



## POLICIES AND PROCEDURES

<b>SECTION:</b> Operations	<b>POLICY #:</b> LOPSNAP01	<b>PAGE</b> 1 of 9
<b>TITLE:</b> SNAP Local Operating Procedure	<b>EFFECTIVE DATE:</b> April 1, 2025	
<b>SUPERSEDES:</b> LOPSNAP01		<b>DATED:</b> January 1, 2023

**Distribution:** CareerSource North Central Florida (CSNCFL) Staff

### **Purpose:**

Florida's SNAP E&T is a mandatory program designed to help ABAWDS 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 in order to maintain eligibility to receive food assistance. CareerSource NCFL will offer Employment and Training (E&T) services to all referred Able Bodied Adults Without Dependents (ABAWDS). Components offered will include job search 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 for participant activity assignments and the process for sanctions and good cause/lifts.

### **Definitions:**

**ABAWDs** -- Able Bodied Adults Without Dependents, ages 18--49, (Fiscal Responsibility Act (FRA) effective June 3, 2023, age expansion 18 – 59) who do not meet a qualifying exemption or exception, as determined by Department of Children and Families (DCF), and who are required to participate in the Supplemental Nutrition Assistance Program (SNAP) E&T program.

**Department of Children and Families (DCF)** – DCF administers the State of Florida's Food Assistance Program (FAP).

**Florida Commerce (FC)** – FC operates the Employment and Training (E&T) program for the Food Assistance Program. E&T program participants are engaged in activities delivered by CareerSource NCFL.

**Employ Florida (EF)** – Florida’s labor exchange system.

**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.

**Exemption Categories for ABAWDs:**

- Homeless Individuals – Those experiencing homelessness are exempt
- Veterans – All veterans, regardless of discharge conditions, are exempt, including reserve component service
- Former Foster Youth – Individuals aged 24 or younger who were in foster care on their 18<sup>th</sup> birthday or later are now exempt.

**Local Operating Plan:**

1. Florida Commerce (FC) will send ABAWDs, ages 18-49, (effective June 3, 2023 – age expansion to 18 – 59), an Employment and Training referral with instructions on how to engage in the program as a condition for receiving SNAP benefits. To comply, each ABAWD will complete an online orientation and assessment by logging into the OSST system participant site. The assessment will identify the participant’s strengths and skills to assist in the development of employment goals. Once completed, the participant must schedule an appointment using the OSST client system.
2. If the SNAP participant does not respond to the Employment and Training referral within seven calendar days, the OSST system will automatically send DCF a noncompliance record. DCF will inform participants through a Good Cause Notice (GCN). The GCN will contain information on how the participant can comply. 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.
3. Once the participant completes the online orientation and assessment, the participant will schedule an appointment using the OSST client scheduler. At this appointment, the participant will be provided with a grievance and complaint / Equal Employment Opportunity form. The CareerSource NCFL dress code policy will also be reviewed with and provided to the participant, as will the Opportunities and Obligations form. These forms must be signed, dated, and retained in the participant’s case file.

The online assessment will be reviewed with the participant to determine the most appropriate activity or activities to engage the participant. Participants will meet work requirements by:

- Working\* 20 hours per week

- Participating in and complying with the requirements of a work program 20 hours per week
- Performing any combination of work and participation in a work program for a total of 20 hours per week
- Participating in Supervised Job Search/Job Skills Training activity

For purposes of this provision, 20 hours a week averaged monthly means 80 hours a month.

Employment by definition is not a component of the SNAP E&T program, but it is the desired outcome. When an employed participant is referred to the SNAP E&T Program or if he or she gains employment while in the program, the job is recorded in the One--Stop Service Tracking (OSST) system. If the individual is employed only part--time, an assessment is completed to identify the reason for part--time employment. Employed participants are assigned to activities, as appropriate, for a specified number of hours. If an employed participant is assigned to work experience or self--initiated work experience, those hours assigned for work experience or self--initiated 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.

4. All SNAP E&T participants will be assisted by a CareerSource NCFL Career Navigator who will provide appropriate workforce services and engage the participant in one or more of the mandatory program components. This will be accomplished at the initial meeting. Each of the four SNAP program components are described below:

**Supervised Job Search/Job Skills Training** is a work component consisting of:

- Supervised Job Search (not to exceed 39 hours per month or less than half of the 80-hour requirement) after)
- Job Search Training (not to exceed 30 days after initial referral)

Job searches activities 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. Job searches will be recorded on a job search report form. Documentation supporting all hours will be maintained in the participant's file.

Job search training helps improve a participant's ability to seek, obtain, and/or retain employment. Activities may include 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.

**Work Experience** is a work 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.

Work experience (WE) may count as a stand-alone component or may be combined with other program components in the described combination:

- WE combined with supervised job search (SJS must comprise less than half of the required WE hours for the month)
- WE combined with job search training (JST must comprise less than half of the required WE hours for the month)
- WE combined with education
- WE combined with training
- WE combined with WIOA/TAA activities

Work experience sites are developed by CareerSource NCFL through worksite agreements with employers and community-based organizations. Job description(s) will also be provided to CareerSource NCFL that outlines the skills required to fill the position(s). Worksite agreements and job descriptions will be secured by CareerSource NCFL prior to individuals beginning their work experience activities.

In lieu of wages, work experience participants receive compensation in the form of their household's monthly food assistance allotment. The calculation used to determine the required hours of participation is the household's SNAP allotment, divided by the state minimum wage. The result is further divided by the number of SNAP participants in the household. Hours assigned to work experience will not exceed the allowable hours as derived from the benefit calculation.

**Self-Initiated Work Experience (SIWE)** is a work component comparable to regular work experience. It is 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.

In self-initiated work experience, the participant initiates the work experience. However, CareerSource NCFL will secure all fully executed worksite agreements and job descriptions prior to the participant becoming engaged in the activity at the worksite. Like regular work experience, the SIWE activity may count as a stand alone component or may be combined with other program components in the described combination:

- SIWE combined with supervised job search (SJS must comprise less than half of the required WE hours for the month)
- SIWE combined with job search training (JST must comprise less than half of the required WE hours for the month)
- SIWE combined with education
- SIWE combined with training
- SIWE combined with WIOA/TAA activities

In lieu of wages, SIWE participants receive compensation in the form of their household's monthly food assistance allotment. The calculation used to determine the required hours of participation is the household's SNAP allotment, divided by the state minimum wage. The result is further divided by the number of SNAP participants in the household. Hours assigned to SIWE will not exceed the allowable hours as derived from the benefit calculation.

CareerSource NCFL 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.

**Education and Training** is a non--work component that provides education or training to improve basic skills or otherwise improve the SNAP participant's employability. Allowable education and training program may include, but are not limited to:

Education:

- Adult Basic Education
- Remedial education
- High school completion or General Education Development
- Post--secondary education
- Education combined with job search
- Education combined with job search training
- English for Speakers of Other Languages
- Alison – learner verification record to verify total study hours

Training:

- Vocational training
- Training combined with supervised job search
- Training combined with job search training
- Workforce Innovation Opportunity Act (WIOA) Program
- Trade Adjustment Assistance (TAA) Program

ABAWDs must participate a total of 80 hours a month in order to meet ABAWD requirements. If an

employed participant is assigned to education/training, the total hours assigned in this component plus those in employment must be a minimum of 80 hours per month and shall not exceed 120 hours per month.

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.

CareerSource NCFL 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
- Progress report from an on--line or Internet--based institution
- Alison Learner Verification Record

CareerSource NCFL staff will enter the activity and hours of participation in the OSST case management system accordingly.

**Conciliation** -- CareerSource NCFL staff will obtain and maintain verification of component participation, as well as employment verification, to ensure the participant is engaged in the appropriate number of hours in SNAP E&T components. Participants will be required to turn in verification of completed hours to the career navigator monthly. SNAP participants will come to the career centers to bring their documents on a specified date and time. After receipt of verification of time completed, the Career Navigator will update the JPR screen in the OSST system.

Participants who fail or refuse to comply with program requirements are subject to sanctioning. CareerSource NCFL will record participant's non--compliance in the OSST system. DOC will notify DCF who will subsequently send a Good Cause Conciliation, with compliance language, to the individual. 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. However, once a sanction is imposed, the individual will need to contact DCF for good cause consideration.

Good cause is defined as circumstances beyond an ABAWDs control that prevents participation in assigned SNAP activities. An ABAWD's engagement in E&T activities may resume prior to a good cause determination being finalized. Engagement in E&T activities during this review process does not impact the final result of a good cause determination. The participant will be encouraged to contact DCF for the status of good cause reviews and determinations. Participants have to comply or show good cause before the effective date of the sanction. If they do this, DCF will not impose the sanction. If no good cause can be determined, DCF will impose the appropriate sanction on ABAWDs for noncompliance in the following manner:

- First non--compliance will result in a loss of benefits for one month
- Second non--compliance will result in a loss of benefits for three months
- Third non--compliance will result in a loss of benefits for six months

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. CareerSource NCFL staff will request a Food Stamp Reimbursement (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) include:

#### Self--Attestation Form

Self-attestation forms are allowable and 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.

#### SNAP Sanctions – Food Assistance Penalties

- 1<sup>st</sup> Penalty – Loss of Food Assistance for one month or until compliance, whichever is longer
- 2<sup>nd</sup> Penalty – Loss of Food Assistance for three months or until compliance, whichever is longer
- 3<sup>rd</sup> Penalty – Loss of Food Assistance for six months or until compliance, whichever is longer

### SNAP Sanction Lift prior to sanction imposition –

Mandatory participants (ABAWD) receive an automated referral to work register in OSST. This referral opens a portal in OSST that enables the participants to complete the required work registration process. ABAWD participants have seven days to complete or the portal in OSST closes and a conciliation is auto-generated. If this occurs, ABAWD participants can request to have their benefits reinstated with a sanction lift at any time prior to the sanction imposition date by completing the following:

1. Contact the SNAP Program Career Navigator via email, by calling (352) 955-2245 or by visiting any of the CareerSource Centers to request the sanction lift.
2. Career Navigator will go to the Skill Development Screen in OSST and enter 594 activity code that will enable the participant to complete on-line work registration.
3. Once the ABAWD participant completes the on-line work registration, the Career Navigator request a sanction lift in OSST and enters the compliance date that the on-line work registration is completed, but prior to the sanction imposition date.
4. During work registration, the ABAWD participant is scheduled for a mandatory first appointment with CareerSource staff through the OSST scheduling calendar.
5. If the ABAWD participant fails to attend the first mandatory appointment, the Career Navigator reconciles the appointment in OSST with the selection of “no show”. This action generates a conciliation that is sent to the participant.
6. The ABAWD participant has an opportunity to comply with the pending sanction prior to the imposition date by contacting the SNAP Program as recorded in step one, request a rescheduled appointment and to attend the rescheduled appointment prior to the sanction imposition date.
7. If the ABAWD participant attends the rescheduled appointment, the Career Navigator requests a sanction lift with “complied” and assigns the participant activities for participation.
8. During the next meeting, if the ABAWD participant fails to provide staff with assigned activities, the participant can request an extension but will need to submit the required assignment prior to the sanction imposition date. The assignment must be completed during the month that it was assigned to meet the required 80 hours.
9. Once the assignment of 80 hours is received, the Career Navigator will request a sanction lift with “complied” prior to the sanction imposition date.

### SNAP sanction imposed -

If a SNAP sanction is actually imposed, the ABAWD participant must contact the SNAP Program Career Navigator via email, by calling (352) 955-2245 or by visiting any of the CareerSource Centers to request a SNAP sanction lift.

The following instructions are provided to the ABAWD participant for a sanction lift:

1. Participant logs in or Registers at the Employ Florida website: [www.wmployflorida.com](http://www.wmployflorida.com)  
Participant completes or updates resume, which must include at least name, contact information, 2-3 most recent employers and duties performed at each job, and highest level of education. Participant will print a copy to submit to Career navigator.



2. Participant will apply to at least one job on the Employ Florida website. Participant will print proof of application to submit to Career Navigator.
3. The Career Navigator will request a sanction lift in OSST with “complied” after the sanction is served.
4. The Career Navigator will record a case note in OSST to document the sanction lift and the case is closed in OSST.
5. The participant is instructed to reapply for benefits on their Access account following the completion of the sanction lift process.

OFFICIAL SIGNATURE

A handwritten signature in blue ink, appearing to read "Phyllis Marty", with a stylized, cursive script.

Phyllis Marty  
Chief Executive Officer