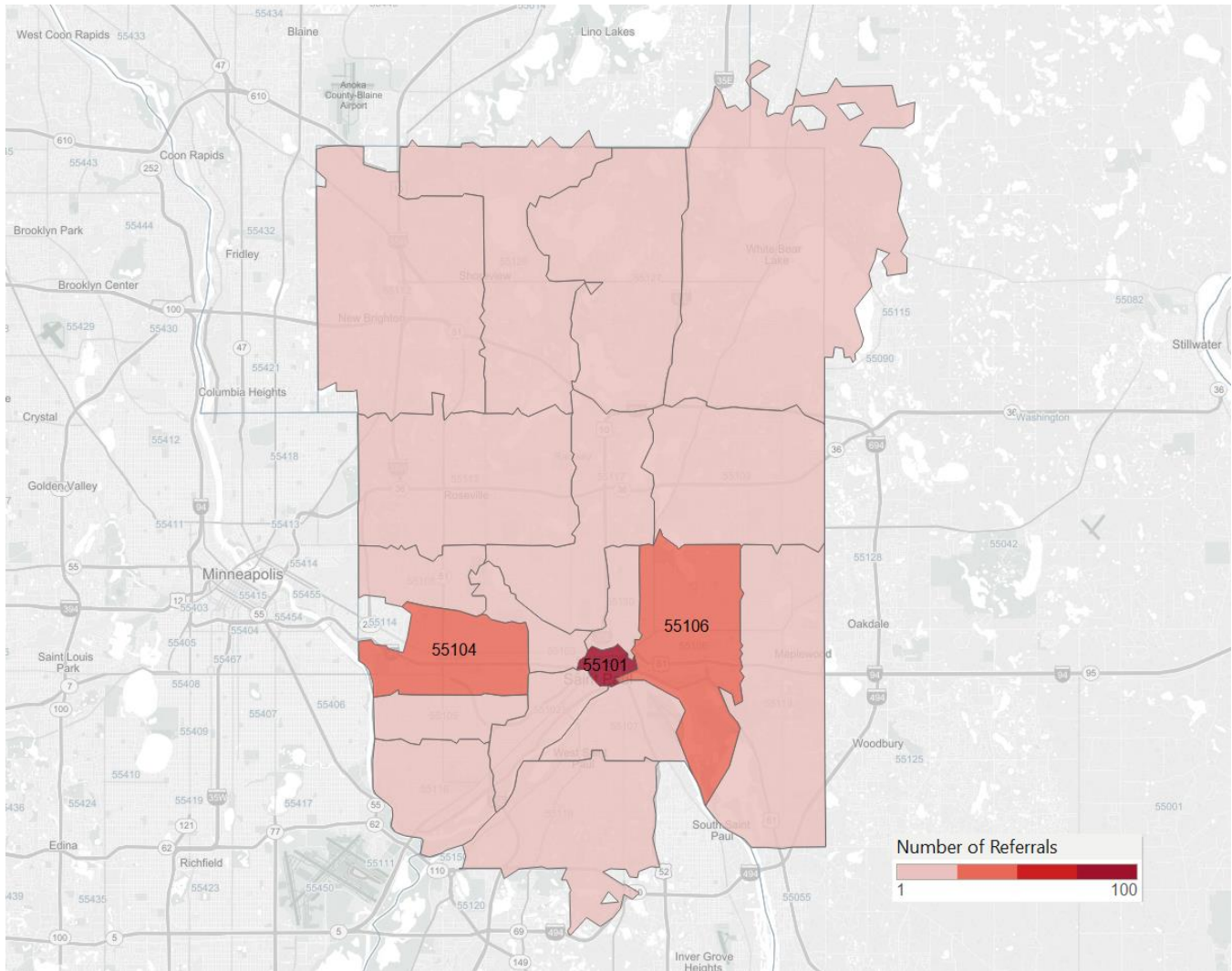
²⁸ Hennepin and Ramsey County data

²⁹ Metropolitan Council. *Choice, Place and Opportunity: An Equity Assessment of the Twin Cities Region: Racially Concentrated Areas of Poverty in the Region.*

³⁰ Note: Map is divided into buckets by number of ABAWDs in the respective zip code. The lightest shade of blue is for zip codes with 0-30 enrolled ABAWDs. The subsequent shades (see legend) have 31-60, 61-90, 91-120 and 121-150 ABAWDs, respectively.

with the concentration of poverty in the county. The large concentration of ABAWDs in 55101 (downtown St. Paul) could be attributed to homelessness, as the zip code is home to numerous shelters and few affordable housing options.

Figure 10. E&T Referrals in Ramsey County - February 2016³¹



Source: Ramsey County; MAXIS

³¹ Note: Given limited available data from Ramsey County, this map highlights the number of people referred to E&T, not the number of ABAWDs enrolled in SNAP as in the Hennepin County map. As only ABAWDs are mandated to participate in E&T, referrals should be a comparable measure to Hennepin County ABAWD enrollment. Map is divided into buckets by number of referrals to E&T in the respective zip code. The lightest shade of red is for zip codes with 0-20 referrals. The subsequent shades (see legend) have 21-40, 41-60, 61-80 and 81-100 referrals, respectively.

Review of Best Practices within Workforce Development and SNAP E&T:

A review of workforce development and SNAP E&T best practices was conducted to provide context for our research on participant barriers and service provision. The literature on employment and training highlights numerous barriers to employment facing different target populations. Academic and practitioner research on participant barriers informs best practices for SNAP E&T service providers. A scan of the literature cites the following barriers³²:

- Homelessness
- Lack of transportation
- Low education and literacy
- Limited English proficiency
- Criminal history
- Soft skills
- Mental health issues
- Childcare
- Lack of work experience
- Substance use issues

Employment and training literature identifies programs and models which address participant barriers and fulfill employment outcomes. This is not a comprehensive review, but is intended to serve as an overview of best practices and models which demonstrate successful employment outcomes for program participants, especially those facing barriers to employment.

Intake and Assessment

Intake and assessment processes are the entry points into training and work readiness for individuals facing barriers. Studies highlight the importance of incorporating a jobseeker's skills, prior experience, career goals, and barriers into assessments to better meet their needs and match them with appropriate services and employment opportunities.³³ Preparing a flexible employment plan acknowledges and addresses barriers while providing measures for progress. Motivational interviewing and empowerment training also help individuals understand how training and employment are positive and achievable goals³⁴.

Soft Skills Training

Soft skills training, often referred to as 'work readiness' training, prepares job seekers with skillsets tailored to professional work environments. Soft skills include communication, critical thinking, professionalism, adaptability and self-management, among others.³⁵ Often industries prioritize certain soft skills, with healthcare seeking customer service and manufacturing emphasizing teamwork. Studies show modelling workplace norms, behaviors and expectations in the service provider environment and training programs helps participants transition into and retain employment.³⁶ Soft skills can also be practiced by simulating real world situations and interactions. Research on soft skills suggests they are just as important as technical skills in predicting adult success in the workplace.³⁷

Support Services

Support services aim to address participants' multi-faceted challenges to employment and training. Support services may also be referred to as wraparound services, retention services and social services. The provision of support services is traditionally separate from employment and training programs and includes a variety of supports for participants with specific barriers and disadvantages to obtaining and retaining employment.³⁸ Support services include transportation, child care assistance, and mental health and substance abuse services. Career advising, job placement support and mentoring are also promising employment and training supports for addressing barriers while achieving rapid attachment to the

³² See Appendix B

³³ Dunlap, Nathan. "Employment Program Components: Considerations for Modifying Programming for People Experiencing Homelessness." *National Initiatives*. National Transitional Jobs Network, Jan. 2012.

³⁴ Dunlap, Nathan. "Service Delivery Principles and Techniques: Helping People Experiencing Homelessness Engage in Services and Succeed in Employment." *National Initiatives*. National Transitional Jobs Network, Jan. 2012.

³⁵ Pritchard, Jennifer. "The Importance of Soft Skills in Entry-level Employment and Postsecondary Success." Seattle Jobs Initiative. January 2013.

³⁶ Dunlap, Nathan. "Service Delivery Principles and Techniques: Helping People Experiencing Homelessness Engage in Services and Succeed in Employment." *National Initiatives*. National Transitional Jobs Network, Jan. 2012.

³⁷ Pritchard, Jennifer. "The Importance of Soft Skills in Entry-level Employment and Postsecondary Success." Seattle Jobs Initiative. January 2013.

³⁸ Jhin Ong, Sook and Sandfort, Jodi. Workforce Development in Minnesota. MSPWin Phase I Report. Sep. 2014.

workforce.³⁹ The delivery methods for these services can vary, including integration into training programs and referrals to other agencies. The overlap of support services with employment and training programs contributes to successful employment outcomes.⁴⁰

Career Pathways

Career Pathways is a nationally recognized program model which serves underemployed and unemployed individuals, with an emphasis on providing resources for populations and communities with barriers to employment. Career Pathways combines career-specific education, training, and support services to prepare individuals for employment. Educational institutions, community-based organizations and employers partner to offer condensed training, retention supports, and work experience to encourage rapid attachment to employment and career advancement opportunities. As illustrated by Figure 11, Career Pathways offer multiple entry points into education and training, while aligning individual interests with programs that meet industry demand.⁴¹

Figure 11. Three Core Features of a Career Pathway⁴²



Bridges to Postsecondary Education

A post-secondary education, which can include a degree, certificate, or industry recognized credential, is the most important determinant of lifetime earnings and income.⁴³ However, many individuals require additional instruction and preparation to be successful in postsecondary courses. Adult basic education (ABE) bridge programs provide individuals with basic academic and English language skills to move individuals into credit-bearing coursework and/or technical training.

³⁹ Dunlap, Nathan. "Employment Program Models for People Experiencing Homelessness: Different Approaches to Program Structure." *National Initiatives*. National Transitional Jobs Network, Jan. 2012.

⁴⁰ Jhin Ong, Sook and Sandfort, Jodi. Workforce Development in Minnesota. MSPWin Phase I Report. Sep. 2014.

⁴¹ Funding Career Pathways: A Federal Funding Toolkit for State and Local/Regional Career Pathway Partnerships. CLASP. February 2016.

⁴² Funding Career Pathways: A Federal Funding Toolkit for State and Local/Regional Career Pathway Partnerships. CLASP. February 2016.

⁴³ 'What Works in Job Training: A Synthesis of the Evidence'. Published July 22, 2014. URL:

<http://www.dol.gov/asp/evaluation/jdt/jdt.pdf>

Contextualized education allows individuals to integrate their ABE requirements into their training plan, aligning ABE with their career interests and goals.⁴⁴

These models and methods have been successfully adopted and improved by many service providers in the employment and training field. However, because the SNAP E&T program is relatively new and is undergoing significant change, research on specific SNAP E&T best practices is limited. Many of the best practices discussed in this review come from general workforce development strategies. Additional research is needed to understand which programs and practices best promote employment outcomes specifically for the SNAP E&T population and service system.

Gaps, Analysis, & Recommendations:

Theme 1: Participant Barriers

The following section addresses some of the most prevalent barriers (those mentioned most by service providers and the literature review) participants face to gainful employment. The barriers discussed here are by no means exhaustive and are based on the service provider responses and quantitative data, not direct participant engagement, which was beyond the scope of this project. This report recognizes that all barriers, addressed here or not, are significant and can be prohibitive to participant success.

Gap 1: Participant Barriers to the E&T Service System & Employment

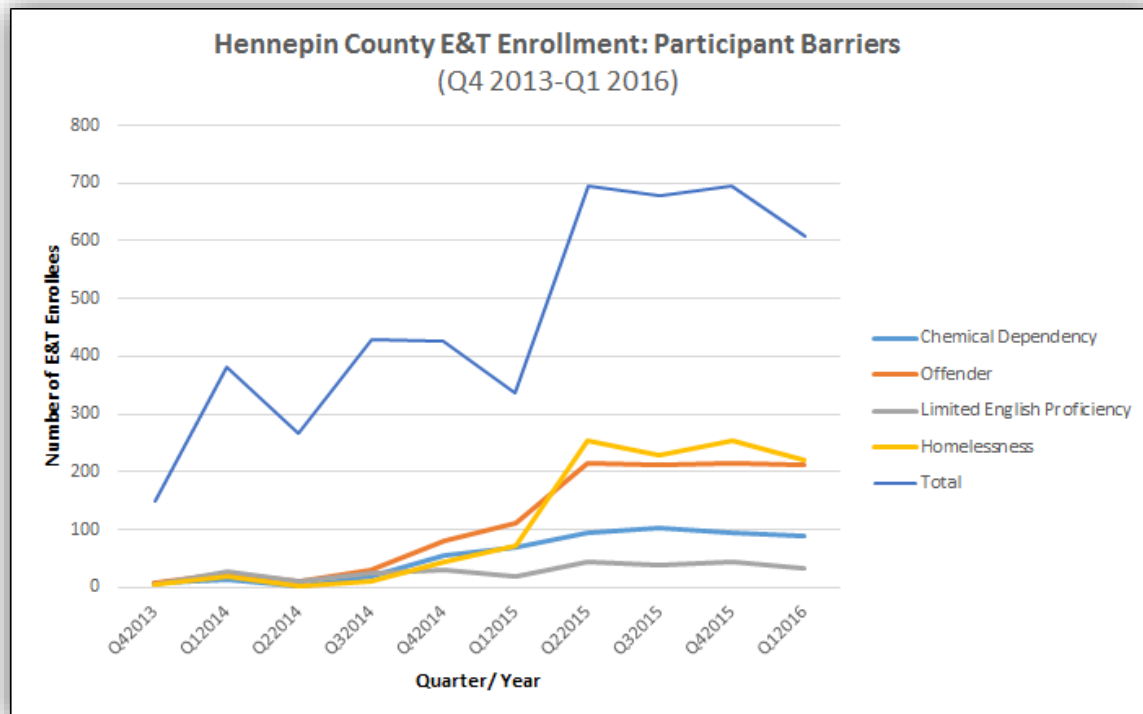
SNAP E&T participants face a variety of barriers preventing them from successfully enrolling in and/or completing the program. Many of these barriers are compounded as they are endemic to poverty. The most frequently referenced barriers were homelessness, transportation, offender status, low education, limited English proficiency, and chemical dependency. These barriers serve as reminders of the hardships that ABAWDs confront, in that their immediate needs (food, shelter, health, etc.) take precedence over employment and training. As one interviewee stated, “Their needs are just so immediate. They’d rather go get that minimum wage job than go through training because they just need that money right now”. This kind of immediacy must be acknowledged and considered as employment and training continues to be developed. These barriers, ubiquitous in the lives of the poorest Minnesotans, must be continually analyzed and evaluated to inform the decisions of policymakers as they seek to improve the lives of those they serve.

Although some of the participant barriers described by service providers in the qualitative research could be substantiated with quantitative data, it cannot tell a complete story. Given the limitations of the data provided, it is difficult to fully understand the context of some information. For example, in a dataset containing information about enrollments, we found that fewer offenders were enrolled in E&T. Without complete data on the overall offender population, it is not possible to know why this is. Another constraining factor was the lack of participant data available for analysis from Ramsey County, as it has only operated SNAP E&T since January 2016, meaning little participant data was available for analysis.

It is important to note that the barriers discussed below are not mutually exclusive. Participants may, and often do face many barriers to employment. According to multiple service providers, the E&T population is shifting as the economy continues to recover. During and immediately after the recession, many people turned to SNAP (and E&T) to support themselves. These included people who had not been on any sort of public assistance in the past. As the economy recovered, those with fewer barriers to employment found jobs faster, leaving those with multiple, complex barriers still unemployed (Figure 12). Service providers have noted that this results in more difficult cases, as many participants need more intensive intervention than, for example, job clubs or resume supports provide.

⁴⁴ Schnur, Caitlin, Chris Warland, and Melissa Young. "Fostering Success for People Facing Barriers to Employment through SNAP Employment and Training: Promising Employment Program Models, Practices, and Principles for SNAP E&T Participants Facing Barriers to Employment." *IssueLab*. Heartland Alliance National Initiatives on Poverty & Economic Opportunity, 25 Aug. 2015.

Figure 12. Hennepin County SNAP E&T Participant Barriers

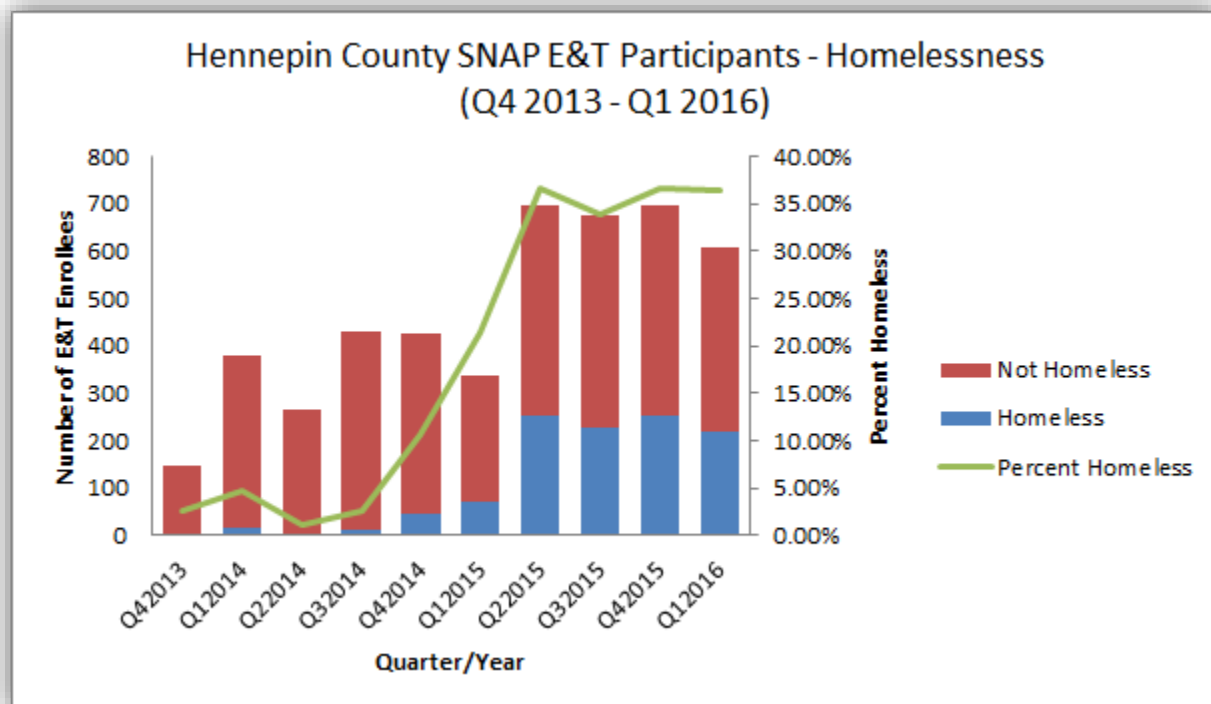


Source: DEED; WorkForce One

Homelessness:

Homelessness is one of the largest quantifiable barriers faced by SNAP participants. Homelessness is also, according to some service providers, one of the most difficult problems to successfully address on a large scale. In Q1 2016, one third of E&T enrollees were homeless (37% in Hennepin County, 32% in Ramsey County). In addition to the physical and emotional stress homelessness places on a person, it often corresponds to many other barriers including a lack of a family support system, low education attainment, poor access to transportation, mental and physical illness, and more. Additionally, tracking highly mobile or transitionally housed participants presents a challenge for service providers and county administrators because it is difficult to encourage participants to stay with a program if they cannot be found by address or phone number.

Figure 13. Hennepin County SNAP E&T Participants - Homelessness (Q4 2013- Q1 2016)



Source: DEED; WorkForce One

Transportation

One of the largest and most prohibitive barriers to employment is transportation. Nearly all service providers interviewed mentioned that poor access to transportation is a major problem for SNAP E&T participants. Some service providers have bus passes available for participants but most of these passes are single use and therefore not helpful for getting to multiple trainings. Service providers expressed frustration at the lack of funding available for this particular problem, as it is so crucial to the success of participants in E&T programming.

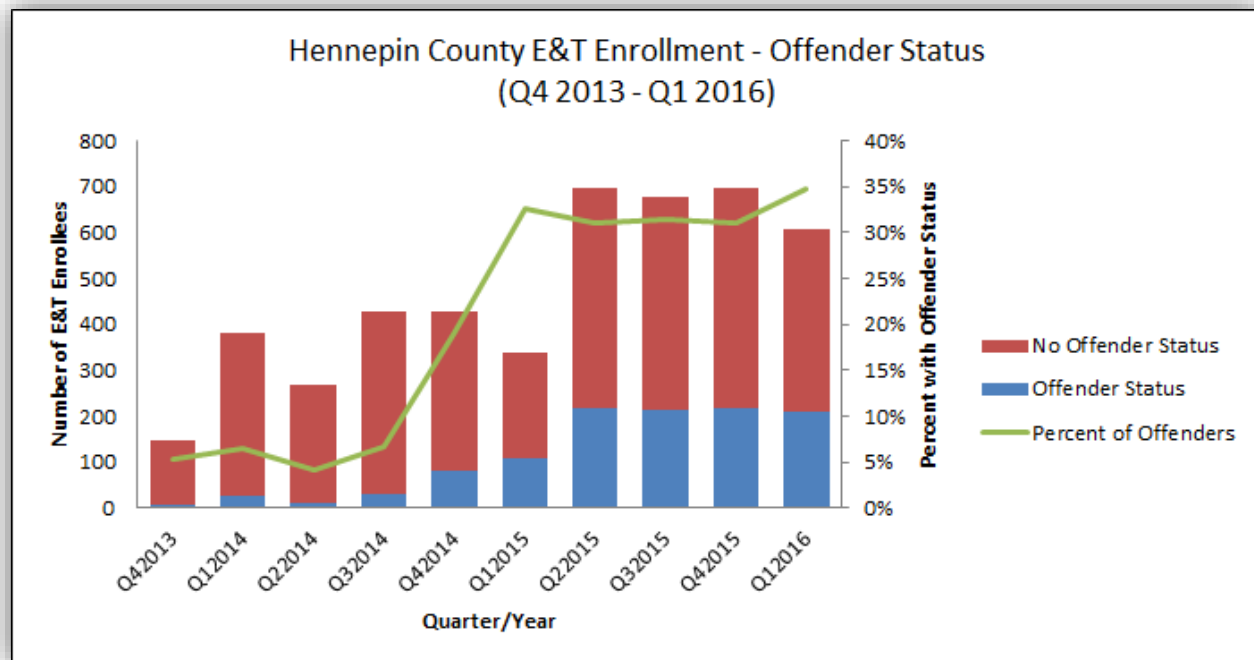
Ex-Offender Status:

Another significant barrier to finding employment is a criminal record. The share of SNAP E&T enrollees with criminal backgrounds has increased since Q4 2013 and, as of Q1 2016, ex-offenders make up roughly 35% of enrollment in Hennepin County (Figure 14)⁴⁵. According to the research, many employers are reticent to hire ex-offenders - which may be a contributing factor to the increase of ex-offenders in the program.

Not only do ex-offenders have limitations in employment, some are inadvertently recruited into E&T programs for careers that restricts those with criminal backgrounds from entering, rendering their training essentially useless. For example, a participant with a criminal background wanting to pursue a career in medicine would be unable to be hired in that field due to state laws preventing ex-offenders from working with patients. The research demonstrates that service providers do not necessarily have sufficient information to dissuade clients from certain career paths. This indicates a problem for both service providers and participants.

⁴⁵ Source: DEED, WorkForce One

Figure 14. Hennepin County E&T Enrollment - Offender Status (Q4 2013 - Q1 2016)



Source: DEED; WorkForce One

Education Barriers

Education levels vary between ABAWDs enrolled in SNAP and those enrolled in SNAP E&T, with the more educated participants comprising a larger percentage of those actually enrolled in E&T. In September 2015 (where available data was comparable between Hennepin and Ramsey), more than 50% of the SNAP ABAWD population had a high school diploma, and a large portion had an 11th grade education or less.

In both Hennepin and Ramsey counties, a sizeable population of ABAWDs have less than an 11th grade education (Table 1). In addition to issues with employability, this group is not opting into the E&T service system. This might be the result of an inability to navigate the SNAP E&T system or that they might not have the ability to read and interpret government forms in the application and orientation processes. In interviews, service providers identified filling out and understanding the information as a problem for participants.

In 2015 in Hennepin County, an average of approximately 35% of the SNAP ABAWD population had less than a high school diploma (Figure 15). Of those who enrolled in E&T, only 19% had less than a high school diploma - a 16 percentage point difference, suggesting people with less education are struggling to enroll and complete E&T.

The same trend appears in Hennepin County as participants with 'some post-secondary/high school certificate attainment' take up a larger share in enrollments (32.4% for E&T enrollees and 10.4% for SNAP ABAWDs). E&T enrollees also have a significantly higher percentage of four year degrees (7% to the ABAWD population's 2.5%). These differences may indicate that participants with high school diplomas and 'some post-secondary', experience fewer barriers to accessing E&T.

Note: Since Ramsey County started E&T in Q1 2016, the education distribution (from ABAWD to enrollment into the E&T) data was not available.

The education attainment of ABAWDs, between Ramsey and Hennepin counties, was similar as each year of education was reflective of the other county. Education distribution was derived from September 2015 which was the only comparable monthly data available. Over half of ABAWDs had a high school diploma which is a few percentage points higher in Ramsey (Table 1). The largest difference in ABAWD education are those who have 'some post-secondary education'. In Hennepin

County, 6.0% of ABAWDs have some post-secondary education while in Ramsey County only .8% do. Overall, the education level of ABAWDs between Ramsey and Hennepin counties are similar.

Figure 15: Hennepin County Education Attainment of ABAWDs & E&T Participants (2015)

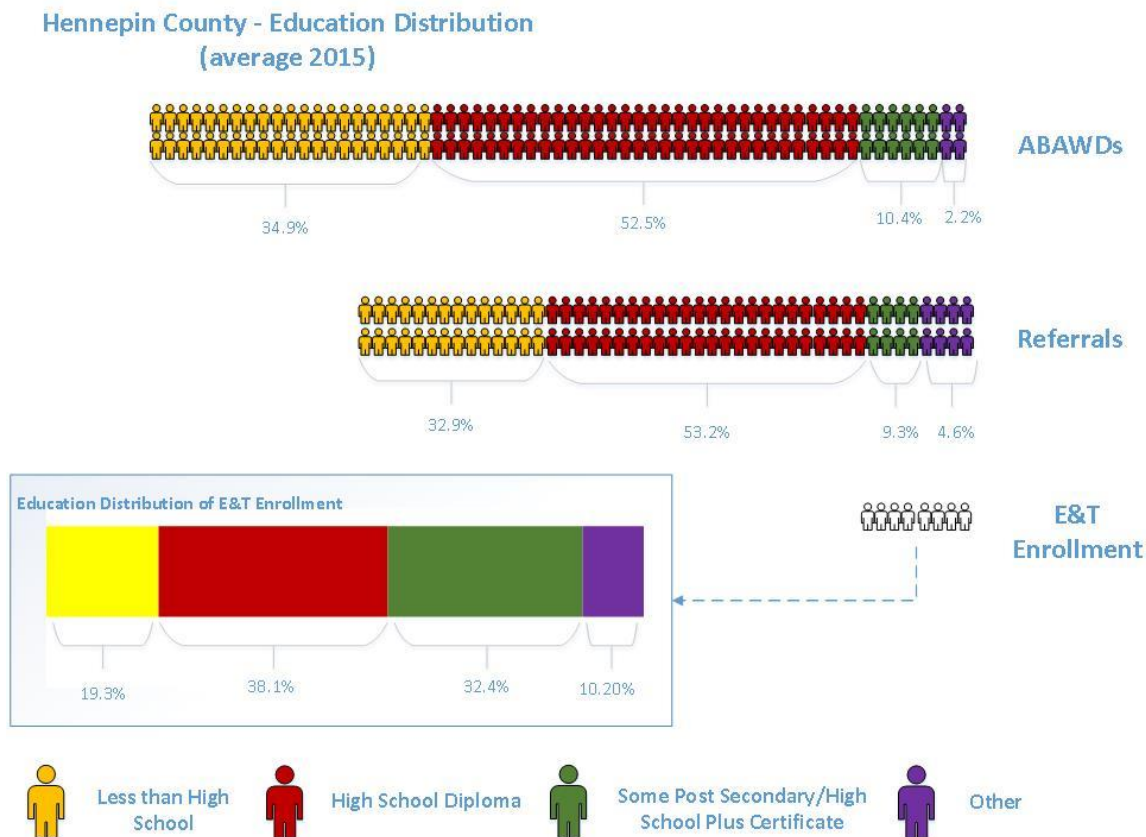


Table 1. Hennepin and Ramsey counties - ABAWDs' Education Level Distribution (September 2015)

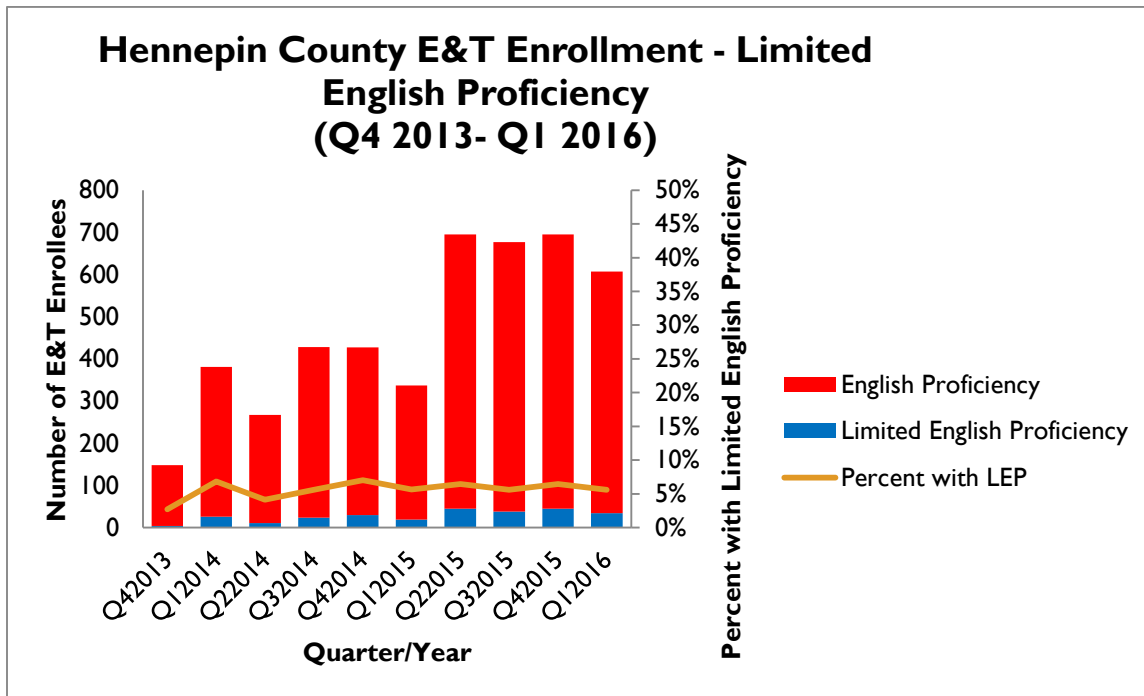
Education Level	Hennepin	Ramsey
Unk	0.1%	0.0%
Never Attended	4.1%	5.1%
1st Grade	0.1%	0.4%
2nd Grade	0.1%	0.0%
3rd Grade	0.3%	0.4%
4th grade	0.5%	0.3%
5th grade	0.6%	0.4%
6th Grade	0.6%	0.7%
7th Grade	0.7%	0.6%
8th Grade	1.8%	0.8%
9th Grade	2.3%	2.4%
10th Grade	6.3%	5.2%
11th Grade	15.9%	11.4%
HS Diploma or GED	54.1%	56.7%
Some post secondary education	6.0%	0.8%
High School plus certificate	2.3%	2.3%
Four year degree	2.4%	2.3%
Graduate degree	1.8%	3.5%

Source: Hennepin & Ramsey counties; MAXIS

Limited English Proficiency

While the quantitative data does not show limited English proficiency as a large problem in E&T, the qualitative research, particularly responses from the SOI, indicates that language barriers are indeed significant for participants. Accordingly, Figure 16 may reflect the fact that participants with limited English proficiency are not making it into SNAP, let alone E&T, due to selection bias. Those with limited English proficiency may not know about SNAP or feel confident in applying.

Figure 16. Hennepin County E&T Participants - Limited English Proficiency



Source: DEED; WorkForce One

Chemical Dependency

Chemical dependency issues were identified in qualitative interviews and the review of best practices but were not able to be substantiated in the quantitative data. In E&T enrollment, where the most data about client issues is collected, clients with chemical dependency make up a small fraction of those enrolled in the program - and there is no discernable trend upwards. It could be that people with these barriers are not disclosing chemical dependency, are finding supports in other programs, or are simply not seeking food support.

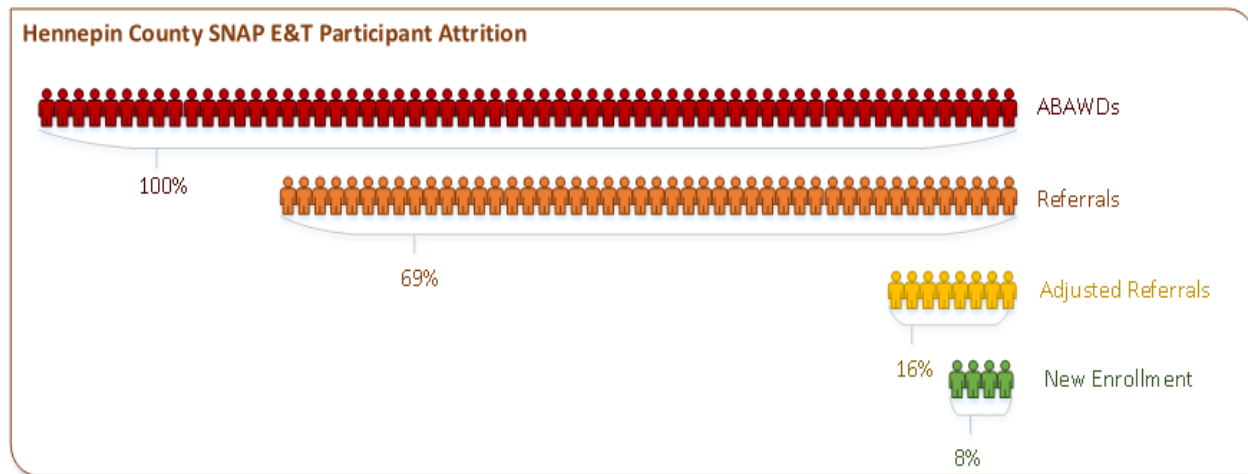
Participant Attrition

As participants enter the SNAP E&T program, attrition occurs between the initial ABAWD SNAP population and those successfully enrolled in E&T services. To make it to the point of enrollment, a participant must go through several steps: eligibility determination, referral to E&T, orientation, and enrollment in an E&T activity. At each of these phases, the number of participants progressing to the next step decreases dramatically.

Once ABAWDs are determined to be eligible, they are referred to E&T - which is where the first major drop in participation occurs. When participants are referred, the service system determines where they should be placed next, in either: served, declined, inactivated, pending, or researching. Declined participants are those that have been accidentally placed into the E&T system but should be exempted for a number of reasons. Inactivated indicates the referral was not processed due to participant failure to attend meetings and the participant lost the 90 day referral timeframe to be accepted. In Q1 2015, 1,745 participants in Hennepin County were marked inactivated. Since the beginning of Q1 2015, confusion over who should or should not be placed into the E&T system has been a rising problem. Qualitative interviews with service providers outlined a trend of confusion in the system where more and more participants are listed as ABAWDs.

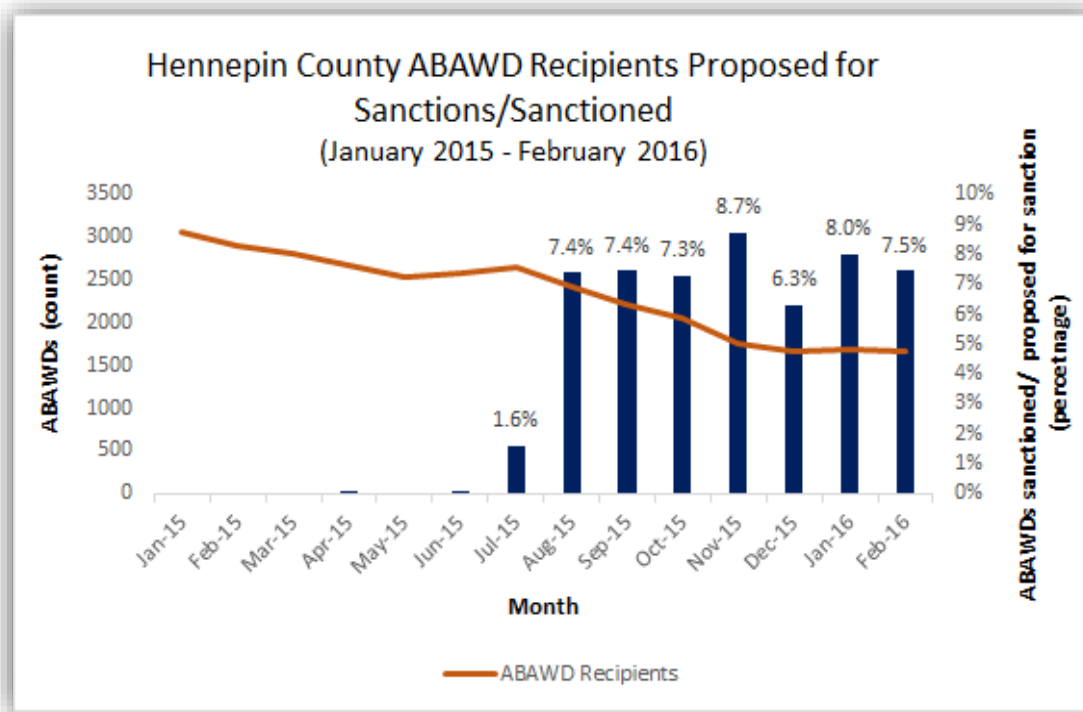
Figure 17 shows the participation rate at each level of the E&T process as percentages of total ABAWDs on SNAP. In Q1 2015 in Hennepin County, approximately 69% of ABAWDs were initially referred to E&T. After adjusting for the number of ABAWDs declined (those who should have been exempted from E&T and were wrongfully referred), 16% of ABAWDs were referred. Of these, only half (8% of total ABAWDs on SNAP) enrolled in E&T. These numbers are not consistent quarter to quarter but all indicate significant fall-off, either due to administrative errors (as evidenced in the high number of declined referrals) or participant failure to enroll after referral. While a high number of declined referral does not necessarily imply problems for the participant, it does indicate a high degree of administrative confusion and inefficiency.

Figure 17. Hennepin County SNAP E&T Participant Attrition (Q4 2015)



Since the beginning of 2015, there has been a drastic reduction in the ABAWD population in Hennepin County. It is not easily identifiable in the data whether participants are feeling the effect of a better labor market and leaving the program voluntarily or leaving due to exhaustion of food benefits. Sanctions increased in the middle of July 2015 and have been steadily on the rise - decreasing the number of ABAWDs receiving benefits (Figure 18). Many of the qualitative interviews indicated that participants often do not return to the program after their first sanction. In Table 2, from January 2015 to February 2016, only 1% of ABAWDs were sanctioned twice, indicating that participants either return to the program and successfully complete E&T or, as appears much more likely based on qualitative research, do not return to SNAP at all. Service providers noted that E&T requirements and lengthy administrative processes are prohibitive to participants both applying and returning to the system after a sanction.

Figure 18. Hennepin County ABAWD Sanctions⁴⁶



Source: Hennepin County; Maxis

Table 2. Hennepin County ABAWD Sanction (January 2015 - February 2016)

Total Sanctions (Jan 2015-Feb 2016)	1011	100%
One Sanction	1003	99%
Two Sanctions	8	1%

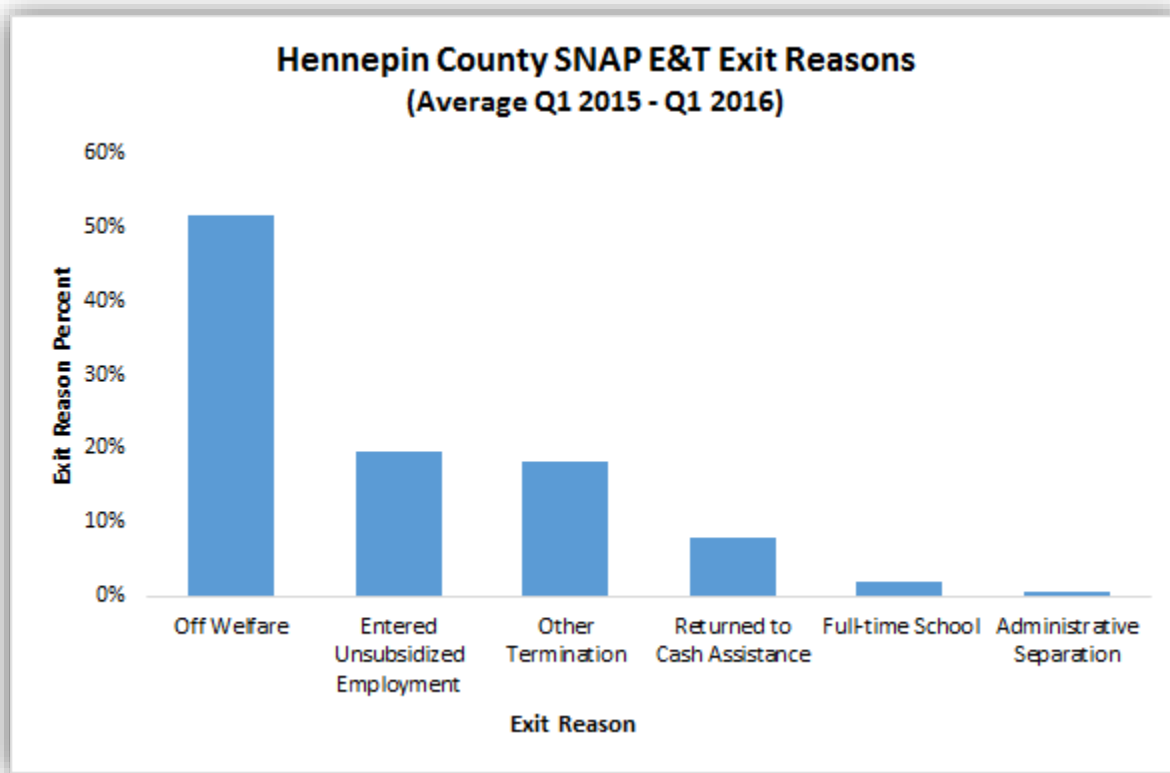
Source: Hennepin County; MAXIS

Exit Reasons:

Reasons for exiting the program are often complicated, in part due to the nature of at-risk transient populations. Data collection is challenging because it is difficult to get responses from individuals who have left the program without providing a reason, updated telephone number, or address. According to WFI data, the top reasons individuals exit the program are: administrative separation, entered unsubsidized employment, full time school, off welfare and other termination, refused to continue, and returned to cash assistance. As an average of exits from E&T, approximately 50% went 'Off Welfare'. It's not clear whether this is a program (or participant) success or another form of administrative separation. Of those who exited the program, roughly 20% leave for unsubsidized employment and 3% leave for full-time school (Figure 19).

⁴⁶ Note: Ramsey County sanction data was not available.

Figure 19. Hennepin County SNAP E&T Enrollee Exit Reasons (Q1 2016)



The issue of participants exiting for unclear reasons is especially pronounced in Q4 2015 where nearly 400 people in Hennepin County were separated due to 'Off Welfare' (Figure 19).

Recommendation 1: Incorporate Barriers into Future Program Implementation

Given the consistency among interviews, quantitative data, and the best practices review that these barriers are the main items for participants to address, it is recommended that these barriers be prioritized, analyzed further, and funded directly and as thoroughly as possible, as future program implementation works to incorporate them.

Aligning support services with service provider employment and training programs is necessary for participants to access comprehensive services while securing and retaining employment, which is imperative for the ABAWD population. Coordination and collaboration between service providers creates an opportunity to strengthen connections with existing support services. Additionally, establishing these connections reduces the potential for duplicating or re-creating services already available. Service providers can also connect their SNAP E&T participants with social services provided by government agencies. For example, in Washington's SNAP E&T system, social services such as child-care, are integrated into the service provider system.⁴⁷ Concerns about the costs for these programs are reasonable, but as Washington demonstrated, these can be addressed by capping costs.⁴⁸

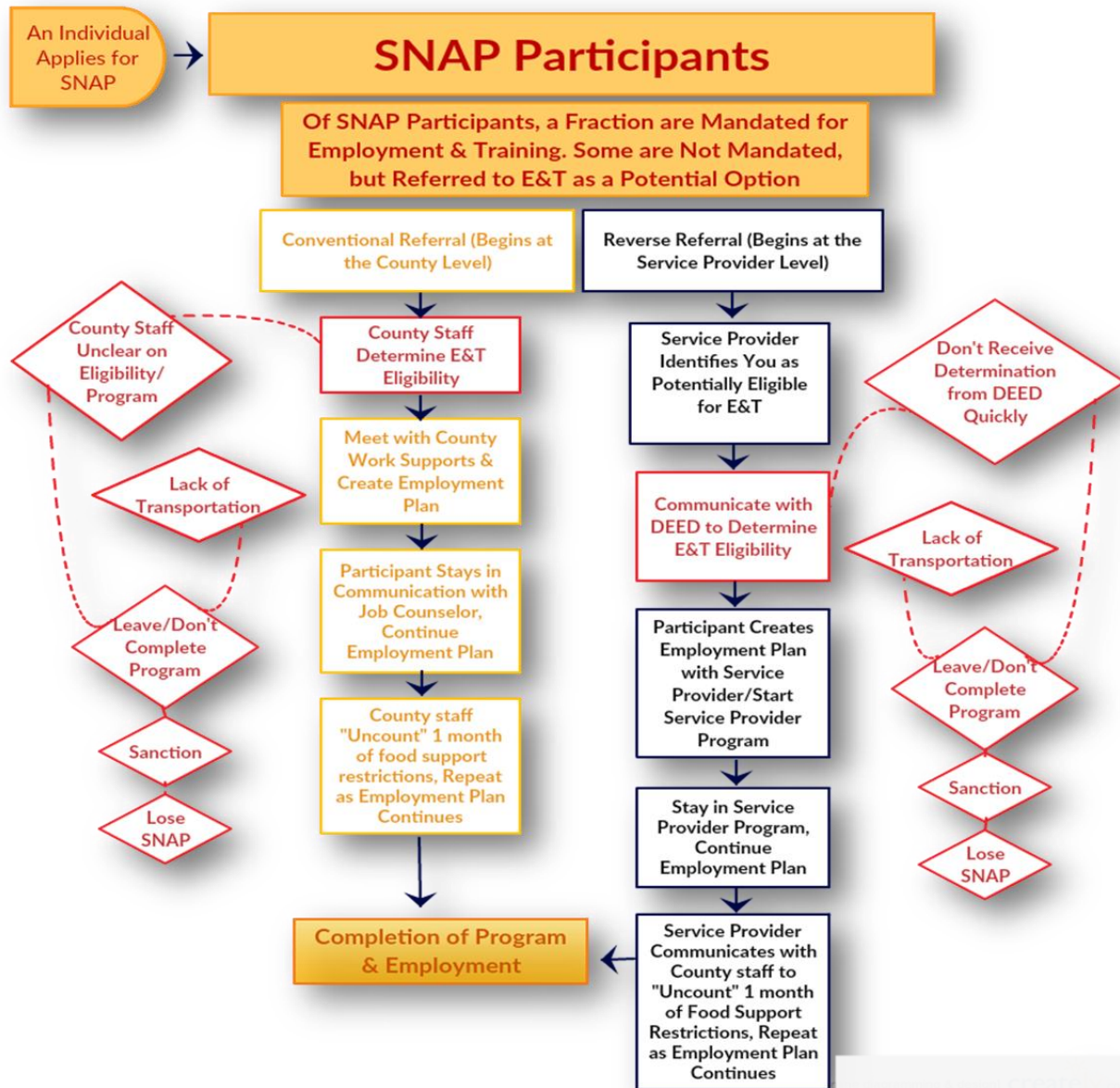
⁴⁷ Gragg, Rachel, and Kaz, David. Replicating Success: Recommendations and Best Practices from Washington State's SNAP E&T Program (BFET). June 2014.

⁴⁸ Ibid

Theme 2: Complex Program Flow

The SNAP E&T participant population is particularly vulnerable as they move from crisis to crisis. Every additional step in the process of enrollment creates the potential for participants to fall off the program and miss out on crucial benefits and E&T opportunities. Disruptions within the process and between service providers and the counties have a large effect on participants moving on to the next stage in the E&T service system, meaning every step added has a considerable impact on the success of the participant and the E&T system as a whole.

Figure 20. Program Flow



Gap 2: Fragmented Referral Process

The fragmented SNAP E&T referral process is a major constraint, as a systematic process has not been established.

SNAP E&T service providers recognize the importance of an intake and referral process that guides participants to the services they need. This referral process can take place through 1) a conventional referral process, or 2) a reverse referral process, both of which are part of the SNAP E&T program design. In the conventional referral process (Figure 20), the process begins when a participant applies for SNAP benefits and through the interview screening is referred into E&T. For example, a person would apply for SNAP benefits (in person, online, or over the phone) and interview with a county financial worker, who would then make a referral to an approved E&T provider.

However, over the course of the research, two systemic challenges in the current process emerged. First, because county financial workers do not know which employment service providers are approved E&T providers, they currently only refer participants to county job counselors for SNAP E&T orientation and the creation of employment plans. However, county financial workers could also refer a participant to a service provider other than county job counselors if a) county financial workers knew which service providers were DEED verified E&T providers, and b) the service providers were able to provide orientation and standardized employment plans.⁴⁹

After referral to E&T, participants are required to attend orientation. This orientation is usually at a separate time and place from the point of application, presenting yet another point of disruption for the participant. According to the qualitative interviews, participants are not guided from application to orientation. Rather, they are informed by mail that they have been referred to E&T and are required to attend orientation. This is especially problematic for homeless participants, as many do not have reliable addresses. If they do receive mail, it is usually sent via general delivery to the city's primary post office where participants must go to pick it up.

In contrast to the conventional referral process and the challenges outlined above, the reverse referral process begins at the local level. The primary distinction between the reverse referral process and the conventional referral process is the point of entry into E&T for the participant. In the reverse referral process, an E&T provider identifies a potentially eligible SNAP participant and refers them into SNAP. This entails compiling a list of potentially eligible SNAP participants, submitting them to DEED, and waiting to hear back on whether or not a participant is eligible for SNAP or is already enrolled. The turnaround time for this process can vary from a couple of days, to weeks. This manual verification process is problematic because it disrupts the intake process, where, as one E&T provider said, "it's crucial to capture participant interest at the moment of motivation."

The reverse referral process (and the process for eligibility verification that facilitates it) is a critical piece of SNAP E&T expansion. A reverse referrals system is essential because it has the potential to dramatically increase the number of access points for participants. Rather than a system in which every E&T participant is funneled through one organization (conventional referrals), a robust reverse referral system would allow participants to access the system through an array of E&T providers. Furthermore, this array of service providers has the potential to a) mitigate the transportation barrier previously identified, and b) increase access to specific populations by leveraging the knowledge of local service providers.

Lastly, the importance of a strong system of reverse referrals is further evidenced by Washington State, where 80% of E&T participants were enrolled through reverse referrals.⁵⁰

Recommendation 2: Create a Robust Reverse Referral System

In order to minimize participant disruptions in the program, eligibility verification should be streamlined.

Recognizing that enrollment in E&T depends upon agency coordination across the policy field, streamlining it will require a collaborative approach that draws on the administrative expertise of state and local policy makers, as well as the input from current E&T providers with first-hand experience and in depth knowledge of SNAP E&T. Any collaborative group of decision makers should consider three approaches, with the goal of a real time eligibility verification system that creates a seamless process for participants to enroll in SNAP E&T and receive the services they need.

First, give approved E&T providers increased access to MAXIS and allow them to administer E&T orientation. This would allow service providers to verify participant eligibility at the point of contact and eliminate a key disruption in the enrollment process. Furthermore, pairing quicker eligibility determination with onsite orientation would significantly reduce

⁴⁹ Plans to release an orientation video are underway at the time of writing.

⁵⁰ O'Callaghan, Susan, and Laura Rowley. Provider & Participant Recruitment. Proc. of SNAP to Skills, Berkeley.

the need to inform participants through the mail that they must enroll in E&T, an important consideration for a population with pervasive homelessness.

Second, increase capacity at the state level (DHS or DEED) to verify eligibility. This would primarily require an increase in the state's ability to administer SNAP E&T, but could also include communication with state personnel in order to ask technical questions and as a means of verifying participant eligibility. A call center in DHS (which would make it authoritative and provide leadership) would be a significant step in coordinating SNAP E&T across the policy field.

Lastly, invest resources in the counties to build a strong referral process. Because counties are uniquely positioned to serve as the link between the community (participants and the community based organization which serve them) and the state, resources should be devoted to ensuring counties can expand SNAP E&T by a) recruiting, engaging, and onboarding future service providers, and b) coordinating with those service providers to ensure participants are enrolled, maintain benefits, and receive high quality E&T services.

Gap 3: Reimbursement Lag Time to Service Providers

SNAP E&T is designed to help service providers maximize their capacity through the 50 percent reimbursement funding option. However, the lag time between invoicing and receipt of payment has been considerable (as long as six months) and is a considerable barrier to entry into the E&T system for many service providers. To provide E&T services, a service provider must have considerable upfront cash flow to fund services while they wait for federal reimbursement to come through. This is not possible for many smaller service providers.

Uncertainty around reimbursement lag time, as well as confusion around which services are and are not reimbursable, is a disincentive for many service providers. While enthusiastic about the flexibility of SNAP E&T and its potential to increase their capacity, some service providers reported that the risks associated with receiving reimbursement can be prohibitive enough to prevent organizations (particularly smaller ones) from becoming SNAP E&T providers in the first place.

The lag time between invoicing and receipt of reimbursement appears to be a consequence of the co-administration of SNAP E&T in Minnesota. Because two state agencies have been required to administer SNAP E&T, the delay appears to occur as each agency performs its due diligence.

Recommendation 3: Simplify Fiscal Management

SNAP E&T demands coordination between state human service agencies (DHS) and state workforce development agencies (DEED). Structures need to be implemented that streamline fiscal administration to increase ease of access for service providers to receive 50 percent matching funding and ensure both DHS and DEED maintain their interests in the successful expansion and operation of SNAP E&T.

While this paper highlights the challenge of co-administering SNAP E&T and how it impacts the SNAP E&T service system broadly, resolving this challenge will require the in-depth knowledge and experience of DHS and DEED administrators. However, any remedy they propose should a) clarify where authority for SNAP E&T lies, b) reduce the state administrative burden, c) reduce reimbursement lag time, d) help service providers better understand what activities are reimbursable, and e) ensure reimbursement aligns with incentives for increasing access for participants.

Gap 4: Data Management

County staff, service providers, and policymakers all rely on data to learn about the participants they serve. As the ABAWD population is traditionally highly mobile, collecting and tracking data on participants is difficult. While attempts have been made to organize and improve data management, there is still confusion and inconsistencies in the data collection process, tracking, and reporting. According to several service providers, staff often do not have the time or expertise to correctly use the WFI system, resulting in incomplete or incorrect data on participants as well as inefficiently spent administrative resources.

In the process of collecting participant information, there is a lack of uniformity when entering data. For example, WFI 'Exit Reasons' has three categories that have been used synonymously: 'administrative separation', 'off welfare', and 'other termination'. These discrepancies have been reported in other data collection as those inputting data are not always certain of the right categorization - or they lack staff time to do it correctly. While it is hard for service providers to know the exact reason for particular variables, categorizing consistently is important.

As mentioned previously, MAXIS was never designed for data collection since its original intent was to determine eligibility. Unlike DEED's WFI data collection database, accessing data from MAXIS is not an easy process. Without properly recorded and tracked data, it is difficult to assess participant outcomes. Having a better understanding of who is using the system, what barriers they face, and why they did or did not succeed in the program is essential to improving service delivery.

Additionally, the forthcoming performance measures recently announced by USDA are one more reason to institute strong data practices. The four metrics states will be required to report on include:

- Number and percentage in unsubsidized employment in second quarter after completion
- Number and percentage in unsubsidized employment in fourth quarter after completion
- Median earnings for those in unsubsidized employment in second quarter after completion
- Number and percentage that completed a training, educational, work experience, or on-the-job training component.

Recommendation 4: Provide Additional Data Management Support

Provide additional data management training and technical support for service provider and county staff. Similar to what is already provided with SNAP enrollment, those providing E&T services should have access to regular trainings on data management, specifically on how to successfully navigate, utilize and collect information from WFI. It is important to note that current staff may feel overburdened with the addition of more trainings and paperwork requirements, so simplifying the data tracking process and improving data systems would make collection less burdensome.

Theme 3: Lack of Alignment in the Field

Gap 5: Structural Confusion

Shared ownership of SNAP E&T between DHS and DEED has led to confusion throughout the policy field.

Both a challenge and an opportunity of SNAP E&T is coupling the knowledge and expertise of DHS and DEED. The opportunity of shared ownership is that SNAP E&T can be a bridge to employment for a population (SNAP recipients) that face numerous barriers to employment and can be hard to serve. However, bridging the human services of the state's largest agency (DHS) with the workforce development focus of DEED, presents challenges of coordination and administration.

These challenges were evidenced by the uncertainty and confusion among the various service providers surveyed in this study. For example, some service providers described confusion around specific program details. They also described a more general uncertainty regarding roles and responsibilities across the policy field, including which organization (DHS or DEED) was ultimately going to lead SNAP E&T expansion.

Given that SNAP E&T is still a developing program in Minnesota, it is unsurprising that questions and uncertainty remain — particularly among those service providers interested in, but not currently providing SNAP E&T. This is notable because a robust and expanded SNAP E&T program in Minnesota will require coordination between the state agencies responsible for oversight and administration of the program, and the local governments, service providers, and educational institutions ultimately responsible for delivering services to participants. In effect, congestion at the highest level (DHS and DEED) has disrupted connections with the lowest level, i.e. with direct service providers, and has inhibited the creation of more SNAP E&T partnerships and access for participants.

Furthermore, while the implementation challenge of connecting authorizing agencies at the state level with local organizations is not unique, it is particularly important in SNAP E&T due to the implications of 50 percent reimbursement and the process of reverse referrals. Since many potential service providers appear to have matchable dollars (as identified through the Hennepin and Ramsey County SOI), money is being “left on the table”. The incentive to claim this money increases the importance of putting a structure in place that fosters collaboration and partnerships throughout the policy field.

Recommendation 5.1: Clearly Define Administrative Roles

Clearly define and communicate the administrative structure for SNAP E&T in Minnesota, by delineating the roles and responsibilities of state agencies, counties and service providers.

Recognizing that expanding access to employment and training services through SNAP will be a collaborative effort requiring coordination across the field, it is imperative to establish an efficient system of administration. Examples of issues this system must be able to address include:

- The roles and responsibilities for state agencies, counties, and program partners.
- Identification of the initial administrative resources required to effectively manage the program.
- Definition of the participant engagement process and “flow”, as well as the supporting databases that will be utilized.
- Partnership organizational chart.

Because Minnesota has already begun a collaborative planning process for expanding SNAP E&T, there already exists a platform for defining the structure of the program that incorporates the perspectives of the state, counties, education, philanthropy, and service providers. Notably, these planning groups have already recognized the need to work together and begun the work of building strong relationships, which is a promising foundation on which programmatic details can be constructed.

Lastly, any system for administering SNAP E&T will need to be communicated to the community of providers and interested stakeholders more generally. Because SNAP E&T has been historically underutilized, onboarding new service providers will require educating them.

Recommendation 5.2: Create a Minnesota SNAP E&T Handbook

In order to increase the knowledge base and facilitate greater coordination across the state for SNAP E&T programming, a Minnesota-oriented SNAP E&T Handbook should be created.

This handbook should be differentiated from the current SNAP E&T manual that DHS has created and incorporate processes and instructions needed for service providers and county financial workers to utilize during day-to-day operations. It should also incorporate a breakdown of information for community partners and local government to understand the basics of the federal law around SNAP E&T and process of SNAP E&T functions throughout the state. The need for a day-to-day handbook is clear from the research, with one service provider stating, “A Minnesota SNAP E&T Toolkit would be the holy grail” when asked what tool would be most helpful to alleviate confusion and facilitate communication.

The Handbook should be comprised of, but not limited to, the following sections⁵¹:

- I. Orientation and Overview of FNS SNAP E&T Workbook
 - A. E&T Basics
 - B. SNAP Work Requirements
 - C. E&T Funding
 - D. Essentials of E&T Program with Components listed
- II. Leadership & Organization
 - A. Defining Leadership and Strategic State E&T Plan
 - B. Key State Functions & Staffing
- III. Eligibility & Tracking
 - A. System of Participant Eligibility & Invoicing
 - B. Overview of System for Data Tracking & Analysis
- IV. Coordination & Services Provided
 - A. System of Participant Referral
 - B. SNAP E&T Services through Community Colleges
 - C. SNAP E&T Services through Community Agencies
 - D. SNAP E&T Services through 3rd Party Providers
- V. Program Implementation

⁵¹ [Washington State's Basic Food Employment & Training Program](#), [FNS Employment and Training Toolkit](#), [MFIP and DWP Employment Services Manual](#), [Supplemental Nutrition Assistance Program \(SNAP\) Employment and Training \(SNAP E&T\) Manual](#)

- A. Employment Plan
 - B. Support Services
 - C. Extensions
- VI. Reimbursement of matchable dollars
- VII. Non-Compliance & Sanctions (if MN remains a “mandatory” state)
- VIII. Performance Measures
- IX. Continuous Assessment

Gap 6: Lack of Network among Service Providers

The current lack of coordination between service providers creates barriers for participants to access the services they need. If a service provider cannot direct participants to other organizations, participants may be slotted into programs that do not align with their employment goals and fail to address their life circumstances. If these linkages are not made immediately, with both organizations connecting participants to services, many participants may drop out of the SNAP E&T program altogether. Lacking service provider coordination and communication, many participants “fall through the cracks.”

One of the strengths of the SNAP E&T program is the flexibility and range of employment and support activities available to participants. The broad range of eligible services also provides collaborative opportunities for organizations to integrate services which support participants. However, if these connections cannot be made, participants are effectively denied full access to a variety of programs which support their training and employment goals.

Recommendation 6: Develop and Distribute a Service Provider Catalogue

Create a catalog of SNAP E&T service providers and their programs in order to facilitate participant connections to services and provide opportunities for coordination and collaboration between service providers.

County staff and service providers currently do not have access to specific information on providers of SNAP E&T services. In the absence of this information, service providers are limited in their ability to direct participants to the services they need. The creation of a catalogue verified E&T providers will allow county financial worker and service provider staff to enroll participants in SNAP E&T and guide them to employment and support services. A catalogue of service providers and their activities would also facilitate the creation of a network of SNAP E&T providers and tailor services to better meet the needs of individual participants. The formation of a SNAP E&T network would potentially:

- Allow service providers to direct participants to services they need
- Foster communication and collaboration between service providers to provide complementary services to participants
- Create a forum for sharing best practices, opportunities and challenges

Creating this network will provide opportunities to identify and strengthen links between service providers, increase the number of participants who can access services, retain SNAP E&T benefits and successfully complete training and obtain employment.

Conclusion

This report has analyzed quantitative and qualitative data to describe the SNAP E&T ABAWD population. The analysis, combined with a scan of best practices, highlighted numerous barriers to employment and training for the SNAP E&T population. Prevalent barriers include low education, homelessness, transportation, and offender status. A strength of SNAP E&T is its flexibility to provide services to participants who face multifaceted barriers to employment and training. SNAP E&T fills a gap in workforce services a potential on-ramp to the on-ramps of the career pathways approach. Specifically, providing the supports in addition to employment and training services that participants need to address employment barriers, enter education and training programs and obtain and retain employment.

This report has also identified several obstacles to the successful implementation of SNAP E&T. A fragmented referral process, reimbursement delays, and data management represented blockages in the program flow. Alignment challenges, including establishing administrative roles, and coordinating information and communication flow are additional implementation impediments.

Perhaps most importantly, stakeholders at each level in the policy field should recognize that the potential of SNAP E&T to serve participants will only be realized if administrative and structural processes are developed, streamlined, and implemented collaboratively. Coordination and collaboration (already taking place between government agencies and service providers) are foundational to developing these processes. With federal funds available for investment, service providers eager for information, and SNAP participants in need of services, now is the time to expand SNAP E&T in Minnesota.

Appendix A: Questions Asked in Qualitative Interviews

The following 'Interview Protocol' was used as a standard questionnaire to guide all qualitative interviews within the analysis.

Name:

Affiliation & Title:

Date, time, who did interview, in person or via phone,

1. *Introduction - warm up, what do you do, what we do/our analysis?*
2. *How is your agency involved in SNAP E&T? [if not already answered]*
 - *How do SNAP participants find you?*
3. *How do you work with participants on SNAP E&T? [intentionally open-ended, to invite descriptions of what work is done and how is coordinated logistically and/or judgements about how well that is going, strengths and problems in that relationship etc.]*
4. *Describe the population that you serve. Is there anything that distinguishes them from other organizations that serve SNAP E&T participants? [share participant data?]*
5. *What's the process of a SNAP E&T participant? From the moment they walk through the door to completion/employment or leaving the program without completing.*
6. *What are you most interested in doing to improve SNAP E&T services? Maybe you are most interested in continuing to do something that is working very well, expanding your existing activities to serve more people or for longer hours, or maybe there is something you would like to get started or change. Any of those kinds of answers are good information. What are the 2-3 things you would emphasize keeping the participants specifically in mind?*
7. *What do you wish other community partners would start doing, or do more of, for you to be successful with your E&T programming efforts?*
 - A. *What isn't working? For example, specific services/activities that aren't effective?*
8. *We are learning about this issue. We're too new to know what we don't know. So, is there anything you were expecting us to ask that we should really know?*
9. *We are interested in gathering a good range of perspectives. Now that you know better what our project is about, are there other people that you suggest we should contact?*

REMINDER: ask for specific organizations and names they recommend we speak with next - with emphasis on "front line" actors.

REMINDER: specifically ask for what information or data can you share that might be useful to our project?

Questions from Solicitation of Information (SOI) Analyzed in Capstone Research:

- 9.d) *What kinds of capacities would your organization need to build, and what kinds of state/county administrative support would help?*
- 9.e) *What are barriers to your organization's participation?*
10. *Expanding SNAP E&T in Minnesota could potentially provide a new source of revenue (through the federal 50% reimbursement) that could be used to expand services where they are needed most. What kinds of gaps in services exist in the communities you serve? What kinds of needs are going unmet?*

Appendix B: Summary of Findings from Relevant Programs and Studies:

Resources and Evaluations Surveyed		
Program/Study	Target Population	Program Description and Major Findings
Innovative City and State Funding Approaches to Supporting Subsidized Employment and Transitional Jobs Warland, Chris and Young, Melissa	Not specified	Provides suggestions and examples of innovative funding strategies to cities, states, and other public-sector entities that are considering implementing or expanding subsidized employment programming. Presents the principal goals of transitional and subsidized employment and outlines some of the key evidence supporting its usefulness.
Developing Pathways Out of Poverty Through Transitional Jobs: Expanding Opportunities to Help Low-Income Workers Overcome Employment Barriers with WIOA Bird, Kisha; Young, Melissa; and Warland, Chris	Low-income and low-skill adults and youth	Describes the WIOA emphasis on transitional jobs and why they should be part of any workforce development strategy.
Connecting the Disconnected: Improving Education and Employment Outcomes Among Disadvantaged Youth Edelman, Peter, and Holzer, Harry	Less educated youth (16-24), particularly young black men.	Reviews trends in employment outcomes for disadvantaged youth, focused on those "disconnected" from school and the labor market. Describes causes and trends among youth, particularly young black men, and makes policy recommendations for (a) skills and work incentives for youth, and (b) employer labor demand.
Michigan Earn and Learn Patel, Margaret Schultz	Disconnected, at-risk youth (ages 18 to 24 and particularly young minority males), formerly incarcerated individuals, and chronically unemployed adults in three particularly hard-hit cities: Detroit, Flint, and Saginaw.	Focus on earning income while pursuing training and education. The goal was to create opportunities for individuals with barriers to employment to pursue the types of education and occupational training associated with economic advancement. <i>Earn and Learn</i> participants who completed all three primary components — (a) work readiness, (b) occupational training, (c) transitional job — appeared to be the most successful at landing unsubsidized employment (83 percent).
CalFresh Employment and Training Plan	CalFrsh only participants; ABAWDS; clients who receive Personal Assisted Employment Services; and clients who are	Lays out the City and County of San Francisco's SNAP E&T Plan for FFY 2015.

Austin, Terry	parents in “timed-out” CalWORKs cases	
Providing True Opportunity for Opportunity Youth David T. Applegate, James A. Jones, Jeanne Murray, Caitlin C. Schnur, Amy Rynell, Chris Warland, Melissa Young	Youth who are not working or in school	Attempts to build on and fill in the gaps of available research on effective strategies for better serving Opportunity Youth. Identifies six principles for effectively serving these youth.
Service Delivery Principles and Techniques: Helping People Experiencing Homelessness Engage in Services and Succeed in Employment Nathan Dunlap, Amy Rynell, Melissa Young, Chris Warland, Sheena McNeal	People experiencing homelessness	Identifies a variety of principles to incorporate in programming for individuals experiencing homelessness. <ul style="list-style-type: none"> • Facilitate process of change. Includes motivational interviewing and employment planning. • Meet people where they are, aligning work interests with skills training and education. • Operate through trauma-informed care, imbedding respect and dignity for participants in programming. • Vocationalize the service organization, modeling norms and expectations of professional settings to ease transition.
Populations Experiencing Homelessness: Diverse Barriers to Employment and How to Address Them Nathan Dunlap, Amy Rynell, Melissa Young, Chris Warland, Sheena McNeal	People experiencing homelessness	Describes barriers faced by individuals experiencing homelessness and recommends strategies specific to each target group. Designing a toolkit for different population-based strategies.
Employment Program Components: Considerations for Modifying Programming for People Experiencing Homelessness Nathan Dunlap, Amy Rynell, Melissa Young, Chris Warland, Sheena McNeal	People experiencing homelessness	Identifies promising components to employment programs including: <ul style="list-style-type: none"> • assessments that take into account needs, strengths, and interests, • providing opportunities for social support and mentorship • enhanced options to acquire work readiness skills, • quality job development and considering customized solutions, • intensive retention and follow-up services, • opportunities for participants to learn from failures and be reconnected to employment opportunities • making linkages to supportive services and housing.
Employment Program Models for People Experiencing Homelessness: Different approaches to program structure Nathan Dunlap, Amy Rynell, Melissa Young, Chris Warland, Sheena McNeal	People experiencing homelessness	Description of best practice models including: <ul style="list-style-type: none"> • Transitional jobs • Individualized Placement Support • Alternative Staffing • Customized Employment • Contextualized Basic Adult Education • Adult Education Bridge Programs • Sector-Based Training
Creating Subsidized Employment Opportunities for Low-Income	TANF recipients with children	In the 2009 Recovery Act, the TANF Emergency Fund was established to help states cover the cost of funding more

Parents: The Legacy of the TANF Emergency Fund Pavetti, LaDonna, Schott, Liz, & Lower-Basch, Elizabeth		<p>assistance to low income families during the Great Recession. The Fund provided \$5 billion over 2 years.</p> <p>The results included:</p> <ul style="list-style-type: none"> • placing more than 260,000 low income youth and adults in paid jobs during high unemployment • demonstrated the feasibility of creating cost-effective, publicly funded jobs in the public and private sectors on a large scale • created new partnerships between TANF agencies, workforce agencies, businesses, foundations, advocates, and local nonprofit service providers
Subsidized Employment: Serving Disadvantaged Workers Hall, Randi	CLASP policy document providing an overview of subsidized employment programs	<p>Under WIOA, there is an opportunity to expand educational and training opportunities for vulnerable workers and for human services agencies to collaborate with workforce agencies. Policymakers must think carefully about the goals of a program, the program design, and who will most benefit.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> • Understand the difference between outcomes and impacts. When working with more disadvantaged workers there may be less favorable outcomes but stronger impacts on the worker's overall success. • Assess participants to identify their barriers to employment, and build appropriate wraparound services into the program from the beginning • Increase partnerships with private-sector businesses to promote the hiring and retention of subsidized workers to enhance employment gains over a long-term period.
How to Dramatically Expand SNAP E&T in Minnesota Bryan Lindsley, Joel Luedtke, and Brian Paulson	ABAWDs	Explains the loss of Minnesota's ABAWD waiver, implications for participants, describes opportunities for leveraging federal funds and provides policy recommendations for expanding SNAP E&T in Minnesota.
Workforce Development in Minnesota Phase I Report for MSPWin Sook Jin Ong and Jodi Sandfort	Low wage, low skilled adults of color	<p>Researches the public resources being invested in Minnesota's workforce development, particularly as regards the six state agencies of interest to MSPWin: Minnesota Department of Human Services, Minnesota Department of Employment and Economic Development, Minnesota Department of Education – Adult Basic Education, Minnesota State Colleges and Universities, Minnesota Office of Higher Education, Minnesota Department of Corrections</p>

Appendix C: Solicitation of Interest – Related Research Questionnaire

HENNEPIN COUNTY

On behalf of Ramsey County and the Human Services and Public Health Department

SOLICITATION OF INTEREST

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

Release Date: March 1, 2016

Submission Due Date: 3 p.m. on March 22, 2016

Solicitation of Interest Questionnaire

This questionnaire is for employment and training service providers interested in engaging in prospective efforts to expand the SNAP Employment and Training (E&T) program, in part through a federal 50% reimbursement feature that offsets local investments in the program and could bring new resources to Minnesota.

The purpose of this questionnaire is to roughly gauge the capacity and interest of service providers to potentially become partners in an expansion effort. The information being collected will not be used to make specific programmatic or funding decisions.

Notably, the administrative requirements of operating an E&T program are significant. Service providers must be able to recruit and/or engage a considerable number of SNAP participants; track participant eligibility, enrollment, and activities; meet federal grant fiscal management guidelines; and handle potential delays in reimbursement.

To answer the questions in the following questionnaire, it will be helpful have a basic understanding of the SNAP E&T Program and the general organizational capacities required of E&T service providers. For further background information about this Solicitation of Interest, SNAP E&T, and this project, please see the full Solicitation available at <http://www.hennepin.us/business/work-with-henn-co/contract-opportunities>.

If you have questions about this form, SNAP E&T, or this project, please contact Timothy Hastings at Timothy.Hastings@Hennepin.us

About You and Your Organization

Name:

Title:

Organization:

Phone Number:

Email Address:

Questions About Services Provided

1. Does your organization provide at least some of the following services, or would it need to create new activities for SNAP E&T clients? *Check all services your organization provides.*

- | | |
|---|---|
| <input type="checkbox"/> <i>Assessment and Employment Plans</i> | <input type="checkbox"/> <i>Work Experience Opportunities</i> |
| <input type="checkbox"/> <i>Job Seeking Skills/Job Club</i> | <input type="checkbox"/> <i>Social Services Referrals</i> |
| <input type="checkbox"/> <i>Job Search</i> | <input type="checkbox"/> <i>Retention Services</i> |
| <input type="checkbox"/> <i>Career and Technical Training</i> | <input type="checkbox"/> <i>Support Services</i> |
| <input type="checkbox"/> <i>Basic Education</i> | |

2. Please provide a brief overview of the employment and training services you offer to low-income job seekers. Please limit your response to 4-6 sentences.

Questions About Participants Served

3. What approximate percent of individuals served by your organization receive SNAP or are potentially eligible for SNAP (generally under 185% of the Federal Poverty Guideline)?

- a. % receive SNAP
- b. % are potentially eligible for SNAP, but not currently receiving benefits

4. About how many new individuals does this represent in an average year?

- a. receive SNAP
- b. are potentially eligible for SNAP, but not currently receiving benefits

5. Are your responses to questions 3a and 4a above estimates or actual numbers? If they are estimates, how did you arrive at them? If actual numbers, how does your organization track this information?

6. What approximate percent of individuals served by your organization reside in Hennepin and Ramsey Counties?

Questions about Funding Sources and Amounts

7. Does your organization have non-federal funding that is useable for employment and training services and is not currently being used as a match for other federal dollars? If so, what are the major sources, average annual amounts and uses of these funds? *Please be as specific as possible.*

Category	Source(s)	Average Annual Amount(s)	Use(s) and Other Notes
State and Local Government	e.g. Minnesota Jobs Skills Partnership	e.g. \$140,000	e.g. Nursing assistant pathways curriculum development, instruction, and training materials
Major Non-Governmental Grant-Makers			
Direct Donations from Individuals and Other Entities			
Earned Revenue			
Other			

Note: Additional space for responses about funding sources is available at the end of this document.

8. Given the population you serve and the resources listed above, can you provide an estimate of the non-federal, unmatched dollars your organization could likely put toward the services listed in question 1, directed specifically at SNAP-eligible participants? (These are dollars that would potentially be eligible for 50% federal reimbursement.) *Please explain how you arrived at your estimate.*

Questions About Organizational Capacity and Interest

The administrative requirements of an E&T program can be strenuous, particularly for smaller service providers. They must be able to verify SNAP participation, manage data systems, track costs, and handle delays in reimbursement of up to 60-180 days. *For more information, please see the full Solicitation available at <http://www.hennepin.us/business/work-with-henn-co/contract-opportunities>.*

9. Given what you know about SNAP E&T program requirements and the capacities required of service providers:

- a. Would your organization be interested in participating in program expansion?
☐ Yes ☐ No
- b. What types of services or supports would your organization be interested in providing?
- c. In what ways is your organizational capacity well-aligned to requirements described above and in the full solicitation of interest?
- d. What kinds of capacities would your organization need to build, and what kinds of state/county administrative support would help?
- e. What are the barriers to your organization's participation?

Wrapping Up

10. Expanding SNAP E&T in Minnesota could potentially provide a new source of revenue (through the federal 50% reimbursement) that could be used to expand services where they are needed most. What kinds of gaps in services exist in the communities you serve? What kinds of needs are going unmet?

Thank you for your time and input!

Funding Sources and Amounts, Continued

Please use this space to continue your response to Question 8:

Does your organization have non-federal funding that is useable for employment and training services? If so, what are the major sources, average annual amounts and uses of these funds? Please be as specific as possible.

Category	Source(s)	Average Annual Amount(s)	Use(s) and Other Notes
State and Local Government	e.g. Minnesota Jobs Skills Partnership	e.g. \$140,000	e.g. Nursing assistant pathways curriculum development, instruction, training materials and supplies
Major Non-Governmental Grant-Makers			
Direct Donations from Individuals and Other Entities			
Earned Revenue			
Other			