



Office of Temporary and Disability Assistance

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Administrative Directive Memorandum

Section 1

Transmittal:	21-ADM-05
To:	Social Services District Commissioners
Issuing Division/Office:	Employment and Income Support Programs
Date:	July 21, 2021
Subject:	Changes to the Supplemental Nutrition Assistance Program (SNAP) Employment and Training (E&T) Policy Mandated by Section 4005 of the Agriculture Improvement Act of 2018
Suggested Distribution:	Employment Coordinators, SNAP Directors, Temporary Assistance Directors, Staff Development Coordinators
Contact Person(s):	Employment and Advancement Services Bureau at: (518) 486-6106

Filing References

Previous ADMs/INFs	Releases Cancelled	Dept. Regs.	Soc. Serv. Law & Other Legal Ref.	Manual Ref.	Misc. Ref.
18-ADM-03 18-ADM-09 18-ADM-07 17-ADM-01 16-ADM-01 16-INF-09 15-INF-11 13-ADM04 97-ADM-16		18 NYCRR 385.3, 385.10	Title IV, Section 4005 of the Agriculture Improvement Act of 2018	TA and SNAP Employment Policy Manual Section 385.3, 385.10	7 CFR 273.7 7 CFR 273.24 GIS 20 TA/DC006 GIS 20 TA/DC105

Section 2

I. Summary

The Supplemental Nutrition Assistance Program (SNAP) was reauthorized as part of the Agriculture Improvement Act of 2018 (the Act). The Act, commonly referred to as the 2018 Farm Bill, was enacted on December 20, 2018. The United States Department of Agriculture (USDA) Food and Nutrition Service (FNS) final rule was published on January 5, 2021 implementing the changes made by section 4005 of the Act. This administrative directive (ADM) provides information on the mandatory provisions of Title IV, Section 4005 of the Act related to changes to the SNAP Employment and Training (E&T) work program and certain Able-Bodied Adults Without Dependents (ABAWD) work policies, and the implementation actions required to comply with the federal changes.

II. Purpose

The purpose of this ADM is to inform social services districts (districts) of policy changes regarding the SNAP E&T program and certain ABAWD work policies as a result of changes in federal law. This ADM also provides direction to districts regarding the specific actions they must take to comply with the new federal rules.

III. Background

SNAP E&T assists household members in receipt of SNAP benefits gain skills, training, or work experience that will increase the individual's ability to obtain and maintain employment. New York State operates a mandatory SNAP E&T program. All non-exempt Temporary Assistance (TA)/SNAP applicant and recipient work registrants are required to participate in a SNAP E&T activity as assigned by the district. The assigned work activity for these individuals is generally a combined TA and SNAP work requirement and willful refusal or failure to comply without good cause may result in a TA and/or SNAP employment sanction in accordance with 18 NYCRR §385.12. For non-Temporary Assistance (NTA)/SNAP recipients, each district determines the extent to which non-exempt NTA/SNAP applicant and recipient work registrants are required to participate in SNAP E&T activities. District specific policies regarding SNAP E&T are outlined in district biennial TA and SNAP Employment Plans. All districts in New York State must operate a SNAP E&T program.

ABAWDs are a subset of the larger SNAP E&T population and are required by federal law to meet additional work requirements to receive SNAP benefits for more than three months in a 36-month period. To retain eligibility for SNAP, ABAWDs must participate in qualifying work activities for at least 80 hours a month, be granted an exclusion consistent with their district's ABAWD exclusion policy or reside in an area with a waiver approved by the USDA. New York State currently has a statewide waiver of the ABAWD time limit in effect through September 30, 2022. The current 36-month period for New York State is a fixed period that started on January 1, 2019. An ABAWD must also otherwise be eligible for SNAP benefits. See ADM [18-ADM-09](#) for more information regarding ABAWD policy.

IV. Program Implications

Provisions of Section 4005 of the Act that require a change in the administration of the SNAP E&T program and certain ABAWD work policies in New York State that directly impact districts include:

- A. Consultation with Local Workforce Development Boards (LWDBs) and employers and coordination with Workforce Innovation and Opportunity Act (WIOA) Title 1 programs
- B. Provision of mandatory case management services
- C. Requirement to advise certain households of available Employment and Training services
- D. Replaces job search programs with supervised job search programs
- E. Removes job finding clubs and job skills assessment as allowable activities under a job skills training program, but adds employability assessment as an allowable E&T activity
- F. Allows SNAP E&T funds to be used to subsidize the wages of E&T participants
- G. Modifies current regulations which allow job retention services as an allowable E&T component for no more than 90 days by requiring that districts/providers offering job retention services as an E&T component must do so for a minimum of 30 days
- H. Expands the types of work programs in which ABAWDs may participate in to meet the ABAWD work requirement and thereby remain eligible beyond the three months in a 36-month time limit by explicitly adding employment and training programs for veterans operated by the Department of Labor or the Department of Veterans Affairs

- I. Introduces a new form of good cause provided to mandatory SNAP E&T participants when the district determines that there is not an appropriate and available opening within the E&T program to accommodate the participant
- J. Adds a new referral requirement for districts regarding any E&T participant, not otherwise exempted from the general SNAP work requirement, who is determined by the provider of an E&T component to be not a good fit to participate in that E&T program component
- K. Introduces a new requirement to provide a consolidated work notice and oral explanation to all households where at least one member is subject to a work requirement describing the pertinent work requirements

Note: The Act did not authorize changes regarding who is eligible to receive SNAP E&T funded services. Therefore, districts are reminded that SNAP E&T funds cannot be used to support employment services, participant reimbursements or job retention services for applicants and recipients of TANF-funded assistance (WMS case types 11 and 12) or two-parent families where neither parent is disabled and whose assistance costs are reported as Safety Net Assistance Federally non Participating Non-MOE consistent with [06-LCM-09](#).

V. Required Action

A. Consultation with State Workforce Development boards or Employers and Coordination with Workforce Innovation and Opportunity Act (WIOA) Title 1 Programs

This provision requires States to design their SNAP E&T programs in consultation with State workforce development boards or with private employers or employer organizations. When designing their SNAP E&T program, districts should coordinate SNAP E&T components and services with available resources in the community, including job training and related employment services available through the local WIOA partners. While existing Department regulations at 18 NYCRR 385.10 already require that districts develop their biennial TA and SNAP Employment Plan in consultation with local Workforce Development Boards, districts as described in [20-ADM-15](#) are strongly encouraged to continue ongoing coordination with Career Center partners to align and improve access to employment, training and supportive services offered in the local area and to streamline the referral process for the broad range of individuals served through the NYS Career Center System. By partnering and coordinating with Career Centers, districts can leverage existing workforce resources, improve service efficiency by reducing duplication, and ensure that district clients can benefit from the full array of services available through the NYS Career Center System.

B. Mandatory Case Management

This provision modifies the definition of an E&T program to require that each State E&T program must also provide case management services. All districts must operate a SNAP E&T program that consists of case management and at least one E&T work activity component. Non-exempt TA/SNAP work registrants are considered mandatory for SNAP E&T participation and must be provided with case management and the assignment to at least one E&T work activity component. NTA/SNAP recipients who are assigned by the district to a mandatory E&T assignment (in accordance with Section 3.4(d) of the district's biennial employment plan) must also receive case management and the assignment to at least one E&T work activity component.

The purpose of case management services is to guide the participant towards appropriate E&T components and activities based on the participant's needs and interests, support the participation in the E&T program, and to provide activities and resources that help the participant achieve program goals. Case management services must directly support an individual's participation in the E&T program. Case management services include, but are not limited to, the completion of an employability assessment, the development of an employment

plan, monitoring the individual's progress in the assigned SNAP E&T activity component, and coordination with service providers. Case management may be provided by district employment unit staff or contracted employment vendors. The case management services provided by the district or contracted provider must be documented in the case record through the completion of an employability assessment, the development of an employment plan, and maintaining detailed case notes to document the frequency of contact with the individual to monitor their progress in the assigned SNAP E&T work activity. Case management may include referrals to activities and supports outside of the E&T program, but districts can only use E&T funds for allowable components, activities, and participant reimbursements.

Time spent participating in case management counts towards the time a participant spends in E&T. In addition, E&T is a way for ABAWDs to fulfill the ABAWD work requirement. As such, hours an E&T participant spends with a case manager must count towards the participant's mandatory E&T and ABAWD work requirement. Districts have flexibility to provide case management services in the mode that best meets the needs of the participant and is in line with the capacity of the district or provider. This flexibility includes offering case management services remotely and delivering services through virtual tools like web applications, as well as in-person services.

Case management is part of the E&T program. Therefore, districts must pay for, or reimburse, participants for expenses that are necessary, reasonable, and directly related to participation in the E&T program, including participation in case management. If a district is unable to provide a participant with participant reimbursements, then the individual would be excused from mandatory participation in SNAP E&T and would not be subject to a SNAP sanction for failure to comply with the assigned SNAP E&T activity.

C. Advising Households of Available Employment and Training Services

This provision requires that at the time of recertification, all districts must advise non-exempt SNAP recipients who are members of TA/SNAP, and/or NTA/SNAP households containing at least one adult, with no elderly or disabled individuals, and with no earned income at their last certification or required report, of the availability of employment and training services within the district and/or region. Employment and training services are not limited to SNAP E&T. Districts should provide information about the availability of opportunities through workforce services offered by the local Career Center, community-based organizations, and local education providers. The method of advising individuals of the available employment and training services in the local area is left to the discretion of districts. However, as a minimum standard for meeting this requirement districts must provide the household a list of available employment and training services electronically (e.g. on a website or in an email) or in printed form. Examples of information in printed form include, but are not limited to, flyers explaining local Career Center offerings, brochures on available local adult education and training resources, and contact information for local community organizations that provide employment and training services. Districts should refer to [GIS 20 TA/DC105 Requirement to Advise Certain SNAP Households of the Availability of Employment and Training Services](#) for examples of where to find information on local employment and training services. The information provided to SNAP households should be specific to the programming available in the district whenever possible.

Districts are also encouraged to frequently check the website of their local Workforce Development Boards to review any other employment and training services that may be available locally.

D. Supervised Job Search Program

This provision replaces job search with supervised job search. Districts that offer job search as a SNAP E&T work activity component for TA/SNAP and NTA/SNAP applicants and recipient work registrants must offer a supervised job search in accordance with federal regulations at 7 CFR 273.7(e)(2)(i). Supervised job search programs are those that occur at district approved locations at which the activities of the participants are directly supervised, and the timing and activities of participants are tracked by the district or contracted provider. Approved locations may include the local Career Center, public library, third-party provider, an individual's home, or any other location deemed suitable by the district where the participant has access to the tools and materials they need to perform supervised job search. Tools used in the supervised job search program may include virtual tools, including but not limited to, websites, portals, or web applications to access supervised job search services. District are encouraged to offer a variety of locations and formats to best meet participant needs, and to the extent practicable, allow participants to choose their preferred location. Supervision must be provided by skilled staff, either remotely or in person, who provide meaningful guidance and support with at least monthly documented check-ins and must be provided in such a way to best support the participant. Supervised job search participants must have access to a case manager or other district/employment services provider worker for the participant to report on progress or seek additional guidance as needed before the next regularly scheduled contact.

Supervised job search activities must have a direct link to increasing the employment opportunities of individuals engaged in the activity. Districts may require an individual to participate in a supervised job search for a specific period of time that, in its estimation, will provide participants a reasonable opportunity to find suitable employment. However, the district should not establish a continuous, year-round supervised job search requirement. If a reasonable period of supervised job search does not result in employment, placing the individual in a training or education component to improve job skills will be more productive.

The number of contacts required of job search participants and the frequency of how often individuals are required to report job search outcomes and activities is determined by the district. Districts describe their local procedures for how the job search activity will be supervised and tracked, including the frequency of monitoring the participant's job search efforts, in Section 3.4 of the district's biennial TA and SNAP Employment Plan.

In accordance with federal regulations at 7 CFR 273.7(d)(4), districts must pay for or reimburse participants for expenses that are reasonably necessary and directly related to participation in the E&T program. Participant reimbursements (i.e. supportive services) would include any materials or tools reasonably necessary for participation in supervised job search including Wi-Fi access, a laptop, or a tablet.

Please note: Job search that does not meet the definition of supervised job search as described in this section is allowed as a subsidiary activity of another E&T component, so long as the job search activity comprises less than half of the total time spent in the component.

In accordance with federal regulations at 7 CFR 273.24, a standalone supervised job search program is not a qualifying E&T activity relating to the participation requirements necessary to maintain SNAP eligibility for ABAWDs unless the hours of participation are limited to less than half of the total number of hours that the individual is participating in ABAWD qualifying activities each month. However, a job search program, supervised or otherwise, when operated under title I of WIOA, under section 236 of the Trade Act, or a program of employment and training for veterans operated by the Department of Labor or the Department of Veterans Affairs, is considered a qualifying activity relating the participation requirements necessary to maintain SNAP eligibility for ABAWDs.

E. Job Finding Clubs/Job-Skills Assessment/Employability Assessment

The Act removed job finding clubs as an allowable activity. However, districts may continue to offer job search training as a SNAP E&T component as long as the job search training program includes reasonable job search training and support activities that may consist of employability assessments, training in techniques to increase employability, job placement services, or other direct training or support activities, including educational programs to expand the job search abilities or employability of the program participant. Additionally, other activities that increase the employability of participants are still permitted, such as district or provider facilitated peer-to-peer learning opportunities or offering job search trainings in a group.

The Act also removed jobs skills assessments as an allowable activity and replaced it with the employability assessments. Employability assessments are determined to be broader in scope and should be used to identify the skills individuals have or need to be successful in finding and retaining employment. Such assessments should include a review of the individual's academic skills and education attainment, interpersonal skills, critical thinking and communication skills and barriers that may impede job attainment/retention. Districts have broad flexibility in the manner and timing of completion of the employability assessment. Employability assessments can be part of the required case management services provided to SNAP E&T participants and/or the job search training component. As employability assessments can be helpful in a number of contexts as described above, they are allowable under either category. However, local districts and their providers should coordinate assessments, so a participant does not undergo an employability assessment twice in a short period of time.

F. Subsidized Employment and Apprenticeships

Federal regulations at 7 CFR 273.7(e)(2)(iv) describes SNAP E&T work-based learning programs as a program designed to improve the employability of household members through actual work experience or training, or both, and to enable individuals employed or trained under such programs to move promptly into regular public or private employment. Work-based learning is a planned, structured learning experience that takes place in a workplace for a limited period of time. Work-based learning emphasizes employer engagement, includes specific training objectives, and leads to regular employment.

All work-based learning activities must be sustained interactions with industry or community professionals in real world settings to the extent practicable, or simulated environments at an educational institution that foster in-depth, firsthand engagement with the tasks required in a given career field, that are aligned to curriculum and instruction.

Work-based learning can include internships, pre-apprenticeships, customized training, transitional jobs, incumbent worker training, and on-the-job training as defined under the Workforce Innovation Opportunities Act (WIOA). Work-based learning can include both subsidized and unsubsidized employment models.

The Act permits the use of SNAP E&T funds to reimburse 50 percent of non-federal funds expended on allowable costs associated with wages through a subsidized employment program, in accordance with applicable SNAP laws and regulations, as well as the federal cost principles in title 2 of the CFR. Prior to this change federal regulations allowed for the use of SNAP E&T funds to support the administration of a subsidized employment program (case management staff, job developers, etc.) but prohibited the use of SNAP E&T and non-federal funds used as a match for SNAP E&T funds for wage subsidies (payment to the employer). Districts and/or contracted providers who intend to use SNAP E&T funds to implement a subsidized employment program must have agreements in place with employers to provide actual training to SNAP participants, and a plan to move participants into unsubsidized

employment as a result of the subsidized employment experience, with either the same employer or with another employer. Unless otherwise approved by OTDA, a subsidized employment position funded through SNAP E&T funds must be limited to a maximum of a 12-month period. After the 12-month period, it is expected that the participant remains employed without a subsidy or be placed in another appropriate activity to enable them to obtain unsubsidized employment. Subsidized employment positions may be full or part-time, but full-time positions are preferred. Income recipients earn from such subsidized placements is subject to the same consideration as other income for purposes of eligibility and benefit determination in accordance with 7 CFR 273.9. Therefore, districts and/or providers using SNAP E&T funds to support subsidized employment must be mindful that should the subsidized wages result in the household's ineligibility for SNAP, the district or provider will need to use another funding source to support the subsidized employment placement.

Apprenticeships are a specific type of work-based learning authorized by the National Apprenticeship Act, which is administered by the U.S. Department of Labor (DOL) Employment and Training Administration. Districts can find additional information about types of apprenticeships at: www.apprenticeship.gov, the U.S. Department of Labor's apprenticeship website. Districts are also encouraged to work with their local workforce agencies to determine what types of apprenticeship programs may already be operating in their district.

G. Job Retention Programs

Job retention services are designed to help individuals achieve satisfactory performance, retain employment, and to increase earnings over time. To qualify for SNAP E&T funded job retention services the recipient who is employed must have participated in another SNAP E&T activity within 90 days prior to starting employment. Districts may offer job retention services, such as case management, job coaching, dependent care assistance and transportation assistance, for up to 90 days to an individual who secured employment. Districts that offer job retention as a SNAP E&T component must make a good faith effort to provide job retention services for a minimum of 30 days. Good faith efforts may include informing participants receiving job retention services of the 30-day minimum requirement, developing a job retention case management plan that extends for at least 30 days, and continuing to conduct outreach to the individual for at least 30 days, and not more than 90 days following the date the employment started. As a best practice, districts should document that a reasonable effort was made for each job retention participant.

H. Additional Work Programs for Fulfilling the ABAWD Work Requirement

Districts were previously notified in [GIS 20 TA/DC006](#) that employment and training programs for veterans operated by the Department of Labor or the Department of Veterans Affairs are considered a qualifying ABAWD work activity for the purposes of meeting the ABAWD work requirements. New York State Career Centers offer priority of service to veterans and their eligible spouses. Among other benefits, this includes receiving first priority for jobs and training for which they are eligible and qualified. For more information on Department of Labor services available to veterans, please visit: <https://www.labor.ny.gov/vets/vetintropage.shtm>.

I. Good Cause for Failure to Participate when there is No Appropriate/Available Opening in E & T

Districts are responsible for operating a SNAP E&T program that can accommodate all mandatory SNAP E&T participants. In situations where there is not an appropriate and available opening for a mandatory E&T participant in the E&T program, the district must determine that the participant has good cause for failure to comply with the mandatory E&T requirement. If the case manager at a contracted E&T provider determines there is not an appropriate and available opening, the case manager must inform the appropriate district staff, who can then

determine if the participant has good cause. Good cause for a lack of an appropriate or available opening in an E&T program ends when the district identifies an appropriate and available opening and informs the participant.

In accordance with 7 CFR 273.24(b)(2), an ABAWD who receives good cause for failure to comply with the mandatory E&T requirement, must also receive good cause for failure to comply with the ABAWD work requirement, with one exception. An ABAWD may receive good cause for a lack of an appropriate and available opening in E&T for the mandatory E&T requirement, but this form of good cause does not extend to the ABAWD work requirement. This is because the ABAWD has other ways to meet the ABAWD work requirement outside of E&T. It is expected the ABAWD will seek out other opportunities even if there is not an appropriate and available opening in E&T. Districts implementing ABAWD requirements that receive an additional allocation of federal pledge funds to serve ABAWDs must still offer a slot in a qualifying ABAWD work activity to permit ABAWDs to remain eligible beyond the three-month limit.

An ABAWD who would have fulfilled the work requirement through working (paid or unpaid), participating in a work program, a combination of working and participating in a work program, or through a work experience program, but missed some hours for good cause, would be considered to have fulfilled the work requirement if the absence from work, the work program, or the workfare program is temporary. Good cause includes circumstances beyond the individual's control, such as, but not limited to, illness, illness of another household member requiring the presence of the member, a household emergency, or the unavailability of transportation.

J. Referral of Individuals/Provider Determination

Districts must inform their local SNAP E&T providers of their authority and responsibility to determine if an individual is not a good fit for a particular E&T component. Such determinations are referred to as provider determinations.

E&T providers know best the skills and qualifications that will likely enable an individual to be successful in their programs. As such, providers have flexibility to establish the criteria used to make a provider determination. The provider may use any information available to make the determination. Districts are encouraged to work with providers to understand the skills and qualifications needed for E&T participants to be successful in the E&T components, and to thoroughly screen individuals prior to referral, in order to reduce the number of participants referred by the district to components where they are not likely to be successful.

SNAP E&T providers have 10 days from the date of a provider determination to notify the district that a participant is not a good fit for a program. The notification must include the reason for the provider determination and may include input to the district on the most appropriate next step. If the provider is unable to provide the reason for the provider determination, the district should process the provider determination without the reason.

Districts are required to notify a mandatory or voluntary E&T participant with a provider determination within 10 days of receiving the notification from the E&T provider. Districts may make such notification either verbally or in writing, but must, at a minimum, document when the notification occurs in the participant's case file. The district must explain to the E&T participant, as applicable, what a provider determination is, the next steps the district will take as a result of the provider determination, and contact information for the district. In the case of either a mandatory or voluntary E&T participant with a provider determination, the district must also notify the individual that they are not being sanctioned as a result of the provider determination.

In the case of an ABAWD who has received a provider determination, districts implementing ABAWD requirements must also notify the ABAWD about the accrual of countable months. In particular, the district must notify the ABAWD that the ABAWD will accrue countable months toward their three-month participation time limit the next full benefit month after the month during which the district notifies the ABAWD of the provider determination, unless the ABAWD fulfills the work requirements in accordance with 7 CFR 273.24, or the ABAWD has good cause, lives in a waived area, or is otherwise exempt. Districts should refer to [18-ADM-07](#) for guidance on the requirement for districts that do not have a federally approved ABAWD waiver for all residents of the district to offer and provide a qualifying work or training opportunity to all ABAWDs who are subject to the ABAWD requirements to maintain or reestablish eligibility for SNAP.

Districts must document the provider determination and notification to the participant in the participant's case record. No later than the date of the individual's recertification, the district must take the most suitable action from the following two options:

1. **Refer the individual to an appropriate E&T program component.** If selecting this option, districts must first perform a reassessment to determine an appropriate E&T program component to refer the individual to, considering the suitability of the individual for any available E&T components. Additionally, all E&T participants must receive case management services along with at least one E&T work activity component.
2. **Re-assess the participant's physical and mental fitness.** If selecting this option, districts must perform a reassessment and screen the individual for any other exemptions from the work requirement. Individuals who are determined to be mentally or physically unfit must be exempt from the work requirement. If the individual is found to be physically or mentally fit, and the district determines the individual is not otherwise exempt from the general work requirements, the district must follow the process described in option one of this section to determine an appropriate E&T program component.

Provider determinations are not an exemption from the general SNAP work requirements or an exemption from mandatory SNAP E&T. Provider determinations are made by E&T providers based on criteria specific to that E&T provider about whether or not an E&T participant is a good fit for a particular E&T work activity component. Providers may share a reason for the provider determination with the district and suggest a next step for the individual, and the district may use that information in determining which of the two actions, identified above, the district will take with the individual. Districts may also reassess an individual with a provider determination to determine if the individual should be exempt from the general work requirement or from mandatory E&T.

The processes associated with receiving a provider determination apply to both voluntary and mandatory E&T participants.

Districts are reminded of their oversight authority to ensure E&T providers are not making unfair provider determinations or using provider determinations to discriminate against protected classes.

Districts must implement a local process for provider determinations by October 1, 2021.

K. Informing SNAP Applicants and Recipients About Their Work Requirements

During the certification process, districts must provide a written notice and oral explanation to all households where at least one member is subject to a work requirement describing the pertinent work requirements. For the purposes of this notice, the work requirements are the general work requirement, mandatory E&T, and the ABAWD work requirement. The written notice and oral explanation must also be provided to the household at recertification and when a previously exempt household member or new household member becomes subject to work requirements.

The consolidated written notice must contain all pertinent information related to each of the applicable work requirements, including: an explanation of each applicable work requirement; which individuals are subject to which work requirement; exemptions from each applicable work requirement; an explanation of the process to request an exemption (including contact information to request an exemption); the rights and responsibilities for each applicable work requirement; what is required to maintain eligibility under each applicable work requirement; dates by which an individual must take any actions to remain in compliance with each applicable work requirement; the consequences for failure to comply with each applicable work requirement; an explanation of the process for requesting good cause (including examples of good cause circumstances and contact information to initiate a good cause request); and any other information that would assist the household members with compliance. If an individual is a mandatory SNAP E&T participant, the written notice must also explain the individual's right to receive participant reimbursements for allowable expenses related to participation in E&T, and the responsibility of the local district to excuse the individual from the requirement to participate in mandatory SNAP E&T if the individual's allowable expenses exceed what the local district will reimburse. In addition to the consolidated written notice, the district must provide a comprehensive oral explanation to the household of each applicable work requirement pertaining to individuals in the household.

Districts must implement this new requirement by October 1, 2021. OTDA is in the process of developing a consolidated written notice for districts to use for informing SNAP participants about their work requirements. Additional guidance on this provision, along with a model consolidated written notice developed by OTDA, will be forthcoming in a separate directive.

VI. Systems Implications

Districts must report SNAP E&T and ABAWD work activity assignments for all TA/SNAP and NTA/SNAP recipients in the Welfare to Work Caseload Management System (WTWCMS) and/or New York City Human Resource Administration (NYC HRA) systems in a timely manner. Districts must obtain information necessary to document the actual hours of participation in unpaid work activities each month and must verify hours of paid work activities at certification, recertification, and as needed if a change is reported.

OTDA is responsible for submitting SNAP E&T Program Participant Reports to USDA FNS on a quarterly basis. The SNAP E&T Program Participant Reports include the following:

- A list of E&T components offered during the fiscal year and the number of ABAWDs and non-ABAWDs who participated in each;
- The number of ABAWDs and non-ABAWDs who participated in the E&T Program during the fiscal year. Each individual must be counted only once;

- Number of SNAP applicants and recipients required to participate in E&T in the State and of those the number who begin participation in an E&T program and the number who begin participation in an E&T component. An E&T participant begins to participate in an E&T program when the participant commences at least one part of an E&T program including an assessment, case management, or a component. An E&T participant begins to participate in an E&T component when the participant commences the first activity in the E&T component; and,
- Number of mandatory E&T participants who were determined ineligible for failure to comply with E&T requirements.

To meet these reporting requirements, districts outside of New York City must accurately and timely report activity enrollments in WTCMS for E&T participants in TA/SNAP and NTA/SNAP households. SNAP E&T participant related data for TA/SNAP and NTA/SNAP households in New York City is reported directly to OTDA by the NYC HRA.

VII. Effective Date

All provisions in the Act as outlined in this ADM are effective immediately, with the exception of the following provisions, which are effective October 1, 2021:

- The processes associated with provider determinations
- The processes associated with the new consolidated work notice and oral explanation

Additional guidance on the consolidated work notice and oral explanation to inform SNAP participants of their work requirements will be forthcoming in a separate directive.

Issued By:

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