



POLICIES AND PROCEDURES

SECTION: Operations	POLICY #: LOPSNAP01	PAGE 1 of 13
TITLE: SNAP Local Operating Procedure	EFFECTIVE DATE: November 10, 2025	
SUPERSEDES: LOPSNAP01		DATED: January 1, 2023

DISTRIBUTION:

CareerSource North Central Florida (CSNCFL) Staff

PURPOSE:

Florida’s SNAP E&T is a mandatory program designed to help Able Bodied Adults Without Dependents (ABAWDs) and Mandatory Work Participants (MWP) gain skills, training, and/or work experience that will increase their ability to move directly into employment. ABAWDs are required to meet 80 hours per month work requirements, and Mandatory Work Participants are required to meet 120 hours per month work requirements, in order to maintain eligibility to continue to receive food assistance. CareerSource NCFL will offer Employment and Training (E&T) services to all referred ABAWDs and MWP. Components offered will include supervised job search/job skills training, work experience, education, vocational training, and services offered through the Workforce Innovation and Opportunity Act (WIOA) and Trade Adjustment Assistance (TAA) programs. This procedure outlines CareerSource NCFL’s local operating plan for administering the E&T components to ABAWDs and MWP for participant activity assignments and the process for sanctions and good cause/lifts.

DEFINITIONS:

- **ABAWDs** – Able Bodied Adults Without Dependents, ages 18 through 54 (Fiscal Responsibility Act (FRA) effective June 3, 2023, age expansion) who do not meet a qualifying exemption or exception, as determined by Department of Children and Families (DCF), and who are required to work or participate in the SNAP Employment and Training program for at least 80 hours monthly.

- **Department of Children and Families (DCF)** – DCF administers the State of Florida’s Food Assistance Program.
- **Employ Florida (EF)** – Florida’s labor exchange system.
- **Florida Commerce (FC)** – FC operates the Employment and Training (E&T) program for the Food Assistance Program. E&T participants are engaged in activities delivered by CareerSource NCFL.
- **Mandatory Work Participants (MWP)** – individuals, ages 55 through 59, who do not have dependents, and do not meet an exemption, are required to work or participate in the SNAP Employment and Training program for at least 120 hours monthly.
- **Supplemental Nutrition Assistance Program (SNAP)** – provides food assistance recipients who are engaged in Employment and Training activities with training, education, support services, and skills needed to gain employment and increase the likelihood of self-sufficiency.

LOCAL OPERATING PLAN:

A. Program Access and Participant Engagement

1. **Referral** – DCF screens food assistance recipients and refers eligible individuals to LWDBs via the One-Stop Service Tracking (OSST) system.
 - This referral will trigger the 599 activity code in OSST and when it opens, it is best practice for staff to attempt to contact the participant within seven (7) days to provide guidance on the Work Registration process, scheduling their initial appointment, and connecting the participant to any wraparound services (e.g., housing, mental health, substance abuse recovery, etc.) as needed.
2. **Orientation and Initial Engagement** – Florida Commerce will send ABAWDs and MWPs an Employment and Training Referral (ETR) notification letter with instructions on how to engage in the program. Participation is mandatory.
 - The ETR will instruct ABAWDs and MWPs to complete an online orientation and assessment by logging into the OSST client system.
 - Once completed, the participant will schedule an appointment using the OSST client scheduler to meet with a case manager for their initial engagement appointment. This will close out the 599 activity code and open the 590 activity code.

- All steps must be completed within seven (7) days to avoid OSST beginning the automated conciliation and Good Cause Consideration (GCC) process with DCF to determine if the reason for being non-compliant is related to good cause. If the participant fails to engage with the E&T program by a specific date, DCF will impose sanctions for failure to comply with program requirements. If the participant does not comply, the case will close automatically in the OSST system, and no action will be necessary by CareerSource NCFL staff.
 - At the participant's scheduled appointment, they will be provided with and informed of the Grievance and Complaint form, Equal Employment Opportunity form, the Opportunities and Obligations form, and the CareerSource NCFL dress code policy. These forms must be reviewed, signed, dated, and retained in the participant's case file.
 - After the participant attends the scheduled appointment, staff will enter the appropriate outcome for the appointment status (code 590) within two (2) business days.
3. **Eligibility Verification** – at the scheduled appointment and before assigning the participant to a program component, staff will confirm the participant's information and OSST records to ensure the individual has been properly referred and does not appear to meet an exemption.
- If it is determined that the participant may meet an exemption, staff will instruct the participant to notify DCF of their household changes to allow DCF to determine whether the participant continues to meet the requirements for referral to the SNAP E&T program.

B. Assessment and Employability Planning

1. **Online Assessment** – During the online assessment, participants will answer questions that provide information on their:
- Academic and occupational skills
 - Career goals and interests
 - Personal needs/barriers
 - Employability skills
 - Work history
- Staff will review the assessment information with the participant during the initial engagement appointment. The information will be used throughout the employability planning process and to create the Individual Employment Plan.

- Other assessment tools may be used, in addition to the OSST Initial Assessment, to assist with employability planning/case management, such as Test of Adult Basic Education (TABE), Career Scope, and the CLIFF Dashboard.
2. **Individual Employment Plan (IEP) Development** – All participants must have an IEP developed and maintained in their case file and a summary documented via case notes in OSST. IEP development should use the S.M.A.R.T (Specific, Measurable, Achievable, Relevant, Time-Bound) principles.
- The IEP will identify appropriate SNAP E&T components, support services, and co-enrollment opportunities with WIOA and other workforce programs. IEPs should reflect both short-term and long-term employment and educational goals, informed by labor market information and participant interests.
 - The IEP will be initiated during the initial appointment, signed by both participant and staff, and a copy retained in the participant's file.
 - All contact attempts made to complete or update the IEP must also be documented in case notes.
 - IEPs must be updated at least every 30 days, or when the participant has a reportable change (earned income, unearned income, household members, address, telephone number, etc.), or an activity has been updated.

C. SNAP E&T Components, Employment, and Hours

Career center staff will assign participants to appropriate SNAP E&T components (upon completion of assessment), document components assignments in OSST, and update the IEP accordingly. This will be accomplished at the initial appointment.

A qualifying SNAP E&T component is considered standalone and can count for part or all of the monthly work requirement for ABAWDs and MWPs. Participants may be enrolled in one or more qualified components each month to satisfy the program's mandatory work requirement.

1. **Supervised Job Search** – activities that may include completing applications, submitting resumes, meeting with staff for referrals to employers, contacting employers about job opportunities, attending interviews, going to job fairs, and other activities directly related to securing employment, such as searching for jobs using the internet.
 - Supervised Job Search is a non-qualifying component unless paired with a qualifying activity. This component, when offered as part of other E&T program

components, is acceptable as long as these activities comprise less than half the total required time spent in the components.

- The hours assigned to Supervised Job Search for ABAWDs are limited to 39 hours/monthly, and if combined with Job Search Training, the total combined hours cannot exceed 39 hours/monthly.
- The hours assigned to Supervised Job Search for MWPBs are limited to 59 hours/monthly, and if combined with Job Search Training, the total combined hours cannot exceed 59 hours/month.
- Supervised Job Search assignment should not exceed 12 consecutive months.
- The Supervised Job Search activity component will be conducted independently or within a group setting, and occur in-person at the LWDB computer labs or conducted remotely (while still being supervised), or a combination of both.
- Supervised Job Searches will be recorded on the SNAP E&T – Supervised Job Search Forms. Documentation supporting all hours will be maintained in the participant's file. The hours will be recorded in OSST accordingly.

2. **Job Search Training** – a component that assists participants with development of essential job readiness/employability skills, through workshops or sessions to secure/retain employment. Job Search training may consist of, but is not limited to: workshops, classes, seminars, etc. That cover topics such as employability skills, life skills, interpersonal skills, time management, decision making skills, basic job seeking skills, resume development, interviewing skills, appropriate dress, job retention skills, career planning, etc. Documentation supporting the job skills training hours may consist of certificates of completion, job search training logs, etc. And will be retained in the participant's case file. The hours will be recorded in OSST accordingly.

- Job Search Training is a non-qualifying component unless paired with a qualifying activity. This component, when offered as part of other E&T program components, is acceptable as long as these activities comprise less than half the total required time spent in the components.
 - The hours assigned to Job Search Training for ABAWDs are limited to 39 hours/monthly, and if combined with Supervised Job Search, the total combined hours cannot exceed 39 hours/monthly.

- The hours assigned to Job Search Training for MWP's are limited to 59 hours/monthly, and if combined with Supervised Job Search, the total combined hours cannot exceed 59 hours/month.

3. **Basic Education and Vocational Training** – a non-work component that provides education or training to improve basic skills or otherwise improve the SNAP participant's employability.

- An ABAWD may complete 80 hours monthly in basic education and/or vocational training to meet the mandatory work requirement.
- A MWP may complete 120 hours monthly in basic education and/or vocational training to meet the mandatory work requirement.
- **Education** – offers participants an opportunity to earn postsecondary credentials valued by employers and industry, including certificates and degrees, industry-recognized credentials, and licensures. Education may be provided onsite or through online classes. Allowable Education may include, but are not limited to:
 - Adult Basic Education
 - Remedial education
 - High School completion or General Education Development
 - Post-secondary education
 - English for Speakers of Other Languages
 - Alison.com
- **Training** – helps improve the employability of participants through training in a skill or trade that will allow the participant to move directly into employment. Training is offered at the career center, through community partners, and training providers who are approved by the LWDBs and/or CareerSource Florida. Allowable Training may include, but are not limited to:
 - Vocational Training
 - Workforce Innovation Opportunity Act (WIOA) program
 - Trade Adjustment Assistance (TAA) program
- Participants assigned to education components (basic education/vocational training), may be allowed one hour of study time for each hour of class time completed, as long as documented verification is provided of the actual time spent in the classroom. OSST must be updated with the number of hours completed (including study time) and documentation maintained in the participant's case file.

- Education components (basic education/vocational training) may be combined with the following components:
 - Supervised Job Search
 - Job Search Training
 - Work Experience

- Career center staff will track hours of attendance in an educational and/or training program through acceptable forms of documentation received by the participant, such as:
 - Timesheets signed by any of the following entities: the class instructor, a teacher's assistant (TA), lab instructor/assistant, clinical supervisor
 - Designated party at the school submitting hours on behalf of the institution
 - Progress report from the instructor, TA, or other designated party on behalf of the institution
 - Document verifying hours of participation from an on-line or internet-based institution
 - Alison.com Learner Verification record

- Educational expenses will not be paid for training that is normally available to the public at no cost, will not be in excess of what the general public pays, and will be necessary and reasonable. SNAP E&T funds may be used to cover the cost of education, develop a program component, and pay for costs associated with an education program through a provider on the Eligible Trainer Provider List (ETPL) (such as tuition, books, uniforms, tools, etc.), if available. These costs may be expended after the participant has attempted to secure federal financial aid, such as the Pell Grant, but is not eligible.

- **Co-enrollment in the WIOA Program** – Career center staff will assess all participants for co-enrollment opportunities in WIOA and other workforce programs at the initial appointment. Co-enrollment can fill service or funding gaps (e.g., training, support services), provide access to additional work-based learning (e.g., On-the-Job Training and apprenticeships), and maximize participant outcomes through layered support.

All interested participants will complete a WIOA application. Staff will document co-enrollment decisions in OSST and record participant information on the referral spreadsheet to coordinate services with WIOA case managers.

4. **Work Experience** – a component designed to connect program participants with employers to build employability skills or job-related skills through actual work

experience or training at a worksite. The goal is to help participants move into employment.

- Hours assigned to work experience must not exceed the allowable hours derived from the benefit calculation. To determine the benefit calculation, staff will use the participant's monthly food assistance allotment divided by the current state minimum wage which equals the monthly required hours. If the number of hours determined by the benefit calculation is not enough to satisfy the work requirement for the participant type, additional program components must be assigned.
 - If there is more than one participant within a household, the monthly required hours will be further divided by the number of participants to derive the number of hours that each career seeker will need to complete monthly.
- Work experience may be combined with the following components:
 - Supervised Job Search
 - Job Search Training
 - Education
 - Vocational Training
 - WIOA/TAA activities
- Participants may identify a worksite that aligns with their career path. However, the participant will not be assigned to work experience at the worksite until a Worksite Agreement with the site, as well as job descriptions for each work experience position, has been executed and completed by both parties.
 - Work experience sites can be developed with not-for-profit, for profit, private, and public employers.
 - When a participant is assigned to a worksite, the employer cannot replace regular employees with participants performing work experience. The employer must also provide participants with the same or similar work conditions and assignments as regular employees and is required to supervise work activities and complete time sheets for participants.
- Work experience or training activity at any Worksite should not exceed six (6) consecutive months.
- Career center staff will track hours of attendance at the worksite, maintain documentation of hours utilizing timesheets, and report on participant activities through the OSST case management system.

5. **Employment** – employment, by definition, is not a component of the SNAP E&T program, but it is the desired outcome.

- If the participant is employed part-time in which the number of hours worked or earned income does not close the food assistance benefits, the participant may be assigned to other activities, as appropriate, for a specified number of hours. If an employed participant is assigned to work experience, those hours assigned for work experience shall not exceed the result of the benefit calculation.
 - The total required hours in employment and these components will not exceed 120 hours per month for both ABAWDs and MWP.
 - When an employed participant is referred to the SNAP E&T program or if he or she gains employment while in the program, a completed Verification of Employment form should be obtained from the participant. The employment must be verified through either verification documentation or phone call with the employer notated on the Verification of Employment form and case notes, and the job is recorded in the OSST system.
- **Partial Month Participation** – Participants in partial month participation are required to participate (in any combination) in a minimum of 4 work hours per day, or 20 hours per week and MWP are required to participate in a minimum of 6 work hours per day, or 30 hours per week. In this instance, the ABAWD/MWP will not be required to complete the required monthly participation hours. Participants in partial month participation who complete the partial hours for the given month will be considered compliant.
 - For example, an ABAWD was referred for participation on June 9th with 15 business days remaining in the month. The ABAWD must complete 60 hours (15 days multiplied by 4 hours daily) to be considered compliant; anything less will be considered non-compliance.

D. Support Services and Participant Reimbursements

Individuals participating in SNAP E&T program activities will be eligible to receive Food Stamp Reimbursement (FSR) for transportation costs based on a demonstrated need for the reimbursement. Career center staff will request a FSR if the individual participates in one or more program components, documents such participation, submits documentation of participation and submits information to support the cost related to transportation spent on participation.

- Acceptable forms of documentation (in addition to program components participation) is the Self-Attestation Form. The Self-Attestation form must include:

- Dollar amount spent on transportation to participate in program components
 - The month the reimbursement was earned
 - The qualifying component
 - Participant's signature, case manager's signature, and the date
- An earned month is the calendar month in which the activity hours were completed and documented.
 - The reimbursement requests are entered directly into the OSST system by way of the FSR Requests Screen. Participants receive FSRs on their EBT card.

E. Provider Determination

In some cases, despite their best efforts to remain in the program, a participant may be ill-suited for a particular Education and Training component.

- Based on the case manager's assessment of the participant's fit with the work component and after documented efforts to explore all available alternative program components, staff may record the participant as not suited for the program work requirements.
- All assessments of fit and documented efforts to identify an alternative work component must be maintained as part of case management prior to this determination and must contain documented supervisor approval.
- All documentations of the provider determination will be sent by following the procedures put in place by Florida Commerce for consideration of program exemption.

F. Case Management and Compliance

1. **Ongoing Case Management** – Career center staff will maintain regular contact with SNAP E&T participants to monitor progress and address ongoing barriers.
 - All SNAP participants will meet with staff at least twice a month at scheduled appointments to submit documentation of activities completed, and review and/or update their IEP accordingly.
 - Staff must enter Job Participation Hours for all activities, support services, participant reimbursements, supporting documentation, outcomes, and applicable documentation in OSST as soon as possible but no later than by the 10th business day following the end of the month.

2. **Documentation and Compliance** – Staff must document case management activities, participation hours, support services, participant reimbursements, support documentation, and outcomes in OSST and the participant’s case file in a timely and accurate manner.
- All documentation of activities, all data entry, and case notes entered in OSST and Employ Florida should occur within two (2) days of provision, to be considered timely.
 - Case files must include verification of participation (i.e., timesheets, attendance records, check stubs, etc.), documentation supporting participant reimbursements, support service referrals, and any correspondence related to the participant’s progress or challenges.
 - Documentation may be submitted to staff either in-person or virtually (i.e., email, fax, or uploaded to the Atlas system, etc.).
3. **Participant Noncompliance and Good Cause Consideration** – Participants who fail or refuse to comply with program requirements are subject to a conciliation and possible sanction.
- Career center staff will record the participant’s non-compliance in the OSST system as a SNAP E&T Conciliation on the day of the noncompliance, but no later than two business days following the noncompliance.
 - DOC will notify DCF who will subsequently send a Good Cause Consideration, with compliance language, to the participant. The DCF GCC letter will communicate the number of days an individual has to comply before the sanction is imposed. If good cause can be determined before the end of the non-compliance period, the sanction will not be imposed.
 - An ABAWD/MWP’s engagement in E&T activities may resume prior to a good cause determination being finalized. Participants must comply with the program requirements, or show good cause with DCF before the effective date of the sanction, otherwise, DCF will impose the appropriate sanction level in the following manner:
 - 1st Penalty – Loss of Food Assistance for one month or until compliance, whichever is longer
 - 2nd Penalty – Loss of Food Assistance for three months or until compliance, whichever is longer

- 3rd Penalty – Loss of Food Assistance for six months or until compliance, whichever is longer
- **SNAP Sanction Lift Prior to Effective Date** – if a conciliation occurs and a sanction is placed on the case, the participant may request a sanction lift at any time prior to the sanction effective date.
 - The participant will contact staff via phone or visiting the CareerSource center to request the sanction lift.
 - If the participant has not yet completed the Work registration process, Staff will enter the 594 activity code on the Skill Development screen in OSST. This will reopen the OSST portal and enable the participant to complete the on-line work registration. The participant must complete all steps and schedule their mandatory appointment.
 - If the sanction was due to a missed appointment, the participant must contact staff to reschedule and attend their compliance appointment. The IEP must be completed with assigned activities at this appointment, signed, dated, and a copy retained in the case file.
 - If the sanction was due to the participant failing to provide staff with assigned activities, the participant can request an extension but will need to submit the required assignment prior to the sanction effective date. The assignment must be completed during the month that it was assigned to meet the required 80 hours.
- **SNAP Sanction Lift During Effective Date** – If a sanction has been imposed on the case and the participant requests a sanction lift after the effective date, the participant must serve the penalty period.
 - The participant may contact DCF for Good Cause Consideration.
- **SNAP Sanction Lift After Effective Date** – If it is after the sanction effective date and the participant has served their penalty period, the participant may request a sanction lift.
 - The participant will contact Career staff or visit the Career center to request a Sanction Lift Form and follow the steps on the form. They will turn in all documents and form to staff for processing.
 - Staff will have 72 hours to process the Sanction Lift and the participant may reapply for their benefits.

OFFICIAL SIGNATURE

A handwritten signature in blue ink, appearing to read "Phyllis Marty". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Phyllis Marty
Chief Executive Officer