



Administrative Directive Memorandum

Section 1

Table with 2 columns: Field (Transmittal, To, Issuing Division/Office, Date, Subject, Suggested Distribution, Contact Person(s), Attachments) and Value.

Filing References

Table with 6 columns: Previous ADMs/INFs, Releases Cancelled, Dept. Regs., Soc. Serv. Law & Other Legal Ref., Manual Ref., Misc. Ref.

Section 2

I. Summary

This Administrative Directive (ADM) is to inform social services districts (districts) of the opportunity to utilize the SNAP E&T 50% funding reimbursement model to enter into partnerships with community-based organizations (CBOs), State universities, community colleges, employers, and other organizations in the workforce development system to deliver SNAP E&T services.

## II. Purpose

The purpose of this ADM is to inform districts of the opportunity to utilize the SNAP E&T 50% reimbursement model to enter into partnerships with providers of employment and training services and to put forth guidance and direction for establishing and operating such partnerships. Throughout this policy directive the term “third-party partnerships” is used to refer to partnerships between districts and providers of employment and training services where providers are responsible for outlaying 100% of the expenses for serving eligible SNAP E&T program participants and receive 50% reimbursement for allowable expenses from the district. The district may then seek reimbursement through the federal SNAP E&T 50% funding.

## III. Background

The purpose of the SNAP E&T program is to provide SNAP participants with opportunities to gain the skills, training, or work experience they need to move forward to sustainable, gainful employment with the goal of achieving financial independence and stability. The SNAP E&T program is also intended to offer SNAP participants varying ways to meet SNAP work requirements.

All districts must operate a SNAP E&T program consisting of case management services and one or more of the work activity components authorized under [18 NYCRR 385.9](#) that are included in a district’s local biennial employment plan as part of the district’s SNAP E&T program. Individuals who participate in a SNAP E&T work activity component on a voluntary or mandatory basis must be provided with case management services. Case management comprises activities such as comprehensive intake assessments, individual service plans, progress monitoring, and coordination with service providers. Case management may also include referrals to activities and supports outside of the district’s SNAP E&T program, but districts can only use SNAP E&T funds for allowable activities. SNAP E&T work activity components may include adult basic education, education leading to a high school equivalency diploma, bridge programs, English as a Second Language (ESL) instruction, job skills training, vocational training including post-secondary education, work experience, pre-apprenticeships, apprenticeships, internships, on-the-job training, transitional jobs, job readiness training, community service, and supervised job search. Detailed information about SNAP E&T activity components that may be offered through New York State’s SNAP E&T Program can be found in Part B of Section [385.3](#) in the TA and SNAP Employment Policy Manual.

To support local SNAP E&T operations, the Office of Temporary and Disability Assistance (OTDA) provides each district with an annual 100% SNAP E&T funding allocation. The 100% federal funds are available to fully reimburse SNAP E&T eligible administrative costs without any required non-federal share. Additionally, federal 50% SNAP E&T funds are available to districts to reimburse 50% of SNAP E&T eligible expenditures. Each district’s 50% SNAP E&T target allocation is based on the district’s SNAP E&T claiming history and available federal funding. The total amount of 50% SNAP E&T funds available to districts is based on New York State’s 50% SNAP E&T target allocation.

## IV. Program Implications

Due to the limited amount of 100% SNAP E&T funding available, districts are encouraged to explore third-party partnerships to expand the array of SNAP E&T services available to eligible SNAP participants. Districts can leverage 50% SNAP E&T reimbursement by partnering with third parties that can satisfy the non-federal funding requirement and deliver SNAP E&T services.

In this third-party partnership model, partner organizations use allowable non-federal funding for the operation of the SNAP E&T program including the provision of allowable SNAP E&T services and supports, which are then eligible for a 50% reimbursement through the district’s SNAP E&T program. Third-party providers may include but are not limited to CBOs, State universities,

community colleges, employers, public school districts, and Boards of Cooperative Educational Services (BOCES).

### **Allowable Sources of Non-federal Funding**

Examples of allowable non-federal funding include private cash donations from non-federal third parties such as charitable foundations/organizations but cannot include private cash donations from an individual. Local tax levy dollars such as those provided by the New York City Council Discretionary Funds that are received by a non-profit organization could be used toward the non-federal funding requirement. State funds received by a non-profit or other organization can also be used as non-federal funding.

Third-party providers that are government/public entities may also use eligible in-kind contributions to satisfy all or a portion of the non-federal funding requirement. In-kind contributions are property or services which benefit the project or program, and which are contributed by non-federal third parties without charge to the third-party provider. In-kind contributions must also be funded through eligible non-federal sources. Examples of in-kind benefits may include:

- Use of space from a school district, public library or State university when they do not expect payment for use of the space; and,
- Teacher's time donated by a school district or community college.

A governmental entity is defined as any organization of State or local government that is supported by funds derived from general tax revenues of a state or locality specifically allocated from appropriate budgetary authority, such as a state legislature, county or local government. Examples of governmental entities that may receive in-kind contributions include:

- Public entities, which are an arm of government
- Public libraries
- State universities and community colleges
- Public school districts, including BOCES

Third-party providers that are not defined as a governmental entity may not use in-kind contributions to support their program even if the in-kind source derives from a governmental entity. Examples of entities that may not utilize in-kind contributions to meet the non-federal funding requirement include:

- Private entities, even if under contract with State government
- Private universities and community colleges
- Private non-profit organizations
- Private schools

For non-governmental organizations, there must be a cash outlay for the SNAP E&T goods and services provided in order to receive a 50% reimbursement. In-kind (non-cash) contributions from non-government organizations are not allowable as charges to SNAP E&T. In-kind contributions are only allowable for governmental organizations.

As indicated previously, funds used to receive 50% SNAP E&T reimbursement must not be from a federal source unless specified by federal legislation. One exception to this funding rule is related to the use of *Community Development Block Grant* (CDBG) funds. CDBG funds supporting SNAP E&T services are eligible for 50% SNAP E&T reimbursement. Please see section 105(a)(9) of the Community Development Act of 1974 for further information.

Districts interested in implementing a third-party partnership are encouraged to reach out to their OTDA Employment Services Advisor (ESA) with specific questions regarding allowable sources of non-federal funding.

## Benefits of Third-Party Partnerships

- Help districts expand their SNAP E&T programs.
- Help districts reach more SNAP participants.
- Improve program outcomes.
- Help districts capitalize on third-party providers' expertise and experience within the workforce and employment and training arena to ensure SNAP participants are offered high-quality services.
- Third-party vendors are responsible for outlaying 100% of the expenses up front.

## District Considerations When Thinking about Third-Party Partnerships

When developing third-party partnerships, districts should consider how their expanded SNAP E&T programs will align with local workforce development priorities, such as increasing postsecondary education attainment, growing a skilled workforce and meeting labor market demand.

Districts must consult with their local workforce development board (LWDB) to identify specific sectors and occupations where the local labor supply is not meeting employer demand, thus presenting an opportunity for SNAP E&T participants. In addition, districts may want to consider holding discussions directly with major employers to gain a better understanding of what skills employers are looking for in an employee and how employers may be able to partner with the district in training and hiring participants. These conversations will help districts assess if there are gaps between the jobs the E&T program is preparing participants for and where the labor market has the most need. In addition, districts can also find labor market information on the NYS Department of Labor website. The website provides a comprehensive overview of labor data, including wages, projections, job figures, and more. The [Research & Statistics Division of the Department of Labor](#) is the premier source of labor market information in the State. The [Labor Market Briefings](#) section of the website offers in-depth region-specific information about which industries gained jobs, unemployment rates, demographics, and labor market development.

Districts should think about what gaps in services in other programs and/or funding streams exist and how SNAP E&T funding could help bridge those gaps as allowable. The strategic implementation of the third-party partnership model will help districts maximize the impact of their SNAP E&T programs by using 50% funds to build on investments and effective employment and training services provided by community colleges, community-based organizations (CBOs), State universities, and other agencies. When conducting a gap analysis to identify appropriate third-party providers, districts must consider employment and training offerings available through the Venture V Program (if operating in the local area) for SNAP Participants to ensure there is no duplication of services. Information about currently operating Venture providers can be accessed at [County Employment & Training Contractors](#).

## Selecting Third-Party Partners

The appropriate third-party partners will:

- Provide suitable services (e.g., are skill-based, lead to industry-recognized certificates or credentials, align with SNAP E&T activity components, use high-quality labor market information, address in-demand occupations, employ best practices such as career pathways, fill critical gaps) with positive outcomes.
- Have appropriate funding (stable, non-federal sources of funding) and capacity (financial stability, good record on contracts, ability to meet contract requirements).
- Serve the appropriate participants (those who are receiving or are eligible to receive SNAP, targeted populations and geographic areas) by implementing a holistic, individualized approach.
- Have client-centered models and strong partnerships in the community to be able to provide a vast array of supportive services.

- Fully understand applicable policies and procedures and have the information and training they need to meet their contractual responsibilities.

For additional information on unique considerations for selecting third-party providers to build and strengthen their SNAP E&T programs, districts can refer to the brief [Selecting the Right E&T Providers for Your Program](#) prepared by Mathematica for the U.S. Department of Agriculture (USDA) Food and Nutrition Service (FNS). This resource describes a variety of best practices for State and local SNAP E&T administrators to consider when selecting providers that will best fit their programs and meet the needs of program participants.

## **Monitoring and Oversight**

Third-party partnerships must:

- Follow local procurement rules.
- Have an appropriate Memorandum of Understanding (MOU) or contract in place.
- Have clear referral and information sharing processes in place to ensure compliance with local, State, and federal reporting requirements.
- Have proper fiscal controls and monitoring to ensure that federal and State SNAP E&T guidelines are followed.
- Have clearly defined activities and outcomes.
- Clearly identify how case management and supportive services will be provided to participants.

Monitoring and oversight of third-party partners should include but may not be limited to:

- Fiscal review of all expenditures
- Case file reviews to ensure program eligibility and appropriateness of the activities and services provided
- Guidelines for partners that address allowable SNAP E&T activities, costing methods/cost allocations, keeping an audit trail, maintaining adequate documentation in participant case records, mandatory reporting requirements, data security, and client confidentiality.

## **Participant Eligibility**

Districts and third-party partners must work together to verify that all participants are eligible for services received and that SNAP E&T funds are both spent on allowable costs and eligible for reimbursement. Districts must provide guidance regarding individuals who are eligible to receive SNAP E&T-funded services and implement a process with providers to confirm program eligibility on a monthly basis. SNAP E&T participants may enroll with multiple service providers to ensure that participants receive a comprehensive set of services; however, when SNAP E&T participants are co-enrolled with multiple service providers, districts should monitor participant activities to prevent duplication of services. Districts are ultimately responsible for ensuring that participants enrolled in SNAP E&T are eligible for the services provided and SNAP E&T funds are used appropriately.

In this vein, when exploring opportunities to develop third-party partnerships, districts should keep in mind that SNAP E&T funds cannot be used to supplant State, county, or local funds for educational programs generally available to residents. They can only pay for the same amount for costs (tuition, fees, books, etc.) that other, non-SNAP E&T students pay. Thus, SNAP E&T funds cannot support any instructional costs that the State, or other sources, subsidize for non-SNAP E&T students. For example, if adult basic education is typically available free of charge, SNAP E&T funds cannot support the costs of instruction for individuals attending an adult basic education program. However, SNAP E&T programs can cover enhanced services provided exclusively to SNAP E&T participants, such as intensive case management including completion of an employability assessment, development of an individualized employment plan, coordination with service providers, progress monitoring and a robust array of supportive services.



## Reimbursement of Third-Party Providers

Districts should develop an efficient process that reimburses third-party partners for allowable services in a timely fashion. To ensure that third-party partners understand the invoicing process, districts should establish clear policies and procedures governing how third-party partners will invoice the district for reimbursement for their expenditures on eligible SNAP E&T services. Districts are encouraged to explore existing services in the community offered by high-quality service providers. Districts have flexibility to determine policies and procedures governing SNAP E&T service delivery and should collaborate with service providers to determine what works best for both the provider and the district. For example, third-party partners may choose to use a cohort model to serve SNAP E&T participants, or they may choose to cost allocate across programs. The approach will likely depend on the size of the SNAP E&T population to be served in the district and by a given service provider. There may not be enough clients interested in the same training to fill a cohort and cost allocating across programs can reduce the time an individual must wait to enroll in a specific program.

## Approval of a Third-Party Partnership

All SNAP E&T supported contracts/MOUs must be approved by OTDA prior to their execution. Districts must consult with their assigned OTDA ESA and provide contract specifics and documents. Local SNAP E&T-funded contracts with third-party providers that are approved by OTDA and executed during the biennial employment plan cycle must be included in the district's Employment Plan through the plan amendment process. When establishing third-party partnerships, each district must adhere to its local procurement procedures, have the appropriate Memorandum of Understanding (MOU) or contract in place and implement proper fiscal controls and monitoring to ensure that federal and State SNAP E&T guidelines are followed.

## V. Required Action

### Third-Party Partnership Implementation

OTDA encourages districts to explore third-party partnerships as an avenue to expand the array of SNAP E&T services available to eligible SNAP applicants and recipients. Districts that implement this model successfully will benefit since the third-party provider will be responsible for outlaying 100% of the expenses for providing allowable SNAP E&T services. Participants will also benefit, as training opportunities will expand and give them a wider diversity of potential employment options. Under this scenario:

1. Districts are provided with their 50% SNAP E&T target allocations via annual policy release.
2. Districts seek out and consider providers based on the criteria referenced on page 4 of this guidance document. Districts should also review provider program design and proposed outcomes.
3. Districts are required to consult with their LWDB that the training and/or work-based learning programs being offered will provide workforce skills that are in demand within the local workforce investment area, and with proper preparation, participants will obtain and retain jobs within the local labor market. To assist districts in the implementation of this requirement, OTDA has developed a *Local Workforce Development Board (LWDB) Approval* form (Attachment 1) which partnering providers must use to document the approval of their program offering(s) by the respective LWDB.
4. Districts contract with SNAP E&T providers (following local and State procurement requirements). Contracts will identify planned services, referral and eligibility verification processes, contractor reporting responsibilities and proposed outcomes. They will also include detailed budget information and identify the eligible non-federal funding that the contractor will use to receive 50% SNAP E&T funding reimbursement.
5. Districts will submit local SNAP E&T contracts to the OTDA Employment and Advancement Services (EAS) Bureau for review and approval prior to execution.
6. Once a local contract is executed, contractor requests for reimbursement will be sent to

the district for review and will include documentation to support 100% of expenditures.

7. Districts will review the documentation supporting all eligible expenditures and may request clarifications and additional documentation. If the district believes the appropriate documentation to support the expenditures has been submitted, they will reimburse the provider for 50% of the provider's total expenditures attributed to SNAP E&T services.
8. Once provider reimbursement has occurred, the district may claim through a special project within the Automatic Claiming System (ACS) for their costs incurred, which is 50% of the total amount of E&T services incurred by the provider.
9. Once the claim has been received by OTDA, OTDA will reimburse 100% of the submitted claim to the district utilizing SNAP E&T 50% funding.
10. OTDA will incorporate the cost reimbursed to the district and the gross-up of costs (50% of provider costs) into the OTDA Central Office Cost Allocation Claim (COCAC) in order to report the full 100% value of the E&T costs for federal reporting purposes. The gross-up of costs in the COCAC is based on the assumption that the payment made by the district to the provider represents 50% of the amount invoiced by the provider for their eligible incurred E&T costs under the contract.

Districts interested in developing third-party partnerships should work with their designated ESA to ensure proper implementation of the third-party reimbursement model consistent with federal and State requirements. Organizations that intend to partner with districts as third-party providers will be required to identify the source and amount of non-federal funds that will be used to support expenditures for SNAP E&T services provided and will be informed of the array of components included in the State's SNAP E&T Plan approved by USDA FNS.

### **Allowable Costs**

The following program and participant costs are allowable expenditures that can be claimed for reimbursement under the third-party model:

- Staff salaries and fringe benefit costs of the staff that will be working on the program.
- Space and utilities that are required to operate the program.
- Staff travel necessary to attend meetings or trainings associated with the implementation of the SNAP E&T Program.
- Contractual services with partner organizations directly related to the operation of the program.
- Equipment, materials or supplies directly related to the operation of the program.
- Case management services including the completion of an employability assessment, the development of an employment plan, monitoring the participant's progress in the assigned SNAP E&T component, and coordination with service providers.
- Supervised job search.
- Job retention for a minimum of 30 days and up to a maximum of 90 days following the date the employment started. (To qualify for SNAP E&T funded job retention services, the participant who is employed must have received other SNAP E&T services within 90 days prior to starting employment.)
- Participant reimbursements (supportive services) that are reasonable, necessary and directly related to participation in the SNAP E&T program and job retention services. Allowable participant reimbursement costs include transportation costs (other than payments for automobile insurance, registrations and automobile purchases), as well as costs for clothing, equipment or tools required for the job, laptops, tablets, and Wi-Fi connections necessary for program participation. Dependent care costs may also be allowable when the district has determined that the household is not eligible for Child Care

Block Grant (CCBG) funds but is eligible for SNAP E&T Dependent Care reimbursement.

- Loaner laptops for participants: SNAP E&T funds may be used to reimburse the provider for 50% of expenditures on laptops or other computer equipment that may be loaned to program participants. If the provider operates a laptop loaner program for SNAP E&T participants upon completion of the SNAP E&T program, all loaned equipment must be returned to the provider who loaned the laptop and/or equipment.
- Educational components including a wide range of activities that improve basic skills and the employability of SNAP participants. Such programs include Adult Basic Education (ABE), English as a Second Language (ESL), high school equivalency (such as GED), career and technical education (CTE), and other post-secondary education. Education components can offer SNAP participants an opportunity to earn postsecondary credentials valued by employers and industry, including certificates and degrees, industry-recognized credentials, and licensures. Please note that there are specific rules regarding what can be charged to an E&T education component. Activities charged to E&T may not supplant non-federal funds for existing educational services and activities and E&T may not be charged more than what the general public would pay for the same service. There are also regulations pertaining to students enrolled in institutions of higher education and their eligibility for SNAP at 7 CFR 273.5.
- Administrative costs for the planning, implementation, and operation of the SNAP E&T program.

### **Ineligible Costs**

The following program and participant costs are **not** allowable expenditures for the third-party model:

- Services associated with substance use disorders, including drug and alcohol addiction counseling and the costs associated with monitoring a client's compliance with a treatment program.
- Costs of supervision of work experience participants or the cost of materials and/or equipment necessary to support a work experience placement.
- Costs of providing employment services for applicants and recipients of TANF-funded assistance (case types 11 or 12) or two-parent families where neither parent is disabled and whose assistance costs are reported as SNA Federally Non-Participating Non-MOE consistent with [06-LCM-09](#).
- Costs of determining whether an individual is subject to SNAP work requirements. This restriction includes any costs related to the evaluation of an individual's medical condition. SNAP E&T funds must not be used to reimburse costs for medical screenings, examinations, or medical services of any kind.
- Costs for activities that exceed 120 hours per month (unless the individual volunteers to participate for the additional hours).
- SNAP E&T funds cannot be used to supplant State, county, or local funds for educational programs generally available to residents. Moreover, the educational provider must not charge more, and the district cannot claim more than what the general public or the individual would pay if not participating in SNAP E&T.

USDA has developed a [SNAP E&T Program Toolkit](#) to assist states with implementing their SNAP E&T programs. Districts may refer to this resource for additional policy guidance on SNAP E&T funding, allowable costs, third-party partnerships, and other SNAP E&T-related topics.

### **Federal Reporting Requirements**

To meet the reporting requirements, districts outside of New York City (NYC) must report activities correctly under the appropriate activity components in WTWCMS 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 Temporary Assistance (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.

Note: As a reminder, costs of providing employment services for applicants and recipients of TANF-funded assistance (case types 11 or 12) or two-parent families where neither parent is disabled and whose assistance costs are reported as SNA Federally Non-Participating Non-MOE consistent with 06-LCM-09 are **not** allowable expenditures for the third-party model.

It is important to note that participation must also be reported in WTCMS and/or NYC HRA systems for TA applicants and recipients engaged in work activities for the purposes of the federal All Families work participation rate calculation. Participation reported in WTCMS 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](#). All hours of participation (actual for unpaid work activities, actual prospective for paid employment, including OJT) should be entered into WTCMS or NYC HRA systems no later than the 15th of the month following the report month and documentation must be maintained as discussed below.

Documentation for the hours that an individual is participating in paid employment may include pay stubs, employer records or time and attendance records. Documentation for the hours that an individual is participating in unpaid work activities may include attendance sheets or other documentation developed by the provider or the district whichever is the appropriate party in each respective district to verify attendance. At a minimum, monthly attendance records should include:

- The participant's name;
- The actual hours of participation for each activity for each day of participation;
- The number of hours missed due to holiday time observed by the provider;
- The number of hours granted as excused absence;
- The total number of hours of participation for each activity; and
- The name and contact information of the person verifying the hours of participation.

When developing third-party partnerships, districts may grant the third-party provider the ability to document participation directly into the appropriate systems. Districts must ensure that only authorized provider personnel have access to WTCMS or NYC HRA systems if this is the preferred method.

### **Record Retention Requirements**

Documentation to support the hours of participation reported by the district will be subject to review by federal and State representatives and must be maintained either as part of the case record or by alternate means that permits the district to locate the attendance record for any individual reported as participating. If attendance information is entered by the provider directly into WTCMS or NYC HRA systems, documentation must be maintained as part of the provider's records. Documentation of all hours of participation must be retained by the district for no less than six years from the date the information is submitted to the State.

## Internal Control Requirements

Districts must have internal control procedures in place to ensure that participation in work activity components is entered in the system for both TA and SNAP purposes. Work activities must be consistent with federal and State work activity definitions, and hours of participation must be reported accurately.

For example, as part of the 2024-2025 Biennial TA and SNAP Employment Plan development process (see [23-LCM-15 - 2024-2025 Biennial Temporary Assistance \(TA\) and Supplemental Nutrition Assistance Program \(SNAP\) Employment Plan](#)), districts were required to develop a plan to describe the controls they have in place to ensure that:

- hours of attendance reported by providers are accurate and documented;
- data entry is accurate; and
- district and providers adhere to approved district and State policy in terms of work activity definitions and determination of excused absence and holiday reporting.

Districts must validate attendance reporting by monitoring visits to providers and viewing attendance rosters for training. Districts must also describe the frequency of attendance monitoring visits, which may vary based on the number of participants served by the provider.

## Case Record Documentation Guidance

OTDA EAS Bureau has developed the following guidelines related to documentation requirements for third-party providers.

Issue	Case Record Documentation
Eligibility	Enrollment consent form for each participant and corresponding eligibility verification documents. All verification documentation must include the participant's SNAP authorization period. Verification documentation may include: a Welfare Management System (WMS) printout, an email from the district, or other formal district verification. Consent forms must be updated every 6 months, and eligibility must be confirmed on a monthly basis.
Participation/Case Management	Maintain in the participant's file as applicable: <ul style="list-style-type: none"><li>• Release of Information form(s).</li><li>• Client Intake/Assessment form including a review of the participant's supportive services needs if applicable.</li><li>• Education/Employability Plan.</li><li>• Contact Log and/or Case/Progress Notes, including proof that the district was informed within 10 days if the participant was not appropriate for program/component.</li><li>• Attendance records.</li><li>• Resume.</li><li>• Job Search logs and case notes documenting participation in supervised job search.</li><li>• Documentation/case notes to support provision of supportive services if applicable.</li></ul>

Issue	Case Record Documentation
High School Equivalency (HSE)/Credential/Job Skills Training/Vocational Training	Maintain in the participant's file: <ul style="list-style-type: none"> <li>• A copy of the HSE diploma, HSE quarterly report, or HSE pass/fail report provided by the State Education Department (SED) upon request for the purposes of a case audit.</li> <li>• A copy of the certificate of completion of a vocational or job skills training program awarded by the governing agency.</li> </ul>
Job Entry	A wage stub verifying that the participant began employment, an Employment Verification Form, or an equivalent employer statement must be retained in each participant's case file. Job Entry documentation must contain the date the job commenced.
Job Retention	Wage stubs verifying up to 90 days of employment, an Employment Verification Form, or an equivalent employer statement must be retained in each participant's case file. The district must be able to clearly discern the date employment began and when the participant reached 90 cumulative days of employment. The provider must document job retention services provided during the 90-day period.

Additional technical assistance will be provided to districts interested in implementing the third-party partnership model.

### Claiming and Documentation Guidance

In order to be reimbursed, third-party providers must submit to the district copies of documentation supporting all expenses claimed for 50% reimbursement with SNAP E&T funds. Described below are acceptable standards of documentation for various expense categories.

#### *Personnel Expenses*

##### Payroll Expenses

Payroll expenses must be supported by a payroll register or by pay stubs. Third-party providers claiming payroll expenses must ensure that each employee's time is properly cost allocated and should be required to complete an employee time allocation form for each employee. To be accepted, the payroll register or stubs must show the following information:

- Employee's name.
- Pay period ending date.
- Gross salary/hourly wages earned.
- All appropriate deductions.
- Net salary amount.

##### Fringe Benefits

Third-party providers will not be required to submit documentation for mandatory fringe benefits (FICA, SUI, NYS Disability Insurance, and Workers' Compensation); however, claimed fringe benefits may not exceed the amount paid by the provider. For optional fringe benefits such as dental, health or life insurance, the provider will be required to submit a copy of the paid premium statement. The statement must show the date paid, the check number and the names of the employees being claimed.

### Non-Personnel Expenses

When submitting invoices and copies of checks or receipts, third-party providers will be required to ensure that the name of the purchasing organization (the third-party provider) and the items purchased are clearly visible. In the case of rent, utilities and repairs, the invoice or receipt must show the location where the service was provided. If less than 100% of the receipt/invoice is being claimed for 50% reimbursement, the provider will be required to indicate the amount charged. Copies of checks made payable to the vendor are preferred documentation for each invoice. For items paid for at purchase, a cash register receipt that shows payment is sufficient.

### Purchase of Service

The purchase of consultant services, contractual services, rent, telephone, etc. must be supported by an invoice and copy of check or receipt showing:

- The time period covered by the invoice.
- Description of the service(s) being provided.
- Amount of expense.

### Purchase of Supplies/Equipment

The purchase of supplies and/or equipment must be supported by an invoice and copy of check or receipt showing:

- Date of purchase.
- Items purchased.
- Amount of expense.

### Travel Expenses

Expenses related to travel must be supported by the following:

For local mileage claims: A copy of the mileage log showing the following information:

- Date of travel.
- Distance in miles.
- Rate of “per mile” reimbursement, not to exceed the NYS rate.

For long distance/per diem claims: Copies of receipts for transportation, hotel accommodations, meals, taxis, parking and any other expenses associated with the purpose of the trip. All claims for travel must include the name and title of the traveler and the purpose of the travel. Travel expenses can be reimbursed only for employees for whom the third-party provider is also claiming payroll expenses.

Below is an example of what third-party providers may be required to maintain in each participant’s case record for claiming and documentation purposes:

<b>Item</b>	<b>Documentation</b>	<b>In File</b>	<b>Submitted with claim</b>
<b>Assessment and Employment Plan</b>	An Assessment and Employment Plan must be completed and maintained in the participant’s file. Both documents must be updated as each participant progresses through the program.	YES	NO
<b>Attendance Records</b>	Attendance records (class sign-in sheets, instructional rosters or computer-generated records) must be maintained in each participant file in order to document all hours of participation.	YES	NO

Item	Documentation	In File	Submitted with claim
<b>Job Retention</b>	Wage stubs verifying at least 90 days of employment, an Employment Verification Form, or an equivalent employer statement must be completed and maintained in the participant file. When using pay stubs, the district must be clearly able to discern when a client started employment and that the client has obtained the 90 days. The provider must document job retention services provided to the client during the job retention period (at least 30 days and not more than 90 days following the date the employment started).	YES	YES

*Non-Reimbursable Expenses*

Some expenses are not eligible for reimbursement. Examples of such expenses are listed below:

- Sales tax, if applicable.
- Fines and penalties.
- Interest expense costs.
- Late fees.
- Bad debts.

Additional guidance will be provided to districts on the record keeping and claim submission requirements for third-party providers.

**VI. Claiming Instructions**

Third-party partnerships must be approved by OTDA EAS prior to claiming any costs in ACS, and only the 50% portion of the provider’s total expenditures reimbursed by the district is claimable.

Expenditures for third-party partnerships should be claimed through the RF-17 claim package for special project claiming for the month(s) that the expenditures were made. These costs are first identified on the RF-2A claim package as F17 functional costs and reported in the F17 column on the LDSS-923 “Cost Allocation Schedule of Payments Administrative Expenses Other Than Salaries” and the LDSS-2347 “Schedule D “DSS Administrative Expenses Allocation and Distribution by Function and Program.” After final accepting the RF-2A, the individual project costs are then reported under the project label “FFY24 SNAP THIRD PARTY PRTNSP” on the RF-17.

Costs should be reported as object of expense code 37 – Special Project Program Expense on page 2 of the LDSS-923B “LDSS-923B Summary - Program Schedule of Payments for Expenses Other Than Salaries for Other Reimbursable Programs.”

Total project costs should be reported on the LDSS-4975 “Monthly Statement of Special Project Claims Federal and State Aid (RF-17)” as 100% federal share.

Districts can receive reimbursement for the period October 1, 2023, through September 30, 2024. All claims for expenditures must be final accepted in ACS by February 3, 2025.

Further instructions for completing the LDSS-923, LDSS-923B and Schedule D, and the RF-17 claim package are found in Chapters 7 and 18, respectively, of the Fiscal Reference Manual (FRM) Volume 3. The FRMs are available online at: <https://intranet.otda.ny.gov/bfdm/finance/>.

**VII. Effective Date**

Immediately



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**Issued By:**

**Name:** Valerie T. Figueroa

**Title:** Deputy Commissioner

**Division/Office:** Employment and Income Support Programs / Office of Temporary and Disability Assistance