

SNAP EARN

**SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM
EMPLOYMENT ADVANCEMENT AND RETENTION NETWORK**

**PROGRAM
PROCEDURES**

**DEPARTMENT OF
PROGRAM YEAR**



**POLICY AND
MANUAL**

**HUMAN SERVICES
2025-2026**

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SECTION 1 – INTRODUCTION

Program Overview

Supplemental Assistance Nutrition Program Employment Advancement and Retention Network (SNAP EARN) is designed to provide a range of services to meet individuals' needs, including access to education and training opportunities to move clients toward family economic stability. The program is based on human-centered design and includes an appropriate combination of case management, coaching, and peer to peer experiences to develop a career pathway through job placement and job retention goals for the participants referred from the County Assistance Office (CAO).

Eligibility Criteria

CAO staff will determine eligibility for the SNAP EARN program and refer clients to SNAP EARN based on CAO policy and procedures.

Individuals eligible for Supplemental Nutrition Assistance Program (SNAP, previously known as food stamps) benefits, who are not also eligible for Temporary Assistance for Needy Families (TANF), may be referred to the SNAP EARN contractor. The hours of participation are determined by whether the individual is considered an Able-Bodied Adult Without Dependents (ABAWD).

SECTION 2 – REFERRALS

Program Referrals

Outreach efforts to increase program enrollment rates and continued participation are expected to begin when a program receives a referral in the Commonwealth Workforce Development System (CWDS). Outreach efforts are to include contacting program participants prior to their enrollment date to introduce yourselves and your program, confirming the participant's attendance, and answering any additional questions that the participant may have. Programs must make a minimum of three contact attempts should the initial attempt be unsuccessful. Documentation of contact attempts is required. Programs are required to develop a plan for referral outreach available to the Bureau of Employment Programs (BEP) via the Program Implementation Plan (PIP).

The provider will make every reasonable accommodation to accept referrals every day of the business week.

SNAP EARN programs may set their orientation times and dates; however, a client must be given opportunity to report to the program and should not have their referral rejected if they are late for the program's orientation or scheduled appointment date. Initial meetings with the client may be done via phone or other electronic means. The client does not need to physically report to the SNAP EARN center to be enrolled in programming.

In the case of an employed individual being referred to SNAP EARN for additional participation hours; case managers should meet with the client at a time and location that does not interfere with the client's scheduled work hours.

It is required that the program work with the CAO before referral rejecting a client.

The SNAP EARN provider must act on the CAO referral within 14 days of the referral date.

NOTE: The referral date is not included in this count. It is day zero.

Reverse Referrals

Reverse Referrals are program referrals that are initiated by the SNAP service provider instead of the CAO. The provider must use the Reverse Referral Form ([PA 1951](#)) to give the local CAO the information necessary to determine if the referral for a specific program or service is appropriate and allowable. The referral determination can then be shared with the individual and provider. The submission of a PA 1951 does not change the policy or process for determining appropriate referrals or completing the EDP and submitting a system referral if the referral is approved. The form offers individuals an additional way to request consideration for programs and services in which they are interested.

The CAO has 15 calendar days to:

- determine eligibility for a contracted program referral;
- complete/update the Agreement of Mutual Responsibility (AMR) or Employment Development Plan (EDP) and obtain recipient's signature;
- discuss and issue special allowances as needed for participation;
- return a completed copy of the PA 1951 to the recipient and contracted program with the eligibility determination; and
- submit an electronic referral via eCIS

NOTE: The contracted program may assist the CAO in obtaining the recipient's signature on required documents to complete the referral.

A recipient does not need to provide a PA 1951 in order to be referred to an E&T program by the CAO. The recipient may contact the CAO directly, in-person or by telephone, to request to participate in cash or SNAP E&T, complete or update an AMR or EDP, and receive an electronic referral to an E&T program.

The use of the PA 1951 does not change the policy or process for completing the AMR or EDP and submitting an electronic referral via eCIS if the activity is approved. A face-to-face appointment is not required. The AMR or EDP may be updated by telephone, and/or with the assistance of a contracted provider. A copy, signed and initialed by the recipient, must be returned to the CAO by either the recipient or contractor. If a signed copy is not received by the CAO within 10 calendar days of the date the EDP or AMR was sent to the recipient for signature, the CAO will reject the reverse referral.

The electronic referral to a contracted program and SPALs to support the activity may not be processed until the signed and completed AMR or EDP is returned to the CAO.

If the CAO determines the E&T referral is not appropriate, or if the individual and/or contractor does not return a completed AMR/EDP, the CAO must notify the recipient and the contracted program by returning a completed PA 1951 indicating that the reverse referral was rejected

Providers must report reverse referrals to DHS using the [Reverse Referral Tracking Report](#). DHS is monitoring how many reverse referrals are rejected or accepted by the CAO. Only the reverse referrals that have received a response by the CAO should be on the list. Programs should inform BEP if pending reverse referrals are taking longer than 15 calendar days to be reviewed by the CAO. BEP can assist the programs in resolving the issue. The Reverse Referral Report is due by the close of business the first week of the month following the reporting month. Please refer to [Contractor Letter #2021-05-25](#) for more background and guidance regarding the Reverse Referral process.

Project Referral Rejection Codes

If the client does not show for orientation the SNAP EARN service provider will conduct outreach to the client to enroll and engage the client. If the client refuses to cooperate at the orientation, the provider should speak with the client one-on-one to determine how they can assist the client in engaging in and successfully completing the program.

Referral rejection codes will be used to track the reason a client's referral to SNAP EARN is rejected prior to enrollment. The SNAP EARN service provider must data enter these codes in CWDS.

The following project referral rejection codes may be used with SNAP EARN:

- Code 1 – Failed to report (after documented repeated attempts at outreach)
- Code 2 – Refused to cooperate (after documented repeated attempts at outreach)
- Code 4 – No Action Taken (System Generated)
- Code 5 – Other
- Code T – Referred in error

SECTION 3 - ENROLLMENTS

Initial Program Enrollment

The SNAP EARN service provider must enroll the client in the program the date they report to or agree to participate via phone or other electronic means. Data entry of the client's enrollment in CWDS must be completed within three working days of the date of enrollment.

NOTE: The client's reporting date is not included in this 3 business-day count.

To enroll a client (Project Code SD or SN for Philadelphia), the SNAP EARN service provider will enter an enrollment date in CWDS. After enrolling the client in the program, the SNAP EARN service provider must open at least one activity code to track participation. Under **NO** circumstance is a client to have an open project without an open activity code.

Once notified that the participant is to be enrolled, the SNAP EARN service provider will conduct a case review to become familiar with the client's background and situation to determine what additional assistance the participant will need to achieve family economic security. The SNAP EARN service provider will review the information below:

- Family and social history
- Medical information, including physician, clinic, and hospital records
- Work history
- Information regarding services the participant is receiving from other agencies or providers
- Case narratives
- Job readiness assessment
- Employment Development Plan (EDP)
- Information regarding the participant's current and past participation in Employment and Training (E&T) programs
- Educational activities and outcomes of those experiences
- Any other pertinent information

Each participant shall have an in-person orientation, either individually or in a group, to the SNAP EARN Program within five business days of the participant's referral. During participant orientation the SNAP EARN service provider must review the SNAP EARN policies and participant requirements with the participant, including:

- The goals and purpose of the program
- The overall approach to reaching these goals including participation in a joint planning process to identify needs and appropriate activities
- Attendance requirements to include hourly requirements, holidays, and unexcused absence policy

- Participant and SNAP EARN rights and responsibilities
- Explanation of how participant progress is tracked and measured
- Information on the grievance procedure
- Confidentiality agreement
- Authorization for release of participant information
- Program requirements (lunch, breaks, behavior, dress code, reporting changes, income, submission of paystubs to the SNAP EARN and the CAO)

For SNAP participants, the SNAP EARN service provider and its team shall conduct an in-person comprehensive assessment that identifies participant strengths and barriers to employment and family economic security. The assessment shall be completed within 14 business days after the enrollment date. As part of the assessment, the participant's social indicators of health (SIOH) shall be identified, including but not limited to:

- Interests and goals
- Current employment and financial status
- Education
- Language and literacy (including English proficiency)
- Housing
- Food security and nutritional education
- Clothing
- Transportation
- General and mental health
- Criminal History
- Criminal background inquiry and checks
- Domestic violence
- Support network
- Work experience

The appropriate activity for the assessment period will be AC 09. Based on the results of the assessment, the SNAP EARN program will determine the next appropriate activity and develop the service plan.

Providers are expected to share any completed assessments whenever a participant transitions to another E&T provider in the network.

The assessment must be completed within 14 business days following the enrollment. To capture the performance standard correctly, the provider is expected to open AC 09, complete the assessment and close AC 09 within 14 business days following the participant enrollment.

Individualized Employment Plan (IEP)/Service Plans

The SNAP EARN service provider will use the comprehensive assessment to coordinate with the participant to create and execute an Individual Employment Plan (IEP) in CWDS. The IEP will be a living document. In coordination with the participant, the SNAP EARN service provider shall develop and use the IEP as the comprehensive plan to:

- describe goals, objectives, barriers, interests, and planned services of the participant, as determined from the assessment
 - Interventions (including crisis mitigation and barrier remediation);
 - Education;
 - Training and credentialing;
 - Community service opportunities consistent with the community service option reflected on the EDP; and
 - Job readiness and skills (such as soft skills and employment tools, basic life skills, barrier remediation, career exploration, assessments, and aptitude testing)
- measure goals, including specific outcomes, to be achieved to demonstrate stabilization of the participant's barriers and needs, the time frame(s) for achieving them, the resources available and to be used to realize the outcomes, and the desires and motivation of the participant that may have an impact on their success
- if required, work with a multidisciplinary group consisting of a CAO worker or an agent authorized by the Department and professionals from various disciplines, which may include physicians, psychologists and vocational or behavioral rehabilitation specialists to develop a service plan that meets the needs of the participant

To remain enrolled in SNAP EARN, the client must agree to the terms of the IEP and sign and date the document at the time of completion. Updated staff and participant signatures must be obtained when there is a change or addition to the goal or objective.

If a participant already has an existing IEP in CWDS, the provider is expected to review the IEP and make any necessary updates to the goals, barriers, or objectives upon enrollment.

NOTE: The SNAP EARN service provider is to create the IEP in CWDS 2.0 using the Create Plan screen.

NOTE: Inability or refusal to make progress with the IEP should be documented in the case notes and discussed at the local DST meeting.

As part of the ongoing services to the participant, the SNAP EARN service provider will:

1. Conduct and document participant contacts at least weekly. This can be done via face-to-face meetings, telephony, or electronic means. The SNAP EARN service provider shall use one or more of the following methods to engage and support the participant in working through the IEP:
 - Case management
 - Coaching
 - Peer-to-peer experiences
2. Identify and refer the participant, the family, or both to the appropriate local community resource(s) to achieve goals identified in the IEP, such as:
 - Shelter
 - Education
 - Adult Basic Education
 - English as a Second Language
 - Post-secondary institutions
 - Keystone Education Yields Success (KEYS) providers
 - Education Leading to Employment and Career Training (ELECT)
 - WIOA Title I Individual Training Accounts
 - Registered Pre-Apprenticeships
 - Legal Assistance
 - Legal services
 - Criminal background inquiries and checks
 - Criminal record expungement
 - Pennsylvania Legal Aid Network
 - Life skills, including:
 - Financial literacy
 - Nutrition
 - Other appropriate information
 - Another Employment & Training Provider
 - SNAP EARN program in another area
 - SNAP KEYS
 - SNAP JETS
3. Advocate for the participant when connecting to local community resources by providing participants with:
 - Maintain an active connection and point of contact for all community partners in CWDS

- Assistance with application and scheduling, warm handoffs are encouraged to connect participants with services
- Ongoing case management and services while participant engages with the community resource
- Referrals should be driven by the outcome of the assessment with all identified needs supported through a referral to community partners
- Referrals should also be made anytime a need is identified throughout the enrollment period

4. Employ or have access to, at least one qualified Social Service Professional to provide an outlet to discuss topics such as mental, social, physical, emotional, and behavioral health aspects of the participant's life. The work performed by the professional should be separated from the scope of work being performed by other staff. Social Service Professionals may consist of licensed professional counselors, social workers, therapists, allied health professionals or a combination of these professionals. The SNAP EARN service provider will submit to BEP, the qualifications of said professional for review.

- Social Service Professionals must be available in sufficient numbers so that each participant can be offered the opportunity to have an introductory 1-on-1 meeting with said professional within 28 business days following the date of enrollment.
- During this introductory meeting the Social Service Professional will be required to explain their offered services, review participant assessments, offer services or resources to address identified barriers, and act as a social service coordinator between the grantee, participant, and outside resources. The Social Service Professional will then coordinate and refer the client to any appropriate ongoing services; if they will be the ongoing service provider, they may enroll the client as well. Licensed professionals must be made available on site at least one day per month, based on participant need. 1-on-1 meeting days comply with this requirement.
- If the social service professional is not a licensed social worker or counselor, they may only act as a referral source and must refer the participant to professionals specially trained to provide such services. This includes but not limited to domestic violence or physical and mental health related issues.
- Social Service professionals must be made available to participants upon request. The licensed professional, or their organization, must respond to participant requests for services within 24 hours. At a minimum the response must include documented outreach to schedule an appointment.
- The SNAP EARN service provider should develop a crisis response plan to include professional having flexible hours of contact, including but not limited to weekends and after "traditional" work hours. The SNAP EARN service provider shall continue to provide participants with access to these services as often as needed through the end of the 90-day retention period.

All referrals to the social service professional are to be recorded in CWDS using the service authorization. The provider is to create a service category and select Scheduled Appointments and record the appointment date and outcome of the meeting.

Outcomes of the meeting should be recorded using Meeting Complete or Refused to Cooperate.

5. Provide activities and programs that lead to acquiring job-related and job readiness skills in addition to education and employment activities. Some job-related and job readiness skills may include but are not limited to:

- Time management
- Analytical thinking
- Executive function and decision making
- Verbal and written communications
- Leadership
- Professional behaviors and attire
- Career exploration
- Aptitude testing
- Interpersonal communication
- Collaboration
- Problem solving
- Financial literacy
- Resume writing
- Interview techniques
- Education on regional High Priority Occupations and local job markets: [High Priority Occupations](#)

6. Provide or refer participants to formal credentialing programs or trainings, which may include:

- Industry skill certifications to achieve and demonstrate skills necessary for specific occupations
- Upgrades of an individual's job-related skills including instructional certificate programs that are awarded based upon completion or accumulated credits
- Associate degree programs including those that result in an Associate of Arts, Associate of Science, or an Associate of Applied Science degree
- Organized educational programs that are directly related to the preparation of individuals for employment in current or emerging occupations requiring training other than a degree

- High School Equivalency, General Equivalency Degree, Adult Basic Education, and English as a Second Language programs as part of a career pathway when these classes are integrated within, being taken concurrently with, or for a limited-duration prerequisite to post-secondary education or training as part of a career pathway program

7. Facilitate the transfer of participants to other DHS employment and training programs, when appropriate and approved by both the CAO and the receiving program. Program transfer options include, but are not limited to:

- SNAP KEYS: The SNAP EARN service provider shall transfer to the SNAP KEYS program those participants who have enrolled at a Pennsylvania community college to pursue an education activity that leads to receipt of a diploma or certificate and improves employability. An educational activity improves employability when its Classification of Instructional Program (CIP) code is associated with at least one high-priority Standard Occupational Classification (SOC) code for the local Workforce Development Area. Alternatively, an educational activity improves employability when it is certified as a course of career and technical education under the Perkins Act. The SNAP EARN service provider shall coordinate educational activities at community colleges with the SNAP KEYS program and shall terminate the SNAP EARN participation of participants who meet all requirements for SNAP KEYS and desire to participate in SNAP KEYS shall facilitate the referral and transfer to SNAP KEYS. The SNAP EARN service provider may not terminate the SNAP EARN participation of participants who have expressed interest in community college but have not yet enrolled. The SNAP EARN service provider shall coordinate with SNAP KEYS when participants express a desire to enter community college. If such participants subsequently enroll in a community college, the SNAP EARN service provider shall terminate the SNAP EARN participation of participants meeting all requirements to enroll in SNAP KEYS and shall facilitate the referral and transfer to SNAP KEYS.
- SNAP JETS Third-Party Partnerships: SNAP JETS partnerships are direct contractual relationships between the Department of Human Services and community-based organizations that serve as specialized training providers. Each SNAP JETS partner sets its own prerequisites for admission to the program. The SNAP EARN service provider shall work with each local SNAP JETS partner organization to identify when referrals to that organization are appropriate. The SNAP EARN service provider shall transfer participants to the SNAP JETS program who have been thusly identified.

8. Place participants in unsubsidized employment. To identify and fill employment opportunities, the SNAP EARN service provider should utilize the resources within the local area including but not limited to, Workforce Development Boards, existing and newly developed relationships with local employers, chambers of commerce, employer

lead groups, career workshops, job fairs, and Registered Apprenticeship programs. The SNAP EARN service provider shall require participants meet with potential employers in person, when appropriate. The SNAP EARN service provider shall advocate and advise their participants to accept employment consistent with their IEP even if the employment will not result in a placement performance outcome.

The SNAP EARN service provider achieves a placement performance outcome when a participant is working in unsubsidized employment (Activity 93) at least 80 hours in a four consecutive week period at the higher of the state minimum wage plus two dollars per hour or the federal minimum wage plus two dollars per hour. Once the participant is placed in employment and has entered the retention period, the SNAP EARN service provider shall contact the participant biweekly for the full 90 days of the SNAP retention period.

9. Assist participants who obtain employment to achieve satisfactory performance, retain employment, and increase earnings over time through the provision of retention services. The SNAP EARN service provider shall provide retention services when an individual obtains unsubsidized employment (Activity 93). The SNAP EARN service provider shall provide retention supports and services for 90 calendar days after the beginning of unsubsidized employment (Activity 93), regardless of whether the SNAP benefit closes during this period.

Determining Hours of Participation

The number of hours a SNAP participant is required to participate will be determined by the CAO and recorded on the client's EDP. The SNAP EARN service provider must ensure the client participates for at least the minimum number of hours as determined by the CAO caseworker and recorded on the EDP.

Participation Hours

Non-ABAWDs: Individuals who are exempt or geographically waived from ABAWD rules are considered voluntary participants under SNAP E&T and must participate for at least 12 hours per month. The SNAP EARN service provider may terminate a participant who fails to meet this standard; however, this termination only extends to participation in SNAP EARN and eligibility for SPALs. Since the individual is a volunteer, no sanction will apply to the SNAP benefit.

ABAWDs: Individuals who are not exempt or geographically waived from ABAWD rules must meet a work requirement of either 20 hours per week (averaged 80 hours monthly) **or**, for community service participants, the number of hours will vary by participant and will be listed on the EDP.

ABAWDs may also meet the work requirement by combining hours spent in unsubsidized employment with hours spent performing an E&T activity. In this instance, the SNAP EARN service provider will track only the hours spent performing an E&T activity, not the hours spent in unsubsidized employment. Instead, the SNAP EARN service provider should encourage the participant to report those hours to the CAO.

ABAWDs may participate in more than one activity to meet the work requirement; however, in no instance may participation in job search (AC 89) and job readiness/prep (AC 80) activities count for more than half (10 hours per week) of the 20 hour per week requirement. The SNAP EARN service provider shall assist ABAWDs in combining hours spent in other activities with hours spent in AC 80 or AC 89 to meet the work requirement.

[SNAP E&T Outcome Reporting](#)

The Food and Nutrition Service requires each state to report on activity outcomes as well as project/case-level outcomes. SNAP EARN providers shall cooperate with any request from BEP staff to collect additional data necessary for this reporting. Currently, the majority of data is collected under a memorandum of understanding between the Department of Human Services and Department of Labor and Industry and requires no action from the SNAP EARN provider. Participants in the SNAP EARN program are not individually identified in the standard report transmitted to the federal government.

SECTION 4 – Employment and Training (E&T) ACTIVITIES

E&T Activity Codes and Descriptions

E&T Activity Codes will be used to track the activities in which the SNAP EARN client is engaged at any specific time. The SNAP EARN service provider will data enter the activity codes in CWDS. Multiple activity codes can be entered at the same time; however, the activity codes in CWDS and the activities listed on the IEP must agree.

The SNAP EARN service provider must enter participation hours after the client attends the service or activity and documentation is provided.

The activity codes that may be used in the SNAP EARN program are listed in the table on the following pages, along with descriptions of each code. Please note any durational time limits or important notes included as applicable.

It is important to note that self-initiated education clients can remain in their educational track. SNAP EARN service providers should encourage and support clients as they seek to improve themselves through education. See the self-initiated student section below.

NOTE: Self-initiated clients who are enrolled in SNAP EARN should have the appropriate activity code opened along with the appropriate sub-project code. See the [Self-Initiated Students Section](#).

Remote Activities and Service Provision

Contracted providers are responsible for developing a remote participation plan for everyone who will be using this option as part of the PIP. Remote participants must use form PA 1895 (Employment and Training Weekly Activity Verification Form) to log their activities, including the date of the activities, type of activity, their E&T case manager's contact information, and the begin and end times for each activity recorded. When the log is completed, the participant must transmit it (via mail, fax, or electronically – pictures are acceptable via phone) to the E&T case manager. In difficult times, contracted providers may complete the PA 1895 with the client and request their signature at a later point in time, but prior to the monthly reporting deadline.

Supervision

Supervision must be provided by the contracted program. Supervision does not mean in person contact. The supervision may be by telephone or electronic contact (email/text) and ensures the individual participates and progresses in their assigned activities. The contact should occur on the days the individual is scheduled to participate.

E&T ACTIVITY CODES AND DESCRIPTION				
Activity	Code	Description	Durational Limits	Comments
Assessment	09	Comprehensive assessment that identifies participant strengths and barriers to employment and family economic security. The assessment shall be completed within 14 business days after enrollment date. As part of the assessment, the participant's social indicators of health (SIOH) shall be identified.	None	Completed within 14 business days after enrollment.
Job Readiness/ Preparation	80	Prepares the individual for the workplace by teaching interviewing techniques, preparation of resumes, employer expectations, and basic life skills. This activity may also include career exploration and activities designed to improve self-esteem. These activities may be conducted in workshops, seminars or classroom sessions coordinated through the local CareerLink (One Stop).	None	ABAWDs may use Supervised Job Search and/or Job Readiness Prep activities to meet up to 10 hours per week of the required 20 hours per week.
English-as-a-Second Language	81	Includes any formal education training specifically designed to improve an individual's proficiency in English needed to compete in the current job market.	None	
Adult Basic Education	82	ABE provides an individual with a basic literacy level, equivalent to successful completion of grade eight to fulfill an employment goal.	None	
SNAP Satisfactory Attend GED/HSE	83	This is an education activity designed to prepare a person to qualify for a high school diploma or equivalency credential. This includes any formal education training provided to an individual functioning at an eighth-grade level or above. High school remediation involves repetition of such instruction previously given to the participant to improve the individual's educational functioning level. Normal enrollment and participation in high school is not allowed in this activity.	None	May be pursued at any age, without need to enter good cause.

E&T ACTIVITY CODES AND DESCRIPTION				
Activity	Code	Description	Durational Limits	Comments
Skill/Vocational Education	84	<p>Provide individuals with specific occupational skills needed in the current job market. Vocational skills can include a wide range of training programs from learning to type to computer repair to entrepreneurship. Only educational activities that directly enhance the employability of the participant are allowed. Activities shall be deemed to directly enhance employability if: (1) the course of study meets the definition of career and technical education under the Perkins Act; or (2) the Classification of Instructional Programs (CIP) code associated with the course of study aligns with a high-priority Standard Occupational Classification (SOC) code for the local workforce development area. This may be determined by referencing the current High-Priority Occupation list and the Pennsylvania CIP-SOC Crosswalk, both available online at: https://www.workstats.dli.pa.gov/Products/HPOs/Pages/default.aspx.</p> <p>The individual may be credited with one hour of unmonitored study time for each hour of instructional time.</p>	24 months with six-month extensions available.	
Vocational Work Experience	85	<p>VWE is a paid work activity, which enhances an individual's employability by helping to develop good work habits and basic skills needed for the work environment through up to six months of paid employment in the public sector.</p> <p>VWE will be available for individuals who have never worked or have been unemployed for a considerable length of time. VWE can also be used to offer the individual who is currently enrolled in an advanced degree program an opportunity to apply classroom theories in a work setting. The participant's wages can only be paid using State funds or outside funding secured by the provider. The participant's wages cannot be claimed for reimbursement under the grant.</p>	Participation in this activity is limited to a 12-month period.	
Paid Work Experience	86	<p>PWE is a paid work activity, which enhances an individual's employability by helping to develop good work habits and basic skills needed for the work environment through up to six months of paid employment in the public sector.</p> <p>PWE will be available for individuals who have never worked or have been unemployed for a considerable length of time. The participant's wages can only be paid using State funds or outside funding secured by the provider. The participant's wages cannot be claimed for reimbursement under the grant.</p>	Participation in this activity is limited to a 12-month period.	

E&T ACTIVITY CODES AND DESCRIPTION				
Activity	Code	Description	Durational Limits	Comments
KEYS Postsecondary Education	87	<p>Educational activity offered by an accredited KEYS post-secondary institution. Only educational activities that directly enhance the employability of the participant are allowed. Activities shall be deemed to directly enhance employability if: (1) the course of study meets the definition of career and technical education under the Perkins Act; or (2) the Classification of Instructional Programs (CIP) code associated with the course of study aligns with a high-priority Standard Occupational Classification (SOC) code for the local workforce development area. This may be determined by referencing the current High-Priority Occupation list and the Pennsylvania CIP-SOC Crosswalk, both available online at: https://www.workstats.dli.pa.gov/Products/HPOs/Pages/default.aspx.</p> <p>The individual may be credited with one hour of unmonitored study time for each hour of instructional time.</p>	24 months with six-month extensions available.	
Non-KEYS Postsecondary Education	88	<p>Educational activity leading to a credit-bearing certificate program or career specific associate degree. This activity is designed to serve individuals with very specific needs. Only educational activities that directly enhance the employability of the participant are allowable. Activities shall be deemed to directly enhance employability if: (1) the course of study meets the definition of career and technical education under the Perkins Act; or (2) the Classification of Instructional Programs (CIP) code associated with the course of study aligns with a high-priority Standard Occupational Classification (SOC) code for the local workforce development area. This may be determined by referencing the current High-Priority Occupation list and the Pennsylvania CIP-SOC Crosswalk, both available online at: https://www.workstats.dli.pa.gov/Products/HPOs/Pages/default.aspx.</p> <p>The individual may be credited with one hour of unmonitored study time for each hour of instructional time.</p>	24 months with six-month extensions available.	
Supervised Job Search	89	<p>Activity which serves job-ready participants engaged in job-seeking activities, either individually or in a group. A specific plan of activities must be outlined on the individual's Employment Development Plan (EDP). Supervised Job Search may include counseling, provision of local labor market information, instruction in job-seeking skills, use of telephone banks, etc. Individuals who are employed or who have accepted an offer of employment are not eligible for enrollment in the Supervised Job Search activity. Participants should be credited with one hour for each job contact they make.</p>	<p>Maximum of 60 days in a 12-month period.</p> <p>After the Supervised Job Search activity is completed, the individual is not eligible for Supervised Job Search again for 12 months.</p>	<p>ABAWDs may use Supervised Job Search and/or Job Readiness Prep activities to meet up to 10 hours per week of the required 20 hours per week.</p>

Community Service	90	<p>Community Service is an unpaid work activity used to provide work experience for individuals in the federal, state, or local government or nonprofit sector arranged for by the SNAP recipient. Community Service enhances an individual's employability by helping to develop good work habits and basic skills. The number of hours of participation required of an ABAWD is determined by the county assistance office, which obtains this figure by dividing the household's SNAP allotment by the federal minimum wage. The required number of hours will be identified on the Employment Development Plan (EDP). This activity is prospectively verified through completion of the PA 1938 Community Service Verification Form.</p> <p>Note: An ABAWD may <u>not</u> combine Community Service with any other E&T activity to meet the ABAWD Work Requirement.</p>
Workforce Innovation & Opportunity Act (WIOA)	91	<p>Used to track wrap-around services provided to dual-enrolled WIOA and SNAP E&T recipients. Services can be provided under SNAP E&T if they are not already being provided by the WIOA grant that provided to the participant through the PA CareerLink center. Wrap-around services include, but are not limited to, case management, SPALs, and participant reimbursements.</p>
Case Management	92	<p>Includes services such as post-assessment development of the IEP, progress monitoring, coordination with service providers, and in-person, telephonic, and virtual case management meetings with a participant. This activity is available to all individuals enrolled in at least one other SNAP E&T activity code.</p>
Job Retention	93	<p>Job Retention is a work activity intended to provide services for up to 90 days to participants who secured employment while enrolled in the SNAP E&T program. Job retention activities include services and activities that will help a participant retain their new employment. Services and activities may include parenting and family responsibility classes, family financial planning, organization skills, mentoring, peer support activities, job development, job coaching, workplace literacy, etc. This activity is available to employed participants who secured employment as a result of participation in an E&T program.</p> <p>A SNAP E&T participant may choose whether to receive job retention services, however if the participant does opt to receive job retention services, any other Activity Codes must be closed out the day before the open date for AC-93. The participant remains eligible for Special Allowances (SPALs) and Child Care</p>

		<p>during the retention period, even if SNAP benefits close, as long as the closure was not due to a sanction or disqualification.</p> <p>ABAWDs in job retention not working at least 80 hours per month may participate in job retention services for the number of hours required to meet the 80-hour monthly requirement.</p>
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Self-Initiated Students

SNAP participants who self-enroll in post-secondary education – also known as self-initiated students – may be referred to SNAP EARN from the CAO. SNAP EARN is responsible for case management, verification, and data-entry of participation hours and job placement assistance after graduation. Self-initiated students fall into two main categories 1.) KEYS Expansion Students and 2.) Non-KEYS Students.

Students	Activity Code	Sub Project Code 1	Sub Project Code 2	Durational Limits	Comments
KEYS Expansion Students (Enrolled in a KEYS approved educational institution)	87	45: Career & Tech Students 46: State-Owned University Students	48: Students who are in months 13 to 24 of voc-ed time 49: Students who are in month 25 or over of voc-ed time	24 months with 6-month extensions available. Enter an additional sub-project code if beyond 12 months. (See Sub Project Code 2 in chart)	For a complete list of schools, see KEYS Program Institutions .
Non-KEYS Students	88	50	n/a	24 months with 6-month extensions available	
	84		n/a	24 months with 6-month extensions available for participants obtaining a credential/ certification.	

Study Time Policy

The school's study policy must be obtained and retained. This document identifies the number of study time hours expected by the school. A student can receive one hour of unsupervised study time for one hour of class time with no verification needed. Study time that is documented and monitored by the E&T contractor or an accredited education provider can also be counted. Total study time hours – unsupervised and supervised, may not exceed the number of study time hours expected for the course as determined by the school's study policy.

Credentialing and Training Services

The SNAP EARN service provider must provide credentialing and training opportunities for participants as outlined in this section. Vocational educational training is defined as "organized educational programs that are directly related to the preparation of individuals for employment in current or emerging occupations requiring training other than an advanced degree."

All vocational education activities conducted in-house, whether designed to provide a credential/certification or not, must be matched to high-priority career fields within the Workforce Development Area.

Credentialing

Credentials consist of an industry recognized certificate or certification, a certificate of completion of a Registered Pre-Apprenticeship, a license issued by the Pennsylvania Department of State or federal government, or an associate's or baccalaureate degree. Credentials measure competence in core content and performance standards in a specific set of work-related tasks. The work-related tasks and assessment must connect with workforce demands. The SNAP EARN service provider shall submit proposed credentials to the Bureau of Employment Programs (BEP) for review prior to implementation. In its sole discretion, BEP will approve the credentials. The SNAP EARN service provider shall include the following in any credentialing program package:

1. Certification area: A statement including what marketable, valuable skill will be earned by the participant when the program is completed.
2. Classification of Instructional Program (CIP) code: The CIP code most closely associated with the certification program.
3. Perkins Indicator: A yes/no indication of whether the program is a program of career and technical education, as defined in section 3 of the Carl D. Perkins Act of 2006.
4. Program's value: Justification of why the certification is valuable in your area industry, and how developing the skill will improve the participant's chance of gaining employment in a high priority occupation based on the workforce area and moving toward self-sufficiency.

5. Curriculum: The subjects that the certification program will cover.

Example: If the program is going to lead to a certificate in customer service, you would list all the subjects you will cover such as; Proper Dress Codes, Professional Writing Skills, How to Speak to Customers, etc.

6. Syllabus: A day-to-day outline of the progression of the program, including time frames. This should provide detail on how the curriculum will be taught. It also needs to include the goal of each lesson.

7. Assessment: The methods to be used in measuring student progress.

8. Statement of study time expectations (if applicable): Study time will not be granted automatically for these programs. If a client is expected to study outside of class time, then a statement of what the study time expectations are must accompany the program description. If a statement of study time is not submitted, no study time will be allowed when a case is pulled for validation.

If changes are made to the approved certification program, an updated package must be resubmitted for endorsement to BEP 10 days prior to implementation. However, changes should be submitted as quickly as possible as the certification process may take longer. Certification program packages should be submitted to the BEP EARN resource account, RA-BOPEARNPOLICY@PA.GOV

Other Vocational Activities (not credentialed)

Vocational education activities conducted in-house without the intent of credentialing must be accompanied by a curriculum that is available at the request of the BEP. When closing a non-credentialing AC 84, code 1 or 9 should be data entered. Closing code C should not be used.

Vocational Education not provided by the SNAP EARN Contractor (Credentialing and Non-Credentialing)

Hours of participation and/or certifications will only be recognized for those educational institutions who are approved by the Pennsylvania Department of Education (PDE) to grant degrees or certifications and are operating as a licensed business as registered with the Pennsylvania Department of State (DOS).

Online education/certification will only be accepted if the online institution is recognized by the United States Department of Education as an accredited institution. SNAP EARN contractors must be diligent in ensuring they are connecting their participants with education institutions and programs that will offer the individuals viable and suitable career pathways.

PDE approved training facilities can be searched at the following link:

<http://www.edna.pa.gov/Screens/wfSearchEntity.aspx>

Businesses licensed with DOS can be searched at the following link:

<https://www.corporations.pa.gov/Search/CorpSearch>

Online colleges approved by the US Department of Education can be searched at the following link:

<https://ope.ed.gov/dapip/#/home>

Activity Closing Codes

The SNAP EARN service provider is required to data enter an appropriate activity closing code when ending the client's participation in an activity. The code used to terminate the activity will indicate the completion of the activity and must be entered before terminating the project in CWDS.

NOTE: All activities and sub-projects must be end-dated before a termination code can be data entered on the Edit Participant Case Details Screen to end the client's project enrollment.

The following activity closing codes may be used with SNAP EARN activities:

- Activity Termination Code 1: Did Not Report (DNR)/Failed to Cooperate/Refuse
- Activity Termination Code 4: Successful Term – Obtained Employment
- Activity Termination Code 5: Completed and Employed – Activity End Date Required
- Activity Termination Code 9: Completed – Activity End Date Required
- Activity Termination Code C: Credential Received (available for AC 84, 87 & 88)

The CWDS service record must accurately represent a client's scheduled activities. If a client no longer has scheduled days of participation in an activity, the activity must be closed. The activity can be reopened when additional hours of participation are needed to meet EDP requirements.

SECTION 5 – PROGRAM ATTENDANCE & RECORD KEEPING

Attendance Documentation

Participation hours in all activities except SNAP job retention must be verified by the [SNAP EARN weekly attendance forms](#), vocational education/skills training weekly attendance forms, SNAP community service verification form ([PA 1938](#)), and/or any other weekly attendance form deemed acceptable by DHS.

To ensure attendance documentation meets minimum requirements, and to avoid the need for potential clarification during the monitoring process, the provider must use the DHS approved SNAP EARN weekly attendance form to verify participation hours.

When a client participates in community service or vocational education at a location other than the SNAP EARN center, the SNAP EARN service provider is required to collect documentation from the third party documenting the activities in which the client participated. To ensure continued participation in off-site locations, it is required that documentation be collected weekly. Clients participating in activities at the SNAP EARN center must complete and sign the SNAP EARN attendance sheet, along with the case manager.

Community Service

Specific forms need to be completed by the client and community service site when a client is participating in community service (See Attachments [CS Agency Agreement](#), [CS Weekly Participation](#) and [CS Verification](#)). The maximum number of allowable hours that a client may participate in community service should be documented on the EDP by the CAO. Please reference comments for Community Service in [Section 4, E&T Activity Codes and Descriptions](#).

Vocational Education/Enrolled in KEYS approved institution/Enrolled in non-KEYS Post-Secondary Education

Hours of participation may be verified using one of the following methods:

1. An instructor, or other college personnel such as, but not limited to, a staff member in the registrar's office, financial aid office, or academic department, may verify hours of participation on a weekly basis, at the minimum. Signatures may be physical or electronic.
2. The contractor case manager may sign the attendance form to verify hours of participation only when there is ongoing contact with the student or when adequate evidence is provided that the student is making satisfactory progress.
 - Ongoing contact is defined as weekly contact with the student.
 - Adequate Evidence of satisfactory progress could include:

- Electronic communication with the instructor or college personnel to verify that the student is attending class or completing required assignments on a weekly basis.
- Weekly progress reports from the college.
- Documentation of expected assignments and confirmation of completion and submission of assignments on a weekly basis.
- Satisfactory progress is defined as meeting the college's expectations to remain enrolled in the college the following semester.

3. Electronic time sheets, time clocks, swipe cards, or telephone time and attendance sheets to verify the hours of participation listed on the attendance sheets.

The school's study policy must be obtained and retained in the client's file. This document identifies the number of study time hours expected by the school. A student can receive one hour of unsupervised study time for one hour of class time with no verification needed. Study time that is documented and monitored by the E&T contractor or an accredited education provider can also be counted. Total study time hours, unsupervised and supervised, may not exceed the number of study time hours expected for the course as determined by the school's study policy.

Absences

Excused Absence Time and Holiday Hours

The SNAP E&T Program does not allow excused absence time or holiday hours. However, the CAO can grant good cause for circumstances that are beyond a participant's control. Per the [SNAP Handbook 536.23](#), good cause can include, but is not limited to the following:

- Circumstances outside the individual's control
- Illness or illness of another household member requiring the presence of the individual
- A household emergency
- Transportation issues
- Hours affected by holiday closings

Only the CAO can grant good cause. The program must contact the CAO should the need occur for good cause to be granted. If good cause is granted, the hours the client would have met are tracked by the CAO as "good cause hours" and if the actual hours they participate for the month plus the good cause hours equals 80 hours, they are still considered to meet their work requirement. If the CAO does not grant good cause, the program should work with the participant to try to offer make-up hours so that the participant can meet the 80 hour per month work requirement.

For example, if a participant is scheduled to go to EARN four hours per day, five days per week:

- If an EARN Center is closed for business on Christmas (Thursday), and the participant doesn't go to the program on Thursday as a result (but otherwise meets their remaining 16 hours for the week), the CAO will grant the participant good cause because it is not within the participant's control to go to the program if it is closed for the day.
 - The participant would not have to bank or make up the hours.
- If an EARN Center is open for business on Columbus Day (Monday), the participant cannot be granted good cause for Monday simply due to it being a federal holiday, because the program is still open and it is therefore within the PEER's control to go to the program for the day.
 - If the participant wishes to take Columbus Day off as an individual, they'd have to bank or make up the four missing hours on some other day in October to remain compliant with the 80 hour per month requirement.

Make-Up Time

For clients that do not meet their required number of hours in any week, the SNAP EARN service provider is required to develop a plan for the client to make-up the hours during the month in which the hours were missed. If clients are unable to make-up hours within the month, they should still be encouraged to make-up missed hours.

Make-up plans should be developed between the client and case manager within a week of the absence. The plan should be maintained in the case record.

Banking Hours

For absences not covered above, including religious holidays not observed by the Department, the SNAP EARN provider should allow participants to "bank" hours in the same month as the absence(s). The participant must notify the SNAP EARN provider of their intentions in advance and together they must develop a plan to make sure hourly requirements are still met within the month of the absence.

Employment Documentation

Employment hours must be verified through paystubs, documentation from the employer, DHS approved Employment Verification Form ([EVF](#)) or the Work Number (or similar service). Hours of employment for SNAP participants may be projected from a single paystub for 90 calendar days. The service provider will be asked to provide actual paystubs for the purpose of job placement validation. A copy of at least one pay stub that was current, if it is representative of ongoing income, at the time it was used should be used to project future hours in CWDS at the beginning

of each month in situations where the participant has not provided any updates. Once employment information is verified, the EARN service provider must enter a placement report in CWDS to notify the CAO of the client's earned income. For tipped employment, the hourly wage should be calculated based off of the same 4 consecutive week period of pay documentation used to establish representative pay (as defined by the Pennsylvania TANF Work Verification Plan), where the gross amount of pay, including tips, divided by the number of hours stated on the pay documentation, equals the hourly rate. This hourly rate can be entered into the associated employment activity's placement report in CWDS, and used ongoing, unless the pay or employment changes.

Retention

SNAP Retention eligibility begins when a participant starts new employment while enrolled in at least one SNAP activity. Upon notification that a SNAP EARN participant has obtained employment, the SNAP EARN service provider should close the open activities and open activity code 93. This is the case whether the employment causes the SNAP budget to close or not. The program will be notified of any potential SNAP closure through the CWDS 45 Day Hold alert. The 45 Day Hold alert indicates the client's SNAP case has a closure date. If a participant opened in activity code 93 enters 45 Day Hold status, the SNAP EARN service provider should contact the CAO to alert them that the participant is in SNAP Job Retention and may be served by the service provider for 90 additional calendar days, notwithstanding the closure of benefits. At this point, the CAO should take action which will cause the participant to return to Enrolled status. AC 93 cannot be opened when a participant is already employed and becomes enrolled in a program.

NOTE: If the 90th day of retention falls on a holiday or weekend, the last day of retention will be the next business day.

Earned Income Verification

The SNAP EARN service provider must verify employment upon placement. The methods of employment verification include but are not limited to paystubs, documentation from the employer, DHS approved Employment Verification Form (EVF), the Work Number (or similar service), or CIS.

Retention Services

Retention services should be a continuum of services provided prior to placement. Client contact should occur biweekly, at a minimum, for the full 90 calendar days of retention. Retention contacts should include a comprehensive overview of the client's IEP as well as a discussion to determine if the client needs any referrals for services. Programs should look to develop and offer workshops or events that are designed to support employed participants.

Data Entry

SNAP EARN service providers may have their own data information system to track program referrals, rejections, enrollments, participant data, activities, and terminations. However, CIS, CWDS and DocuShare are the official data systems that DHS will use to validate a client's activities and evaluate achievement of outcomes. SNAP EARN service provider staff hired to perform data entry are required to attend CWDS training.

DHS has instituted restrictions on timeframes for the data entry of client information into CWDS. These restrictions are necessary to ensure the timely reporting to the Department's state and federal partners, and timely action by CAOs affecting clients' eligibility for benefits or continued participation in EARN.

CWDS access/termination

In order to obtain access to CWDS, the CWDS User Agreement Form & MD 205_34 need to be completed for the new user and submitted to the CWDS resource account RA-CWDS@pa.gov . Please submit in one document per user access request. You may choose to utilize the [Onboarding/Offboarding Checklist](#).

Upon the departure of an employee from the employment program agency, access to CWDS will be terminated promptly and securely to safeguard sensitive information.

It is the responsibility of the employee's immediate supervisor or designated administrative personnel to notify the BEP CWDS resource account RA-CWDS@pa.gov and the BEP EARN resource account ra-bopearnpolicy@pa.gov of the employee's departure within three business days.

Supervisors and administrative personnel responsible for initiating access termination requests are accountable for ensuring the timely and accurate execution of the process.

Failure to adhere to the access termination protocol may result in disciplinary action.

The EARN service provider must complete data entry into CWDS as follows:

Reporting Element	System of Record	Reporting Deadline
Program Implementation Plan	Docushare	45 business days following the start of the PY
Assessment/IEP	CWDS	14 business days following the date of enrollment

Case Progress Notes	CWDS	30 calendar days following the point of contact
TANF Sampling	CWDS	1 st day of the month following the month of request
Annual Monitoring/Technical Assistance	N/A	Ongoing
Referrals	CWDS	14 business days following the discovery of need
Unsubsidized Employment	CWDS	All hours must be entered by the last day of the month up to two months after the month of participation (i.e., March hours must be entered into CWDS by May 31st)

Any data not entered by the data entry deadlines will not count toward the performance outcomes.

Mathematical rounding will be used to round clients' hours: round down to the next whole hour if the fraction is .49 or below and round up to the next whole hour if the fraction is .5 or above. Mathematical rounding will be instituted at the end of each week per activity.

SNAP EARN service providers must promptly and correctly data enter information into CWDS. It is essential to capture all client activity hours toward meeting any potential SNAP work requirement.

All information data entered into CWDS must match the information on the SNAP EARN attendance sheets ([Attachment Attendance](#)). All service providers must develop a data reconciliation process to ensure that all information in CWDS is accurate. Data reconciliation must be completed at least monthly.

SNAP EARN service providers are expected to maintain a data accuracy and timeliness rate of at least 85%.

NOTE: SNAP EARN service providers may refer to the CWDS manual for further information on the operation of the CWDS. Data entry questions can be directed to the CWDS Help Desk at 1-866-236-6297.

[SNAP EARN Case Record Requirements](#)

The SNAP EARN service provider will create a confidential SNAP EARN Case Record. The SNAP EARN Case Record must be kept in a secure location with limited accessibility. Staff not associated with the SNAP EARN case may not have access to the case record or narrative.

The SNAP EARN service provider will document the following in the SNAP EARN case record narrative:

- date, time, and location of all SNAP EARN related contacts
- purpose and outcome of all SNAP EARN related contacts
- any changes in the client's conditions or circumstances
- solutions offered and the client's responses
- services and supports requested or provided /
- pertinent information received from the CAO
- any other relevant information

NOTE: The SNAP EARN service providers are required to document their narratives using the CWDS Create Case Progress Notes screen. Additionally, it is suggested to identify case notes with specific topics.

The following documents should be maintained in the client's file and must be available for upload in CWDS for validation purposes.

- EDP
- Service Plan/IEP
- Attendance Sheets, including make-up plans (See [SNAP EARN Attendance Form](#))
- Job Search Logs
- Release of Information Form (See [Confidential Release of Information](#))
- Employment Verification Form ([EVF](#))
- Verification of Retention
- Any other relevant information

Documents must be retained for a period of six years.

Internal Data Reconciliation

The SNAP EARN program is evaluated based on CIS and CWDS information; therefore, it is imperative that the contractor schedule time at least once a month to reconcile the data found throughout all systems and case files used by the contractor to ensure the accuracy of the data used to track participants.

At a minimum, the following must be consistent in all the data systems.	Critical data that must match across all reporting systems.
Client Information System	Project begin and end dates

Commonwealth Workforce Development System	Activities, including begin and end dates
Job Placement and Retention Report	Time and attendance information.
Case Records	Employment information (employer, job start and end dates, medical information, wages, etc.)

The CWDS Enrollment, Closings and other reports must be accessed and used for reconciliation purposes.

SECTION 6 – TERMINATIONS

Project Termination

Project termination codes reflect program outcomes, including whether the client secured employment or not. The SNAP EARN service provider must include the reason for termination in the narrative of the client's case record.

Termination codes 3, 5, and 7 must be data entered within three business days of the date of the decision to terminate. For clients terminated with employment/retention codes 1 and 8, the termination date may date back to the final day worked which completes 90 calendar day retention period as verified by paystubs.

Programs must conduct outreach efforts for clients that miss three consecutive scheduled days of program activity. If a client does not respond to the outreach efforts and does not report on the fourth day the client must be terminated from the program. Clients who report at any time on the fourth day should not be terminated.

The CAO and contractor members of the DST can decide jointly to terminate an underperforming client from the program even if attendance does not warrant it under the three-day absence rule. Alternatively, if it is determined by the CAO that a client who missed three or more consecutive scheduled days or fell short of their required hours would benefit from remaining in the program, and there is a plan of action with the client for them to be re-engaged immediately, the client may be retained in the program. The plan of action should include using make-up time and/or CAO considerations to remain within a reasonable level of compliance with their EDP. This should be noted in the contractor's case narrative and the decision documented by the CAO. In no circumstance should the contractor make the decision to retain the client without approval from the CAO and contact with the client.

When a client moves out of their county of residence, the SNAP EARN provider must terminate the project.

Banning Participants

The following is intended to be guidance to assist providers in determining when a participant should be banned. It is recognized that each situation may be unique and might require additional steps or discussion before a decision to ban a participant can be reached. The decision to ban a participant should be a last resort after all attempts to remediate the situation have taken place.

The safety and well-being of all participants and program staff are paramount. Any behavior that jeopardizes this safety will be subject to immediate action.

Disruptive or criminal behavior includes but is not limited to physical violence, verbal abuse (making threats), harassment (stalking), theft, vandalism, , possession of weapons, or any act that creates an unsafe environment for others.

Individuals engaging in serious offenses, such as physical violence or possession of weapons, will be immediately banned from the employment program without warning.

For less serious offenses, such as repeated instances of verbal abuse, harassment, or minor theft, a progressive disciplinary action approach will be followed:

- First Offense: Verbal warning and counseling session outlining the consequences of continued behavior.
- Second Offense: Written warning, mandatory participation in behavior modification workshops, and probationary period.
- Third Offense: Temporary suspension from the program pending further review with BEP approval.
- Fourth Offense: Permanent ban from the program with BEP approval.

Remote participation should be given as an alternative option to promote the safety and well-being of program staff and participants while also allowing the participant to benefit from employment and training services.

Participants should be made aware of any site rules regarding acceptable behavioral standards upon enrollment. The participant should be included in all levels of any progressive discipline and be given due process prior to taking any action to terminate or ban.

Participants and staff are encouraged to report any incidents of disruptive or criminal behavior promptly to program administrators. Reports will be handled with confidentiality and investigated thoroughly.

Regular training sessions and workshops will be conducted to educate participants and staff on acceptable behavior standards, conflict resolution techniques, and the importance of maintaining a safe and respectful environment.

Program administrators must elevate any instance of banning a participant to BEP prior to making decisions regarding the banning of individuals from the employment program. The provider will submit any incident reports, case notes or documentation to BEP for review. BEP will review and provide a decision within 7 business days. BEP will review and evaluate the request always with the primary concern of ensuring the safety and well-being of all involved parties.

Note: Decisions to ban a participant from the program must be elevated and approved by BEP prior to termination.

Project Termination Codes

Termination Type	Code	Clarifications
Part-time Employment. Client obtains employment for 20 to 29 hours per week as validated by CWDS reports.	1	The termination date may date back to the final day worked which completes 90-day retention period.
Full-time Employment. Client obtains employment for 30 hours or more per week as validated by CWDS reports.	8	
Transfer to Educational program. Successful transfer to SNAP KEYS or SNAP JETS programming.	X	Provider must facilitate the referral/transfer to the educational program prior to termination from the SNAP EARN program.
Withdraws or Terminates Without Good Cause. Client withdraws from the program without good cause or fails to comply with the contractor's absence policies. This includes clients who are terminated from the program for missing three consecutive scheduled days of activity and who do not report on the fourth day. It also includes participants who have been placed but terminated without meeting retention requirements.	3	Good cause is determined by the CAO after the client is terminated. Use code 3 unless the CAO determines at the time of termination that good cause will be granted, at which time code 7 is appropriate.
Completion of planned EDP activities with no employment. Client has successfully completed the SNAP EARN Program and is transferred back to the CAO to be referred to another appropriate E&T program.	5	
Other. Client's reason for termination does not fit other termination codes listed here.	7	

SECTION 7 – PERFORMANCE REQUIREMENTS & STANDARDS

Performance Outcomes

Certain performance outcomes will be used to assess the effectiveness of the service provider. Performance outcomes for SNAP EARN PY 2025-2026 are outlined in the charts below. If the service provider does not meet the threshold/goal for any of the categories listed, a corrective action plan must be submitted.

Outcome	SNAP Outcome Description	SNAP Goal	Measurement
Secondary Equivalent and Credentialing	A participant must receive a diploma or certification that will provide the participant with an industry-recognized certificate or certification (as defined in Section III(H)(a - c)) and marketable skill directly related to their employment goals listed in their EDP and IEP.	50% of all enrolled participants in an approved credentialing activity that results in the achievement of a credential	Number of credential activities closed where credential earned during program year / number of credential activities closed during the program year.
Successful Referral to Educational Programming	Grantee shall coordinate educational referral to SNAP KEYS or SNAP JETS program where appropriate; providing supports to ensure successful transfer, referral, and enrollment to the receiving program.	90% of those terminated from EARN with Project Termination Code X go onto enroll with SNAP KEYS or SNAP JETS program within 90 days.	Number of individuals who have a referral (regardless of outcome) to SNAP JETS or SNAP KEYS within 90 days following Project Termination X in program year /number of individuals with project term code X in program year.

Employment with hourly wage (\$2 hour above minimum wage)	Grantee shall place participants in unsubsidized employment for an average of 20 hours a week in a four consecutive week period and is paid at least two dollars above the higher of the federal or state minimum wage as of July 1 of the program year.	50% of all employed participants	Number of cases where individual employed with hourly wage during program year / number of cases with active unsubsidized employment during program year.
Retention 90 days	Participants are still employed 90 days after starting the retention activity.	50% of all enrolled participants	Number of retention activities that achieved 90 days during program year / number of retention activities that could achieve 90 days in program year (i.e., individuals who start retention less than 90 days before program year ends would not be included in the denominator as they could not achieve the performance benchmark in the program year)

Reporting Measures

Grantee will be expected to report on the following measures monthly:

Outcome	SNAP Outcome Description	Measurement
Employment	Grantee shall place participants in unsubsidized employment for an average of 20 hours per week in a consecutive four-week period	Actual hours of attendance entered for unsubsidized employment in a four-week period.
Employment related to High Priority Occupations (HPO)	Grantee shall place participants in unsubsidized employment for an average of 20 hours per week in a consecutive four-week period and the employment is related to an HPO	O*NET or SOC code in placement report in CWDS unsubsidized employment activity in a case is determined to be a DLI HPO for program county after, or in unison with, Employment measures being fulfilled as described above.
Employment related to IEP and Goals	Grantee shall place participants in unsubsidized employment for an average of 20 hours per week in a consecutive four-week period and the employment is related to a marketable skill directly related to their employment goals listed in their EDP and IEP.	Goal or Skill in IEP/EDP has a SOC/O*NET code that matches the SOC/O*NET code of an unsubsidized employment achieved during the case/enrollment that has also met the "Employment" reporting measure.
Employment related to education and training	Grantee shall place participants in unsubsidized employment for an average of 20 hours per week in a consecutive four-week period and the employment is aligned with their completed credentialing, certification, or vocational education studies.	SOC/O*NET code for unsubsidized employment that meets "Employment" performance measure matches CIP code associated to previously completed credential/training activity on case. CWDS will match the CIP code to the SOC/O*NET code based on the 2020 CIP/SOC Crosswalk .

Retention IEP Services	Grantee shall continue to update the participant's IEP throughout the retention period until the individual is terminated from the E&T program; no later than 90 days after starting the retention activity	IEP has at least one component updated, as indicated by date in CWDS, between start of retention activity and end of retention activity.
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Service Delivery Standards

Outcome	SNAP Outcome Description	SNAP Goal	Measurement
Assessment and IEP	Grantee shall complete a comprehensive needs assessment as well as complete and document a detailed IEP within 14 business days of a participant's enrollment.	90% of all enrolled participants for whom an assessment and IEP is required.	Count of individuals who have assessment activity complete, with IEP showing updated or new barrier and goal, with assessment activity end & participant signature date occurring less than or equal to 14 business days from the case begin date divided by all newly enrolled individuals in program year.
Referrals to External Support Services	Grantee shall complete a referral to a community-based organization to help assist the individual, family, or both within 14 business days of discovering the need	90% of all enrolled participants for whom a need has been identified.	Count of new IEP Barriers that have referral made to an outside agency within 14 business days of IEP Barrier being opened divided by all IEP Barriers with a referral made to an outside agency. (Only IEP Barriers with an associated referral will be evaluated.)

Social Service Professional	Grantee shall have a network of professionals as required by Section III. D so that eligible participants have a one-on-one meeting within 28 business days following the date of enrollment.	80% of all enrolled participants for whom a meeting is required will have an introductory one-on-one meeting with the social service professional within 28 business days following the completion of the assessment.	LC/SW services that are opened 14 or fewer business days after case begin date where the service was closed as Meeting Complete, divided by all LC/SW services that are opened 28 or fewer business days following the date of enrollment.
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Monitoring

DHS will monitor SNAP EARN service providers at least annually but may conduct more frequent monitoring at its discretion. Monitoring will include a review of data systems, case record reviews as well as site visits to review program compliance. DHS will also conduct training and information sessions, along with technical assistance with the service providers.

SNAP EARN service providers that do not meet minimum outcomes and expectations will be asked to submit a corrective action plan addressing the deficiencies within 14 business days of notification of the deficiencies. Regular progress reports on actions to correct the deficiencies will also be required.

SNAP EARN service providers that have multiple areas of deficiencies or those who do not show progress as a result of the corrective action plans are required to participate in meetings to plan and review progress.

See [SNAP EARN Validation](#) for detailed information on performance validation.

Program Implementation Plan

At the beginning of each program year, every provider will be required to submit a Program Implementation Plan ([PIP](#)) to BEP. This plan will be used by the providers to explain how they intend to operate and design programming that aligns with the requirements outlined in the Statement of Work. The PIP must be submitted to BEP within 45 days of the program year start.

The PIP will be used in conjunction with the monthly reports to evaluate program effectiveness and may be referenced throughout the year as part of program monitoring, technical assistance and overall program performance.

SECTION 8 – PROGRAM OVERSIGHT

Americans with Disabilities Act of 1990 (ADA)

The ADA prohibits discrimination and ensures equal opportunity for persons with disabilities in employment, State and local government services, public accommodations, commercial facilities, and transportation. It also mandates the establishment of TDD/telephone relay services. All contractors must comply with the ADA. Civil rights and non-discrimination training can be accessed on the Provider Website: [BEP Training Resources](#).

USDA Non-Discrimination Statement

SNAP EARN service providers are bound by Title VI of the Civil Rights Act (42 U.S.C. § 2000d), in addition to USDA civil rights regulations and policies, the USDA Nondiscrimination Statement found below explains the legal non-discrimination obligations of SNAP EARN. SNAP EARN service providers are required to prominently post “And Justice for All” posters, to be provided by BEP. Civil rights and non-discrimination training can be accessed on the Provider Website: [BEP Training Resources \(sharepoint.com\)](#).

“In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discrimination based on race, color, national origin, sex, religious creed, disability, age, political beliefs, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotape, American Sign Language, etc.), should contact the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, (AD-3027) found online at http://www.ascr.usda.gov/complaint_filing_cust.html and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

- (1) mail: US Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410;
- (2) fax: (202) 690-7442; or
- (3) email: program.intake@usda.gov.

This institution is an equal opportunity provider.”

Limited English Proficiency (LEP)

Each SNAP EARN provider must have a written LEP policy that includes a plan to serve LEP populations, compliance with Title VI Requirements, acceptable use of volunteer interpreters, and the description and level of training staff has obtained yearly. The SNAP EARN provider will provide yearly LEP training and will maintain documentation of the staff receiving yearly LEP training. LEP training can be found on the Provider website: [LEP Training](#)

The SNAP EARN provider will provide LEP participants with information in their native language either through translation or interpretation. The SNAP EARN provider will notify participants of the availability of oral and written language services at no cost to the participant.

Confidentiality

All clients must be assured that the personal data they provide will be confidential. The SNAP EARN service provider will keep client information obtained from the client or other sources confidential. It will only be released upon the participant's written approval, obtained on DHS approved [Authorization for Release of Information Forms](#), and only for the purpose specified by the participant.

The Health Insurance Portability and Accountability Act (HIPAA), the privacy regulations at 45 CFR §§ 160-504 and 164.530 indicate that all personal health information should be retained for a period of seven years. All SNAP EARN information should be kept for a period of six years, after which the information should be shredded.

Data sharing with any third party must adhere to DHS' data sharing agreement and approved by DHS prior to implementation.

All program staff must receive annual training to ensure full understanding of safeguarding policies. Safeguarding Information training can be found here: [Safeguarding Participant Information](#). The EARN provider will provide yearly safeguarding information training to staff and maintain documentation of all staff trained.

All trainings must be completed within the program year 07/01-06/30.

Disposition of Equipment

Grantees must request approval for disposal instructions from the state office for all inventories. Equipment may be disposed of with no obligation to the federal program, if all of the following criteria are met: (2 CFR §200.313(e))

1. Equipment is no longer needed in the current program;
2. Equipment is not needed in other programs or previously funded by a federal agency;
3. Equipment is an item that has a current per-unit fair market value of less than \$5,000.

Grantee may purchase or lease equipment with federal funds if:

1. It is reasonable and necessary to operate its federal program effectively;
2. Existing equipment will not be sufficient; and
3. The costs are reasonable.

Client Incentives/Reimbursements

Currently there is no funding available for client incentives/reimbursements in the SNAP EARN program. This policy may change at a later date.

All promotional program materials created to share externally must be submitted and approved by BEP prior to implementing use. Promotional materials include brochures, pamphlets, surveys, flyers and posters. DHS has the sole discretion on determining allowable program materials that can be shared with the CAO and participants.

Supportive Services

SNAP EARN service providers will not issue special allowances to clients. Clients may continue to be eligible for CAO-issued special allowances. The SNAP EARN provider may assist clients in completing and submitting the SPAL Request Form ([PA 1883](#)), along with any supporting documentation, to the CAO. This form and documentation may be submitted by secure email or fax or via CWDS. (If submitting through CWDS, a SPAL Verification form must still be submitted separately to the CAO).

The CAO will consider multiple factors when determining eligibility for a SPAL, including, but not limited to, those listed below.

The item or service must:

1. Be required for participation in work or an approved activity;
2. Be the least costly and most practical item or service that will meet the need;
3. Not available from another source or at no cost to the client; and
4. Not already owned by or previously paid for by participant

Additionally, SPALs should not be used to replace other resources that are available to the participant through another state or federal government entitlement.

Exception: Certain federal financial aid issued under Title IV of the Higher Education Act of 1965 such as Pell Grants, federal Secondary Opportunity Education grants, federal work study, and federal student loans may not be taken into account when determining eligibility for a SPAL.

If the CAO finds the client eligible for the SPAL, the client is to provide a receipt showing that the SPAL was used for the intended purpose within 14 days. Failure to document how the SPAL was used within the 14-day time frame, or documentation showing the SPAL was used inappropriately, may result in an overpayment for the client.

See [SPAL Request Form \(PA 1883\)](#) for the SPAL Request Form and [SPAL Desk Guide](#) used by the CAOs.

Direct Service Team (DST) Meetings

DST Meetings provide an opportunity for CAOs and case managers from contracted employment and training programs to meet, at least monthly, to problem solve for individual clients and reconcile records.

The DST must consist of at least a representative from the CAO and a program operator from the SNAP EARN provider. DHS has made a commitment to reforming E&T programming to better suit the varied needs, challenges, and situations that our participants represent. As such, one initiative is to foster better communication between all area contracted E&T providers and the CAO.

Contracted E&T providers should establish a meeting time and location to engage the CAO via DST meetings no less than once a month; in-person meetings are preferred but telephone meetings are also permissible.

Contracted E&T providers will utilize the DST meetings to reconcile records, develop makeup plans, discuss participant issues, and collaborate toward resolutions with meaningful impact.

Local Management Committee (LMC) Meetings

All local E&T program providers are required to attend as this meeting is responsible for the coordination of operations and services provided in the local areas to public assistance recipients.

See [Attachment Q](#) LMC information.

[Contacts](#)

Questions regarding SNAP EARN program policy should be addressed to
RA-BOPEARNPOLICY@PA.GOV.

Questions regarding SNAP EARN program data entry into CWDS should be addressed to the CWDS Help Desk at 1-866-236-6297 or RA-CWDS@PA.GOV.