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A. Cover Page and Authorized Signatures

State: Pennsylvania

State Agency Name: Pennsylvania Department of Human Services

Federal FY: 2025

Date Submitted to FNS (revise to reflect subsequent amendments): August 15, 2024

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

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Certified By:

State Agency Director (or Commissioner)

08/15/2024 Date

Certified By:

forak. Gillizan The Agency Elscal Reviewer

Sta

08/14/2024 Date

B. Amendment Log

In accordance with 7 CFR 273.7(c)(8), State agencies must submit plan revisions to the appropriate FNS Regional office for approval if it plans to make a significant change. For a complete list of situations requiring an amendment to the E&T State plan, see Plan Modifications in the E&T State Plan Handbook. The State agency must submit the proposed changes for approval at least 30 days prior to the planned implementation.

Please use the log below to document the submission of an amended plan. A single line in the log should capture each time a plan is amended and resubmitted, not each individual amendment throughout the plan.

To expedite the review process for amendment changes, please highlight areas where text has been added or changed. After FNS approval of amendment changes, highlighting must be removed and a clean, updated plan submitted to FNS.

 Table B.I. Amendment Log

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

C. Acronyms

State agencies may consider including acronyms for the SNAP State agency, SNAP *E&T* program name, State's management information system, and SNAP *E&T* providers or contractors.

Below is a list of common acronyms utilized within this plan. Please delete acronyms that do not apply and add additional acronyms in alphabetical order.

Acronym	Acronym Definition
ABAŴD	Able-Bodied Adult without Dependents
E&T	Employment and Training
FY	Fiscal Year
FNS	Food and Nutrition Service
GA	General Assistance
ITO	Indian Tribal Organization
SNAP	Supplemental Nutrition Assistance Program
TANF	Temporary Assistance for Needy Families
USDA	United States Department of Agriculture
WIOA	Workforce Innovation and Opportunity Act
CAO	County Assistance Office
CWDS	Commonwealth Workforce Development System
DHS	Pennsylvania's Department of Human Services
eCIS	electronic Client Information System
EDP	Employment Development Plan
ELRC	Early Learning Resource Center (child care centers)
IMCW	Income Maintenance Case Worker (eligibility worker)
RESET	Road to Economic Self-sufficiency through Employment and
	Training
SNAP	SNAP Employment Advancement and Retention Network
EARN	
SNAP	SNAP Keystone Education Yields Success (community
KEYS	college)

Table C.I. Acronyms

D. Assurances

By signing on the cover page of this document and checking the boxes below, the State agency Director (or Commissioner) and financial representative certify that the below assurances are met.

Table D.I. Assurances

Cheo st	Check Box	
I. II.	The State agency is accountable for the content of the E&T State plan and will provide oversight of any sub-grantees. (7 CFR 273.7(c)(4) and 7 CFR 273.7(c)(6))	×
11.	The State agency is fiscally responsible for E&T activities funded under the plan and is liable for repayment of unallowable costs. (7 CFR 271.4, 7 CFR 276.2, and 7 CFR 277.16)	×
III.	State education costs will not be supplanted with Federal E&T funds. (7 CFR 273.7(d)(1)(ii)(C))	\boxtimes
IV.	Cash or in-kind donations from other non-Federal sources have not been claimed or used as a match or reimbursement under any other Federal program. (7 CFR 277.4(d)(2))	×
V.	Documentation of State agency costs, payments, and donations for approved E&T activities are maintained by the State agency and available for USDA review and audit. (7 CFR 277.17)	\boxtimes
VI.	Contracts are procured through appropriate procedures governed by State procurement regulations. (7 CFR 277.14)	X
VII.	Program activities are conducted in compliance with all applicable Federal laws, rules, and regulations including Civil Rights and OMB regulations governing cost issues. (7 CFR parts 271, 272, 273, 274, 275, 276, 277, 281, and 282)	×
VIII.	E&T education activities directly enhance the employability of the participants; there is a direct link between the education activities and job-readiness. (7 CFR 273.7(e)(2)(vi))	\boxtimes
IX.	Program activities and expenses are reasonable and necessary to accomplish the goals and objectives of SNAP E&T. (7 CFR 277.4(d)(3))	\boxtimes

Table D.II. Additional Assurances

The f with t check state	Check Box	
Ι.	If in-kind goods and services are part of the budget, only public in-kind services are included. No private in-kind goods or services are claimed. (7 CFR 277.4(d) and (e))	
11.	The E&T Program is implemented in a manner that is responsive to the special needs of Indian Tribal members on Reservations. The State agency shall consult on an ongoing basis about portions of the E&T State Plan which affect them; submit for comment all portions of the E&T State Plan that affect the Indian Tribal Organization (ITO); if appropriate and to the extent practicable, include ITO suggestions in the E&T State plan. (For States with Indian Reservations only.) (7 CFR 272.2(b)(2) and 7 CFR 272.2(e)(7))	

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

I. Summary of E&T Program

a) Provide the vision and mission of the State E&T program. In addition, describe how your State agency's E&T program meets the purpose of E&T which is to: 1) increase the ability of SNAP participants to obtain regular employment; and 2) meet State or local workforce needs.

DHS's mission is to improve the quality of life for Pennsylvania's individuals and families. We promote opportunities for independence through services and supports while demonstrating accountability for taxpayer resources. Pennsylvania will continue to offer a voluntary SNAP E&T program in Federal FY 2025. Pennsylvania's SNAP E&T program increases the ability of SNAP participants to obtain employment by providing targeted investments in vocational trainings and other workforce services in in-demand industries (including but not limited to healthcare, manufacturing, and hospitality), while empowering each participant to choose their desired career path.

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

Pennsylvania administers SNAP E&T at the state level through the Bureau of Employment Programs (BEP), in the Office of Income Maintenance, (OIM).

c) (For county-administered States only) Describe how counties share information with the State agency (e.g. county E&T plans), and how the State agency monitors county operations.

N/A		

d) Provide the geographic areas of the State where the E&T program operates, and describe the rationale for this selection. Designate which areas, if any, operate mandatory E&T programs.

Pennsylvania offers a voluntary program so that E&T participants may pursue an appropriate component applicable to their local labor market conditions through one of three SNAP E&T contractor groups: 1) SNAP KEYS, 2) SNAP EARN, or 3) SNAP 50/50. Not all counties have SNAP KEYS or SNAP 50/50 contractors. However, each of Pennsylvania's 67 counties is served by at least one SNAP EARN program which offers all eight components. No areas operate a mandatory E&T program.

Provide a list of the components offered.

The eight SNAP E&T components offered in Pennsylvania are:

- 1. Supervised Job Search
- 2. Job Search Training
- 3. Job Retention
- 4. E&T Workfare
- 5. Basic/Foundational Skills Instruction (includes High School Equivalency Programs)
- 6. Career/Technical Education Programs or other Vocational Training
- 7. English Language Acquisition
- 8. Work Experience, consisting of the following components:
 - a. Internship
 - b. Pre-Apprenticeship
 - c. Transitional Jobs (unsubsidized)
 - d. Transitional Jobs Subsidized

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

55 Pa. Code 165:

https://www.pacodeandbulletin.gov/Display/pacode?file=/secure/pacode/data/055/chapter165/chap165toc.html&d=

Pennsylvania DHS Employment and Training Website: https://www.pa.gov/en/agencies/dhs/resources/snap/snap-employment-training.html

Pennsylvania DHS Employment and Training Providers Interactive Map: <u>https://www.google.com/maps/d/viewer?mid=1d-</u> <u>kG6kCZpAZstAbflzxyKXwVh9_s0c4V&II=41.059645838295936%2C-</u> <u>78.07554334813845&z=8</u>

II. Program Changes

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

a) Summarize changes for the upcoming Federal fiscal year (FY) from the prior FY. Significant changes may include new initiatives, changes in funding or funding sources, policy changes, or significant changes to the number of partners or participants. Significant changes could include those made as a result of management evaluation findings or participation in program improvement initiatives, such as SNAP to Skills. It is not necessary to include changes made as a result of new Federal rulemaking.

Pennsylvania is reviewing a Request for Application for potential grant changes which would be effective later in FY25. Pennsylvania will submit a revision to this State Plan if necessary when grantees are selected. As part of this process, Pennsylvania is carefully reviewing participant data and hopes the RFA process will allow the state to serve more underserved populations through the SNAP 50/50 program.

In the interim, during FY25, Pennsylvania will reallocate funds between existing SNAP 50/50 partners to better target resources to partners who have shown the greatest ability to enroll SNAP E&T participants and assist them in achieving robust outcomes. These new whole-year allocations are reflected in the attached State Plan Budget, and may be revised further in a subsequent State Plan Revision depending on the outcome of the RFA.

In FFY 2025, Pennsylvania is reinstituting Health Enterprise Zone (HEZ) grants with two existing third-party partners — Philabundance and Project HOME — located in the North Philadelphia HEZ. Residents of the HEZ are disproportionately likely to live in poverty and suffer from chronic diseases and low life expectancy. Pennsylvania plans to invest state funds to expand the SNAP 50/50 partnership with the two HEZ grantees beyond the scale and scope of services that the programs have been able to attain leveraging their own non-federal funds. In the case of Project HOME, the HEZ grants will be utilized for services allowable under SNAP E&T; therefore, DHS is requesting to leverage 50% federal reimbursement for these grants based on the investment.

Highlight any changes from above that the State agency is making to the E&T program based on the prior year's performance, for instance changes made as a result of E&T outcome and participation data.

In FY24, Pennsylvania set a new annual record for number of participants served in a SNAP 50/50 program, and participation across PA's SNAP E&T program has now exceeded pre-pandemic levels.

Over the past several years, Pennsylvania has improved internal data collection and sought feedback from a diverse range of stakeholders, including SNAP E&T

providers, SNAP eligibility workers, and, most importantly, SNAP E&T participants. During FY25, Pennsylvania will continue to thoughtfully incorporate this feedback into our program design to further improve our SNAP 50/50 initiative as it shifts toward a new procurement mechanism.

In addition, Pennsylvania is considering expansion of the "Quick Referral Guide" pilot (currently operating in Northampton County) to additional counties. This pilot, developed with the help of the technical assistance of the SNAP2Skills project, is designed to increase the number of traditional/direct referrals to Pennsylvania's SNAP E&T program. Expansion was put on hold while the SNAP interview waiver remained in effect, but now Pennsylvania is actively considering expansion.

Starting in FY 25, Pennsylvania will expand the type of participant reimbursements offered, including through the special allowance (SPAL) program, to include certain hygiene items. The "Clothing" SPAL category will be expanded and renamed the "Clothing and Hygiene" category. This category will continue to be subject to the same \$150 combined annual limit, however participants will now be able to receive SPALs for items including hairbrushes, basic haircuts, shaving supplies, and other items necessary to maintain proper hygiene such as soap, shampoo, toothbrush/toothpaste, deodorant, feminine hygiene supplies, and laundry supplies/dry cleaning for professional attire.

III. Consultation and Coordination with the Workforce Development System

State agencies must design the E&T program in consultation with the State workforce development board and operate the E&T program through the Statewide workforce development system (7 CFR 273.7(c)(5)). The goal of this section is to explain the relationship between the State agency and other organizations it plans to consult and coordinate with for the provision of services, including organizations in the statewide workforce development system. The statewide workforce development system refers to a network of providers, which may include government and the public sector; community-based organizations and non-profits; employers and industry; occupational training providers; and post-secondary institutions, such as community colleges. Please note the State workforce development board is an entity that establishes regional strategic plans and sets funding priorities for their area. They are distinct from State workforce agencies.

Consultation

Consultation with the workforce development system generally includes discussions to learn about services provided in the community and how each organization functions and coordinates with others in the community. State agencies can demonstrate they consulted with their State workforce development board by noting the dates of conversations, who they spoke with, what they spoke about, and how they incorporated this information into the design of their E&T program. a) **Consultation with State workforce development board:** Describe how the State agency consulted with the State workforce development board in designing its SNAP E&T program. This description should include with whom the State agency consulted and the outcomes of the consultation. If the State agency consulted with private employers or employer organizations in lieu of the State workforce development board, skip to question (b).

Department of Labor and Industry (L&I): DHS regularly engages its sister agency, L&I, to provide information and updates regarding DHS E&T programs. These conversations have included specific details on Pennsylvania's SNAP E&T program design, including efforts to expand 50/50 partnerships so that trainings in in-demand fields are offered at even more locations throughout the commonwealth, access to data through an MOU for purposes of enhancing service delivery, and compiling the Annual SNAP E&T Reporting Measures. In addition, SNAP E&T is now included in Pennsylvania's WIOA Combined State Plan. To satisfy the requirement that educational components must "directly enhance the employability of participants" (7 CFR 273.7(e)(2)(vi)(B)), DHS annually aligns the allowable majors and courses of study under the SNAP KEYS program with L&I's high-priority occupation list, which is based on an industry cluster analysis, occupational data analysis, expert input, and regional factors.

State Workforce Development Board: The Secretary of DHS, Dr. Valerie Arkoosh, is a member of the PA Workforce Development Board. During a quarterly meeting of the board, the previous Secretary of DHS, Teresa Miller, presented information regarding the SNAP state plan's E&T activities; this was provided in writing for the board members' briefing books, as well. Board members were invited to share input, questions, and concerns on the SNAP E&T activities described. DHS staff sit on and regularly contribute to Board sub-committees and assist in the development and updating of Pennsylvania's WIOA Combined State Plan.

Keystone Economic Development and Workforce Command Center: Former Governor Tom Wolf created this Command Center, which meets weekly and is led by the Secretaries of Labor & Industry, the Department of Community and Economic Development, and the Department of State, in addition to the President of the PA Chamber of Commerce and the President of the AFL-CIO. DHS also participates on the Command Center and provided a presentation on SNAP E&T programming. DHS's goal and method of implementing SNAP 50/50 has been discussed multiple times at the Command Center.

The PA Chamber of Commerce: DHS invited the President of the PA Chamber of Commerce to visit a SNAP 50/50 program to further understand the model and

advance discussions around training programs to meet employer needs, as well as employer investments in these programs.

Interagency Workforce Collaboration Meetings: DHS holds monthly interagency meetings focused on workforce development. Plans for SNAP E&T programming, particularly around the 50/50 model, have been discussed in these meetings with the L&I Deputy Secretary of Workforce Development and multiple bureau directors and staff.

L&I Bureau of Workforce Development Administration and Center for Workforce Information and Analysis: DHS collaborated with L&I regarding the state's goals and developing access to data through an MOU for purposes of enhancing service delivery and compiling the Annual SNAP E&T Reporting Measures.

b) **Consultation with employers**: If the State agency consulted with private employers or employer organizations in lieu of the State workforce development board, document this consultation and explain the determination that doing so was more effective or efficient. Include with whom the State agency consulted and the results of the consultation.

N/A

Coordination

Coordination with the workforce development system consists of efforts to partner with workforce providers to directly serve SNAP E&T participants or to align the flow or types of services offered across programs.

c) **Special State Initiatives:** Describe any special State initiatives (i.e. Governorinitiated or through State legislation) that include SNAP E&T. Describe any efforts taken by the State agency to coordinate these programs, services, partners, and/or activities with the State's E&T program.

DHS collaborates with third party entities who offer PA Department of Labor and Industry-approved Registered Pre-Apprenticeship programs in the fields of machining and construction. DHS collaborates with the 14 Pennsylvania community colleges, 14 state universities, and numerous career or technical schools certified by the Pennsylvania Department of Education through the SNAP KEYS program established by state legislation (<u>Act 92 of 2015)</u>. d) **Coordination with title I of WIOA**: Describe the extent to which the State agency is carrying out SNAP E&T programs in coordination with title I programs under the Workforce Innovation and Opportunity Act (WIOA).

DHS coordinates with L&I and local workforce development boards through American Job Centers. This relationship ensures that dual eligible SNAP/WIOA clients can receive access to high quality services under both programs while avoiding duplication. SNAP EARN contractors work with local workforce development boards to refer SNAP participants to appropriate Title I services, and reverse refer SNAP-eligible Title I recipients into SNAP E&T. The SNAP EARN contractor is then able to track hours and supports across both programs, and report these accurately to the SNAP certification office to ensure compliance with ABAWD work requirements when necessary.

- e) **WIOA Combined Plan:** Is SNAP E&T included as a partner in the State's WIOA Combined Plan?
 - ⊠ Yes
 - \Box No
- f) TANF/GA Coordination: Describe how the State agency is coordinating with TANF/GA programs, services, partners, and/or activities. Describe any TANF/GA special initiatives targeting specific populations and any actions taken to coordinate with these efforts.

Since approval by FNS in 2006, Pennsylvania continues to operate a Mini-Simplified SNAP Program (mini-SNAP) for households that receive SNAP and TANF (Title IV-A) benefits concurrently. DHS understands that no federal SNAP E&T funds may be used to serve SNAP recipients who also receive Title IV-A assistance.

In FFY 16, Pennsylvania implemented system enhancements to eCIS, Pennsylvania's Management Information System for SNAP and TANF eligibility, to prevent individuals who are receiving TANF assistance from being enrolled in SNAP E&T or receiving SNAP E&T-funded participant reimbursements.

In FFY 22, Pennsylvania implemented policy changes and system enhancements to allow recipients of TANF "non-assistance", such as Diversion, to receive SNAP E&T services, while continuing to ensure that SNAP E&T funds are not used to serve individuals who are receiving Title IV-A assistance.

As part of mini-SNAP, joint TANF/SNAP households are subject to the TANF work requirement and are served by DHS's TANF E&T program, RESET. The RESET program and the SNAP E&T program are integrated on the state and local levels. On the state level, the Bureau of Employment Programs within the Office of Income

Maintenance is responsible for administering both the RESET and the SNAP E&T programs, which includes program oversight, policy guidance, and technical assistance to local County Assistance Office (CAO) and to contracted program staff. On the local level, each CAO has Income Maintenance Caseworkers (IMCWs) that enroll participants in both RESET and SNAP E&T.

As the administrator of both the RESET and SNAP E&T programs, DHS ensures that all participants in RESET who lose eligibility for TANF assistance, and thus the ability to participate in RESET, are given the opportunity to enroll in SNAP E&T programs if appropriate.

g) Other Employment Programs: Describe how the State agency is coordinating its SNAP E&T program with any other Federal or State employment program (e.g. HUD, child support, re-entry, refugee services).

One of our SNAP 50/50 contracted programs, the Center for Employment Opportunities (CEO), works exclusively with returning citizens. CEO serves three of Pennsylvania's largest cities — Pittsburgh, Harrisburg, and Philadelphia — and has an MOU with the Pennsylvania Department of Corrections (DOC). CEO participants are dual clients of both DHS and DOC.

IV. Consultation with Indian Tribal Organizations (ITOs)

State agencies are required to consult with Tribes about the SNAP State Plan of Operations, which includes the E&T State Plan, per 7 CFR 272.2(b) and 272.2(e)(7). The consultations must pertain to the unique needs of Tribal members. State agencies are required to document the availability of E&T programs for Tribal members living on reservations in accordance with 7 CFR 273.7(c)(6)(xiii). The goal of this section is to describe how the State agency consulted with Indian Tribal Organizations (ITOs), describe the results of the consultation, and document the availability of E&T programs for Tribal members living on reservations.

- a) Did the State agency consult with ITOs in the State?
 - □ Yes, ITOs in the State were consulted. (Complete the rest of this section.)
 - □ No, ITOs are located in the State but were not consulted. (*Skip the rest of this section.*)
 - ⊠ Not applicable because there are no ITOs located in the State. (Skip the rest of *this section.*)

- b) Name the ITOs consulted.
- c) **Outcomes:** Describe the outcomes of the consultation. Provide specific examples of how the State agency incorporated feedback from ITOs into the design of the E&T program (e.g., unique supportive service, new component, in-demand occupation).
- **d)** Enhanced reimbursement: Will the State agency be seeking enhanced reimbursement for E&T services (75%) for ITO members who are residents of reservations, either on or off the reservation?

□ Yes

□ No

V. Utilization of State Options

State agencies have the flexibility to implement policy options to adapt and meet the unique needs of State populations. Check which options the State agency will implement.

- a) The State agency operates the following type of E&T program *(select only one)*: □ Mandatory per 7 CFR 273.7(e)
 - ⊠ Voluntary per 7 CFR 273.7(e)(5)(i)
 - $\hfill\square$ Combination of mandatory and voluntary
- b) The State agency serves the following populations (check all that apply):

 \Box Applicants per 7 CFR 273.7(e)(2)

- □ Exempt members of zero benefit households that volunteer for SNAP E&T per 7 CFR 273.10(e)(2)(iii)(B)(7)
- Categorically eligible households per 7 CFR 273.2(j)

c) Does the State agency enable ABAWDs to regain SNAP eligibility through E&T and verify that the ABAWD will meet the work requirement within 30 days subsequent to application per 7 CFR 273.24(d)(1)(iv)?

⊠ Yes

□ No

VI. Characteristics of Individuals Served by E&T

State agencies are required to include information about the categories and types of individuals they plan to exempt from mandatory E&T participation (7 CFR 273.7 (c)(6)(iv)), as well as the characteristics of the population they plan to place in E&T (7 CFR 273.7 (c)(6)(v)).

 a) Describe the categories and types of individuals the State will exempt from mandatory E&T participation. In accordance with 7 CFR 273.7(e), State agencies may exempt from mandatory E&T participation, categories of work registrants (e.g. all those in counties X, Y, Z, or those in their first 30 days of receipt of SNAP) and individual work registrants based on certain personal characteristics or circumstances (e.g. lack of transportation or temporary disability). These exemptions are in addition to the federal exemptions from work requirements at 273.7(b) and only applicable to the E&T requirement at 7 CFR 273.7(a)(1)(ii). Exemptions from Mandatory E&T must also be listed in Table H 'Estimated Participant Levels' Sheet of the Excel Workbook.

(Note: States than run all-voluntary E&T programs would note that they exempt all work registrants.)

Pennsylvania operates a voluntary SNAP E&T program and therefore exempts all work registrants.

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

Annually

c) What are the characteristics of the population the State agency intends to serve in E&T (e.g. target population)? This question applies to both mandatory and voluntary participants.

 \boxtimes ABAWDs

- ⊠ Homeless
- ⊠ Veterans
- ⊠ Students
- ⊠ Single parents
- Returning citizens (aka: ex-offenders)
- ⊠ Underemployed
- \boxtimes Those that reside in rural areas
- □ Other: Click or tap here to enter text.

VII. Organizational Relationships

State agencies are required to include information on the organizational relationship between the units responsible for certification and the units operating the E&T components, including units of the statewide workforce development system, if available. For the purposes of the questions below, E&T providers are considered to include units of the Statewide workforce development system. FNS is specifically interested in ensuring that the lines of communication are efficient and that, if applicable, noncompliance with mandatory E&T is reported to the certification unit within 10 working days after the noncompliance occurs, per 7 CFR 273.7(c)(4). State agencies must also include information on the relationship between the State agency and other organizations it plans to coordinate with for the provision of services.

The following questions are about how the E&T program is structured in your State agency.

a) Please indicate who at the State agency directly administers the E&T program (i.e. establishes E&T policy, contracts for E&T services, monitors providers). For example, if the E&T program unit is separate from the SNAP certification unit, and if there are separate E&T units at the county level.

On the state level, the Bureau of Employment Programs (BEP), in the Office of Income Maintenance (OIM), is responsible for administering the Road to Economic Mobility through Employment and Training (RESET) which is the state's TANF E&T and the SNAP E&T programs.

The SNAP E&T Policy Unit within BEP is responsible for establishing SNAP E&T policy as well as establishing grant agreements with new SNAP 50/50 partners and monitoring and providing technical assistance to existing SNAP 50/50 partners. In addition, the SNAP E&T Policy Unit is responsible for addressing policy and programmatic inquiries from the CAOs that are responsible for referring participants to an E&T contracted program and determining participants' eligibility for Special Allowances (SPALs).

The Education and Youth Opportunities (EYO) Unit within BEP is responsible for monitoring and providing technical assistance to the SNAP KEYS program. In addition, the EYO Unit works collaboratively with the SNAP E&T Policy Unit to develop E&T policies specific to educational programs.

The EARN/Work Ready (WR) Unit within BEP is responsible for monitoring and providing technical assistance to the SNAP EARN program with the support of a second unit which serves a similar purpose for Philadelphia-area EARN contracted programs.

The Systems Unit within BEP is responsible for providing technical assistance related to the E&T program's system of record, Commonwealth Workforce Development System (CWDS), as well as for maintaining and updating new system features. The Systems Unit works collaboratively with the SNAP E&T Policy Unit to ensure that CWDS captures the data elements needed to comply with SNAP E&T state and federal rules and requirements.

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

On the state level, the Bureau of Policy (BOP) in OIM is responsible for certification of eligibility policy with respect to the SNAP and TANF programs, among others.

BEP coordinates closely with BOP on areas of shared responsibility, such as policies pertaining to work registrant status and tracking, consolidated notices regarding work requirements, ABAWDs, and other SNAP certification policies that have a major effect on higher education students, re-entering citizens, individuals receiving wages from a paid work experience program, and other populations disproportionately represented among E&T participants.

BEP has a regular monthly standing meeting with BOP to discuss these and other issues of shared responsibility. Further, BEP and BOP co-author memoranda or review each other's policy guidance within these areas of shared responsibility.

IMCWs in E&T units comment on each contact with a participant through case narratives in eCIS from which the IMCWs responsible for certification are responsible for reviewing. Required paperwork received is scanned and uploaded into the database. When system alerts are triggered in an IMCW's dashboard in eCIS, the IMCW is responsible for reviewing and clearing the alert. For example, an IMCW would receive an alert in eCIS when a provider determination has occurred and would have to take the appropriate action in accordance with Pennsylvania's policy guidance. In addition, participants in SNAP E&T can contact an IMCW at Customer Service Centers if unable to get in contact with a(n) IMCW at their local office to relay information in which the IMCW at a Customer Service Center will generate an electronic report that will appear at the appropriate worker's dashboard to resolve.

- c) Describe the State's relationships and communication with intermediaries or E&T providers (if applicable):
 - 1. Describe how the State agency, intermediaries, E&T partners, share participant data and information. Include the names of any MIS systems (or other modes of communication) used.

On the local level, each CAO has IMCWs that enroll voluntary or ABAWD participants in SNAP E&T. A basic intake assessment is conducted by the IMCW to determine which SNAP E&T contractor is most appropriate for the participant. An Employment Development Plan (EDP) is created to identify participant needs and goals as they move toward obtaining employment. As those needs change, and at a minimum of every 12 months, the plan is updated. The EDP is supplemented by a more comprehensive assessment – sometimes called a service plan or Individualized Employment Plan (IEP) – which is completed by the SNAP E&T contractor. CAOs and E&T contractors regularly share copies of EDPs and other assessments with each other via email.

Each CAO has an E&T Ombudsman who the contracted programs in that county may reach out to by phone or email at any time for technical assistance with local issues. In addition, CAOs have regular Direct Service Team meetings with each E&T contracted program (to review specific participant-related issues including special allowances, good cause, or other necessary issues) and Local Management Committee meetings with a panel of several area E&T contracted programs and supportive service providers.

CWDS includes digital interfaces for E&T contractors, participants, and employers and acts as the system of record. SNAP E&T requires contractors use CWDS to track participation in all components, as well as case management. CWDS's participant-facing interface, known as Job Gateway, includes built-in resume development and job search tools, and is one method DHS uses to deliver supervised job search and job search training components to participants. E&T contractors enter case notes in CWDS, which may then be reviewed by other contractor staff members, select IMCWs, and the SNAP E&T Policy Unit.

Additionally, eCIS, the eligibility management information system, is linked to CWDS via an overnight batch process, allowing the CAOs and

contracted providers to share updates concerning participants. In addition, at least one staff person at each CAO is authorized to directly access CWDS to review cases and case notes entered by contracted programs. IMCWs comment on each contact with a participant through case narratives in eCIS. Case narratives may be reviewed by other IMCWs as well as the SNAP E&T Policy Unit.

2. If the State uses an MIS system, describe the E&T related data that is tracked and stored in those systems (e.g. referrals, noncompliance with program requirements, provider determinations, etc.), and whether the system(s) interact with each other.

eCIS, the eligibility MIS, is used by IMCWs at CAOs to approve referrals electronically after they receive and review the Reverse Referral Form. These referrals are transferred to CWDS via an overnight batch process.

eCIS also contains demographic information (e.g. name, age, county of residence, gender, race, marital status, education, SSN) and information regarding whether an individual is receiving SNAP and/or TANF. Select E&T contractors have access to a "Preliminary Screening" tool in CWDS which accesses this eCIS data in real-time to screen for potential eligibility under the SNAP E&T funding stream. (NOTE: The Preliminary Screening tool does not constitute an E&T enrollment or replace the referral process described above.)

Finally, eCIS is the system used to authorize and track issuances of SPALs – the most common method of issuing participant reimbursements in Pennsylvania. eCIS system logic ensures that participants are not issued SPALs more than the relevant annual and lifetime limits (see Table E.II).

CWDS is the system of record for SNAP E&T. CWDS is used by E&T contractors to record various data including: case narratives, service plans, component codes, component start and end dates, dates and hours of participation, whether or not the component was completed successfully, and whether or not employment was obtained. CWDS can also be used by the SNAP E&T Policy Unit and/or E&T contractors to generate reports summarizing the above data.

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

BEP communicates with E&T partners through a variety of communication channels.

BEP holds onboarding sessions for new E&T contractors to discuss policies and procedures as well as CWDS data entry in a two-day training. Other contracted partners are invited to participate as a refresher. CWDS data-entry refreshers are held on a quarterly basis for all contracted partners.

Technical Assistance calls happen on a weekly, bi-weekly, monthly, or quarterly basis as appropriate depending on the audience and context.

Each of the three E&T contracted program groups (SNAP 50/50, SNAP KEYS, and SNAP EARN) receive an updated comprehensive program manual at the beginning of each program year. Policies announced during the program year are disseminated to E&T contractors through Contractor Letters, emails, and/or other technical assistance meetings. Monitoring visits are also used to discuss new policies and initiatives.

4. Describe the State agency's process for monitoring E&T partners' program and fiscal operations. Include plans for direct monitoring such as visits, as well as indirect monitoring such as reviewing program data, financial invoices, etc.

DHS monitors each program at least annually. Larger contracted programs (such as SNAP EARN and SNAP KEYS) may be monitored more frequently.

SNAP 50/50 contracts are monitored annually. Program monitors review client case records and program data during a desk audit preceding an inperson visit. Program monitors sample cases randomly and send contractors a checklist requesting any paper case file information not already contained within CWDS. During desk audits, program monitors review CWDS data to ascertain whether contracted outcomes are being met and review compliance with data-entry timelines and accuracy requirements. Program monitors typically then schedule an in-person inspection of the training or case management facility. During these visits, program monitors determine whether contractors are compliant with additional contract provisions and federal regulations (such as civil rights requirements). In addition, monitors interview multiple staff members and at least one SNAP 50/50 participant. After the visit, a monitoring report is completed and sent to the contractor outlining next steps, such as any required corrective action.

SNAP KEYS program monitors review the outcomes for the program performance outcomes. The contractor's performance is based on the goals of the program performance outcomes and also considers other factors such as timely response to DHS requests, timely submission of invoices, appropriate expenditure of funds, and maintenance of adequate case records and documentation which could raise or lower the contractor's performance rating.

Program Performance monitoring includes a review of the Semester Academic Report, SNAP End of Semester Employment Report, and CWDS reports. A KEYS Program Monitoring Report is sent to contractors annually to outline their program performance outcomes. In addition to site visits, DHS conducts case record reviews as desk audits twice per year to ensure that case records include all necessary student files and documents for program compliance and to ensure timely data entry into CWDS. This allows on-site monitoring to focus on program operation and technical assistance. DHS requests the documents needed for the case record review in the Case Record Compliance Checklist and the contractors provide the appropriate documentation. Following the case record reviews, DHS sends a Case Record Review Technical Assistance Report to the contractor.

Providers that do not meet minimum outcomes and expectations as noted in the KEYS Program Monitoring Report and the KEYS Case Record Technical Assistance Report are required to submit a corrective action plan using the Corrective Action Plan Template to address the deficiencies for both reports in a timely manner. DHS plans to conduct follow-ups on the provider's corrective action plan three and six months after receipt of DHS' corrective action response.

Monitoring for the SNAP EARN program consists of reviewing overall program performance in relation to established performance goals, as well as individual case reviews from each provider to verify compliance to policy. Data is collected monthly from each program through self-reporting and collection from CWDS. This data is used to evaluate performance measures throughout the year.

Several participant files maintained by the program are also reviewed as part of the annual monitoring process. These files include the programs' attendance verification and other programing documentation that is checked against what was entered into CWDS for accuracy. Annual monitoring reviews are normally conducted onsite when possible. As part of these onsite visits, staff and clients may be interviewed for their feedback on the program. Site visits also allow for the verification of accessibility and security compliance.

Each EARN program is given a report of their monitoring annually reviewing their performance numbers as well as any findings from the file reviews and site visit. If necessary, a Corrective Action Plan is requested to address areas of concern or non-compliance. Each E&T contractor's invoice is reviewed monthly by DHS. Irregularities are addressed with the E&T contractor as necessary.

5. Describe how the State agency evaluates the performance of partners in achieving the purpose of E&T (assisting members of SNAP households in gaining skills, training, work, or experience that will increase their ability to obtain regular employment and meets State or local workforce needs).

Contracted programs are required to track outcomes in CWDS. DHS staff compile reports monthly based on CWDS data capturing the performance outcomes of each contracted program. Technical assistance is provided to contracted programs as needed. During monitoring visits, DHS staff evaluate whether outcome data from CWDS is consistent with performance benchmarks described in each contracted partner's grant agreement.

VIII. Screening for Work Registration

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

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

The IMCW in the local CAO determines work registrant status at application, renewal, provider determination, and as other changes become known to DHS. IMCWs encourage SNAP recipients to volunteer to participate in the SNAP E&T program at certification and renewal without regard to their work registrant or ABAWD status. Work registrant status is entered into eCIS by an IMCW using a series of two-digit numerical identifiers called ETP codes. Most ETP codes correspond to specific federal exemptions from general work registration requirements. Several other ETP codes are assigned to work registrants who meet state discretionary exemptions for ABAWD purposes, while ETP Code 30 is used for work registrants who do not meet a state discretionary exemption. IMCWs determine which ETP code is most appropriate by following state policy guidelines outlined in <u>SNAP Handbook 535.3</u>. If two or more ETP Status Codes apply to an individual, at least one of which would exempt the individual from work registration, the CAO assigns a code making the individual exempt from work registration.

b) How does the State agency work register non-exempt individuals? For example, does the State agency make a notation in the file, do individuals sign a form, etc.?

Work registrants are required to report their work status to the CAO at application and renewal. Work registrants are required to sign the application form which informs them that unless they meet an exemption or good cause, they could be subject to sanction for failure to meet SNAP work rules. Work registrants also receive a copy of the PA 772, a form that informs them of their rights and responsibilities as a work registrant in greater detail.

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

Oral notification is provided during application and renewal interviews. Written notification is provided in the form of the PA 772, which is mailed to SNAP recipients immediately following authorization of SNAP benefits. Prior to March 2023, the PA 772 was focused on work registration requirements and included many of the elements of the consolidated notification of work requirements required under new federal rules. In March 2023, Pennsylvania updated systems and revised the PA 772 to meet all consolidated notice requirements, including speaking to the ABAWD work requirement. NOTE: Pennsylvania does not operate a mandatory E&T program.

IX. Screening for Referral to E&T

The State agency must screen each work registrant to determine if it is appropriate, based on State specific criteria, to refer them to the E&T program per 7 CFR 273.7 (c)(2). State agencies may operate program components in which individuals elect to participate, per 7 CFR 273.7(e)(4).

a) List the State-specific criteria eligibility workers use to screen individuals to determine if it is appropriate to refer them to the State's SNAP E&T program. (*Note: This question is not asking about criteria that may be unique to each provider.*)

Pennsylvania operates an all-voluntary E&T program. The potential participant must be receiving SNAP, 18 years of age or older (although exceptions may be made for 16–17-year-olds pursuing certain components, as appropriate), a resident of Pennsylvania, not under a sanction or disqualification, and willing to volunteer for E&T and accept employment at the conclusion of their participation. In addition, an IMCW reviews each request for participation to determine if an appropriate and available E&T opportunity is available for the individual, as well as whether the request to participate complies with Pennsylvania's second and subsequent training policy (described in <u>SNAP Handbook 535.12</u>), which prohibits certain individuals from participating in E&T if they have pursued DHS-supported trainings in the past. Potential participants must speak to an IMCW and complete an EDP prior to enrolling in E&T. The IMCW then uses the result of that discussion and the EDP to determine to which E&T contractor to refer the individual using the SNAP E&T referral chart located in <u>SNAP Handbook 535.11</u>. b) Describe the process for screening during the certification and recertification process. Include the staff involved in the screening, how the staff conduct the screening, and when the screening occurs.

At application and renewal, IMCWs inquire as to whether a SNAP applicant/recipient would be interested in volunteering for SNAP E&T. If an individual expresses interest, the IMCW will determine whether the individual meets the state-specific criteria listed above. Then the IMCW will discuss the E&T contractors available in the area with the potential participant, work with the potential participant to complete the EDP, and complete an appropriate referral. These steps are considered part of the IMCW's certification/eligibility-determination duties and are not charged to the E&T grant.

In some CAOs, this responsibility is assigned to a specific IMCW or unit of IMCWs (i.e. – a local "E&T unit"). In this case, the IMCW normally assigned to a SNAP applicant/recipient's case will still make the inquiry described above. If the individual expresses interest in volunteering, they will be referred to the specific E&T IMCW or local E&T unit for completion of the remaining steps outlined above. In addition, reverse referrals initiated by an E&T contractor are routed directly to the E&T IMCW or local E&T unit.

As noted above, the screening is performed by an eligibility worker (IMCW) for both direct and reverse referrals.

c) *(If applicable)* Describe the process for screening upon receipt of a request for referral to E&T from an E&T provider (reverse referral). Include the staff involved in the screening, how the staff conduct the screening, and when the screening occurs.

Each CAO develops a local procedure for handling reverse referrals. The E&T contractor typically sends the reverse referral to an E&T IMCW, local E&T unit, or an Ombudsman who will either process the referral themselves or route it to another IMCW or local branch for processing. The reverse referral is reviewed for eligibility and an interview is conducted. The IMCW works with the potential participant to complete the EDP over the phone, after which the EDP is mailed or electronically sent to the participant for signature. When the potential participant returns the signed EDP, the CAO electronically refers the potential participant to the E&T contractor.

d) How and when are participants informed about participant reimbursements? In the case of mandatory participants, how and when does the State agency ensure individuals are exempted from mandatory E&T if the costs of participant reimbursements exceed any State agency cap or are not available?

The IMCW informs E&T participants of the availability of state-issued participant reimbursements, known as Special Allowances (SPALs), when completing the EDP and reminds them of the availability of SPALs at subsequent E&T-related contacts.

In addition, contracted programs inform E&T participants of the availability of both provider-issued participant reimbursements (if available) and/or SPALs at assessment and ongoing case management meetings as new participant needs are discovered. If a contracted program does not offer a participant reimbursement directly and the needed item or service is not otherwise available to the participant at no cost, the contracted program will assist the E&T participant in requesting a SPAL from the CAO.

As Pennsylvania operates a voluntary E&T program, all participants are already exempt from mandatory E&T so there is no need to further exempt participants from E&T if the cost of participant reimbursements exceed annual or lifetime limits.

X. Referral to E&T

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

a) What information does the State provide to E&T participants when they are referred and how is the referral communicated (e.g. information about accessing E&T services, case management, dates, contact information)?

Participants who are found eligible to be enrolled in SNAP E&T will be electronically referred to the program. During the screening process, participants are required to complete an interview and the EDP. The EDP includes the services required, the hourly requirement (if any), goals to be achieved, and a short assessment. Some CAOs utilize a cover letter to provide location and contact information for the E&T contractor to which a participant has been referred, however this is not a statewide requirement at this time. IMCWs also inform participants at this time that SNAP E&T participation is voluntary, and if they choose to stop participating in the program, they will not face sanction or disqualification. These steps are considered part of the IMCW's certification/eligibility-determination duties and are not charged to the E&T grant.

As noted above, the referral is performed by an eligibility worker (IMCW) for both direct and reverse referrals.

b) If a State receives and approves a referral request from an E&T provider (reverse referral), how does the State communicate to the SNAP participant that they are in SNAP E&T and about their rights to receive participant reimbursements, etc.?

During the reverse referral process, an IMCW reaches out to the potential participant to complete an EDP. During this conversation, the IMCW discusses SNAP E&T enrollment and participant reimbursements with the potential participant. The EDP contains language indicating that the individual is volunteering to enroll in SNAP E&T

and questions that screen for potential need for participant reimbursements. The IMCW provides a copy of the completed EDP to the participant and E&T contractor.

c) After referral, describe what the E&T participant must do next. For instance, if the participant must report for an orientation describe who conducts the orientation, where the orientation occurs (e.g. in-person at a provider, log-in to a computer program, telephone interview with a case manager), and what happens during the orientation. If the next step varies throughout the State, describe the most common next step.

The next step varies by E&T contractor. Typically, the most common next step after referral is for the individual to appear in-person at the location where the E&T contractor provides services. At this time, the participant typically receives an orientation and meets their case manager if they have not already as part of a reverse referral process. The orientation occurs no more than one to two weeks after a referral is made. The length of the orientation period varies by program and takes from one day to one week. In some instances, participants may have to appear on a specific day of the week or cohort start date to receive a formal orientation.

d) How is information about the referral communicated within the State agency? For instance, is the information entered into an MIS by the eligibility worker and reviewed by an E&T specialist?

Prior to referral, each CAO uses local procedures to communicate internally regarding requests to participate in SNAP E&T. CAOs may use system features in eCIS that allow for the creation of alerts and work items, however this is not required on a statewide basis. CAOs may also choose to communicate via email or another communication channel. Once the electronic referral has been made in eCIS, the electronic case record will include screens visible to all IMCWs which indicate that the participant has been enrolled in SNAP E&T, the name of their E&T contractor, and the number of hours they are participating.

e) How is information about the referral communicated to E&T providers, as applicable? If the State works with E&T providers outside the State agency, how does the E&T provider know a SNAP participant has been referred to them?

If the participant was direct referral or directly referred or was reverse referred without using the preliminary screening tool, the E&T contractor receives an update on their CWDS Dashboard the day after the CAO submits the referral in eCIS indicating that they have received a new referral. The electronic referral includes the individual's name, ABAWD/non-ABAWD status, and other key demographic information.

If the participant was reverse referred and the preliminary screening tool was used, the electronic referral is automatically accepted, and this is reflected on the E&T

contractor's CWDS Dashboard by an increase in the number of cases listed as Enrolled and a corresponding decrease in the number of cases listed as Preliminary Screened. In addition, E&T contractors may click on either figure to see a real-time list of the names of individuals in each status.

In addition, regardless of referral method, the CAO will send a copy of the EDP to the E&T contractor at the time of referral, thus further notifying the E&T contractor that the participant has been referred. In the case of reverse referrals, the CAO will also return the completed Reverse Referral Form to the E&T contractor at this time reflecting that the reverse referral was approved.

XI. Assessment

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

a) Does the State require or provide an assessment?

☑ Yes (Complete the remainder of this section.)

 \Box No (Skip to the next section.)

b) If yes, describe the processes in the State, if any, to provide E&T participants with an assessment (e.g. who conducts the assessment, when are participants assessed, what tools *are* used, and how are the results shared with State agency staff, providers, and/or participants)

The EDP provides a basic assessment to determine a participant's goals and barriers to help the CAO make an appropriate referral and issue initial participant reimbursements. An extended assessment is performed by each E&T contractor. Both the type of assessment conducted as well as the precise timing varies by E&T contractor. SNAP EARN and SNAP KEYS perform assessments within seven days of referral to the program. In some cases, SNAP 50/50 providers may perform an assessment immediately prior to or simultaneous with the reverse referral. The information gathered during assessments may be subsequently used by the E&T contractor when developing an Individualized Employment Plan (IEP) and/or delivering case management services.

XII. Case Management Services

The State E&T program must provide case management services to all E&T participants. In accordance with 7 CFR 273.7(c)(6)(ii), State agencies are required to include specific information about the provision of case management services in the E&T State plan.

- c) What types of E&T case management services will the State agency provide? *Check all that apply.*
 - \boxtimes Comprehensive intake assessments
 - ☑ Individualized Service Plans
 - ⊠ Progress monitoring
 - \boxtimes Coordination with service providers
 - ⊠ Reassessment
 - □ Other. Please briefly describe: Click or tap here to enter text.
- d) Describe how case management services are delivered in your State. For instance, in one model case management is provided by E&T specialists who provide assessments and other services after participants are referred to E&T. In other instances, case management is integrated into the component. If your State uses more than one model, describe the one or two most common ways of delivering case management services.

Contracted programs are responsible for case management. Contracted programs will consult the EDP, the assessment, and one-on-one conversations with the participant to determine when case management is appropriate. The structure of case management will differ among PA's three types of SNAP contracted programs.

SNAP EARN provides case management to all participants through at least biweekly meetings, working through program advisors to establish a plan to address each participant's need, set up time to discuss steps and action plans, and assist the participant in connecting with local resources. SNAP EARN providers will provide additional case management to participants with the greatest need on an as-needed basis. Case management is documented through activity tracking and case notes.

SNAP KEYS provides case management at least monthly using the CWDS system through IEP, activity tracking, and case progress notes.

SNAP 50/50s offer case management at least monthly to complement the vocational education or work experience components. Counselors, job and life coaches, and other staff members interview and assist the participants for the duration of participation in the program.

c) Using the table below, describe how E&T case managers coordinate with other staff and services. Coordination can involve tracking E&T participation, sharing information that may be relevant to participation in E&T (e.g. information related to good cause or a work exemption), and referral to additional services. Communication/Coordination with:

SNAP eligibility staff:	E&T case managers regularly communicate with IMCWs, local E&T units, and/or CAO E&T Ombudsmen. E&T case managers enter component codes in CWDS for each component in which a participant is actively being served. Case managers also enter hours of participation monthly for each open component code and enter termination codes corresponding to positive or negative outcomes when a component code is closed. CAO staff can view these codes in eCIS the day after the E&T case manager enters them into CWDS. In addition, E&T case managers can enter case notes in CWDS that may be viewed by CAO staff, and regularly reach out to CAO staff via phone or email on an ad hoc basis to share other information that may be relevant to participation in E&T. E&T case managers also participate in Direct Service Team (DST) and Local Management Committee (LMC) meetings with the CAO, providing another venue to coordinate services. Finally, E&T case managers use the Special Allowance Verification Form to refer participants to the CAO for determination of eligibility for most participant reimbursements.
State E&T staff:	E&T case managers communicate with BEP through email resource accounts. The SNAP E&T Policy Unit, EARN/WR Unit, EYO Unit, and Systems Unit each have dedicated resources accounts to answer ad-hoc questions. In addition, BEP staff host regular calls with E&T contractors to provide technical assistance and answer questions and each E&T contractor may reach out to their BEP program monitor at any time with ad-hoc questions or requests for technical support. E&T contractors also benefit from annual monitoring and/or technical assistance visits from BEP staff.
Other E&T providers:	BEP encourages E&T case managers to communicate with other E&T contractors and occasionally hosts regional and/or all-contractor calls and meetings to facilitate relationship building. BEP has encouraged E&T contractors to transfer cases to other E&T contractors in certain situations where the gaining contractor is better suited to serve a particular participant.
Community resources:	E&T case managers build relationships with community resources in their local area and refer E&T participants to these resources as needed. BEP supplements these efforts by frequently alerting E&T case managers to new government programs and services that may benefit E&T participants.

 d) Describe how the State agency will ensure E&T participants receive targeted case management services through an efficient administrative process, per 7 CFR 273.7(c)(6)(ii).

Each contracted partner is required to offer case management services to all SNAP E&T participants. Each provider is allowed the flexibility to create their own internal process(es) for case management that suits their participants.

SNAP EARNs utilize a full family assessment and IEP to support a person-centered approach that identifies and addresses individual, targeted needs.

SNAP KEYS programs have a detailed Manual that outlines the standard requirements of assessment, IEP, case management, case progress notes, and community referrals.

DHS reviews each new SNAP 50/50 third-party partner during onboarding to ensure their case management services are compliant with federal standards. Participants will be guided through the case management process as determined by the SNAP 50/50 program with the guidance from the SNAP 50/50 program manual.

XIII. Conciliation Process (if applicable)

In accordance with 7 CFR 273.7(c)(3), State agencies have the option to offer a conciliation period to noncompliant E&T participants. The conciliation period provides mandatory E&T participants with an opportunity to comply before the State agency sends a notice of adverse action. The conciliation process is not a substitute for the determination of good cause when a client fails to comply.

- a) Does the State agency offer a conciliation process?
 - □ Yes (Complete the remainder of this section.)
 - ⊠ No (Skip to the next section.)
- b) Describe the conciliation process and include a reference to State agency policy or directives.
- c) What is the length of the conciliation period?

XIV. Disqualification Policy for General Work Requirements

This section applies to the General Work Requirements, not just to E&T, and should be completed by all States, regardless of whether they operate a mandatory or voluntary E&T program.

All work registrants are subject to SNAP work requirements at 7 CFR 273.7(a). A nonexempt individual who refuses or fails to comply without good cause, as defined at 7 CFR 273.7(i)(2), (i)(3), and (i)(4), with SNAP work requirements will be disqualified and subject to State disqualification periods. Noncompliance with SNAP work requirements includes voluntarily quitting a job or reducing work hours below 30 hours a month, and failing to comply with SNAP E&T (if assigned by the State agency).

- a) What period before application does the State agency use to determine voluntary quit and/or reduction in work effort without good cause per 7 CFR 273.7(j)(1)?
 - 🗵 30 days
 - \Box 60 days
 - \Box Other: Click or tap here to enter text.
- b) For all occurrences of non-compliance discussed below, must the individual also comply to receive benefits again?
 - ⊠ Yes
 - □ No
- c) For the first occurrence of non-compliance per 7 CFR 273.7(f)(2)(i), the individual will be disqualified until the later of:
 - I One month or until the individual complies, as determined by the State agency
 - □ Up to 3 months
- d) For the second occurrence of non-compliance per 7 CFR 273.7(f)(2)(ii), the individual will be disqualified until the later of:
 - ☑ Three months or until the individual complies, as determined by the State agency
 - \Box Up to 6 months

- e) For the third or subsequent occurrence per 7 CFR 273.7(f)(2)(iii), the individual will be disqualified until the later of:
 - Six months or until the individual complies, as determined by the State agency
 - \Box Time period greater than 6 months
 - □ Permanently
- f) The State agency will disqualify the:
 - ☑ Ineligible individual only
 - \Box Entire household (if head of household is an ineligible individual) per 7 CFR 273.7(f)(5)(i)

XV. Good Cause

In accordance with 7 CFR 273.7(i), the State agency is responsible for determining good cause when a SNAP recipient fails or refuses to comply with SNAP work requirements. Since it is not possible for FNS to enumerate each individual situation that should or should not be considered good cause, the State agency must take into account the facts and circumstances, including information submitted by the employer and by the household member involved, in determining whether or not good cause exists.

g) Describe the State agency process to determine if a non-exempt individual has good cause for refusal or failure to comply with a SNAP work requirement. Include how the State agency reaches out to the SNAP participant, employers, and E&T providers (as applicable), as well as how many attempts are made to reach out to the SNAP participant for additional information.

Pennsylvania is a voluntary program for SNAP E&T purposes, meaning good cause is not directly relevant to our E&T program. However, Pennsylvania uses the definition of good cause under federal regulations to determine if good cause should be extended to an ABAWD who would have otherwise met their work requirement through participation in E&T.

When an IMCW is notified that a work registrant declined a *bona fide* offer of employment, voluntarily quit a job, or voluntarily reduced work effort, a compliance review is held to determine whether good cause exists using guidelines described in <u>SNAP Handbook 535.6</u>. The IMCW must attempt to contact the SNAP recipient within three days of the date non-compliance becomes known. The first contact attempt is made by telephone; if unsuccessful, the IMCW sends a written compliance review appointment letter to the SNAP recipient to schedule an appointment within

ten business days of the date the non-compliance became known. The SNAP recipient's statement may be accepted as verification for good cause unless questionable. If found questionable, the IMCW will request verification from the recipient, which can be provided up until the date the sanction begins. The CAO must wait 10 business days after the date the compliance review appointment letter is sent before entering the sanction in eCIS and adverse action requirements apply in the case of an ongoing SNAP recipient household.

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

Pennsylvania's criteria for good cause include:

- 1. circumstances beyond the household member's control, such as, but not limited to, household emergencies or unavailability of transportation;
- discrimination by an employer based on age, race, sex, gender identity, sexual orientation, color, disability, religion, national origin, religious origin or political beliefs (Note: Under Title VII of the Civil Rights Act of 1964 (42 U.S.C. §2000e et seq), sexual harassment experienced in the workplace is considered discrimination on the basis of sex);
- 3. unreasonable work demands or conditions;
- acceptance of employment or enrollment (at least half time) of the head of household in a recognized school, training program, or institution of higher learning that requires the head of household to quit a job (Note: IMCWs must also review the case to determine if the individual remains eligible under student regulations at 7 CFR §273.5 if this good cause condition exists);
- 5. relocation because any household member accepts employment or enrolls (at least half time) in a recognized school, training program or higher institution of learning, which requires the household to move and the head of household to leave employment (Note: IMCWs must also review the case to determine if the individual remains eligible under student regulations at 7 CFR §273.5 if this good cause condition exists);
- 6. resignations of persons under 60 that the employer recognizes as retirement;
- acceptance of a job offer of more than 30 hours per week or in which the earnings are equal to at least 30 times the <u>federal minimum wage</u> that does not materialize, due to circumstances beyond the household member's control, or results in less than expected hours or earnings;
- 8. frequent moves from one employer to another due to the nature of the work such as migrant or seasonal farm labor, or construction work;
- 9. quitting an unsuitable job as defined in <u>SNAP Handbook 535.7;</u> and
- 10. lack of adequate child care of a child age 6-12.

Pennsylvania does not treat this list as exhaustive. As noted above, good cause is defined as a circumstance that is beyond the individual's control.

c) Please describe the State agency's process to determine good cause if there is not an appropriate and available opening for an E&T participant.

Pennsylvania operates a voluntary SNAP E&T program, therefore there are no sanctions for failure to participate and the concept of good cause is relevant only to other work registrant work requirements, not to E&T.

XVI. Provider Determinations

In accordance with 7 CFR 273.7(c)(18) a State agency must ensure that E&T providers are informed of their authority and responsibility to determine if an individual is ill-suited for a particular E&T component.

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

The E&T contractor is responsible for making provider determinations, with the assistance of guidelines issued by BEP.

When an E&T contractor determines that a participant who was previously referred to them is not well suited for the component in which they are enrolled, the E&T contractor first determines whether the participant is well-suited to another component it is authorized to provide. If the contractor determines that the participant is well suited to a different E&T component offered by the contractor, the contractor enrolls the participant into that component by entering a corresponding activity code in CWDS. This information is then transmitted to the CAO via an overnight batch process. At this point, the provider determination process is considered to have concluded without the need for the State agency to act further on the provider determination.

If the E&T contractor determines that *none* of the components that they offer are a good fit for the participant, the following additional steps occur. If the E&T contractor terminated a SNAP E&T participant because the contractor determined the participant was not suitable for the program, the E&T contractor will enter case termination code 3, 7, X, W, or Y in CWDS. These codes cover the wide variety of circumstances for program exit that are correlated with a provider determination, including when a participant neither finishes the program nor is employed upon program exit or when a participant wishes to participate in a program administered by a different E&T contractor. The E&T contractor enters the case termination code into CWDS within ten calendar days of the participant's exit. The CAO receives an ASAP 156 alert in eCIS the following morning.

CAOs are instructed to treat any ASAP 156 alert which indicates a termination code of 3, 7, X, W, or Y as a notification from the E&T contractor that a provider determination has occurred. E&T contractors are also encouraged to submit a paper

E&T Provider Determination Form to the CAO to provide secondary notification and additional information regarding the provider determination.

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

The CAO notifies the SNAP recipient that a provider determination has been made within 10 calendar days of the CAO receiving the ASAP 156 alert in eCIS. The CAO is required to make this notification even if the E&T contractor has not yet submitted the E&T Provider Determination Form to the CAO. For non-ABAWD E&T volunteers, the CAO completes and mails the Volunteer E&T Termination Form to notify the SNAP recipient of their situation and next steps. For ABAWD E&T participants who are not exempt, geographically waived, or otherwise meeting the work requirement, the CAO completes and mails the ABAWD E&T Termination Form to notify the SNAP recipient of the provider determination. These forms also contain a questionnaire that the recipient can optionally return to the CAO to request to re-enroll in E&T or request an exemption from work registration or the ABAWD time limit.

The CAO will then perform one of the following three actions, within 15 days, regardless of whether the CAO has received the E&T Provider Determination Form from the E&T contractor or a response to the questionnaire from the SNAP recipient:

- 1. Refer the SNAP recipient back to the SNAP E&T program, or to another SNAP E&T program. Follow referral guidance in SNAP HB 535.11.
- 2. Reassess the SNAP recipient for exemptions from the ABAWD time limit (SNAP Qual Code) and general work requirements (SNAP ETP Code).
- Inform the SNAP recipient that additional non-DHS sponsored workforce development services are available at PA CareerLink® Centers. Information about the PA CareerLink® is available at <u>https://www.pacareerlink.pa.gov/</u>.

NOTE: While Pennsylvania currently does not have any workforce partnerships (as defined in 7 CFR §273.7(n)), should any such partnerships materialize, they will be included in the list of services listed in option #3.

The CAO will perform the action that is most appropriate for the SNAP recipient in light of the circumstances of their termination from E&T, other information known to the CAO in the case record, and the information contained on the forms described above (if those forms were returned to the CAO).

XVII. Participant Reimbursements

In accordance with 7 CFR 273.7(d)(4), State agencies are required to pay for or reimburse participants for expenses that are reasonable, necessary, and directly related

to participation in E&T. State agencies may impose a maximum limit for reimbursement payments. If a State agency serves mandatory E&T participants, it must meet all costs associated with mandatory participation. If an individual's expenses exceed those reimbursements available by the State agency, the individual must be placed into a suitable component or must be exempted from mandatory E&T.

Table E.I. Estimates of Participant Reimbursements

Ι.	Estimated number of E&T participants to receive participant reimbursements. This is an unduplicated count. If an individual participates in more than one month, they would only be counted once.	1949
num Table Worł partie	e agencies should take into consideration the ber of mandatory E&T participants projected in e H – Estimated Participant Levels in the Excel kbook, and the number of mandatory E&T cipants likely to be exempted, if the State agency not provide sufficient participant reimbursements.	
11.	Estimated number of E&T participants to receive participant reimbursements per month. This is a duplicated count. This calculation can include the same individual who participates in more than one month.	767
111.	Estimated budget for E&T participant reimbursements in upcoming FY.	\$5,200,000
IV.	Estimated budget for E&T participant reimbursements per month in upcoming FY. (Row III/12)	\$433,333
V.	Estimated amount of participant reimbursements per E&T participant per month. (Row IV/Row II)	\$564.97

Participant Reimbursement Details

Complete the table below with information on each participant reimbursement offered/permitted by the State agency (do not indicate information for each provider). A description of each category is included below.

Allowable Participant Reimbursements. Every State agency must include child care and transportation in this table, as well as other major categories of reimbursements (examples of categories include, but are not limited to: tools, test fees, books, uniforms, license fees, electronic devices, etc.). Mandatory States must meet all costs associated with participating in an E&T program, or else they must exempt individuals from E&T.

- **Participant Reimbursement Caps (optional)**. States have the option to establish maximum levels (caps) for reimbursements available to individuals. Indicate any caps on the amount the State agency will provide for the participant reimbursement.
- Who provides the participant reimbursements? Indicate if the participant reimbursement is provided by the State agency, a provider, an intermediary, or some other entity. The State agency remains ultimately responsible for ensuring individuals receive participant reimbursements, even if it has contracted with another entity to provide them.
- **Method of disbursement.** Indicate if the participant receives the participant reimbursement *in advance* or as *a reimbursement*. Also indicate if the amount of the participant reimbursement is an *estimated amount* or the *actual amount*.

Table E.II. Participant Reimbursement Details

The following table should be completed with details that reflect the State agency's policies on allowable reimbursements. If the response varies by E&T provider, include examples to illustrate this variation. Expenses must be listed in the State plan and approved by FNS to be allowable.

Allowable Participant Reimbursements	Participant Reimbursement Caps (optional)	Who provides the participant reimbursement?	Method of disbursement
Transportation (may include public transportation, mileage, car repair, taxi, carpool)	\$1,500 per participant per year combined expenses in entire category (SPAL) Mileage limited to 20¢ per mile	DHS directly (SPAL), Traveler's Aid/SEPTA, or via select contracted programs	Actual amount, in advance via EBT card or restricted endorsement check; direct issuance of needed item or service through third-party vendors
Clothing and Hygiene	\$150 per participant per year (SPAL)	DHS directly (SPAL) or via select contracted programs	Actual amount in advance via EBT card; direct issuance of needed item or service through third- party vendors

Allowable Participant Reimbursements	Participant Reimbursement Caps (optional)	Who provides the participant reimbursement?	Method of disbursement
Dependent Care	Established rate for dependent care costs unless SNAP regulations are revised to increase the federal ceiling or match.	DHS directly via referral to the local ELRC	DHS directly pays the provider the actual cost of care (up to the cap) in the calendar month following the month services are provided.
Other work, education, and training-related expenses (may include tools, equipment, select technology items, books, supplies, and certain fees)	\$1,000 lifetime limit per participant combined expenses in entire category (SPAL)	DHS directly (SPAL) or via select contracted programs	Actual amount in advance via EBT card; direct issuance of needed item or service through third- party vendors

 a) If providing dependent care, specify payment rates for child care reimbursements, established in accordance with the Child Care and Development Block Grant (CCDBG) and based on local market rate surveys. If alternative dependent care is provided by the State agency in lieu of reimbursement, describe these arrangements.

DHS works closely with the Office of Childhood Development and Early Learning (OCDEL), the CCDBG state agency in Pennsylvania which is housed jointly under DHS and the Pennsylvania Department of Education. SNAP E&T participants with a need for childcare are referred to OCDEL's local Early Learning Resource Center (ELRC) offices. At the ELRC, the participant is directly connected with a childcare provider approved by the ELRC; the childcare provider is directly paid by the ELRC based on the established payment rates that ELRC uses for both CCDBG and SNAP E&T clients.

b) If dependent care agencies have a waiting list or otherwise cap the number of enrolled dependents, how will the State agency ensure E&T participants with dependent care needs receive dependent care?

In Pennsylvania, SNAP E&T participants are considered a priority population by OCDEL, meaning that even if a waiting list is instituted for families requesting childcare under Pennsylvania's Low-Income Subsidy childcare program, SNAP E&T participants will retain access to childcare. Pennsylvania also operates a voluntary SNAP E&T program, meaning that in the very unlikely event that childcare could not be offered to SNAP E&T participants, these participants would not be subject to sanction if they discontinued participation in E&T.

XVIII. Work Registrant Data

The SNAP general work requirements are described at 7 CFR 273.7(a). Individuals who do not meet an exemption from the general work requirements, as listed in 7 CFR 273.7(b)(1), are subject to the general work requirement and must register for work. In accordance with 7 CFR 273.7(c)(10), the State agency must submit to FNS the number of work registrants in the State as of October 1st. This information is submitted on the first quarter E&T Program Activity Report.

a) Describe the process the State agency uses to count all work registrants in the State as of the first day of the new fiscal year (October 1). Please provide information about how data is pulled from the eligibility system. For instance, how work registrants are identified and how counting is conducted.

IMCWs input ETP codes during eligibility determination which indicate work registrant or exempt status. To count work registrants for the FNS-583, DHS uses those codes in the Electronic Data Warehouse to identify all SNAP recipients who meet a federal exemption from work requirements, then subtracts the number of such recipients from the total number of all SNAP recipients to arrive at who is a work registrant as of October 1st. This process occurs once the entirety of October's eligibility information has been uploaded to the DHS Data Warehouse, typically around the first week of November. This provides DHS enough time to report this figure to FNS on the first quarter FNS-583 report by February 14 in accordance with 7 CFR §273.7(c)(9).

b) Describe measures taken to prevent duplicate counting.

Each SNAP recipient is identified in eCIS with a unique "individual number". The SQL code used to identify work registrants utilizes the "distinct" function to ensure that

each individual number is counted only once in the reported number of work registrants.

XIX. Outcome Reporting Measures

National Reporting Measures

Table E.III. National Reporting Measures

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

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

PA DHS Data Warehouse houses data from eCIS, which is the management information system for SNAP eligibility. The Data Warehouse and eCIS also house migratory data from CWDS, which is the data-entry system for contracted E&T programs.

b) If a manual follow-up with SNAP E&T participants is conducted, describe the process for follow-up, including the contact method (e.g., verbal contact, email, or mail).

N/A

c) If a State agency is not using Quarterly Wage Records (QWR) as the source for the national measures, describe the State agency's plan to move toward using QWR including a timeline for completion.

N/A

State Component Reporting Measures

- d) Check all data sources used for the State-specific component measures.
 - □ Quarterly Wage Records (QWR)
 - □ National Directory of New Hires (NDNH)
 - State Management Information System. *Indicate the MIS used below.*

⊠ Manual follow-up with SNAP E&T Participants. *Answer follow-up question below.*

□ Follow-up Surveys. *Answer follow-up question below.*

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

PA DHS Data Warehouse which houses data from eCIS, which is the management information system for SNAP eligibility. The Data Warehouse and eCIS also house migratory data from CWDS, which is the data-entry system for contracted E&T programs.

f) If a manual follow-up with SNAP E&T participants is conducted, describe the process for follow-up, including the contact method (e.g., verbal contact, email, or mail).

PA DHS contacts each SNAP E&T contracted provider to confirm how many individuals received a credential or a GED to satisfy specific State Component Outcome Measures. Typically, contracted providers can confirm this information by reviewing their records and/or case management notes. Follow up with individual SNAP E&T participants is conducted as necessary.

g) If follow-up surveys are used, please describe the sample frame. This description must include source, availability, accuracy, completeness, components, location, form, frequency of updates and structure.

N/A		

 h) If follow-up surveys are used, please describe the sample selection. This description must include the method of sample selection, procedures for estimating caseload size, computation of sampling intervals and random starts, as appropriate, and a time schedule for each step in the sampling procedure.

N/A			

Using the table below, indicate the outcome measure that will be used for each component that the State agency will offer that is intended to serve at least 100 participants in the FY. Explain in detail the methodology for acquiring the component data. Please ensure the component names listed here match the component names in the FNS-583 report and <u>Section G: Component Detail</u>.

		Methodology including the
		timeframes being reported (e.g.
Component	Outcome Measure	denominator and numerator).
Example: Supervised Job Search	Example: Number of people who obtain employment after completion of component.	Example: Numerator will include those participants who obtained employment after completing component during the period of 10- 1-2019 to 9-30-2020
		Denominator will include the number of participants that participated in supervised job search during the period of 10-1- 2019 to 9-30-2020.
Supervised Job	Number and Percentage of	Numerator will include those
Search (SJS)	participants employed	participants who were employed
	during or upon completion	during or upon completion of the
		component during the period of
		10/1/2024 and 9/30/2025
		Denominator will include those
		participants who are currently
		participating in the component and
		those who have exited the

Table E.IV. Component Outcome Measures

		Methodology including the
Component	Outcome Measure	timeframes being reported (e.g. denominator and numerator).
		component for any reason during the period of 10/1/2024 and
		9/30/2025
Job Search	Number and Percentage of	Numerator will include those
Training (JST)	participants employed during or upon completion	participants who were employed during or upon completion of the
		component during the period of
		10/1/2024 and 9/30/2025
		Denominator will include those
		participants who are currently participating in the component and
		those who have exited the
		component for any reason during the period of 10/1/2024 and
		9/30/2025
Job Retention (JR)	Number and Percentage of participants employed	Numerator will include those participants who were employed at
	during or upon 90-day	the 90-day completion of the
	completion	component during the period of
		10/1/2024 and 9/30/2025
		Denominator will include those
		participants who are currently participating in the component and
		those who have exited the
		component for any reason during the period of 10/1/2024 and
		9/30/2025
E&T Workfare	Number and Percentage of	Numerator will include those
(W)	participants who continue to be actively engaged in	participants who are enrolled in the component as of 9/30/2024
	component as of the end of	
	the fiscal year	Denominator will include those participants who are currently
		participating in the component and
		those who have exited the

		Methodology including the
0		timeframes being reported (e.g.
Component	Outcome Measure	denominator and numerator).
		component for any reason during the period of 10/1/2024 and
		9/30/2025
	Number and Percentage of	
	participants employed	
	during or upon completion	Numerator will include those
		participants who obtained
		employment after or were
		employed when the component
		completed during the period of 10/1/2024 and 9/30/2025
		10/1/2024 and 9/30/2025
		Denominator will include those
		participants who are currently
		participating in the component and
		those who have exited the
		component for any reason during
		the period of 10/1/2024 and
Basic/Foundatio	Number and Percentage of	9/30/2025 Numerator will include those
nal Skills	participants who continue	participants who are enrolled in the
Instruction	to be actively engaged in	component as of 9/30/2025
(includes High	component as of the end of	
School	the fiscal year	Denominator will include those
Equivalency		participants who are currently
Program (EPB)		participating in the component and
		those who have exited the
		component for any reason during
	Number and Percentage of	the period of 10/1/2024 and 9/30/2025
	participants employed	0,00,2020
	during or upon completion	
		Numerator will include those
		participants who obtained
		employment after or were
		employed when the component

		Methodology including the
Component	Outcome Measure	timeframes being reported (e.g. denominator and numerator).
	Number and Percentage of participants who earned a High School Equivalency Degree	completed during the period of 10/1/2024 and 9/30/2025 Denominator will include those participants who are currently participating in the component and those who have exited the component for any reason during the period of 10/1/2024 and 9/30/2025 Numerator will include those participants who obtained a High School Equivalency Degree during the period of 10/1/2024 and 9/30/2025
	Number and Percentage of participants who successfully complete as determined by the provider	Denominator will include those participants who are currently participating in the component and those who have exited the component for any reason during the period of 10/1/2024 and 9/30/2025 Numerator will include those participants who successfully completed the component as determined by the provider during the period between 10/1/2024 and 9/30/2025 Denominator will include those participants who are currently participating in the component and those who have exited the component for any reason during

		Methodology including the timeframes being reported (e.g.
Component	Outcome Measure	denominator and numerator).
		the period of 10/1/2024 and 9/30/2025
Career/Technica I Education Programs or other Vocational	Number and Percentage of participants who continue to be actively engaged in component as of the end of	Numerator will include those participants who are enrolled in the component as of 9/30/2025
Training (EPC)	the fiscal year	Denominator will include those participants who are currently participating in the component and those who have exited the component for any reason during the period of 10/1/2024 and
	Number and Percentage of participants employed during or upon completion	9/30/2025
		Numerator will include those participants who obtained employment after or were employed when the component completed during the period of 10/1/2024 and 9/30/2025
	Number and Percentage of participants who earned a Credential	Denominator will include those participants who are currently participating in the component and those who have exited the component for any reason during the period of 10/1/2024 and 9/30/2025
		Numerator will include those participants who obtained a Credential during the period of 10/1/2024 and 9/30/2025
		Denominator will include those

Component	Outcome Measure	Methodology including the timeframes being reported (e.g. denominator and numerator).
		participants who are currently participating in the component and those who have exited the component for any reason during the period of 10/1/2024 and 9/30/2025
English Language Acquisition (EPEL)	Number and Percentage of participants who continue to be actively engaged in component as of the end of the fiscal year Number and Percentage of participants employed during or upon completion	Numerator will include those participants who are enrolled in the component as of 9/30/2025 Denominator will include those participants who are currently participating in the component and those who have exited the component for any reason during the period of 10/1/2024 and 9/30/2025 Numerator will include those participants who obtained employment after or were employed when the component completed during the period of 10/1/2024 and 9/30/2025 Denominator will include those participants who are currently participating in the component and those who have exited the component for any reason during the period of 10/1/2024 and 9/30/2025

Component	Outcome Measure	Methodology including the timeframes being reported (e.g. denominator and numerator).
Internship (WBLI)	Number and Percentage of participants who continue to be actively engaged in component as of the end of the fiscal year Number and Percentage of participants employed during or upon completion	Numerator will include those participants who are enrolled in the component as of 9/30/2025 Denominator will include those participants who are currently participating in the component and those who have exited the component for any reason during the period of 10/1/2024 and 9/30/2025 Numerator will include those participants who obtained employment after or were employed when the component completed during the period of 10/1/2024 and 9/30/2025 Denominator will include those participants who are currently participating in the component and those who have exited the component for any reason during the period of 10/1/2024 and 9/30/2025
Pre- Apprenticeship (WBLPA)	Number and Percentage of participants who continue to be actively engaged in component as of the end of the fiscal year	Numerator will include those participants who are enrolled in the component as of 9/30/2025 Denominator will include those participants who are currently

		Methodology including the
-		timeframes being reported (e.g.
Component	Outcome Measure	denominator and numerator).
	Number and Percentage of participants employed during or upon completion	participating in the component and those who have exited the component for any reason during the period of 10/1/2024 and 9/30/2025
		Numerator will include those participants who obtained employment after or were employed when the component completed during the period of 10/1/2024 and 9/30/2025. The definition of "employment" includes, but is not limited to, participants who were placed in a registered apprenticeship (RA).
		Denominator will include those participants who are currently participating in the component and those who have exited the component for any reason during the period of 10/1/2024 and 9/30/2025
Transitional Jobs (WBLTJ)	Number and Percentage of participants who continue to be actively engaged in component as of the end of the fiscal year	Numerator will include those participants who are enrolled in the component as of 9/30/2025 Denominator will include those participants who are currently participating in the component and those who have exited the component for any reason during
	Number and Percentage of participants employed during or upon completion	the period of 10/1/2024 and 9/30/2025

		Methodology including the
Component	Outcome Measure	timeframes being reported (e.g. denominator and numerator).
oomponent		Numerator will include those
		participants who obtained
		employment after or were
		employed when the component
		completed during the period of
		10/1/2024 and 9/30/2025
		Denominator will include those
		participants who are currently
		participating in the component and
		those who have exited the
		component for any reason during
		the period of 10/1/2024 and
Turnetting	Newskaw and David states of	9/30/2025
Transitional Jobs –	Number and Percentage of participants who continue	Numerator will include those participants who are enrolled in the
Subsidized by	to be actively engaged in	component as of 9/30/2025
E&T (WBLTJ -	component as of the end of	
SUB)	the fiscal year	Denominator will include those
,	, ,	participants who are currently
		participating in the component and
		those who have exited the
		component for any reason during
	Number and Percentage of	the period of 10/1/2024 and
	participants employed	9/30/2025
	during or upon completion	
		Numerator will include those
		participants who obtained
		employment after or were employed when the component
		completed during the period of
		10/1/2024 and 9/30/2025
		Denominator will include those participants who are currently participating in the component and
		those who have exited the

Component	Outcome Measure	Methodology including the timeframes being reported (e.g. denominator and numerator).	
		component for any reason during the period of 10/1/2024 and 9/30/2025	

F. Pledge to Serve All At-Risk ABAWDs (if applicable)

The Act authorizes FNS to allocate \$20 million annually to State agencies that commit, or pledge, to ensuring the availability of education, training, or workfare opportunities that permit able-bodied adults without dependents (ABAWDs) to remain eligible beyond the 3-month time limit.

To be eligible for these additional funds (pledge funds), State agencies must pledge to offer and provide an opportunity in a work program that meets the participation requirements of 7 CFR 273.24 to every applicant and recipient who is in the last month of the 3–month time limit and not otherwise exempt. Individuals are exempt from the time limit if they meet an exception under 7 CFR 273.24(c), reside in an area covered by a waiver in accordance with 7 CFR 273.24(f), or who are exempted by the State under 7 CFR 273.24(g). ABAWDs who meet the criteria outlined in 7 CFR 273.7(d)(3)(i) are referred to as "at-risk" ABAWDs.

a) Is the State agency pledging to offer qualifying activities to all at-risk ABAWDs? □ Yes (*Complete the rest of this section.*)

⊠ No (Skip to Section G: Component Detail.)

Table F.I.	Pledge	Assurances
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Check the box to indicate that the State agency understands and agrees to comply with the following provisions, per 7 CFR 273.7(d)(3).	Check Box
The State agency will use the pledge funds to defray the costs of offering every at-risk ABAWD a slot in a qualifying component.	
The cost of serving at-risk ABAWDs is not an acceptable reason for failing to live up to the pledge. The State agency will make a slot available and the ABAWD must be served even if the State agency exhausts all of its 100 percent Federal funds and must use State funds.	
While a participating State agency may use a portion of the additional funding to provide E&T services to ABAWDs who are not at-risk, the State agency guarantees that at-risk ABAWDs are provided with opportunities by the State agency <u>each month</u> to remain eligible beyond the 3-month time limit.	
The State agency will notify FNS immediately if it realizes that it cannot obligate or expend its entire share of the ABAWD allocated funds, so that FNS may make those funds available to other participating pledge States within the fiscal year.	

Check the box to indicate that the State agency understands and agrees to comply with the following provisions, per 7 CFR 273.7(d)(3).	Check Box
The State agency will be ready on October 1 st to offer and provide qualifying activities and services each month an ABAWD is at-risk of losing their benefits beyond the 3-month time limit.	

- b) Where will the State agency offer qualifying activities?
 - □ Statewide
 - □ Limited areas of the State (Complete questions c and d below.)
- c) Explain why the State agency will offer qualifying activities in limited areas of the State.
 - \Box ABAWD waiver for parts of the State
 - □ Will use discretionary exemptions
 - \Box Other: Click or tap here to enter text.
- d) If the State agency will be offering qualifying activities only in limited areas of the State, please list those localities/areas.

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

- f) How does the State agency identify ABAWDs that are at-risk?
- g) When and how is the offer of qualifying activities made? Include the process the State agency uses to ensure that at-risk ABAWDs receive an offer of a qualifying component for every month they are at risk, including how the offer is made.

The next set of questions is intended to establish the State agency's overall capacity and ability to serve all at-risk ABAWDs during the fiscal year through the services available in SNAP E&T as well as through other qualifying activities available through other Federal or State employment and training programs. In addition to SNAP E&T components, qualifying activities for ABAWDs include programs that operate outside of SNAP E&T. Such as Optional Workfare programs, WIOA title I programs, programs under Section 236 of the Trade Act of 1974, Veterans employment and training programs offered by the Department of Veterans Affairs or the Department of Labor, and Workforce Partnerships in accordance with 7 CFR 273.7(n).

- h) What services and activities will be provided through SNAP E&T? (List the components and participant reimbursements.) This should be consistent with the components detailed in Section G, as well as Section E-XIV regarding participant reimbursements.
- i) What services and activities will be provided outside of SNAP E&T? (List the operating program, such as title 1 of WIOA, services and activities.)
- j) To pledge, State agencies must have capacity to offer a qualifying activity to every at-risk ABAWD for every month they are at-risk. What is the State agency's plan if more ABAWDs than expected choose to take advantage of the offer of a qualifying activity? For instance, how will the State agency ensure the availability of more slots? What steps has the State agency taken to guarantee a slot through agreements or other arrangements with providers?

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

Question	Number
I. How many ABAWDs did you serve in E&T in the previous FY?	

	Question	Number
11.	How many SNAP recipients are expected to be ABAWDs this fiscal year? This should be an unduplicated count. If an individual is an ABAWD at any time during the fiscal year, they would be counted only once. Note: This should be consistent with the projected number of ABAWDs shown on Table H row 11 in the Excel Workbook.)	
111.	How many ABAWDs will meet the criteria of an at-risk ABAWD? This should be an unduplicated count. If an individual is an at-risk ABAWD at any time during the fiscal year, they would be counted only once. (Note: This should be consistent with the projected number of at-risk ABAWDs shown on Table H row 14 in the Excel Workbook.)	
IV.	Number of at-risk ABAWDs averaged monthly? This should be annual total from line (III) divided by 12.	

Table F.III. Available Qualifying Activities

When considering all the qualifying activities that the pledging State agency intends to offer to at-risk ABAWDs, provide a projected estimate for each category below.

	Expected average monthly slots available to at-risk ABAWDs	Expected average monthly slots offered to at-risk ABAWDs	Expected monthly at-risk ABAWD participation for plan year
SNAP E&T			
All other programs outside of SNAP E&T			
Total slots across all qualifying activities			

Table F.IV. Estimated cost to fulfill the pledge

		Value
Ι.	What is the projected total cost to serve all at-risk	
	ABAWDs in your State?	
П.	Of the total in (I), what is the total projected	
	administrative costs of E&T?	
III.	Of the total in (I), what is the total projected costs for	
	participant reimbursements in E&T?	

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

G. Component Detail

The goal of this section is to provide a comprehensive description of E&T program components and activities that the State agency will offer. A State agency's E&T program must include one or more of the following components: supervised job search; job search training; workfare; work experience or training; educational programs; self-employment activities; or job retention services. The State agency should ensure that the participation levels indicated in this section align with other sections of the State Plan, such as the projected participant levels in Section H – Estimated Participant Levels.

Complete the following questions for each component that the State agency intends to offer during the fiscal year.

I. Non-Education, Non-Work Components

Complete the tables below with information on each non-education, non-work component that the State agency intends to offer during the fiscal year. *If the State does not plan to offer one of the components in the table, please leave the cells blank.* For each component that is offered, the State should include the following information:

- Summary of the State guidelines implementing supervised job search (applies to SJS only). This summary of the State guidelines, at a minimum, must describe: The criteria used by the State agency to approve locations for supervised job search, an explanation of why those criteria were chosen, and how the supervised job search component meets the requirements to directly supervise the activities of participants and track the timing and activities of participants.
- **Direct link (applies to SJS only)**. Explain how the State agency will ensure that supervised job search activities will have a direct link to increasing the employment opportunities of individuals engaged in the activity (i.e. how the State agency will screen to ensure individuals referred to SJS are job ready and how the SJS program is tailored to employment opportunities in the community).
- **Description of the component (applies to JST, SET, and Workfare)**. Provide a brief description of the activities and services.
 - **For JR Only:** Provide a summary of the activities and services. Include a description of how the State will ensure services are provided for no less 30 days and no more than 90 days.

- **Target population**. Identify the population that will be targeted. Include special populations such as ABAWDs, Returning Citizens, Homeless, Older Disconnected Youth, etc.
- **Criteria for participation.** What skills, knowledge, or experience is necessary for participation in the component? For example, literacy or numeracy levels, recent labor market attachment, computer literacy etc.
- **Geographic area**. Where will the component be available (statewide, regional, counties, localities not covered by ABAWD waivers, areas covered by American Job Centers, etc.).
- **E&T providers**. Identify all entities that will provide the service.

Projected annual participation. Project the number of unduplicated individuals.

Estimated annual component costs. Project only administrative costs

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

Details	Supervised Job Search (SJS)
Summary of the State guidelines implementing SJS	Supervised job search component serves job-ready participants engaged in job-seeking activities, either individually or as a group at state-approved locations. Case managers validate client's job search activities through discussions and guidance at minimum once per month. Job-seeking activities may include counseling, provision of local labor market information, and instruction in job-seeking skills, and a minimum effort of 12 hours per month. Job Search can be conducted at state-approved locations including American Job Centers, online via CWDS/Job Gateway, or at facilities operated by a contracted E&T service provider included in this Plan. Locations were selected based on alignment with PA's workforce development system, and to ensure E&T participants may utilize the job search component in a space similar to the one in which they engage in other components. Online or internet-based job applications will be tracked by the case manager, who will provide continuous advice to participants as the component progresses.
Direct link	PA DHS has ensured a direct link for Supervised Job Search in each contracted program. SNAP EARN is required to provide employability assessment and case management to all participants not only by regulation, but also by program design through their contract. They complete a service plan and have access to Job Search Training services to assist. SNAP EARNs are contracted with the Workforce Development Boards, are able to leverage local resources and employer partnerships, and uniquely suited to providing the Supervised Job Search component. SNAP 50/50s are designed so that Supervised Job Search is only offered following completion of vocational education or work experience components, when participants are ready to put their new skills into action. As part of the onboarding process for each new SNAP 50/50 third party partner, PA DHS reviews the partner's ties to employers in

	the community as well as the job coaching and placement services.
Target population	This component is open to any E&T participant who meets criteria for participation and wishes to volunteer
Criteria for participation	Participation in this component is determined at the contractor level. Each contractor may determine the suitability of a participant for this component. Typically, individuals are encouraged to enroll in a supervised job search period following successful completion of another SNAP E&T component.
Geographic area	Statewide
E&T providers	SNAP EARN and SNAP 50-50 contractor groups Note: Graduates of the SNAP KEYS program are referred to SNAP EARN after graduation for assistance with job placement.
Projected annual participation	457
Estimated annual component costs	\$1,995,799

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

	Job Search Training (JST)
Details	
Description of the component	Job Search Training component prepares individuals for the workplace by teaching interviewing techniques, preparation of resumes, employer expectations, and basic life skills.
Target population	This component is open to any E&T participant who meets criteria for participation and wishes to volunteer
Criteria for participation	Participation in this component is determined at the contractor level. Each contractor may determine the suitability of a participant for this component.
Geographic area	Statewide
E&T providers	All contracted groups

Projected annual	1170
participation	
Estimated annual	\$2,211,208
component costs	

Details	Job Retention (JR)
Description of the component	The job retention component includes services designed to assist individuals to successfully transition into the workplace and retain employment. This component is restricted to participants who obtain new unsubsidized employment while participating in another SNAP E&T component. This component includes financial literacy planning, job coaching, and workplace literacy services. This component is offered to each participant for a minimum of 30 days and a maximum of 90 days. Consistent with federal rules, this component is offered for the full period of up to 90 days notwithstanding a
	participant's loss of eligibility for SNAP benefits.
Target population	This component is open to any E&T participant who meets criteria for participation and wishes to volunteer
Criteria for participation	Participation in this component is determined at the contractor level. Each contractor may determine the suitability of a participant for this component.
Geographic area	Statewide
E&T providers	All contracted groups
Projected annual participation	810
Estimated annual component costs	\$2,060,685

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

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

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

Estimated annual
component costs

Target population	By reviewing the activity codes opened, the monthly data- entry of hours, and the receipt of E&T termination notifications, the CAO is able to take action to discontinue benefits to ABAWDs who are no longer meeting the ABAWD work requirement through participation in E&T, pursuant to 7 CFR §273.7(m)(9)(ii). This component is open to any E&T participant who meets criteria for participation and wishes to volunteer.
Criteria for participation	Participation in this component is determined at the contractor level. Each contractor may determine the suitability of a participant for this component.
Geographic area	Statewide
E&T providers	All contracted groups
Projected annual participation	35
Estimated annual component costs	\$65,249

II. Educational Programs

Complete the tables below with information on each educational program component that the State agency intends to offer during the fiscal year. *If the State does not plan to offer one of the components in the table, please leave the cells blank.* For each component that is offered, the State should include the following information:

Description of the component. Provide a summary of the activities and services.

- **Target population**. Identify the population that will be targeted. Include special populations such as ABAWDs, Returning Citizens, Homeless, Older Disconnected Youth, etc.
- **Criteria for participation.** What skills, knowledge, or experience is necessary for participation in the component? For example, literacy or numeracy levels, recent labor market attachment, computer literacy etc.
- **Geographic area**. Where will the component be available (statewide, regional, counties, localities not covered by ABAWD waivers, areas covered by American Job Centers, etc.).
- **E&T providers**. Identify all entities that will provide the service.
- Projected annual participation. Project the number of unduplicated individuals.
- Estimated annual component costs. Project only administrative costs.
- **Not supplanting**: Federal E&T funds used for activities within the education component must not supplant non-Federal funds for existing educational services and activities. For any education activities, provide evidence that costs attributed to the E&T program are not supplanting funds used for other existing education programs.
- **Cost parity**: If any of the educational services or activities are available to persons other than E&T participants, provide evidence that the costs charged to E&T do not exceed the costs charged for non-E&T participants (e.g. comparable tuition).

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

Details	Basic/Foundational Skills Instruction (includes High School Equivalency Programs) (EPB)
Description of the component	This component is designed to increase employability of participants through an appropriate course of literacy, numeracy, and basic skills education equivalent to successful completion of the 8 th grade. For individuals who successfully attain this level of proficiency, or who already demonstrated it upon placement into the component, this component will also prepare a participant to qualify for a high school general equivalency diploma or equivalent certification.
Target population	This component is open to any E&T participant who meets criteria for participation and wishes to volunteer
Criteria for participation	For GED/high school equivalency services only, an individual must be functioning at the 8 th grade level or above to enroll.
Geographic area	Statewide
E&T providers	SNAP EARN and SNAP 50/50
Projected annual participation	160
Estimated annual component costs	\$451,598
Not supplanting	SNAP EARN contractors are provided with guidance prohibiting the use of funds to supplant existing state entitlements. Generally, if a service is available from a reputable provider in the community at no charge, SNAP EARN programs are expected to refer the participant to the no-charge provider and bill DHS only for the cost of providing case management, supportive services, and supplemental activities that are provided to the SNAP participant, but not available to the general public.
Cost parity	Contractors are advised of the requirement that costs charged to the E&T grant may not exceed costs charged to or for non-E&T participants.

Details	Career/Technical Education Programs or other Vocational Training (EPC)
Description of the component	This component provides occupational skills training that lead to certifications, industry-recognized credentials, and in-demand jobs. Only educational activities that directly enhance the employability of the participant are allowed.
	This component also includes credit-bearing certificate programs and career-specific degrees that enhance participants' employability. Program partners include but are not limited to: Pennsylvania's community colleges and state-owned universities.
	Examples of credentials earned through the EPC component include National Institute for Metalworking Skills (NIMS) credentials, Pennsylvania Commercial Drivers Licenses (CDLs), BankWork\$ (banking industry) certification, OSHA-10, North American Board of Certified Energy Practitioners (NABCEP) Associates, and more.
	ABAWDs are advised that they may appropriately combine this component with up to 10 hours/week of job search and/or job search training to meet the ABAWD work requirement.
Target population	This component is open to any E&T participant who meets criteria for participation and wishes to volunteer.
Criteria for participation	Most contracted partners have specific criteria for admission into their program that align with labor market demand. For example, completion of high school; verification of literacy or numeracy levels; or, in limited instances, criminal history requirements.
Geographic area	Statewide
E&T providers	18 SNAP 50/50, 14 SNAP KEYS, and 23 SNAP EARN
Projected annual participation	2725
Estimated annual component costs	\$9,675,036

Table G.VII. Educational Program Details: Career/Technical Education Programsor other Vocational Training

Not supplanting	Contractors are provided with guidance prohibiting the use of funds to supplant existing state entitlements. Generally, if a service is available from a reputable provider in the community at no charge, contractors are expected to refer the participant to the no-charge provider and bill DHS only for the cost of providing case management, supportive services, and supplemental activities that are provided to the SNAP participant, but not available to the general public.
Cost parity	In the SNAP KEYS program, tuition is generally not paid for with SNAP E&T funds, and KEYS coordinators are expected to refer students to free resources available on campus to all students. KEYS contractors then use funds to pay for case management, supportive services, and additional activities and enhanced services (not available to non-E&T participants) that address the unique needs of the E&T participant population. SNAP 50/50 third-party partners, which are community- based organizations, are required to bill DHS for SNAP E&T participants consistently with the amount charged per non-E&T student to their other charitable donations or grants.

Table G.VIII. Educational Program Details: English Language Acquisition

Details	English Language Acquisition (EPEL)
Description of the component	Formal education training specifically designed to improve an individual's proficiency in English needed to compete in the current job market.
Target population	This component is open to any E&T participant who meets criteria for participation and wishes to volunteer.
Criteria for participation	The participant has expressed that English is not their first language to the CAO or the E&T contractor staff.
Geographic area	Statewide
E&T providers	SNAP 50/50, SNAP KEYS, and SNAP EARN

Projected annual participation	11
Estimated annual component costs	\$71,566
Not supplanting	Contractors are provided with guidance prohibiting the use of funds to supplant existing state entitlements. Generally, if a service is available from a reputable provider in the community at no charge, contractors are expected to refer the participant to the no-charge provider and bill DHS only for the cost of providing case management, supportive services, and supplemental activities that are provided to the SNAP participant, but not available to the general public.
Cost parity	Contractors are advised of the requirement that costs charged to the E&T grant may not exceed costs charged to or for non-E&T participants.

Table G.IX. Educational Program Details: Integrated Education andTraining/Bridge Programs

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

Details	Work Readiness Training (EPWRT)

Description of the	
component	
Target population	
Criteria for participation	
Geographic area	
E&T providers	
Projected annual participation	
Estimated annual	
component costs	
Not supplanting	
Cost parity	

Table G.XI. Educational Program Details: Other

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

III. Work Experience (WE)

Work experience is divided into two subcomponents per 7 CFR 273.7(e)(2)(iv): Work activity (WA) and Work-based learning (WBL). WBL activities like internships, apprenticeships, and on-the-job training, among others, may provide wages subsidized by the E&T program. In order to capture information about WBL activities that may be subsidized or unsubsidized by E&T, there are two sets of tables below for each kind of WBL activity – the first group of tables are for activities not subsidized by E&T (e.g. Work-based learning – Internships) and the second group of tables are for activities subsidized by E&T (e.g. Work-based learning – Internships - Subsidized by E&T). Note that subsidized means programs where E&T funding is used to subsidize wages of participants. Subsidized in this context does not mean programs where participants receive a subsidized wage from another source.

Work Activity and Unsubsidized WBL Components

Complete the tables below with information on Work Activity and each unsubsidized WBL component that the State agency intends to offer during the fiscal year. *If the State does not plan to offer one of the components in the table, please leave the cells blank.* For each component that is offered, the State should include the following information:

- Description of the component. Provide a summary of the activities and services.
- **Target population.** Identify the population that will be targeted. Include special populations such as ABAWDs, Returning Citizens, Homeless, Older Disconnected Youth, etc.
- **Criteria for participation.** What skills, knowledge, or experience is necessary for participation in the component? For example, literacy or numeracy levels, recent labor market attachment, computer literacy etc.
- **Geographic area.** Where will the component be available (statewide, regional, counties, localities not covered by ABAWD waivers, areas covered by the American Job Centers, etc.).
- **E&T providers.** Identify all entities that will provide the service.
- Projected annual participation. Project the number of unduplicated individuals.
- Estimated annual component costs. Project only administrative costs.

Table G.XII. Work Experience: Work Activity

Details	Work Activity (WA)
Description of the	
component	
Target population	
Criteria for participation	
Geographic area	
E&T providers	
Projected annual	
participation	
Estimated annual	
component costs	

Table G.XIII. Work Experience: Internship

Details	Internship (WBLI)
Description of the component	Short-term entry-level work experience with an employer in an industry associated with the participant's course of study and supervised or case managed by the E&T provider. The most common industries for internships are nursing (RN/LPN), Medical Assistants, Social Workers,
	and Nursing Assistants. The participant may or may not be paid by the employer, however wages will not be subsidized with E&T dollars.
Target population	Community College students
Criteria for participation	This component is open to E&T participants who are simultaneously enrolled in or recently were enrolled in the career/technical education programs or other vocational training component.
Geographic area	Statewide, including areas covered by Pennsylvania's 14 community colleges
E&T providers	SNAP KEYS
Projected annual participation	44
Estimated annual component costs	\$84,626

	Pre-Apprenticeship
Details	(WBLPA)
Description of the component	Registered pre-apprenticeships (RPAs) that expand participants' career pathway opportunities with industry- based training and classroom instruction, preparing individuals to enter and succeed in registered apprenticeships (RAs) or other unsubsidized employment. RPAs are typically conducted in a classroom setting, with participants also experiencing simulated job environments to gain relevant hands-on experience.
	ABAWDs are advised that they may appropriately combine this component with up to 10 hours/week of job search and/or job search training to meet the ABAWD work requirement.
Target population	This component is open to any E&T participant who meets criteria for participation and wishes to volunteer.
Criteria for participation	Each contracted partner has specific criteria for admission into their program that align with labor market demand. For example, completion of high school; verification of literacy or numeracy levels; or, in limited instances, criminal history requirements.
Geographic area	Philadelphia and Allegheny Counties
E&T providers	SNAP 50/50 (Samuel Staten Sr. Pre-Apprenticeship Program, Trade Institute of Pittsburgh, and New Century Careers)
Projected annual participation	171
Estimated annual component costs	\$1,212,397

Table G.XIV. Work Experience: Pre-Apprenticeship

Table G.XV. Work Experience: Apprenticeship

	Apprenticeship (WBLA)
Details	
Description of the	
component	
Target population	
Criteria for participation	
Geographic area	

E&T providers	
Projected annual	
participation	
Estimated annual	
component costs	

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

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

Table G.XVII. Work Experience: Transitional Jobs

Deteile	Transitional Jobs (WBLTJ)
Details	
Description of the component	Transitional Job activities provide time-limited work experiences that are wage-paid, but not subsidized, and are in the public, private, non-profit sectors for those individuals with barriers to employment who are chronically unemployed and have inconsistent work history. These jobs are designed to enable an individual to establish a work history, demonstrate work success in an employee- employer relationship, and develop the skills that lead to unsubsidized employment. Training objectives include enhanced coaching designed to build non-cognitive (soft) skills, as well as job skills specific to the participant's specific TJ placement, which can be in industries such as distribution/supply chain, food processing and manufacturing, hospitality, printing/imaging, and restoration/large loss.
Target population	Returning citizens, homeless, chronically unemployed.
Criteria for participation	This component is open to any E&T participant who meets criteria for participation and wishes to volunteer. Participation in this component is determined at the contractor level. Each contractor may determine the suitability of a participant for this component.
Geographic area	Philadelphia, Bucks, and surrounding counties
E&T providers	SNAP 50/50 (First Step Staffing)
Projected annual participation	125

Estimated annual	\$488,935
component costs	

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

Subsidized WBL Components

For assistance with developing the State's E&T SWBL budget, please refer to the optional SWBL tool on the Operating Budget Excel Workbook.

For all of the included subsidized components, the State agency attests to the following:	Check Box
Will pay the individual a wage at least equal to the State or Federal minimum wage, whichever is higher.	\boxtimes
Operates in compliance with all applicable labor laws.	\boxtimes
Will not displace or replace existing employment of individuals not participating in E&T.	\boxtimes
Provides the same benefits and working conditions as non-E&T participants doing comparable work for comparable hours.	X

Complete the tables below with information on each subsidized WBL component that the State agency intends to offer during the fiscal year. *If the State does not plan to offer one of the components in the table, please leave the cells blank*. For each component that is offered, the State should include the following information:

Description of the component. Provide a summary of the activities and services.

- **Target population.** Identify the population that will be targeted. Include special populations such as ABAWDs, Returning Citizens, Homeless, Older Disconnected Youth, etc.
- **Criteria for participation.** What skills, knowledge, or experience is necessary for participation in the component? For example, literacy or numeracy levels, recent labor market attachment, computer literacy etc.
- **Geographic area.** Where will the component be available (statewide, regional, counties, localities not covered by ABAWD waivers, areas covered by the American Job Centers, etc.).
- **E&T providers.** Identify all entities that will provide the service.
- Projected annual participation. Project the number of unduplicated individuals.
- Estimated annual component costs. Project only administrative costs.
- **Length of time the SWBL will run.** Indicate the maximum number of hour participants can receive SWBL (e.g. 300 hours). Indicated if there is variation in how many hours will be offered to participants.
- What other administrative costs, if any, will be associated with the SWBL. Examples include workers compensation, payroll taxes paid by the employer, and costs, direct or indirect costs associated with training and administering the SWBL.

Details	Internship – Subsidized by E&T (WBLI - SUB)
Description of the	
component	
Target population	
Criteria for participation	
Geographic area	
E&T providers	
Projected annual	
participation	
Estimated annual	
component costs	
Length of time the SWBL	
will run	
Other administrative costs	
associated with SWBL	

Table G.XX. Subsidized Work Experience: Pre-Apprenticeship– Subsidized by E&T

Details	Pre-Apprenticeship– Subsidized by E&T (WBLPA- SUB)
Description of the	
component	
Target population	
Criteria for participation	
Geographic area	
E&T providers	
Projected annual	
participation	
Estimated annual	
component costs	
Length of time the SWBL	
will run	
Other administrative costs	
associated with SWBL	

Table G.XXI. Subsidized Work Experience: Apprenticeship – Subsidized by E&T

Details	Apprenticeship – Subsidized by E&T (WBLA- SUB)
Description of the	
component	
Target population	
Criteria for participation	
Geographic area	
E&T providers	
Projected annual	
participation	
Estimated annual	
component costs	
Length of time the SWBL	
will run	
Other administrative costs	
associated with SWBL	

Table G.XXII. Subsidized Work Experience: Transitional Jobs – Subsidized by E&T

Details	Transitional Jobs – Subsidized by E&T (WBLTJ - SUB)
Description of the component	Transitional Job activities provide time-limited work experiences that are wage-paid. Contractors will subsidize 100% of the cost of the wage, and receive 50% federal reimbursement of all costs incurred, including wages. Two third-party partners will provide WBLTJ- SUB in Pennsylvania in FY25: the Center for Employment Opportunities (CEO) and Landforce.
	<u>CEO</u> Placements are in the public, private, non-profit sectors for those individuals with barriers to employment who are chronically unemployed and have inconsistent work history. Placements are limited to no longer than 75 working days, which may be consecutive or non- consecutive. Participants receive wages at the end of each working day. These jobs are designed to enable an individual to establish a work history, demonstrate work success in an employee-employer relationship, and develop the skills that lead to unsubsidized employment. Training objectives include non-cognitive (soft) skills, as well as job skills specific to the participant's specific TJ

	placement, which can be in industries such as landscaping/land reclamation, building renovation, litter abatement, information technology, and commercial driver's license. Transitional job partners include: the City of Philadelphia, Philadelphia Parks and Recreation, and Hilco Redevelopment Partners (in Philadelphia), Dauphin County, Dauphin County Housing Authority, Harrisburg Housing Authority, and York Housing Authority (in Harrisburg), and City of PittsburghForestry Department, McConway & Torely, and Arconic Manufacturing Company (in Pittsburgh).
	Landforce Placements are at Landforce, a nonprofit employment
	social enterprise, for those individuals with barriers to employment who are chronically unemployed and have inconsistent work history. A paid training period begins annually in March for spring cohort, with transitions to crew-based employment in May. The fall cohort will begin in August and follow the same training schedule. Transitional placements can continue through November, although participants who can transition into unsubsidized employment before the end of the season are assisted in doing so. Participants receive bi-weekly wages. About two-thirds of Landforce participants have been involved with the justice system, and significant percentages have struggled with mental health, addiction, and/or homelessness. These jobs are designed to enable participants to establish a work history, demonstrate work success in an employee- employer relationship, and develop the skills that lead to unsubsidized employment. Training objectives include non-cognitive (soft) skills, as well as job skills specific to environmental stewardship & basic construction, which can be in industries such as landscaping/land reclamation, arboriculture, construction, etc. Certifications earned include First Aid/CPR, Chainsaw Safety, National Green Infrastructure, and OSHA HAZWOPER 40.
Target population	CEO
	Returning citizens
	Landforce

	Residents of Pittsburgh and the surrounding communities with a history of justice involvement, mental health issues, addiction, and/or homelessness. Landforce promotes equity by serving a target population that is 80% Black with a staff team that is also 50% Black and includes several former crew members.
Criteria for participation	CEO
	Participation is limited to individuals who have been released from state incarceration and are under state supervision/parole. In some instances, individuals released from county incarceration and under county supervision/probation may also be eligible.
	Landforce
	Participation is not limited exclusively to justice-involved individuals, however nearly all Landforce participants have struggled with one or more barriers, including justice involvement, mental health, addiction, and/or homelessness, which has left them chronically unemployed or with a very inconsistent work history prior to engaging in the program.
Geographic area	CEO
	Philadelphia, Allegheny, Dauphin, and surrounding counties.
	Landforce
	Allegheny (City of Pittsburgh and surrounding neighborhoods)
E&T providers	SNAP 50/50 (Center for Employment Opportunities and Landforce)
Projected annual participation	396
Estimated annual	\$1,759,995 (wage portion only)
component costs	\$4,736,906
Length of time the SWBL will run	CEO
	Three months
	Landforce
	Up to thirty-five weeks (approximately eight months). Participants engage in eight weeks of hands-on training

	period during which they receive wages of \$14/hr, followed by an eight-week initial work experience period during which they receive wages of \$15/hr, followed by a second work experience period of 19 weeks during which they receive wages of \$16/hr. Given the tiered wage structure, these phases are listed individually on the SWBL Worksheet to properly capture wage costs; please note that a <u>total</u> of 24 participants are expected to receive services under this grant. Since some participants are expected to be placed in employment during Phases I or II, participation in Phase III is projected to be 33% less than participation in Phase I.
Other administrative costs associated with SWBL	\$2,976,911

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Table G.XXIII. Subsidized Work Experience: Work-based learning - Other - Subsidized by E&T

Detelle	Work-based learning - Other -Subsidized by E&T (WBLO - SUB): State agency must provide
Details	description)
Description of the	
component	
Target population	
Criteria for participation	
Geographic area	
E&T providers	
Projected annual	
participation	
Estimated annual	
component costs	
Length of time the SWBL	
will run	
Other administrative costs	
associated with SWBL	

H. Estimated Participant Levels

Complete the Estimated Participant Levels sheet in the Excel Workbook projecting participation in E&T for the upcoming Federal FY. Use the numbers in the Excel Workbook as a reference to answer the question below.

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

N/A

I. Contracts/Partnerships

For each partner/contractor that receives more than 10% of the E&T operating budget, complete the table below. If all partners receive less than 10% of the budget, provide the information in the table for the five providers who receive the largest total amount of E&T funding. Partners are the entities that the State agency has contracted with or has agreements (MOUs or MOUAs) with for the delivery of E&T services. All partner contracts must be available for inspection by FNS as requested. (Note: All E&T partners and contracts will be included in the Contract and Partnership Matrix in the Operating Budget Excel Workbook.)

Contract or Partner Name:	SNAP KEYS
Service Overview:	Grantees provide assistance, supports, and case management services to SNAP clients referred from the CAO; programming is designed to achieve specific performance standards included in their grant agreements. Grantees are embedded on site at a Pennsylvania community college and provide a dedicated case manager and other dedicated resources to SNAP students enrolled in higher education programs. Grantees are required to meet performance standards including: 75% of students achieve GPA of 2.0 or higher; 50% of students graduate, gain employment, or transfer to another E&T contractor or institute of higher education; 75% of students either graduate or are retained from semester to semester; and 75% of students complete courses and receive a passing grade each semester.
Intermediary:	□ Yes ⊠ No
Components Offered:	Career/technical education programs or other vocational training; job search training; job retention; workfare
Credentials Offered:	A wide variety of associates degrees and certifications are offered. The most common include: pre-nursing, nursing (LPN, RN), social work, psychology, paralegal, medical assistant, medical billing and coding, and early childhood education.

Table I.I. Contractor/Partner Details

Contract or Partner Name:	SNAP KEYS
Participant Reimbursements Offered:	Participants can receive the following participant reimbursements as special allowances through the CAO – childcare, transportation, books and supplies, certain fees associated with E&T, clothing, and tools; participants may also receive certain participant reimbursements directly from the KEYS contractor, however the KEYS contractor is required to confirm that the participant would not be eligible to receive the item/service from the CAO as a special allowance before issuing the participant reimbursement
Location:	The 14 Pennsylvania community colleges
Target Population:	All E&T participants; participants must meet at least one student eligibility criteria at 7 CFR §273.5(b) in order to participate
Monitoring of contractor:	DHS will monitor compliance with Grant Agreement requirements annually but may conduct more frequent monitoring at its discretion. DHS may also monitor any subcontractor and sub-grantees. If DHS identifies deficiencies, the grantee must submit a corrective action plan within 14 days from the receipt of notice of a deficiency. The grantee is responsible for monitoring the CWDS website for changes to policies that impact the administration of the KEYS program.
Ongoing communication with contractor:	DHS has regular ongoing technical assistance calls and ad hoc communications as necessary.
Total Cost of Agreement:	\$3,232,199
Eligible for 75 percent reimbursement for E&T Services for ITOs:	□ Yes ⊠ No
New Partner:	□ Yes ⊠ No

Contract or Partner Name:	SNAP EARN
Service Overview:	After DHS performs an initial assessment and determines that a participant meets state criteria for referral to SNAP EARN, Grantees provide comprehensive assessment of the participant for placement into an appropriate component (or recommend a referral to another SNAP E&T program be made by DHS), case management, and participation tracking. Grantees assist SNAP E&T participants in gaining skills, training, work, or experience that will increase their ability to obtain employment. Grantees are contracted with the local workforce development board, working to connect participants to suitable employment and training opportunities in the workforce development system and the community. Grantees are also charged with administering case management to "KEYS Expansion" students enrolled in a state- owned university or a career and technical education facility, and with case management of participants dual-enrolled in SNAP E&T and WIOA.
Intermediary:	□ Yes ⊠ No
Components Offered:	Basic/foundational skills instruction (including high school equivalency); career and/or technical education programs or other vocational training; job search training; workfare; supervised job search; job retention
Credentials Offered:	Varies depending on the participant and the program they choose. Credentials offered include, but are not limited to, phlebotomist technician, welding certification, commercial driver's license (CDL), certified nurse aid (CNA), and ServSafe (Food Handler and/or Manager) culinary arts certifications.
Participant Reimbursements Offered:	None offered directly by contractor; participants can receive the following participant reimbursements as special allowances through the CAO – childcare, transportation, books and supplies, certain

Table I.II. Contractor/Partner Details

Contract or Partner Name:	SNAP EARN
	fees associated with E&T, clothing, and tools.
Location:	Statewide
Target Population:	All SNAP E&T participants
Monitoring of contractor:	DHS is responsible for monitoring the SNAP EARN Program. DHS will monitor compliance with Grant Agreement requirements annually but may conduct more frequent monitoring at its discretion. DHS may also monitor any subcontractor and sub-grantees. Monitoring will include a review of data systems, as well as site visits to ensure program compliance. If DHS identifies deficiencies, the grantee must submit a corrective action plan within 14 days from the receipt of notice of a deficiency. The grantee is responsible for monitoring the CWDS website for changes to policies that impact the administration of the SNAP 50/50 program. BEP staff also hold monthly conference calls with vendors to discuss policy changes.
Ongoing communication with contractor:	DHS has regular ongoing technical assistance calls and ad hoc communications as necessary.
Total Cost of Agreement:	\$1,565,499
Eligible for 75 percent reimbursement for E&T Services for ITOs:	□Yes ⊠No
New Partner:	□ Yes ⊠ No

Table I.III. Contractor/Partner Details

Contract or Partner Name:	Center for Employment Opportunities
Service Overview:	Grantee offers work-based learning to E&T participants through the transitional jobs component. Grantee partners with private and public sector employers that have a crew-based labor need, often in the transportation, maintenance, and construction fields. Prior to being served by Grantee, about half of participants have no prior work experience; many participants are returning home after having been incarcerated for a long period of time and

Contract or Partner Name:	Center for Employment Opportunities
	are working to gain employment with multiple and/or stigmatized convictions. Grantee provides vocational services to participants, who also work 3-4 days a week. Participants receive daily pay for daily work, gaining stability while working to overcome barriers to employment prior to an unsubsidized job. On average, an individual is employed by Grantee 2-4 months before an unsubsidized placement either with a transitional job partner or another employer in the community aligned with the participant's career goals.
	Within this work-based learning, participants receive supervision from a site supervisor who is trained both to respond to the employment needs of an individual who has been incarcerated (Grantee's site supervisors often have lived experience finding employment post-incarceration), as well as in the contracted transitional work provided to the social enterprise partner. An example of site supervisor training includes deploying cognitive-behavioral interventions, such as motivational interviewing, to assist an E&T participant in overcoming barriers to work. Additionally, participants receive skills training particular to the transitional job employment opportunity; this might include safety training, tools and equipment training, and/or necessary hard skills training to complete the tasks.
	Both participants and site supervisors enter supervision notes into a Constituent Voice platform so the participant has daily feedback on their employment and training progress. Grantee's job coach has access to this platform and uses these notes to provide coaching and work with the participant on progress in their employability assessment.

Contract or Partner Name:	Center for Employment Opportunities
	For each transitional job partner, Grantee provides transportation to the work site each day, wraparound vocational training to support individuals on the job, and coaching and feedback. Grantee provides orientation and up-front basic training needed before anyone begins work, and also maintains payroll, insurance, and workman's compensation for all individuals employed. Grantee has employer agreements in place with transitional job partners that describe the training and support provided for individuals working under the agreement. No single transitional job employer covers the full cost of individuals training in Grantee's subsidized employment model. Instead, the cost is paid through a variety of non-federal funding sources that vary by site (see SWBL Tool for details).
	50% reimbursement of subsidized wages is being requested only for those individuals who Grantee starts serving on or after October 1, 2021. As a result of the stability provided by this 50% reimbursement, Grantee will be able to narrow program deficits and increase transitional job slots and vocational training to E&T participants over time as a result of decreased program deficits.
	With the addition of subsidized wages as an approved E&T expense, this program year Grantee will provide daily pay to E&T participants at a rate of 80% of the living wage for the site jurisdiction. Grantee is committed to offering subsidized employment that allows participants to access immediate stability upon release from incarceration, and engaging individuals in training that could lead to a career pathway.

Contract or Partner Name:	Center for Employment Opportunities
Contract or Partner Name:	 Center for Employment Opportunities Finally, as part of Grantee's E&T subsidized employment program, Grantee anticipates adding these job mobility services to Grantee's core model for E&T participants over the next five years (beginning implementation this program year): More training and access points for participant digital skill-building, both for careers in information technology as well as a part of navigating the digital workplace overall; Additional advanced, job-specific skills training, with an emphasis on supporting participants building basic skills to engage in that training (i.e., literacy, numeracy); Financial services tailored to the experience of someone recently incarcerated, including building credit and developing confidence in navigating financial systems. An outline of CEO's curriculum is attached. CEO's grant has been amended to allow limited enrollment of CEO transitional jobs participants into an Information Technology (IT) or Commercial Driver's License (CDL) training course. Participants who participate in one of the training courses will also participate in transitional jobs, and the time spent in the training course are considered part of the SWBL activity. The wages and other administrative costs associated with these trainings are included separately on
	the SWBL Tool.
Intermediary:	□ Yes ⊠ No

Contract or Partner Name:	Center for Employment Opportunities
Components Offered:	Transitional Jobs (Subsidized), Supervised Job Search, Job Search Training, Job Retention
Credentials Offered:	OSHA-10, Commercial Driving License (CDL) Class A, COMPTIA A+, and more.
Participant Reimbursements Offered:	None offered directly by contractor; participants can receive the following participant reimbursements as special allowances through the CAO – childcare, transportation, books and supplies, certain fees associated with E&T, clothing, and tools.
Location:	Philadelphia, Harrisburg, and Pittsburgh
Target Population:	Re-entering Citizens
Monitoring of contractor:	DHS will monitor compliance with Grant Agreement requirements annually but may conduct more frequent monitoring at its discretion. DHS may also monitor any subcontractor and sub-grantees. If DHS identifies deficiencies, the grantee must submit a corrective action plan within 14 days from the receipt of notice of a deficiency. The grantee is responsible for monitoring the CWDS website for changes to policies that impact the administration of the SNAP 50/50 program.
Ongoing communication with	DHS has regular ongoing technical
contractor:	assistance calls and ad hoc communications as necessary.
Total Cost of Agreement:	\$5,319,314 (total across three grants)
Eligible for 75 percent reimbursement for E&T Services for ITOs:	□ Yes ⊠ No
New Partner:	□ Yes ⊠ No

Contract or Partner Name:	Berks Latino Workforce Development Board
Service Overview:	Grantee serves clients who reside in Berks County, including in the City of Reading. Grantee provides vocational education trainings in in-demand fields including: nursing, medical assistant, phlebotomy, welding, culinary arts, copper cabling and fiber optic networking, bank teller, and cyber security. Grantee is focused on serving the growing Hispanic population in the region but is open to all interested participants. Grantee provides assistance with job search, case management, and job retention services to all participants.
Intermediary:	
Components Offered:	Career and/or technical education programs or other vocational training; supervised job search; job search training; job retention
Credentials Offered:	Certified Nursing Assistant (CNA); National Health Career Association (NHCA) Phlebotomy Technician certification; NHCA Certified Clinical Medical Assistant certification;; ServSafe Food Handler certification; Certified Bill and Coding certification; Radiation Health & Safety Certification; other industry recognized certifications
Participant Reimbursements Offered:	Some transportation and other participant reimbursements will be offered directly by the provider; to the extent these participant reimbursements do not meet all needs, participants can receive the following participant reimbursements as special allowances through the CAO – childcare, transportation, books and supplies, certain fees associated with E&T, clothing, and tools.
Location:	Berks County (City of Reading)
Target Population:	low-income Berks County residents, Hispanic residents
Monitoring of contractor:	DHS will monitor compliance with Grant Agreement requirements annually but may conduct more frequent monitoring at its

Contract or Partner Name:	Berks Latino Workforce Development Board
	discretion. DHS may also monitor any subcontractor and sub-grantees. If DHS identifies deficiencies, the grantee must submit a corrective action plan within 14 days from the receipt of notice of a deficiency. The grantee is responsible for monitoring the CWDS website for changes to policies that impact the administration of the SNAP 50/50 program.
Ongoing communication with contractor:	DHS has regular ongoing technical assistance calls and ad hoc communications as necessary.
Total Cost of Agreement:	\$1,513,576
Eligible for 75 percent reimbursement for E&T Services for ITOs:	□ Yes ⊠ No
New Partner:	□ Yes ⊠ No

Table I.V. Contractor/Partner Details

Contract or Partner Name:	Trade Institute of Pittsburgh
Service Overview:	The Grantee serves participants in Allegheny County and surrounding counties, providing registered pre-apprenticeship trainings in masonry and in carpentry. Participants who excel in the masonry program are eligible to join the carpentry program as an extension of the same track. Grantee is focused on serving the re-entrant population in the region but is open to all interested participants. Grantee provides assistance with supervised job search, financial literacy, driver's license preparation, case management, and job retention services to all participants.
Intermediary:	□ Yes ⊠ No
Components Offered:	Pre-apprenticeship; supervised job search; job search training; job retention
Credentials Offered:	Regionally recognized masonry and carpentry credentials.
Participant Reimbursements Offered:	The contractor will offer limited participant transportation reimbursements until SPALs are issued as well as tools for the carpentry students as needed; participants can also

Contract or Partner Name:	Trade Institute of Pittsburgh
Location:	receive the following participant reimbursements as special allowances through the CAO – childcare, transportation, books and supplies, certain fees associated with E&T, clothing, and tools. Pittsburgh
	Ŭ
Target Population:	Low-income residents and returning citizens of Allegheny County and surrounding counties
Monitoring of contractor:	DHS will monitor compliance with Grant Agreement requirements annually but may conduct more frequent monitoring at its discretion. DHS may also monitor any subcontractor and sub-grantees. If DHS identifies deficiencies, the grantee must submit a corrective action plan within 14 days from the receipt of notice of a deficiency. The grantee is responsible for monitoring the CWDS website for changes to policies that impact the administration of the SNAP 50/50 program.
Ongoing communication with contractor:	DHS has regular ongoing technical assistance calls and ad hoc communications as necessary.
Total Cost of Agreement:	\$983,940
Eligible for 75 percent reimbursement for E&T Services for ITOs:	□Yes ⊠No
New Partner:	□ Yes ⊠ No

J. Budget Narrative and Justification

Provide a detailed budget narrative that explains and justifies each cost and clearly explains how the amount for each line item in the operating budget was determined. Note that the E&T State plan is a public document and must be made available to the public upon request, so the budget should not identify individual names or salaries that are not subject to public disclosure requirements. State agencies should note that the direct costs noted below are exclusively those attributed to the State and local SNAP agencies.

Table J.I. Direct Costs

Salary/Wages: List staff positions in FTE and time spent on the project. Example: E&T Program Manager - \$60,000 x .50 FTE = \$30,000	Total: \$1,786,158 \$1,348,149 Federal; \$438,009 State)
5 E&T Counselors - \$25,000 x 1.00 FTEs x 5 = \$125,000	Derived from the SFY 2022-2023 actual allocated costs from New Directions and CAOs.
	E&T Policy Supervisor - \$73,995 x 1.00 FTE = \$73,995
	Human Services Analyst - \$67,678 x 3.00 FTE = \$203,034
	Remaining \$1,509,129 in costs were estimated using a random moment study (RMS) used to determine how much time CAO caseworkers (IMCWs) spend performing E&T-specific tasks, such as processing participant reimbursements (SPALs). Based on the results of the time study, a percentage of all caseworker salaries is also charged to the E&T grant.

The RMS, officially known as the County Assistance Office Activity Study, determines the distribution of administrative costs of CAOs and other related appropriations within Headquarters according to the type of work activity being served by the Income Maintenance Caseworkers (IMCWs) at the instant moment of the survey. The RMS differentiates between time spent performing SNAP certification activities and time spent performing SNAP E&T activities.
The Bureau of Program Support, Division of Statistical Analysis (DSA) has the responsibility for providing DHS's Bureau of Financial Reporting (BFR) with IMCW activity information from the RMS Web-based application. DSA identifies to BFR how much IMCW time is attributed to SNAP certification, SNAP E&T, TANF, Medical Assistance (MA), and Social Services Block Grant (SSBG) based on the study results. The Bureau of Financial Reporting uses DSA reports to generate claims against the Federal programs within the Food and Nutrition Service, Administration for Children and Families, and Center

	for Medicare and Medicaid
Fringe Depetites If changing fringer and her effect (1)	Service.
Fringe Benefits: If charging fringe and benefits to the	Total: \$1,464,649
E&T program, provide the approved fringe rate.	\$1,105,482 Federal;
	\$359,167 State)
	The fringe benefit rate
	used for PA DHS is 82% in
	SFY 2024-2025. Fringe
	benefit rate is from the
	2024-2025 Re-budget 1 for
	CAOs.
Contractual Costs: All contracts and partnerships	Total:
should be included in the "contracts and partnerships"	\$19,485,322(\$111,312,510
matrix of the E&T State Plan Operating Budget	Federal; \$683,640 State;
Workbook. Briefly summarize the type of services	\$ \$7,489,172 Other Non-
contractors/partners will provide, such as direct E&T program services, IT services, consulting, etc.	Federal)
	Contractual costs are
	based on grant
	agreements and actual
	expenditures invoiced to
	the Department.
	Most contractors provide
	direct E&T program
	services. In some cases,
	contractors provide
	participant
	reimbursements directly.
Non-capital Equipment and Supplies: Describe non-	Total: \$161,376 (\$161,376
capital equipment and supplies to be purchased with	Federal)
E&T funds.	Includes non-recurring
	telecommunications,
	-
	vehicle repairs, office
	supplies, furniture &
	fixtures, printing, purchase
	card purchases, and other operational expenses.
Materials: Describe materials to be purchased with	
E&T funds.	
Travel & Staff Training: Describe the purpose and	Total: \$2,141
frequency of staff travel charged to the E&T program.	(\$2,141 Federal)
This line item should not include E&T participant	

reimbursements for transportation. Include planned staff training, including registration costs for training that will be charged to the E&T grant.	Includes travel for E&T training and monitoring. PA DHS staff travel at least annually to each program site to conduct monitoring and provide technical assistance with the purpose of ensuring each E&T contractor is performing in accordance with the SNAP E&T grant agreement. In some cases, a virtual visit may be substituted. In addition, PA DHS staff perform onboarding sessions to train new E&T contractors on program procedures and data-entry in CWDS.
	PA DHS staff are reimbursed for travel in accordance with the guidelines contained in <u>Management Directive</u> <u>230.10, Commonwealth</u> <u>Travel Policy</u> , as amended, and <u>Manual</u> <u>230.1</u> .
Building/Space: If charging building space to the E&T program, describe the method used to calculate space value.	Total: \$164,359 (Federal: \$164,359) Includes SFY 2021-2022 real estate expenditures from the E&T appropriation apportioned to capture only SNAP E&T expenses using percentage bases on actual expenditures.
Equipment & Other Capital Expenditures: Describe equipment and other capital expenditures over \$5,000 per item that will be charged to the E&T grant. (In	

accordance with 2 CFR 200.407, prior written approval from FNS is required.)

- a) **Indirect Costs.** Indirect costs (also called overhead costs) are allowable activities that support the E&T program, but are charged directly to the State agency. If using an indirect cost rate approved by the cognizant agency, include the approval letter as an attachment to the E&T State plan.
- b) Participant Reimbursements (Non-Federal plus 50 percent Federal reimbursement). Participant reimbursements should include the total participant reimbursement amount from the contracts/partners matrix of the E&T State Plan Operating Budget Excel Workbook, as well as any participant reimbursements the State agency plans to provide.

Dependent Care participant reimbursements are issued directly through PA DHS; no SNAP E&T contractors issue dependent care reimbursements. Dependent Care special allowance costs estimated by reviewing FY23 and FY24 actual issuances and projecting growth in actual program participation for FY25.

Transportation and other cost participant reimbursement estimates were provided by SNAP 50/50 grantees and in the case of SNAP KEYS grantees, capped at 20% of the total grant agreement budget, consistent with the terms of their grant. The transportation and other cost participant reimbursement line item also includes transportation/other special allowance costs estimated by reviewing FY23 and FY24 special allowance actual issuances and projecting growth in actual program participation for FY25.

Attachment 1: Center for Employment Opportunity

Overview

Who CEO serves:

In line with its mission, CEO welcomes all individuals who meet program eligibility criteria and are able to engage in program activities with reasonable accommodations; regardless of the type and/or nature of their prior legal involvement. CEO's vision is that anyone returning from incarceration has the skills and support necessary to obtain a quality unsubsidized job, aligned with their goals.

CEO Program Activity	Week	Skill Development
Pathways to Employment Classroom training/Digital Skills	1 (with coursework available throughout SWBL)	 First two days: Understanding of program overview and goals, including setting an employment environment welcoming to individuals returning home from incarceration Worksite safety training: Proper use of Personal Protective Equipment Roadside Safety Proper Lifting Emergency evacuation procedures Safe use of basic hand tools Potential hazard identification Individual Accountability Injury/incident reporting Coursework and training available throughout SWBL: Interview skills Answering a conviction question with an employer Professional attire Building a great resume Financial capability (budgeting, building savings, credit, overcoming legal and other types of debt) Cognitive behavior intervention for employment:

CEO Program Activity	Week	Skill Development
		 weighing costs & benefits; setting a goal; choice in behavior; recognizing risky situations Digital skills: Through a partnership with Google, CEO has curated robust digital skills trainings to each of its participants. There are three foundational lessons: google workspace which includes setting up and navigating Gmail; starting or joining a video conference through Google Meet; and building a resume. Within these trainings individuals practice skills in: typing, navigating google, social media, phone, and email. Via CEO's classroom training a participant should be successfully able to safely work and operate the proper tools during SWBL, have needed support services, understand expectations for their goal job, and improve digital and financial literacy.
Transitional Employment + Economic Mobility- Focused Training	1-19 (approximate - total length customized to participant needs)	Site supervisors provide training to participants while they engage in SWBL. Via transitional employment and economic mobility training, a participant should have the soft skills and hard skills necessary to be successful in unsubsidized employment, access to experienced professionals in their chosen field, and connections with employers. <u>Soft skills specific to SWBL transitional employment:</u> • Managing task completion and effort at work • Time management • Giving and receiving feedback • Cooperation with supervisor • Cooperation with co-workers • Personal presentation <u>Hard skills specific to SWBL transitional employment:</u> • Operating tools effectively and safely - as the Site Supervisors are confident in a participant's ability to safely use each tool, perform the tasks at hand, and their care and maintenance of the tools, a participant will then progress to training with higher skilled/higher risk tools. Including but not limited to: • Basic Hand Tools • Weed Trimmer • Chain Saw

CEO Program Activity	Week	Skill Development
		 Chipper Powder Coating MIG and/or TIG Welding Manufacturing Industry Skillbuilding (ex. anodizing) Depending on participants' identified employment goals, opportunities for relevant credentials are introduced and included into their employment plan. Credentialing offered during transitional employment, or supported with evening classroom instruction, are specific to sectors of interest where participants have expressed interest to pursue and the industry is favorable to hiring returning citizens. There is a particular emphasis on IT, transportation, and construction career pathways, as employers in those sectors have proven more welcoming of individuals with a criminal record. Current CEO credentials include OSHA trainings, Commercial Driving License (CDL)-Class A, COMPTIA A+, among others. Individuals who participate in these credentialing pathways all have specific coursework that they must follow in order to successfully complete the program.
Job Coaching	1-10 (approximate - total length customized to participant needs)	 Initially, the focus with each participant is on barrier removal and employment goal clarification and planning. Participants complete an External Barrier Checklist to help identify such barriers and work with the Job Coach to initiate potential solutions. As the participant overcomes barriers (i.e. transportation, housing, challenges with parole/probation supervision), focus shifts to more tangible progress toward reaching employment goals including further soft skill training, resume development and job search preparation activities depending on the individual's needs. Motivational interviewing used to reinforce coaching conversations from site supervisors during transitional jobs Project management toward employment goals and job matching discussions 1:1 Mock Interviews Practice difficult conversations with peers and employer Address external barriers through additional support

CEO Program Activity	Week	Skill Development
		and coaching, i.e. transportation, housing, and challenges with parole/probation supervision
	transitional employ overcome specific employability asses assessments every becoming "job star monitor an individu additional training. participants identif	Via job coaching, which is offered concurrently with paid transitional employment/training, an individual should overcome specific barriers to work identified in their employability assessment. Participants typically receive assessments every 2-4 weeks to gauge their progress toward becoming "job start ready," which is helpful for CEO to monitor an individual's progress and identify the areas for additional training. In addition, the job coach helps participants identify their unsubsidized job interests to pursue with CEO's job developer (supervised job search component).

Other Aspects of CEO's E&T program not included in SWBL chart above:

- **Employability assessment**: CEO's "Job Start Ready Assessment" is a collaborative, repeated assessment that determines an individual's training interests, employment goals, and barriers to employment necessary to address during SWBL and other components;
- **Support services:** Participants receive supports reasonable and necessary to engage in a component, including assistance with transportation, obtaining vital documents, and clothing many support services are delivered through referral to the CAO for a SPAL;
- **Case management**: CEO site supervisors and vocational staff coordinate to make sure a participant's employment barriers are addressed and make referrals for additional support needed during their program participation and as they navigate reentry.
- **Supervised job search**: Participants receive coaching from a job developer who works with participants to engage with employers and navigate the interview process once they are ready for an unsubsidized job placement;
- **Retention**: CEO offers a retention component up to the 90th day post-placement in an unsubsidized job placement.

The curriculum and the specific training objectives related to each SWBL employer partnership were informed by the partners in Pennsylvania. CEO meets with their social enterprise SWBL partners on a weekly basis initially and then no longer than one month between meetings. In these meetings they gather feedback on how the partnership is going and what would benefit the employer. For example, they have been responsive to employer requests for their

participants to have the options of flagger certification, forklift certification, first aid, CPR, and other home health certifications. Furthermore, CEO's curriculum is guided by internal and external data on the types of employers likely to provide quality jobs for participants with a prior felony record, independent evaluations, and employer and participant feedback. As CEO creates its relationships with their social enterprise employers, CEO establishes skills needed for sector employment. For example, CEO's manufacturing and housing authority partners have provided training for skills such as welding, painting, and powder-coating, while CEO's partners who are in need of groundskeeping and landscaping services, helped CEO participants learn and become proficient with tools like leaf blowers, pole saws, weed whackers, push and riding mowers.

CEO has a SWBL curriculum that is core to CEO's E&T partnership sites. CEO has this curriculum to establish learning objectives, and program quality and consistency across sites and it's described in detail below. However, CEO also has skills gains specific to Pennsylvania's E&T program. They are detailed in the chart below corresponding to specific social enterprise (WBL) employer partners. CEO uses Salesforce to track each interaction with a participant and how it moves a participant promptly to unsubsidized employment readiness. CEO's assessment for readiness for unsubsidized job placement is a checklist of skills validated as a predictor of placement outcomes. Additionally, CEO tracks placement and job retention outcomes, as well as measures of job quality internally to further strengthen SWBL delivery. Throughout their SWBL, CEO seeks a participant's feedback, and shares with a participant their progress toward unsubsidized job placement readiness.

CEO vocational staff work individually with all participants to coach participants on skills, and identify any barriers to full time, stable employment removed prior to each participant working with their dedicated Job Developer who facilitates the connection to the unsubsidized job employer. CEO Job Developers create relationships with employers, understanding their needs, and the skills they are looking for in their new hires, while collaborating with each participant, identifying their career goals, so as to best match them with a position that can lead to longevity in the workplace. CEO also ensures its work site partners reflect careers that are achievable and that the skills learned while at the work site are transferable. Although CEO develops relationships with multiple employers in the community as aligned with CEO's SWBL curriculum, throughout FY23 CEO has placed 19 individuals directly with WBL social enterprise partners, and 61 individuals with partners that reflect the industries of CEO's work site partners.

CURRICULUM/TRAINING OBJECTIVES

SWBL Training Objectives Overview

- Skill development is paired with case management, referrals to community organizations for support services, interactions with professionals in the workforce, and feedback on job performance. Participants learn new skills and practice these skills in coaching sessions and in a real work environment alongside full-time employees for placements in a variety of industries, including manufacturing, warehousing, construction, and transportation.
- Through SWBL participants are expected to learn and practice workplace safety, operating hand and power tools, and complete certifications related to their target placement industry.
- By working on active crews, CEO participants learn many transferable soft and hard skills that will help them to become Job Start Ready (JSR). For example, each participant must complete digital literacy training. All CEO participants must engage in three weeks of digital literacy training. CEO partnered with Google to curate self-guided trainings to assist participants in creating resumes, attend a video call and use of Gmail. Additionally, all SWBL participants receive introduction to OSHA training to prepare them for an OSHA 10 certification if advanced workplace safety certifications align with their unsubsidized job goals.
- While the jobs participants are doing varies by work crew, the hard skills they obtain are transferrable across industries. These hard skills include equipment management, project management, task structuring, and workplace safety.

Pennsylvania Training Opportunities	Skills Gain/Training Objectives	
Philadelphia Parks and Recreation	 Basic financial literacy skills Interpersonal communications skills for the workplace Goal setting Introduction to OSHA training Digital literacy Communication Time management Conflict Resolution Organization Depending on the participant: Coursera and LinkedIn Learning, GED/HiSet Certification support, advanced training via CDL, CompTIA+, OSHA 10 and 30, flagger Training and practice with hand tools related to road beautification SHARPS Training Operation of basic landscaping and groundskeeping equipment such as weed whackers, blowers, push mowers 	

Hilco Redevelopment Partners (Philadelphia)	 Basic financial literacy skills Interpersonal communications skills for the workplace Goal setting Introduction to OSHA training Digital literacy Communication Time management Conflict Resolution Organization Depending on the participant: Coursera and LinkedIn Learning, GED/HiSet Certification support, advanced training via CDL, CompTIA+, forklift, OSHA 10 and 30 SHARPS training Operation of basic landscaping and groundskeeping equipment such as weed whackers, blowers, push mowers Road safety Environment and traffic awareness Set up and maintain traffic control structures Proper disposal of illegal dumping and tires 	
City of Philadelphia:	 Basic financial literacy skills Interpersonal communications skills for the workplace Goal setting Introduction to OSHA training Digital literacy Communication Time management Conflict Resolution Organization Depending on the participant: Coursera and LinkedIn	
Landscaping at Tookany	Learning, GED/HiSet Certification support, advanced	
Creek	training via CDL, CompTIA+, OSHA 10 and 30 Hand and power tool training: Multiple mowers Chipper machine, Chainsaws, Tools for shredding wood, Weeders, Various tools for equipment repair Hand tools and power equipment related to landscaping: Beautification Mowing Erosion control Vegetation management and mulching 	

Harrisburg Housing Authority	 Basic financial literacy skills Interpersonal communications skills for the workplace Goal setting Introduction to OSHA training Digital literacy Communication Time management Conflict Resolution Organization Depending on the participant: Coursera and LinkedIn Learning, GED/HiSet Certification support, advanced training via CDL, CompTIA+, OSHA 10 and 30 Painting Parking lines Rental Units Vacant Apartment Cleanouts Proper heavy lifting techniques Janitorial and basic sanitation training Hand tools and electric tools related to mowing, weed whacking, brush removal Proper disposal on Housing Authority grounds 	
York Housing Authority (Harrisburg)	 Proper disposal on Housing Authority grounds Basic financial literacy skills Interpersonal communications skills for the workplace Goal setting Introduction to OSHA training Digital literacy Communication Time management Conflict Resolution Organization Depending on the participant: Coursera and LinkedIn Learning, GED/HiSet Certification support, advanced training via CDL, CompTIA+, OSHA 10 and 30 Painting Parking lines Rental Units Vacant Apartment Cleanouts Proper heavy lifting techniques Janitorial and basic sanitation training Hand tools and electric tools related to mowing, weed whacking, brush removal Proper disposal on Housing Authority grounds 	
Dauphin County Housing Authority (Harrisburg)	 Basic financial literacy skills Interpersonal communications skills for the workplace Goal setting Introduction to OSHA training 	

	 Digital literacy Communication Time management Conflict Resolution Organization Depending on the participant: Coursera and LinkedIn Learning, GED/HiSet Certification support, advanced training via CDL, CompTIA+, OSHA 10 and 30 Painting Parking lines Rental Units Vacant Apartment Cleanouts Proper heavy lifting techniques Janitorial and basic sanitation training Proper disposal of materials and hazardous waste related to properties
Dauphin County	 Basic financial literacy skills Interpersonal communications skills for the workplace Goal setting Introduction to OSHA training Digital literacy Communication Time management Conflict Resolution Organization Depending on the participant: Coursera and LinkedIn Learning, GED/HiSet Certification support, advanced training via CDL, CompTIA+, OSHA 10 and 30 Proper disposal of illegal dumping Hand tools and electric tools related to beautification services of county properties
City of Pittsburgh Forestry Department	 Basic financial literacy skills Interpersonal communications skills for the workplace Goal setting Introduction to OSHA training Digital literacy Communication Time management Conflict Resolution Organization Depending on the participant: Coursera and LinkedIn Learning, GED/HiSet Certification support, advanced training via CDL, CompTIA+, OSHA 10 and 30 Hand tools and power tool training: Multiple mowers

	 Chipper machine Chainsaws Tools for shredding wood Weeders Loppers Pole saws Various tools for equipment repair Hand tools and power equipment related to landscaping: Beautification Mowing Erosion control Vegetation management and mulching
McConway & Torely (Pittsburgh)	 Basic financial literacy skills Interpersonal communications skills for the workplace Goal setting Introduction to OSHA training Digital literacy Communication Time management Conflict Resolution Organization Depending on the participant: Coursera and LinkedIn Learning, GED/HiSet Certification support, advanced training via CDL, CompTIA+, OSHA 10 and 30 Lock tag out training and certification Maintaining clean and safe grounds Breaking down and proper disposal of materials Working with hand tools and equipment

1.0 SWBL: Program Model Overview

The Center for Employment Opportunities (CEO) is committed to helping each participant gain the necessary support, skills, and tools for a successful return into the workforce through an evidence-based program that combines training with in-depth hands-on work experience that is informed by employer partner feedback and designed to align with employer needs. As CEO participants move through curriculum, they develop the skills necessary for careers in a variety of industries, including manufacturing, warehousing, construction, and transportation. The program consists of five main components: Pathways to Employment (P2E) training, transitional work, job coaching and development, job placement, and retention services.

Skill development is paired with case management, referrals to community organizations, interactions with professionals in the workforce, and feedback on job performance. Participants

Participant Demographics

- 60% have no education beyond high school or its equivalency
- 56% have no prior work experience
- 55% have one or more children
- 87% are male
- 81% are people of color
- 35% are between ages 18 and 30

learn new skills and practice these skills in coaching sessions and in a real work environment alongside full-time employees. While the transitional work experience is a job bundled with skills training, a difference from traditional work is if a participant did something that would typically result in suspension or termination, they instead get realtime coaching and feedback, work on a resolution, and return to work to continue to develop their soft and hard skills. **This program model increases participants' employability, moves them towards better jobs, and increases the ability to retain a job.** The average

program length is three to five months depending on the individual and their readiness for a job.



As CEO participants move through the cycle, they develop skills that will travel with them into full-time employment and then throughout their careers.

P2E

- Basic financial literacy skills
- Interpersonal communications skills for the workplace
- Goal setting skills
- Basic workplace training skills
- Documents prepared for employment

Transitional Job

- Hard skills specific to jobs, such as power tool use, painting experience, landscaping machine use, etc.
- Time management skills
- Conflict management skills
- Other soft skills developed from work-based learning

Additional Training from CEO

- Digital literacy
- Digital communications
- Job search skills
- Advanced OSHA certifications
- Specialized trainings (e.g., information technology, commercial driver's license)
- Optional union pre-apprenticeship or enrollment in CEO's Emerging Leaders Program

1.1 Our Participants

CEO exclusively serves people who have recently returned home from incarceration, the majority of whom are on probation or parole. Prior to CEO, about half of participants have no prior training or work experience. Many participants are returning home after long sentences or long periods of time experiencing cycles of incarceration; many have stigmatizing convictions. CEO tailors the program to each individual and their incoming skill sets, challenges, and goals, but there are shared aspects of training experienced by each SWBL participant. **CEO's programming increases the baseline employability of participants and focuses on supporting participants in getting better jobs** than they could have gotten at the start of the program or without a programmatic intervention.

1.2 Pathways to Employment (P2E)

CEO's program begins with a two-day paid orientation to take the **first step of increasing employability**. During the orientation, CEO employees assist each participant in assembling all documents necessary for employment and benefits. Additionally, the first topic areas of training (e.g., workplace safety) are covered to prepare participants for work crews. Participants complete an employability assessment which informs the CEO employees of how prepared the individual is to obtain employment and maintain a long-term connection to the workforce and serves as the foundation for how the program is tailored to participant needs.

1.3 Transitional Employment, Job Coaching, and Job Development

The **next step of increasing employability is paid real-world work experience paired with training and feedback**. For the majority of CEO participants, this is their first job. The focus of transitional jobs is developing the soft and hard skills that are crucial to obtaining and retaining a full-time job. CEO's job developers work with local employers to understand what the most in-demand jobs are and the skills needed to get these jobs. They also look at wages across employers to support participants in interviewing and receiving higher paying jobs. Job coaches work to understand participant goals and their desired career paths. This information is combined in a case plan for each CEO participant. CEO employees use this case plan to support participants in achieving their career goals. Additionally, participants are referred to supportive services to overcome barriers to employment. This supports participants in gaining stability and increases their interactions with community members.

CEO's transitional job curriculum is **designed to improve participants' employment**. CEO's participants work on crews and are **paid at least minimum wage** to work alongside full-time

employees up to 4 days a week. Site supervisors create structure for participants by providing daily tasks, deadlines, and feedback. Participants are matched with work crews that best fit their availability, interests, and skillsets. To reduce barriers to the program, CEO also provides participants with support services such as transportation, work clothing, tools, and training. By working on active crews, CEO participants learn many transferable soft and hard skills that will help them to become Job Start Ready (JSR). For example, each participant **must complete digital literacy training**. All CEO participants must engage in three weeks of digital literacy

Network for Employment Services and Training (NEST) Resources

All of CEO's participants have access to the NEST platform, which contains trainings designed to advance additional hard skills as participants work in transitional employment. NEST contains certification trainings such as:

- OSHA 10 (General and Construction)
- General Industry Certificates
- Flagger Qualification Course
- Coursera and LinkedIn Learning
- GED/HiSet Certification Support
- Access to Advanced Training Opportunities (e.g., CDL, CompTIA+)

training. CEO partnered with Google to curate selfguided trainings to assist participants in creating resumes, attend a video call and use of Gmail. Additionally, **all SWBL participants receive introduction to OSHA training** to prepare them for an OSHA 10 certification if advanced workplace safety certifications align with their unsubsidized job goals.

While the jobs participants are doing varies by work crew, the hard skills they obtain are transferrable across industries. These hard skills include equipment management, project management, task structuring, and workplace safety. Additional hard skills specific to industries (e.g. landscaping equipment use, welding, and painting) can be obtained based on work crew assignment.

CEO's program **also emphasizes soft skills through job coaching, job development, and the transitional job participants work on**. Department of Labor, Society for Human Resource Managers, Harvard Business Review, and the National Bureau of Economic Research have cited the importance of soft skills in the workplace. The theme across these articles and research papers is that while hard skills may get individuals into their first job, their **path to career advancement depends on soft skills** like professionalism, communication, teamwork, and problem solving. Participants in CEO's program learn **core principles** including cooperation with their supervisor, effort at work, time management, cooperation with co-workers, personal presentation, and others through their transitional job experience. Work crew supervisor feedback is provided daily to participants and that feedback is also addressed during job coaching and job development. This provides participants with the opportunity to develop their soft skills, which will **help them retain their future jobs and progress in their careers**.

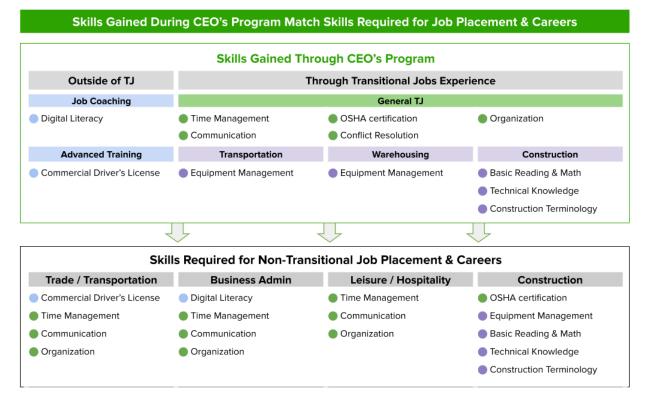
Participants work with vocational staff to create an individualized employment plan, identifying skills, education, experience, barriers, and goals, and focusing on career and job interests. This plan also includes financial coaching, which provides participants with knowledge on how to manage their money, credit, savings, and investments, and how to manage a reduction in SNAP benefits as participants start earning a wage. This information is crucial to maintaining long-term financial stability. Additionally, participants are **given structured feedback via a digital assessment multiple times a week**. This assessment is connected to CEO's case management system and charts participants progress against soft and hard skill attainment on

the crew. This data is used by job coaches to provide timely feedback on how each participant is developing while working on the crew to **support the job readiness/search process**.

Participants go through a **structured process to assess readiness to exit CEO programming and enter unsubsidized employment.** Within the first two weeks of the program, coaches administer the Interview Eligibility Assessment, CEO's employability assessment. The assessment is meant to create efficiency and increase the impact of one-onone coaching and support. By referencing the assessment on an ongoing basis, staff and participants have a shared template to collaboratively prioritize addressing employment challenges over time and allow participants to track their progress toward meeting program objectives. Participants are reassessed every four weeks to track participant progress. Based on the results of the assessment, coaching sessions may be spent on various areas of development including identifying skills and interests, setting employment goals, and preparing for interviews by creating resumes and mock interviewing. This structure focuses CEO employee efforts on assisting participants in mitigating barriers to employment, increasing employment skills, and finding job placement. When participants run into conflicts during transitional work, they work with their job coaches and learn from their mistakes so that when they begin regular employment, they are better prepared for the same challenges.

Participants generally spend two to four months on a CEO crew before securing unsubsidized employment; however, CEO's priority is for participants to move promptly into regular employment, so participants take time off from transitional work to go to interviews and leave transitional work as soon as they are hired into a non-transitional role.

CEO operates in compliance with all labor laws. Participants work within normal business hours and take appropriate breaks. CEO does not displace or replace existing employment of individuals not participating in E&T. The CEO program is available to individuals not participating in SNAP E&T. CEO provides the same benefits and working conditions to E&T and non-E&T training participants. CEO covers participant expenses reasonably necessary and directly related to participating in the SWBL E&T component; participants are reimbursed for transportation either by CEO directly or through a Special Allowance (SPAL) issued directly by the County Assistance Office.



1.4 Advanced Training Opportunities

CEO programming is tailored to each participant's circumstance and needs. Not all participants are interested in the same career fields or opportunities and because of this, CEO offers a variety of programming options available to all participants. Below are some of the advanced training opportunities available for participants. though not all SWBL participants will complete them.

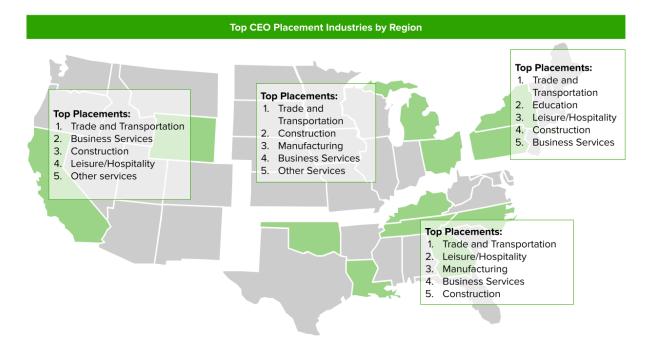
- **Commercial Driver License (CDL) Pathway:** Participants obtain a commercial driver's license and are better equipped to find employment within the transportation industry. Eligibility requirements are based on participants' ability to obtain a CDL license.
- **Union Pathway:** In some sites, participants connect with a pre-apprenticeship construction program or a local construction union work and have the opportunity to learn on the job while getting paid as a union apprentice.
- **Information Technology (IT) Pathway:** Participants learn skills to navigate mobile devices, operating systems, hardware, virtualization, and cloud computing to prepare to take the CompTIA A+ 1001 and A+ 1002 exams.
- **Crew Coach Pathway:** Participants receive specialized training to lead a work crew in the absence of a site supervisor.
- **Emerging Leaders Program:** CEO's training pathway that allows participants to enroll in a defined mentorship track leading to a unsubsidized job placement at CEO.



1.5 Job Placement

CEO's job developers focus on cultivating relationships with employers to not only match participants with unsubsidized jobs, but also to educate employers on how best to support justice-impacted individuals, especially those navigating the requirements of supervision (e.g., parole). Job developers build employer relationships and ease the process of navigating a criminal record in the hiring process for both participants and employers. Over 60% of CEO employers are long-term partners who repeatedly hire participants when they have hiring needs. In order to determine which industries their participants should pursue, CEO takes into consideration both local workforce needs and participant interests and skillsets. CEO uses labor market data from across the country to inform participants' job placement. **Over the last fiscal year our records show that at least 61 Pennsylvania participants were placed into jobs directly related to the skills learned while working on Transitional work crews and many received jobs directly with our work crew partners. Recent data also illustrates that most participants are placed in Trade & Transportation jobs followed by Business Services, Construction, Education/Health and Leisure/Hospitality, and Nonprofit Human Services, depending on the region.**

CEO conducts job quality metric assessments of job placements with participants. These scores are based on objective factors (e.g., wage and distance to worksite) and subjective factors (e.g., how much participants like their coworkers). **This information is used to place participants in better jobs.** Additionally, CEO tracks the top industries for participant placements by region. **This supports a feedback loop for program modification that supports skill development in in-demand industries.**



1.6 Retention Services

CEO recognizes that retention is a valuable additional component under E&T, coupling our retention services with SWBL is important to a participant's success in unsubsidized employment. Upon confirmed placement with an unsubsidized job, participants begin receiving personalized job-retention services from a CEO Retention Specialist (RS), including workplace counseling, crisis management, and career planning. During a participant's first meeting with a RS, participants take the Job Maintenance Assessment. The Job Maintenance Assessment measures how well positioned someone is to maintain a stable connection to the workforce. The assessment is then referenced on an ongoing basis and a RS to guide staff and participant discussions and services. Together, the participant and RS continue building self-management skills such as time management, task management, stress tolerance, emotional intelligence, focus, critical thinking, metacognition, and goal-oriented persistence. The purpose of retention services is to help participants continue to gain skills that improve employability and support participants in getting better jobs. Retention specialists also support participants in career path planning and offer advanced certifications to participants who become eligible and interested in programs (e.g., CDL).

Many participants also benefit from additional job development during their year of Retention Services to support their career advancement (CEO's Retention E&T program concludes at the 90th day of Retention). When Retention Specialists become aware of job loss, dissatisfaction, or a desire to pursue a better opportunity, they collaborate with the participant and the local job developer to identify new opportunities. Participants may take the first job offered to them to build stability and then quickly pivot to a job that's a better long-term fit. CEO is well-positioned to support this career growth strategy.

1.7 Evidence of our Program Model's Impact

CEO has partnered with multiple research firms to conduct major external evaluations of the program model.

- The New York State Division of Criminal Justice Services Recidivism and Employment Outcomes Study used a quasi-experimental design to measure employment outcomes for CEO participants in New York City, Buffalo, Rochester, and Albany. The employment results released in 2018 show that three years post enrollment, **CEO participants** were 48% more likely to be employed than the comparison group.
 - Key Findings Recidivism: The NYC participant group showed significantly less individuals with felony re-arrests at the 6-month (-10%; C.I.=4-16%), 12-month (-13%; C.I.=5-21%), 18-month (-12%; C.I.=3-21%), and 24-month (-11%; C.I.=2-21%) follow-ups as compared to non-CEO participants at the p<.01 level. That group also showed significantly fewer individuals facing negative outcomes* of any type at 6 months (-14%; C.I.=4-23%) and 12 months (-12%; C.I.=2-23%) (p<.01). CEO Rochester showed significant differences in felony rearrests at 6 months (-8%; C.I.=2-14%; p<.05), 12 months, (-13%; C.I.=1-25%; p<.01), and 18 months (-13%; C.I.=3-24%, p<.05). Buffalo showed no significant differences in negative outcomes between program and comparison groups.
 - Key Findings Employment: The NYC participant group showed a significantly higher percentage of employed individuals at the 6-month (+41%; C.I.=31-51%), 12-month (+19%; C.I.=9-29%), 18-month (+18%; C.I.=8-28%), 24-month (+16%; C.I.=6-26%), 30- month (-+12%; C.I.=2-22%), and 36-month (+15%; C.I.=5-25%) follow-ups as compared to non-CEO participants at the p<.01 level. Rochester showed significantly more employment 6 months post release (+17%; C.I.=5-29%; p<.01). The Buffalo participant group showed a significantly higher percentage of employed individuals at the 6-month (+28%; C.I.=18-38%; p<.01), 12-month (+12%; C.I.=2-22%; p<.05), 18-month (+15%; C.I.=6-24%; p<.01), 24-month (+11%; C.I.=1-21%; p<.05), and 36-month (+13%; C.I.=4-22%; p<.01) follow-ups.
- CEO has conducted four RCTs and two quasi-experimental studies that **show better 6month and 2-year outcomes for those that participated in CEO services compared to those that had no services**.

Quick Reference to SWBL Requirements

CEO complies with all SWBL requirements as defined in 7 CFR 273.7(e)(2)(iv). CEO pays all participants at least minimum wage and operates in compliance with all labor laws. Participants work within normal business hours and take appropriate breaks. CEO also does not displace or replace existing employment of individuals not participating in E&T. CEO only hires individuals into open positions which are available to anyone. CEO also provides the same benefits and working conditions as non-E&T participants doing comparable work for comparable hours. About 20% of CEO's workforce does not qualify for SNAP E&T and these participants go through the same program model as those who do qualify.

Policy		Reference		
SWBL activities mu	SWBL activities must:			
	bility and enable participants to move promptly ir private employment.	nto See sections 1.5 and 1.7		
	uctured learning experience that takes place in a nulated environment.	See sections 1.2 and 1.3		
a real world or sir	l interactions with industry or community profession mulated environment.			
4. Foster in-depth fin career field.	rsthand engagement with the tasks required in a g	liven See section 1.3		
	curriculum (i.e. an instructor's plan for providing to nent) and instruction.	raining See sections 1.2, 1.3, 1.4, 1.5, and 1.6		
6. Emphasize emplor the training.	yer engagement in the development and/or execut	tion of See section 1.3		
7. Have specific train	ning objectives (i.e. goals for what a participant is and by able to do by the completion of the trainin	See sections 1.2, 1.3, 1.4, and appendix II		
8. Follow an articula unsubsidized emp	ited and documented path that leads to regular,	See section 1.5		
9. Pay the individual	I a wage at least equal to the State or Federal mini is higher. Note this refers to the wage including the			
10. Operate in compli	iance with all applicable labor laws.	See section 1.3		
11. Not displace or re in E&T	eplace existing employment of individuals not partic	cipating See section 1.3		
	benefits and working conditions as non-E&T partice work for comparable hours.	cipants See section 1.3		
13. Must provide an in management	ndividual participating in a SWBL activity with case	e See section 1.3		
14. Reimburse E&T pa and directly relate	articipants for expenses that are reasonably necess ed to participating in an E&T component, including to participating in a SWBL activity.			
measured in acco	viduals engaged in SWBL activities must be tracked ordance with the E&T outcome reporting regulations of for all E&T components.			

Competency Maps for Work Readiness

CEO is currently working on developing competency maps that will support participants in progressing in their career fields.

	Orientation Onboarding	Job Readiness	Job Stability First 3 Months on Job	Career Advancement Alter First 3 Months / Remainder of Retention Services
Interview & Application	Orientation	Career Exploration Level 1 Resume Creation Interview Prep & Job Search Level 1 Interview Prep & Job Search Level 2 JSR		Independent Resume Creation Independent Cover Letter Creation Independent Job Search
Technology Use		Digital Skills Level 1 & 2 (Laptop) Digital Skills Level 1 & 2 (Phone)		Digitai Skills Level 3
Money Management		Budgeting TJ Pay	Budgeting & Benefits FT Job	Building My Credit
Navigating the Workplace	Orientation	Digital Skills Level 1 & 2 (Laptop) Interview Prep & Job Search Level 2 JSR	Retention Overview Defining Success in a FT Job Relationship Building DEI Level 1: KYR on the Job	Giving & Receiving Feedback Netwarking DEI Level 2: Being an Ally at Work
Professionalism & Teamwork		JSR	Defining Success in a FT Job	Managing & Leading a Team
Managing Your Self		Goal-Setting	Level 1: Time Management Level 2: Task Management Level 3: Stress Tolerance Level 4: Emotional Intelligence	Level 5: Sustained Focus & Working Memory Level 6: Critical Thinking Level 7: Metacognition Level 8: Goal-Oriented Persistance
Long-Term Career Planning	Orientation		Career Exploration Level 2 Imposter Syndrome	Literacy & Education Career Exploration Level 3
			Occupation- Specific	CDL: Class A & B Vehicles ELP: Social Services IT Construction: Technica Entrepreneurship Construction: Safety

CEO FAQ

When you created the structure of your work experience program, did you consult employers or industry sector representatives for input on how it should be structured? If so, how and with whom? What skills were introduced or emphasized due to this collaboration? Did they or others help develop or execute the structured training portion of it?

- The curriculum (outlined below) and the specific training objectives related to each SWBL employer partnership were informed by the partners in Pennsylvania.
- CEO meets with our social enterprise SWBL partners on a weekly basis initially and then no longer than one month between meetings. In these meetings we gather feedback on how the partnership is going and what would benefit the employer. For example, we have been responsive to employer requests for our participants to have the options of OSHA certification, flagger, and other workplace safety certifications.

- Furthermore, our curriculum is guided by internal and external data on the types of employers likely to provide quality jobs for participants with a prior felony record, independent evaluations, and employer and participant feedback .
- As CEO creates its relationships with our social enterprise employers, we establish skills needed for sector employment. For example, our manufacturing and housing authority partners have provided training for skills such as welding, painting, and powdercoating, while our partners who are in need of groundskeeping and landscaping services, helped CEO participants learn and become proficient with tools like leaf blowers, pole saws, weed whackers, push and riding mowers.

What is the curriculum of your structured learning experience associated with your work experience program? Does your curriculum include career-related objectives that a participant is able to learn and do by the end? How do you measure progress and do you share this with the participant?

- We have a SWBL curriculum that is core to CEO's E&T partnership sites. We have this curriculum to establish learning objectives, and program quality and consistency across sites and it's described in detail below. However, we also have skills gains specific to our Pennsylvania E&T program. They are detailed in the chart below corresponding to specific social enterprise (WBL) employer partners.
- We use Salesforce to track each interaction with a participant and how it moves a
 participant promptly to unsubsidized employment readiness. Our assessment for
 readiness for unsubsidized job placement is a checklist of skills validated as a predictor
 of placement outcomes. Additionally, we track placement and job retention outcomes,
 as well as measures of job quality internally to further strengthen SWBL delivery.
 Throughout their SWBL, we seek a participant's feedback, and share with a participant
 their progress toward unsubsidized job placement readiness.

Could you please describe how you provide placement services to the participants to help them achieve employment? Does the work site often hire participants? Do other industry employer partners often hire participants?

 CEO vocational staff work individually with all participants to coach participants on skills, and identify any barriers to full time, stable employment removed prior to each participant working with their dedicated Job Developer who facilitates the connection to the unsubsidized job employer. Our Job Developer creates relationships with employers, understanding their needs, and the skills they are looking for in their new hires, while collaborating with each participant, identifying their career goals, so as to best match them with a position that can lead to longevity in the workplace. CEO also ensures its work site partners reflect careers that are achievable and that the skills learned while at the work site are transferable. • Although CEO develops relationships with multiple employers in the community as aligned with our SWBL curriculum, throughout FY23 CEO placed 19 individuals directly with WBL social enterprise partners, and 200 individuals with partners that benefit from skills gained in SWBL.

Attachment 2: Landforce Program Description and

Curriculum

Because of the seasonal nature of Landforce's work, Landforce recruits one cohort of 24 individuals in the spring of every year. Starting in FY 24, Landforce will recruit a fall cohort of 17 individuals beginning in August who will the same services described below on a six month staggered timeline. Applications open in February; interviews are held in March. Interviews consist of 3 stages -- a small panel interview, an on-site working interview, and a workforce development task. The combination of these three steps enables Landforce staff to get to know an applicant and whether they are ready to embark upon the Landforce challenge. It also allows the applicant to understand what working at Landforce will be like, learning that the workforce development and stewardship aspects are equally important to us. Applications typically exceed availability by a factor of 4 or more. Crew member trainings are held in April and May and focus on hard and soft skills including the following certifications: chainsaw safety, OSHA 40, Tree Tender Green Infrastructure (Penn State Center), First Aid, Bring Your A-Game, and Restorative Practices. Landforce uses a trauma-informed care approach and provides crew training in restorative practices and mental health wellness. (A more complete list of Landforce's educational modules may be found below.)

Following training, crew members work on environmental restoration projects, building and reinforcing their work readiness while improving our environment – installing and maintaining green infrastructure, constructing wooden boardwalks, steps, garden beds, building trails, restoring habitat, planting trees, and improving vacant lots. Landforce employs a crew model to increase the teamwork experience. Crews are supervised by knowledgeable and experienced Landforce staff, who were once crew members themselves. Landforce Site Supervisors set examples and help build confidence, ability, and work ethic. Because of the integrated nature of Landforce's work – combining workforce development and land stewardship – Landforce staff can respond quickly, thoroughly, and with a unified voice to any problems crew members experience.

Landforce's season typically ends in early November as business contracts wind down. Because Landforce also support an individual's transition into future employment, a Landforce career coach meets weekly with each crew member throughout the work season. These weekly meetings include an intensive intake process, the co-creation of an individualized employment plan, connections to necessary supports, and accountability to follow the plan through. In a typical year, 84% of those who complete their terms with Landforce transition immediately into future employment. The Landforce Training Curriculum focuses on three learning goals:

- 1) Understanding work culture, practice, and expectations;
- Building skills for future economic mobility;
- 3) Learning hard skills related to environmental stewardship.

These skills are all practiced through experiential learning as part of Landforce's environmental stewardship crews. They are reinforced by experienced supervisors and with regular one on one career coaching sessions. (Modules in bold with a star indicate certifications.)

UNDERSTANDING	ECONOMIC	ENVIRONMENTAL
WORK	MOBILITY	STEWARDSHIP
 Completing new hire paperwork Employee rights & responsibilities Cultural Competency/Anti- harassment Traveling to & from work Understanding the role of organizational culture Filling out timesheets / calling off Drugs & Alcohol Nonprofit versus For Profit An introduction to Landforce, staff & culture 	 Bring Your A-Game to Work" Restorative Practices Job Searching, resume writing, mock interviews Talking about criminal backgrounds Employer Site Visits & Talks Financial Empowerment / Bank Accounts Healthy Eating on a Budget Mental Health Professional Communication TABE Test (literacy/numeracy) 	 First Aid & CPR Chainsaw Safety National Green Infrastructure OSHA HAZWOPER 40 Tree Tender Tool Use, Safety, & Body Mechanics Personal Protective Equipment Basic Carpentry Environmental Justice Invasive Species Nature education walk Plant and tree ID Trail Terminology & Training

- Team building activities .

Soft-skills training includes; "Bring Your "A" Game to Work Certification, Financial Literacy (Financial Empowerment Centers), Pre-Work Day Preparation, Healthy Eating on A Budget (University of Pittsburgh Department of Sports Medicine & Nutrition), HR Manual and Rights & Responsibilities as an Employee, How to Complete Timesheets, Effective & Professional Communication, Anti-Harrassment and Appropriate Workplace Behaviors, Chain of Command, Effective Teams, Resume Writing, Cover Letter and Email Writing, Applying & Interviewing for Jobs and Mock Interviews, TABE Testing, employer visits and tours, Community College & Technical Institute visits, Restorative Practices Certification, and mental health training. Land stewardship training includes a number of industry certifications including: HAZWOPER (OSHA 40), Tree Tender, Chain Saw Safety, and Green Infrastructure through Penn State Center. In addition, Landforce teaches body mechanics, safe tool use, trail construction & maintenance, basic construction, planting & plant care, habitat restoration, and invasive and native plant identification. Because Landforce participants work on actual job sites through

their time in the program, they are able to learn and become proficient at these skills by the end of their terms.

In addition to pre- and post-tests for some subject matter courses, Landforce uses a work readiness tool first developed by RDF. It is a national tool that Landforce has modified to measure career-readiness skills for Landforce crew members. The measurement includes evaluations of both hard and soft skills, and even enables Landforce to consider things like housing stability and other barriers that can impact long-term employment success. Our site supervisors and work readiness managers complete the evaluation for each crew member every 6 weeks. Once the evaluation is complete, the Site Supervisor and Work Readiness Manager sit with the participant, review the evaluation, discuss any problem areas, troubleshoot solutions, and explore the trajectory of successive evaluations. As a result, participants receive regular personalized feedback, allowing room for growth in specific areas that equip them and help them to be work ready.

Landforce's model grew out of a joint planning process by six non-profit organizations, including the Three Rivers Workforce Investment Board (now known as Partner4Work, a local workforce development board in Allegheny County). Other non-profits involved in the planning process included the Allegheny Land Trust, GTECH Strategies (now known as Grounded), MWCDC, the Pittsburgh Park Conservancy, and UrbanKind. The planning process was supported by a grant from the Hillman Foundation to research and plan the creation of a Conservation Corps, conduct national best practice benchmarking and site visits, and begin significant outreach. During this planning process, Landforce visited four organizations (in Seattle, San Francisco, Oakland, and Detroit) and garnered key insights that fell into three main categories – land stewardship services, workforce development, and partnerships:

- Land Stewardship Services
 - Work opportunities are based upon the demands of the current land stewardship market;
 - Dedicated contracts are essential if Landforce is to meet both the land stewardship and workforce development goals;
 - Land stewardship services must be of the highest quality in order to build a positive reputation and secure long-term contracts, as a result, quality standards, accountability, and professionalism need to be prioritized;
 - Developing specialized work niches allows unique and often neglected services to be improved while simultaneously preventing labor disputes with representative labor agencies;
 - Internal capacity is critical to ensure quality of work and relationships with employees.
- Workforce Development
 - Human services need to be embedded within the organization for higher impact and program success – these include services in workforce training and development, case management, and identification of goals, barriers,

and a plan of action, and connecting to existing social services if necessary;

- Successfully enhancing workforce skills depends upon an evolving balance of professional accountability and patient flexibility with everything from uniforms to performance management, soft skills development, and setting expectations;
- Relationships with employers is a crucial component of workforce development, and communication must be consistent and open to ensure positive outcomes.
- Partnerships
 - Partnering with public agencies is critical, yet operating the program outside of governmental responsibility is preferred;
 - Serving as a pathway for employment as well as a pool for employment recruitment enables numerous partnerships;
 - Operational capability on both sides needs to be established from the beginning;
 - Utilization of partnerships can enhance but internal expertise and direct contact with work and workers is paramount; and
 - Recruiting program participants/employees needs to come from a variety of trusted and vetted partners – most models indicated that those partnerships are refined and made more reliable once the program establishes and demonstrates a consistent competency in retaining, employing, and supporting individuals

Landforce was also able to garner additional key insights from further literature review:

- Successful programs for hard-to-employ people need to focus on ways to sustain employment even past the initial job placement, maintaining a supportive relationship with the hard-to-employ person.
- Connecting people to sector-specific training programs can substantially increase employment and earnings.
- Placing people in training opportunities with the possibility of rolling over directly onto the employer's payroll can increase long-term success.
- Co-locating work and treatment/service-focus strategies in a more integrated model may be more promising than offering either one alone, especially for people with disabilities and behavioral health problems.

Landforce has continued to build on and refine this model. Part of the refinement process was the relationships Landforce has built (and continues to build) with employers. Early in Landforce's conversations with employers, Landforce learned that employers wanted employees to be reliable, show up on time everyday, and be able to provide evidence that they could learn and master new skills, and Landforce integrated this feedback into the soft skill portion of its model. As Landforce grew, it established a permanent feedback channel for existing and potential employers through a biannual survey, within which Landforce inquires about positions most needed, those most

challenging to fill, and the skills which make candidates most attractive for employment. This information is used to assess how Landforce's training regimen, curricula, and the types of certifications Landforce trainees and crew member receive link to the labor market. Landforce also receives input from an Advisory Board which includes: Partner4Work (the local workforce development board), PWSA, Hazelwood Initiative, Penn State Center Pittsburgh, One Pennsylvania, Davey Tree, Pittsburgh Department of Public Works, Plantscape, Eichenlaub, and the Pittsburgh Department of Public Works (DPW). PWSA emphasizes green infrastructure training, and local employers recognize a Penn State Center completion certificate, meeting local employers needs. The Advisory Board and employer surves also cited as necessary the OSHA/HAZWOPER 40 certification, tool identification and use skills, and basic construction skills. Based on the employer survey, those hiring laborers had significant challenges in filling those positions in 2022. Davey Tree has 5,000 laborer positions company-wide, and 1,500 (30%) remain unfilled today. Local landscaping firm Plantscape has 8 of 10 laborer positions unfilled. One-third of Pittsburgh DPW laborer positions remain unfilled, with similar data from PWSA. DPW and PWSA both started hosting job shadow programs for Landforce crew members in 2022.

In 2019 and 2020, Landforce was accepted into a national employment social enterprise accelerator program called REDF. Landforce's experience in REDF was foundational in ensuring processes, training, supports, and work experience are all best practice. Through the REDF accelerator and follow-up programming, Landforce introduced a standardized work-readiness evaluation, introduced additional supports for participants, and brought new skills to staff.

Landforce are also currently working closely with PWSA and Pittsburgh DPW to develop a (pre-)apprenticeship program for Landforce participants to enter employment with those agencies. Landforce will continue growing, revising, and strengthening their program model based upon conversations with current and future employer partners.

When a crew member is first hired on by Landforce, the Landforce Work Readiness Manager completes an in-depth intake assessment with the crew member. This assessment addresses an in-depth look into the crew member where Landforce asks challenging questions that help bring out the personal and career-related interests of the individual. Subsequently, Landforce provides weekly on-on-one case management meetings with each crew member, providing the opportunity for each crew member to set short- and long-term goals to address career-related decisions and receive feedback on their progress toward meeting training objectives. The Work Readiness Manager then helps the crew member with any employment-related needs, such as obtaining a driver's license/permit, addressing any court fines, finding child care or housing, finalizing the resume and cover letter, assisting with completing applications, advocating for the crew member with employers, ensuring the crew member has the correct qualifications, etc. This guidance and one-on-one assistance is one of the keys to Landforce participants ultimately securing and retaining unsubsidized employment. Because of the way the Landforce SWBL model is designed, Landforce completes soft and hard skills training with participants, then offers them a transitional employment opportunity as a seasonal crew member. Occasionally, Landforce may hire participants on into unsubsidized employment following the SWBL period. Landforce also works intentionally with crew members to find them placement in family-sustaining employment by the time the SWBL period ends, working with employer partners that offer job shadowing opportunities, like PWSA and Pittsburgh DPW (described above), as well as opportunities with other industry employer partners. After placement, Landforce conducts follow-ups with crew members and works as a team to assure their success.

Participant expenses reasonably necessary and directly related to participating in the SWBL E&T component are generally reimbursed through a Special Allowance (SPAL) issued directly by the County Assistance Office.