



Office of Temporary and Disability Assistance

KATHY HOCHUL
Governor

DANIEL W. TIETZ
Commissioner

BARBARA C. GUINN
Executive Deputy Commissioner

Administrative Directive Memorandum

Section 1

Transmittal:	22-ADM-08
To:	Social Services District Commissioners
Issuing Division/Office:	Employment and Income Support Programs (EISP)
Date:	June 29, 2022
Subject:	Changes made to the Welfare-to-Work Caseload Management System (WTWCMS) to Ensure Compliance with Section 4005 of the Agriculture Improvement Act of 2018
Suggested Distribution:	Commissioners, TA Directors, SNAP Directors, Employment Coordinators, Staff Development Coordinators
Contact Person(s):	Employment and Advancement Services at 518-486-6106 or otda.sm.eisp.eas@otda.ny.gov
Attachments:	None

Filing References

Previous ADMs/INFs	Releases Cancelled	Dept. Regs.	Soc. Serv. Law & Other Legal Ref.	Manual Ref.	Misc. Ref.
21-ADM-05		18 NYCRR 385.3, 385.9	Title IV, Section 4005 of the Agriculture Improvement Act of 2018	Employment Policy Manual Sections 3 and 9	7 CFR 273.7 GIS 16 TA/DC052 07-ADM-08 08-ADM-07 21-ADM-04

Section 2

I. Summary

This Administrative Directive Memorandum (ADM) provides guidance on changes to the Welfare-to-Work Caseload Management System (WTWCMS) implemented to ensure compliance with federal reporting requirements introduced in [21-ADM-05](#).

II. Purpose

The purpose of this ADM is to inform social services districts (districts) of changes to WTWCMS implemented to ensure compliance with federal reporting requirements introduced in [21-ADM-05](#). This ADM also provides direction to districts regarding data entry and other actions that districts

must take as a result of these changes. In addition, this ADM includes important information related to the recording and tracking of participation in case management.

III. Background

Federal Reporting Requirements

As a result of the Agricultural Act of 2014, the United States Department of Agriculture (USDA) developed national and state Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T) reporting measures to monitor SNAP E&T programs provided by states, assess the effectiveness of the programs in preparing members of households participating in SNAP E&T for employment, and increase the number of household members who obtain and retain employment subsequent to SNAP E&T participation. The Office of Temporary and Disability Assistance (OTDA) informed districts of the national and state SNAP E&T reporting measures in [GIS 16 TA/DC052](#).

The Agriculture Improvement Act of 2018 (the Act), commonly referred to as the 2018 Farm Bill, contained changes pertaining to the SNAP E&T program and certain aspects of the work requirement for able-bodied adults without dependents (ABAWDs) as well as several additional reporting requirements for states. The changes made by section 4005 of the Act including the new reporting requirements were implemented by the final rule *Employment and Training Opportunities in the Supplemental Nutrition Assistance Program* published on January 5, 2021. These additional reporting requirements are described below.

Federal regulations at 7 CFR 273.7(c)(9) require State agencies to submit SNAP E&T Program Activity Reports to USDA Food and Nutrition Service (USDA-FNS) on a quarterly basis. The final quarterly report for the year must include the following:

- A list of SNAP E&T activity components offered during the fiscal year and the number of ABAWDs and non-ABAWDs who participated in each activity component;
- The number of ABAWDs and non-ABAWDs who participated in the SNAP E&T Program during the fiscal year (each individual must be counted only once);
- The number of SNAP applicants and recipients required to participate in SNAP E&T in the State separated between those who begin a specific program and those who begin a specific activity within a program. A single program may offer multiple activities.
 - Program participation commences when the participant begins at least one part of a SNAP E&T program including an assessment, case management, or an activity component.
 - A SNAP E&T participant begins a SNAP E&T activity component on the first day of participation in that activity component; and
- The number of mandatory SNAP E&T participants who were determined ineligible due to failure to comply with SNAP E&T requirements.

As indicated in [GIS 16 TA/DC052](#), OTDA uses wage reporting data to meet the national reporting measures and to document entries to employment for individuals who completed a SNAP E&T activity component, as reported by districts other than New York City (NYC) through WTWCMS and data reported by the NYC Human Resources Administration (HRA) for SNAP recipients that reside in NYC. To ensure compliance with the new SNAP reporting requirements for upstate districts, OTDA has implemented several changes to WTWCMS. NYC HRA is also modifying their systems to comply with the reporting requirements introduced in [21-ADM-05](#). Please note that the implementation of these modifications to WTWCMS does not affect the reporting of work activities in which Temporary Assistance (TA) applicants and recipients are engaged for the purposes of the participation rate calculation. Participation reported in WTWCMS under all newly added activity components and used in the participation rate calculation remains consistent with the federal requirements outlined in [08-ADM-07](#) and [21-ADM-04](#) and state requirements for safety net households without dependent children outlined in [07-ADM-08](#).

Addition of Newly Defined SNAP E&T Activity Components to New York State's SNAP E&T Program

Each year, OTDA is required to submit a State SNAP E&T Plan to USDA-FNS. The State Plan must contain a description of the State's E&T program and provide detailed information about the SNAP E&T activity components the State offers. Longstanding SNAP E&T activity components currently provided through New York State's SNAP E&T program are: supervised job search; job readiness assistance; job retention; work experience; education training including literacy training and high school equivalency preparation; career and/or technical education; subsidized public sector employment; subsidized private sector employment; and community service.

As a result of changes to the definitions of SNAP E&T activity components implemented by the final rule published by USDA-FNS on January 5, 2021, the NYS SNAP E&T Plan for FFY 2022 includes several newly defined activity components. Please note that the majority of these activity components are already being offered by local districts. However, prior to the implementation of the final rule, districts were not required to report participation in these activities discretely. The below listed educational activity components were tracked and recorded by generating enrollments for the activity High School and the work-based learning activity components were tracked and recorded by generating enrollments for the activities Subsidized Private Sector Employment or Subsidized Public Sector Employment.

Due to the changes in activity definitions and reporting requirements districts must begin reporting participation in these activity components discretely under the proper activity component category. The new activity components along with their definitions are listed below:

- **Educational Programs**

- **English as a Second Language (ESL)**

ESL classes, categorized under Education Training for Temporary Assistance for Needy Families (TANF) reporting purposes, are designed to teach a variety of language skills to non-native English speakers (also known as English language learners). Participation in this educational activity component is expected to improve job opportunities for participants. SNAP E&T funds may be used to support educational services for eligible individuals that are not otherwise available to a participant at no cost. Participants must meet the satisfactory attendance and progress standards established by the education/training provider and approved by the district.

- **Bridge Programs**

Bridge programs prepare individuals with low educational attainment and limited skills for entry into a higher education level, occupational skills training, or career-track jobs by building the competencies necessary for work and education alongside career and supportive services. Bridge programs contextualize programming to a specific industry sector and have established relationships with partners (occupational training, education, and/or specific sector employment) who inform program design and serve as the primary destination for program participants.

Bridge programs pair educational instruction and workforce development services using one of two approaches:

- **Contextualized Instruction:** These programs teach academic skills contextualized with sector-specific content. The primary goal for these programs is educational attainment. Levels of contextualization differ according to participants' literacy level. The sector focus serves as an engagement technique and complements career counseling services to support participants in exploring industry sectors.

- **Integrated Instruction:** These programs incorporate basic education into an occupation-specific training. The primary goal for these programs is attainment of an industry-recognized credential, entry into advanced training, or employment. The incorporation of basic education supports individuals whose literacy/numeracy levels preclude them from enrollment in traditional training programs.
- **Work-Based Learning Programs**

Federal regulations at 7 CFR 273.7(e)(2)(iv) and 7 CFR 273.7(e)(2)(iv)(A)(2) describe SNAP E&T work-based learning programs as programs designed to improve the employability of household members and to enable program participants to move promptly into regular public or private sector employment. Work-based learning is a planned, structured learning experience that takes place in a workplace or simulated environment for a limited period of time. Work-based learning emphasizes employer engagement, includes specific training objectives, and leads to regular employment. The following work-based learning programs are allowable SNAP E&T activity components included in NYS's SNAP E&T Plan for FFY2022:

- **Internships**

A work-based learning program which, for the purposes of SNAP E&T, entails 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.

- **Pre-Apprenticeships/Apprenticeships**

Pre-apprenticeship is a program, or set of strategies, designed to prepare individuals for entry into New York State Registered Apprenticeship Programs or other job opportunities. Pre-apprenticeships may last from a few weeks to a few months and may or may not include wages or stipends. Registered apprenticeship is a formal training relationship between an employer and an employee. It is for a specific period of time and combines hands-on work experience in real world settings with classroom instruction. During this time, the worker or apprentice learns a trade. The goal of the apprenticeship is to develop professional, independent, skilled workers.

- **On-the-Job Training (OJT)**

Participation in a public or private sector employment setting, during which the paid employee receives work-essential training and engages in productive work that provides them with the knowledge and skills essential to the full and adequate performance of the job. Supervision of recipients in OJT is provided in a manner determined appropriate by the employer. Please note that OJT as defined by the Workforce Innovation and Opportunity Act (WIOA) is a type of work-based learning activity component in which the employer is reimbursed up to 50 percent of the wage of participants to cover the extraordinary costs of providing the training and additional supervision related to the OJT. OJT payments to employers are deemed to be compensation for the extraordinary costs associated with training participants and the costs associated with the lower productivity of the participants (20 CFR 663.710). SNAP E&T funds can be used to reimburse the portion of the wage allotted as the employer's cost to train the participant. Thus, since OJT activities do not actually subsidize the participant's wage but rather reimburse OJT providers for training costs, wage subsidies using SNAP E&T funds are not appropriate.

- **Transitional Jobs**

Transitional Jobs are a time-limited work placement offering experience that is wage-paid and subsidized, and is in the public, private or non-profit sectors. Transitional jobs are intended for those individuals with barriers to employment who are chronically unemployed or have inconsistent work history. These jobs are designed to enable an individual to establish a work history, demonstrate success in an employee-employer relationship, and develop the skills that lead to unsubsidized employment.

In addition to modifying the definitions of certain SNAP E&T components, the 2018 Farm Bill, in accordance with applicable SNAP laws and regulations, as well as the federal cost principles in title 2 of the CFR, permits the use of 100% and 50% SNAP E&T funds for allowable costs associated with wages through a subsidized employment program. Districts that offer work-based learning activity components where SNAP E&T funding is used to subsidize the wages of participants must report participation in these activity components discretely. For example, an individual's participation in a paid internship program where the participant's wages are subsidized with SNAP E&T funds must be reported separately from participation in a paid internship program where participants receive a subsidized wage from another source.

Note: As outlined in [22-LCM-03-T](#) FFY 2022 Supplemental Nutrition Assistance Program Employment and Training Allocations districts that are interested in operating a program where wages are subsidized with SNAP E&T funds must submit a proposal to OTDA for review and approval prior to implementing such a program. The proposal must provide the number of participants, the anticipated costs, partner organizations and their role (if applicable), a description of the training that will occur while the participant is engaged in the program, and projected outcomes.

IV. Program Implications

Addition of New Activity Components in WTCMS

To assist districts in complying with the requirement to report discrete participation in each of the aforementioned newly defined activity components, OTDA has implemented the modifications to WTCMS listed below:

- Added the following items to the **Activity** drop-down menu under High School:
 - English as a Second Language – (ESL) – an enrollment for this activity component must be generated to track and report an individual's hours of participation in English as a Second Language instruction.
 - Bridge Programs – (Bridge Program) – an enrollment for this activity component must be generated to track and report an individual's hours of participation in a Bridge Program.
- Added the following items to the **Activity** drop-down menu under Subsidized Private Sector Employment (SUB-PVT-SC):
 - Internship – SNAP E&T Subsidized Wage (Intern - SNAP E&T Sub Wage) – an enrollment for this activity component must be generated to track and report an individual's hours of participation in a paid internship program at a private sector employment setting where the participant's wages are subsidized with SNAP E&T funds.
 - Internship – Non-SNAP E&T Subsidized Wage (Intern – Non-SNAP E&T Sub Wage) – an enrollment for this activity component must be generated to track and report an individual's

hours of participation in a paid internship program at a private sector employment setting where the participant's wages are **not** subsidized with SNAP E&T funds.

- Pre-Apprenticeship – SNAP E&T Subsidized Wage (Pre-Apprentice – SNAP E&T Sub Wage) – an enrollment for this activity component must be generated to track and report an individual's hours of participation in a pre-apprenticeship at a private sector employment setting where the participant's wages are subsidized with SNAP E&T funds.
- Pre-Apprenticeship – Non-SNAP E&T Subsidized Wage (Pre-Apprentice – Non-SNAP E&T Sub Wage) – an enrollment for this activity component must be generated to track and report an individual's hours of participation in a pre-apprenticeship at a private sector employment setting where the participant's wages are **not** subsidized with SNAP E&T funds.
- Apprenticeship – SNAP E&T Subsidized Wage (Apprentice – SNAP E&T Sub Wage) – an enrollment for this activity component must be generated to track and report an individual's hours of participation in an apprenticeship at a private sector employment setting where the participant's wages are subsidized with SNAP E&T funds.
- Apprenticeship – Non-SNAP E&T Subsidized Wage (Apprentice – Non-SNAP E&T Sub Wage) – an enrollment for this activity component must be generated to track and report an individual's hours of participation in an apprenticeship at a private sector employment setting where the participant's wages are **not** subsidized with SNAP E&T funds.
- OJT– Non-SNAP E&T Subsidized Wage (OJT – Non-SNAP E&T Sub Wage) – an enrollment for this activity component must be generated to track and report an individual's hours of participation in an OJT program at a private sector employment setting where the participant's wages are not subsidized with SNAP E&T funds. As explained above, using SNAP E&T funds to subsidize the wages of OJT participants is not appropriate.
- Transitional Jobs – SNAP E&T Subsidized Wage (Transitional Job – SNAP E&T Sub Wage) – an enrollment for this activity component must be generated to track and report an individual's hours of participation in a Transitional Jobs program at a private sector employment setting where the participant's wages are subsidized with SNAP E&T funds.
- Transitional Jobs – Non-SNAP E&T Subsidized Wages (Transitional Job – Non-SNAP E&T Sub Wage) – an enrollment for this activity component must be generated to track and report an individual's hours of participation in a Transitional Jobs program at a private sector employment setting where the participant's wages are **not** subsidized with SNAP E&T funds.
- Added the following items to the **Activity** drop-down menu under Subsidized Public Sector Employment (SUB-PUB-SC):
 - Internship – SNAP E&T Subsidized Wage (Intern - SNAP E&T Sub Wage) – an enrollment for this activity component must be generated to track and report an individual's hours of participation in a paid internship program at a public sector employment setting where the participant's wages are subsidized with SNAP E&T funds.
 - Internship – Non-SNAP E&T Subsidized Wage (Intern – Non-SNAP E&T Sub Wage) – an enrollment for this activity component must be generated to track and report an individual's hours of participation in a paid internship program at a public sector employment setting where the participant's wages are **not** subsidized with SNAP E&T funds.
 - Pre-Apprenticeship – SNAP E&T Subsidized Wage (Pre-Apprentice – SNAP E&T Sub Wage) - an enrollment for this activity component must be generated to track and report an

individual's hours of participation in a pre-apprenticeship at a public sector employment setting where the participant's wages are subsidized with SNAP E&T funds.

- Pre-Apprenticeship – Non-SNAP E&T Subsidized Wage (Pre-Apprentice – Non-SNAP E&T Sub Wage) – an enrollment for this activity component must be generated to track and report an individual's hours of participation in a pre-apprenticeship at a public sector employment setting where the participant's wages are **not** subsidized with SNAP E&T funds.
- Apprenticeship – SNAP E&T Subsidized Wage (Apprentice – SNAP E&T Sub Wage) – an enrollment for this activity component must be generated to track and report an individual's hours of participation in an apprenticeship at a public sector employment setting where the participant's wages are subsidized with SNAP E&T funds.
- Apprenticeship – Non-SNAP E&T Subsidized Wage (Apprentice – Non-SNAP E&T Sub Wage) – an enrollment for this activity component must be generated to track and report an individual's hours of participation in an apprenticeship at a public sector employment setting where the participant's wages are **not** subsidized with SNAP E&T funds.
- OJT – Non-SNAP E&T Subsidized Wage (OJT – Non-SNAP E&T Sub Wage) – an enrollment for this activity component must be generated to track and report an individual's hours of participation in an OJT program at a public sector employment setting where the participant's wages are not subsidized with SNAP E&T funds. As explained above, using SNAP E&T funds to subsidize the wages of OJT participants is not appropriate.
- Transitional Jobs – SNAP E&T Subsidized Wage (Transitional Job – SNAP E&T Sub Wage) – an enrollment for this activity component must be generated to track and report an individual's hours of participation in a Transitional Jobs program at a public sector employment setting where the participant's wages are subsidized with SNAP E&T funds.
- Transitional Jobs – Non-SNAP E&T Subsidized Wages (Transitional Job – Non-SNAP E&T Sub Wage) – an enrollment for this activity component must be generated to track and report an individual's hours of participation in a Transitional Jobs program at a public sector employment setting where the participant's wages are **not** subsidized with SNAP E&T funds.

Addition of an Activity for Case Management in WTCMS

The final rule also requires that, in addition to providing one or more SNAP E&T components, all SNAP E&T programs provide case management services to SNAP E&T participants. This change was previously outlined in [21-ADM-05](#), which specifies that all districts must operate a SNAP E&T program that consists of case management and at least one SNAP E&T activity component. Case management services must directly support an individual's participation in the SNAP E&T program. They should be tailored to the needs of each participant and based on the completion of an employability assessment. The definitions of case management services and employability assessments follow below:

- **Case Management**

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. The purpose of case management services is to guide the participant toward appropriate SNAP E&T activity components based on the participant's needs and interests, support the participation in the SNAP E&T program, and to provide activities and resources that help the participant achieve program goals. Case management may include referrals to activities and supports outside of the SNAP E&T program, but districts can only use SNAP E&T funds for allowable activity components and participant reimbursements.

- **Employability Assessments**

Employability 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. They should be used to identify the skills individuals have or need to be successful in finding and retaining employment. Districts have broad flexibility in the manner and timing of completion of the employability assessment.

[21-ADM-05](#) further clarifies that SNAP E&T participation is considered mandatory for nonexempt TA/SNAP work registrants, who must be provided with case management and the assignment to at least one SNAP E&T activity component. Non-Temporary Assistance (NTA)/SNAP recipients who are assigned by the district to a mandatory SNAP E&T assignment (in accordance with Section 5.2 of the district's biennial employment plan) must also receive case management services and be assigned to at least one SNAP E&T activity component.

Furthermore, federal regulations at 7 CFR 273.7(e)(4) specify that the time spent participating in case management must be counted toward the time a participant spends in SNAP E&T. In addition, participation in SNAP E&T is also a way for ABAWDs to fulfill the ABAWD work requirement. As such, hours a SNAP E&T participant spends with a case manager must count towards the participant's mandatory SNAP E&T and ABAWD work requirement. An assessment is considered an element of case management. The completion of an initial assessment generally signifies the beginning of an individual's participation in the SNAP E&T program. As indicated in the *Federal Reporting Requirements* section of this directive, due to changes in reporting requirements imposed by USDA-FNS, State agencies are required to report the number of SNAP applicants and recipients who begin participation in a SNAP E&T program and the number who begin participation in a SNAP E&T activity component.

To assist districts in complying with these reporting requirements, OTDA added a new activity to the **Activity** drop-down menu in WTCMS titled Case Management. The Case Management activity will have two subcategories:

- Case Management other than assessment (CS MGMT other than ASMT) – an enrollment for this activity must be generated to track the time SNAP E&T participants spend in case management.
- Case Management: Assessment (CS MGMT: ASMT) - enrollments in the activity Case Management: Assessment will facilitate tracking and reporting of the number of SNAP applicants and recipients who begin participation in the district's SNAP E&T program in instances where the assessment is not embedded in the SNAP E&T activity component itself. In cases where the assessment is provided as part of the specific SNAP E&T activity component, time spent to complete the assessment should also be recorded as participation in Case Management: Assessment to distinguish participation in the assessment process from participation in routine case management sessions.

Please note that creating an enrollment for Case Management other than Assessment or Case Management: Assessment is used solely for SNAP reporting purposes and will not trigger reporting for the purposes of the participation rate calculation.

V. Required Action

To meet the reporting requirements imposed by USDA-FNS, districts outside of NYC must report activities correctly under the appropriate newly created activity components in WTCMS and generate the corresponding enrollments in the system to ensure proper tracking and reporting of participation in SNAP E&T activity components for individuals in TA/SNAP and NTA/SNAP households. Districts must report SNAP E&T and ABAWD work activity assignments for all TA/SNAP and NTA/SNAP recipients in WTCMS and/or NYC HRA systems. Districts must obtain information

necessary to document the actual hours of participation in unpaid work activity components each month and must verify hours of paid work activity components at certification, recertification, and as needed if a change is reported. As noted above, the implementation of these modifications to WTWCMS does not affect the reporting of work activities in which TA applicants and recipients are engaged for the purposes of the participation rate calculation. Participation reported in WTWCMS under the newly added activity components and used in the participation rate calculation remains consistent with the federal requirements outlined in [08-ADM-07](#) and [21-ADM-04](#) and state requirements for safety net households without dependent children outlined in [07-ADM-08](#).

Upon the release of this ADM districts must start using the new activity definitions and generating the appropriate enrollments in the system. The reporting requirements **do not** apply retroactively; therefore, districts are not required to adjust existing enrollments at this time. However, for individuals who are currently enrolled in a Bridge Program or ESL classes and whose participation is tracked and reported under the category High School, districts will be required to close the existing enrollment and create a new one under the appropriate newly defined activity component if the participation continues past September 30, 2022. Likewise, for individuals who are currently enrolled in a paid internship, pre-apprenticeship, apprenticeship, OJT, or a transitional jobs program and whose participation is tracked and reported under one of the general work activity categories Subsidized Private Sector Employment or Subsidized Public Sector Employment, districts will be required to close the existing enrollment and generate a new one under the appropriate newly added activity component if the participation continues past September 30, 2022 to ensure that as of October 1, 2022 discrete activity components are accurately reported. Districts are encouraged to contact their Employment Services Advisor for technical assistance regarding these changes.

VI. Effective Date

Immediately.

Issued By:

Name: Valerie T. Figueroa

Title: Deputy Commissioner

Division/Office: Employment and Income Support Programs