

March 28, 2023

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES

EXECUTIVE SUMMARY

ALL COUNTY LETTER NO. 23-34

The purpose of this All County Letter is to inform the County Welfare Departments responsible for the administration of the CalFresh Employment and Training program of the United States Department of Agriculture, Food and Nutrition Service requirement to screen and refer CalFresh applicants and recipients to the program.



KIM JOHNSON
DIRECTOR

CALIFORNIA HEALTH & HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES
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GAVIN NEWSOM
GOVERNOR

March 28, 2023

ALL COUNTY LETTER NO. 23-34

TO: ALL COUNTY WELFARE DIRECTORS
ALL COUNTY CALFRESH SPECIALISTS
ALL QUALITY CONTROL COORDINATORS
ALL CALFRESH EMPLOYMENT AND TRAINING
REPRESENTATIVES
ALL CONSORTIA REPRESENTATIVES

SUBJECT: CALFRESH EMPLOYMENT AND TRAINING SCREENING AND
REFERRAL REQUIREMENT

REFERENCE: [TITLE 7 CODE OF FEDERAL REGULATIONS \(CFR\) 273.7\(c\)\(2\)](#);
[7 CFR 271.2](#); [7 CFR 273.7\(d\)\(1\)\(ii\)\(A\)](#); [7 CFR 273.7\(e\)\(5\)](#);
[SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM](#)
[EMPLOYMENT AND TRAINING SCREENING AND REFERRAL](#)
[GUIDANCE](#); [COUNTY FISCAL LETTER NO. 21/22-88 EXPENSE](#)
[CLAIM TIME STUDY AND CLAIMING INSTRUCTIONS](#); [ALL](#)
[COUNTY LETTER \(ACL\) NO. 22-74](#); [ACL NO. 20-125](#)

The purpose of this All County Letter is to inform the County Welfare Departments (CWDs) responsible for the administration of the CalFresh Employment and Training (E&T) program of the United States Department of Agriculture, Food and Nutrition Service (FNS) requirement to screen and refer CalFresh applicants and recipients to the program. The screening and referral requirement outlined in this letter is effective immediately upon release of this letter.

BACKGROUND

Screening and referral of CalFresh applicants and recipients for the CalFresh E&T program have been the CWD's responsibility since regulatory language was added to [Title 7 Code of Federal Regulations \(CFR\) 273.7\(c\)\(2\)](#) in December 1986. [7 CFR 273.7\(c\)\(2\)](#) was amended to accommodate changes to Supplemental Nutrition

Assistance Program (SNAP) policy made in the Agricultural Improvement Act of 2018 Public Law (P.L. 115-334) in January 2021.

The FNS released additional guidance regarding the screening and referral process via the Policy Memo titled "[Supplemental Nutrition Assistance Program \(SNAP\) Employment and Training \(E&T\) Screening and Referral Guidance](#)" on July 13, 2022.

CALFRESH EMPLOYMENT & TRAINING SCREENING

Screening for CalFresh E&T is defined in [7 CFR 271.2](#) as "an evaluation by the eligibility worker as to whether a person should or should not be referred for participation in an employment and training program." In accordance with [7 CFR 273.7\(c\)\(2\)](#), the CWD is responsible for screening each work registrant to determine whether it is appropriate, based on the CWD's criteria, to refer the individual to the CalFresh E&T program.

Appropriately screening individuals before referral to CalFresh E&T supports access to program benefits and ensures participants are referred to programs that support the individual's employment and training goals.

CERTIFICATION

As part of the certification process for CalFresh benefits, the CWD eligibility worker is responsible for the screening and referral of individuals to the CalFresh E&T program. The certification process is considered complete when an individual is referred to the CalFresh E&T program for assessment or participation.

During the certification process the CWD must complete the following:

- Provide the individual with the written consolidated notice and the comprehensive oral explanation of the CalFresh work rules as described in [ACL No. 22-74](#), released on September 2, 2022;
- Screen and refer the individual to the CalFresh E&T program, if offered;
- Explain the next steps for accessing the CalFresh E&T program; and
- Inform the individual that they are entitled to reimbursements, also known as supportive services, that are reasonable, necessary and directly related to the provision of CalFresh E&T as described in [ACL No. 20-125](#), released on November 17, 2020.

Employment and Training Funds

CalFresh E&T funds cannot be used for the process of determining whether an individual must be work registered, the work registration process, or any further screening performed during the certification process, including referral to E&T, in accordance with [7 CFR 273.7\(d\)\(1\)\(ii\)\(A\)](#). Additional guidance on claiming allowable costs to CalFresh E&T is located in [County Fiscal Letter No. 21/22-88](#), released on April 5, 2022.

CALFRESH EMPLOYMENT & TRAINING REFERRAL

State Criteria for Referral

The California Department of Social Services (CDSS) criteria for referral to the CalFresh E&T program is inclusive of all CalFresh applicants and recipients who are interested in services. The CDSS criteria for referral to the CalFresh E&T program includes but is not limited to work registrants and non-work registrants; individuals with or without recent work history; individuals proficient in English; English-language learners; interest in programs offered; access to technology, if program related; and participant reimbursement needs.

In accordance with [7 CFR 273.7\(e\)\(5\)](#), the CWDs in California may only administer E&T programs to individuals who elect to participate. The CWD cannot disqualify voluntary participants in the CalFresh E&T program for failure to follow E&T requirements. CalFresh benefits cannot be sanctioned or negatively affected due to non-participation in the E&T program.

County Criteria for Referral

The CWDs have the flexibility and responsibility to develop CWD criteria to determine who will be referred to the CalFresh E&T program. The CDSS encourages the CWDs to consider the following when developing criteria for E&T referral:

- Availability of participant reimbursements;
- Criteria for participation in the activities offered;
- Availability of services where participants live; and
- Participant needs and preferences.

MODELS FOR SCREENING AND REFERRAL TO CALFRESH EMPLOYMENT & TRAINING

Referral is the process by which the CWD informs individuals that they are CalFresh E&T program participants and provides information on how to access CalFresh E&T services. Eligibility staff may refer individuals to the CalFresh E&T program using direct and reverse referral methods.

Direct Referral

The CWD eligibility worker is responsible for the referral of CalFresh applicants and/or recipients to the CalFresh E&T program after screening for work registration and criteria for participation. The referral takes place during the certification process, at either application or recertification. As part of the referral process, the eligibility worker must provide information about the next steps for accessing the CalFresh E&T program. The CWD eligibility worker must be familiar with services offered by the CalFresh E&T program to ensure appropriateness of the referral.

Reverse Referral or Referral Request

If an individual was not screened and referred to the CalFresh E&T program by the CWD during the certification process, but later learns about a CalFresh E&T provider program on their own, the individual or E&T provider may ask the CWD to complete a screening and referral to the CalFresh E&T program. The CWD should process the reverse referral promptly to keep the individual's interest in the E&T program. A reverse referral is also known as a referral request.

The CWD remains responsible for the certification of CalFresh benefits, screening for work registration, Able-Bodied Adults Without Dependents exemptions, and determining whether it is appropriate to refer the individual to the CalFresh E&T program, as required by [7 CFR 273.7\(c\)\(2\)](#).

The CWD may implement the following reverse referral options:

- The CWD may dedicate eligibility workers in a specialized unit to promptly screen and refer individuals for whom they receive a referral request and establish a Management Information System, such as a secure data portal that efficiently exchanges information with the provider.
- The CWD eligibility worker may screen and determine appropriateness of referral during certification or recertification and document the outcome in the individual's

case file. Upon receiving a referral request, the eligibility worker can quickly decide whether the individual should be referred and make the actual referral.

Allowable Reverse Referral Processes

The following are allowable methods of reverse referral to the CalFresh E&T program:

1. Individual not in receipt of CalFresh benefits: The CalFresh E&T provider can refer the individual to the CWD to apply for CalFresh benefits. As part of the certification process, the individual will be screened and referred to the CalFresh E&T program, if appropriate.
2. Individual is in receipt of CalFresh benefits: The CalFresh E&T provider may request a referral from the CWD to provide services to the individual. The CWD must screen the individual for appropriateness for CalFresh E&T and document prior to referral to a provider.
3. An individual may request screening and referral to the CalFresh E&T program by contacting the CWD.

If you have any questions or need more guidance regarding the information in this letter, contact the CalFresh E&T Section at CalFreshEandT@dss.ca.gov.

Sincerely,

Original Document Signed By

JULIANNA VIGNALATS
Acting Deputy Director
Family Engagement and Empowerment Division

Attachment



Food and
Nutrition
Service

1320 Braddock Place
Alexandria, VA
22314

DATE: July 13, 2022

SUBJECT: Supplemental Nutrition Assistance Program (SNAP) Employment and Training (E&T) Screening and Referral Guidance

TO: All SNAP State Agencies
All Regions

State agencies are required to screen SNAP participants to determine if it is appropriate, using Federally mandated exemptions and State-specific criteria, to refer those individuals to the State Employment and Training (E&T) Program. Appropriately screening participants before referral to E&T supports access to SNAP benefits, ensures E&T participants are referred to E&T programs where they are most likely to be successful, and can promote more efficient management of State administrative resources. The Food and Nutrition Service provides the attached guidance to State agencies to answer State questions on screening and referral, improve compliance with the regulations, and provide a more accountable E&T program to participants served.

Please contact your respective Regional Office representatives with any questions.

Sincerely,

Rachel Gragg
Acting Director
Office of Employment and Training

Enclosure

Enclosure

Issuing Agency/Office:	FNS/SNAP
Title of Document:	SNAP Employment and Training Screening and Referral Guidance
Document ID:	[leave blank]
Z-RIN:	[leave blank]
Date of Issuance:	July 13, 2022
Replaces:	N/A
Summary:	Guidance document to answer State questions and improve State compliance with the SNAP requirement to screen and refer E&T participants.

Screening and Referral Guidance

A. Definitions and Purpose

1. What is screening?

Screening for referral to E&T is defined at 7 CFR 271.2 as “an evaluation by the eligibility worker as to whether a person should or should not be referred for participation in an employment and training program. This activity would not be considered an approvable E&T component.” The regulations at 7 CFR 273.7(c)(2), require that the State agency screen all work registrants to determine whether it is appropriate, based on the State agency’s criteria, to refer the individual to an E&T program.

At its most basic level, screening for referral to E&T is the process State agencies use to determine whether work registrants are required to participate in E&T as a condition of eligibility or if they meet the State agency’s criteria for exemption. In addition, because State agencies may operate E&T programs in which individuals elect to participate (voluntary E&T), screening is the process State agencies use to determine whether individuals who volunteer to participate in E&T meet the State agency’s criteria for referral. State agencies must have a process for screening individuals for referral to E&T.

See Appendix A for a flow chart depicting the screening and referral process.

2. What is referral?

The regulations at 7 CFR 273.7(c)(2), require that after the eligibility worker determines that an individual meets State specific criteria to be referred to E&T, the State agency must refer that individual to E&T. Essentially, referral to E&T is the process State agencies use to inform individuals that they are E&T participants and to provide them with information on how to access E&T. As part of the referral process, the State agency must explain the next steps for accessing E&T. State agencies must have a process for referring individuals to E&T. See Appendix A for a flow chart depicting how referral to E&T connects with the next steps for an E&T participant.

3. Why is screening and referral for E&T so important?

Screening and referral for E&T is important for many reasons. First, effective screening and referral processes support access to SNAP benefits. State agencies that require individuals to participate in E&T as a condition of eligibility (mandatory E&T) have a particular responsibility for implementing screening processes that properly identify individuals who meet an exemption, and for only referring individuals to E&T if appropriate. It is important that State agencies not put individuals at risk of losing SNAP benefits by requiring them to perform actions that they are not equipped to do or referring them to a program that does not have an appropriate and available opening. FNS strongly encourages States to use their discretionary authority to create and apply a State exemption for circumstances when there is not an appropriate and available E&T opening. If the State does not exempt the individual and there is not an appropriate and available opening in an E&T program, the State must determine the participant has good cause for failure to comply with the mandatory E&T requirement, per 7 CFR 273.7(c)(2).

Second, screening and referral processes support access to and success in SNAP E&T. Well-targeted screening and referral processes set SNAP recipients up for success by ensuring they meet the basic criteria for participation in E&T, receive appropriate E&T services and supports, and know how to access E&T services. As such, SNAP recipients who are appropriately screened and referred to E&T are more likely to successfully engage with E&T, and less likely to get discouraged or fail to comply resulting in disqualification.

Finally, efficient screening and referral processes reduce the overall administrative burden on eligibility workers, E&T participants, and E&T providers. These processes reduce the need for back-end administrative actions associated with determining good cause, rescreening due to provider determinations, imposing disqualifications, administering fair hearings, etc.

4. Is screening and referral for E&T a new requirement?

No. Screening and referral for E&T have been State agency responsibilities since December 31, 1986, when regulatory language was added to 7 CFR 273.7(c)(2) as part of the *FSP; Employment and Training Requirements* Final Rule (47 FR 47378). That final rulemaking

also added the definition of screening at 7 CFR 271.2. In January 2021, the *Employment and Training Opportunities in SNAP* Final Rule made adjustments to 7 CFR 273.7(c)(2) to accommodate other changes in SNAP policy that were implemented through that rulemaking (e.g. the expansion of the definition of E&T to include case management, the addition of the consolidated written notice and oral explanation of work requirements, and the introduction of a new form of good cause when there is not an appropriate and available opening in E&T), but did not change the requirement for the State agency to screen individuals using State-specific criteria to determine if it is appropriate to refer that individual to E&T. This guidance underscores the foundational importance of screening and referral and will help clarify expectations, create consistency, and strengthen the SNAP E&T program.

5. Why is FNS emphasizing the importance of screening and referral to E&T at this time?

While it has long been the State agency's responsibility to screen and refer SNAP recipients to E&T, FNS is emphasizing screening and referral for many reasons.

First, FNS' intent is and always has been ensuring access to SNAP for eligible individuals. For State agencies that operate mandatory E&T programs, it is incumbent on these State agencies to correctly identify individuals through the screening process who must be exempt, and not impose requirements that put individuals' and families' access to SNAP at risk through no fault of their own.

Second, FNS' focus on screening and referral is part of a national shift in how to think about SNAP E&T in response to the 2018 Farm Bill. Through the bi-partisan Farm Bill, Congress called on FNS and State agencies to be more accountable for SNAP E&T programs and participants, and included several provisions that emphasized the importance of matching participants to appropriate activities and supporting them as they engage with E&T. The first step in doing so is the screening and referral process, which is the gateway to accessing E&T services. The final rule, *Employment and Training Opportunities in SNAP* (86 FR 358), published on January 5, 2021, built on these expectations by including provisions that strengthened the relationship between certification functions, such as screening and referral, and E&T service delivery. The rule included provisions that require State agencies to provide a consolidated oral and written explanation of work requirements as part of the certification and recertification process, and when a household member loses their exemption or there is a new household member. State agencies must grant good cause if there is not an appropriate and available slot in E&T and rescreen individuals who receive a provider determination.

Finally, due to the unprecedented operational challenges State agencies face as a result of the public health emergency, FNS is encouraging State agencies to implement effective front-end processes for screening and referral to E&T as a way to reduce the need to perform administrative functions on the back-end that result from referring individuals to E&T who are not a good fit or cannot access the E&T services to which they are referred (e.g. rescreening after a provider determination or determining good cause because there was not an appropriate and available opening).

B. Conducting the Screening and Referral

6. Who can conduct screenings and referrals?

Screening and referral for E&T are part of the certification process to determine eligibility for SNAP and thus must be performed by eligibility workers. The certification process is considered finished once an individual is referred to E&T. Screening and referral are not part of the E&T program and, therefore, State agencies must not use SNAP E&T grants to pay for these functions.

Work registrants are required to participate in E&T unless they are exempted by the State agency. Therefore, as part of the certification process to determine eligibility, eligibility workers must screen work registrants to determine if they meet a State exemption from E&T and impose the work requirement only if appropriate. Participation in mandatory E&T is an eligibility requirement and only eligibility workers can make this determination. See Appendix A for a flow chart depicting the division between certification and E&T functions.

In some cases, State agencies may rely on non-merit personnel to collect information from participants and ensure application or recertification materials are complete. In these situations, it is still the responsibility of the eligibility worker (i.e. merit staff) to conduct the screening and make the determination about referral to E&T.

7. Who is an eligibility worker?

“Eligibility worker” refers to the State merit pay personnel who make eligibility determinations for SNAP benefits (including determining exemptions from the work requirements, including E&T, and screening and referring individuals to E&T) as specified in section 11(e)(6) of the Food and Nutrition Act of 2008. These workers are generally distinct from State E&T staff, who may perform a more robust assessment after an individual is referred to E&T to determine suitability for specific E&T activities and otherwise coordinate activities within the E&T program. While the same State agency personnel may perform both certification functions and E&T functions, their time must be properly cost allocated across SNAP administrative funds and SNAP E&T funds.

8. Is the process of determining if an individual is a work registrant the same as screening to determine if it is appropriate to refer an individual to E&T?

No. Determining if an individual is a work registrant is a distinct process from screening for appropriateness for E&T. State agencies determine if an individual is a work registrant by exploring whether an individual meets an exemption from the general work requirements. Exemptions from the general work requirements are set forth in the Food and Nutrition Act (FNA). Work registrants are mandatory E&T participants, unless exempted from E&T according to State-specific criteria. The FNA and SNAP regulations give State agencies

discretion to exempt work registrants from mandatory participation in E&T and allow them to serve individuals who elect to participate (work registrants and non-work registrants). Therefore, once the State agency has determined an individual is a work registrant, it must then further determine if the individual meets a State exemption from mandatory E&T. Additionally, if a State agency serves volunteers, it must screen individuals against State criteria to determine if it is appropriate to refer them to E&T. Thus, while screening for appropriateness for E&T builds on the work registration determination, it is its own unique process.

9. Are State agencies that operate all-voluntary E&T programs required to have screening and referral processes?

Yes. Many State agencies exempt all work registrants from mandatory E&T and only serve individuals who elect to participate – also known as an all-voluntary E&T program. State agencies that operate all-voluntary E&T programs are still responsible for screening individuals for exemptions from mandatory E&T and against any other State criteria to determine whether it is appropriate to refer them to E&T. At the very minimum, FNS encourages State agencies to determine if an individual wants to volunteer for E&T before referring them and ensuring that all volunteers meet the basic criteria for participation in the E&T activities offered by the State. While the consequences for mandatory participants who are referred to E&T programs that are not appropriate for their abilities and needs are higher than for voluntary participants, State agencies are still accountable for the participation and outcomes for voluntary participants.

10. How does screening for referral to E&T differ between mandatory and voluntary programs?

The process for screening individuals for mandatory versus voluntary participation in E&T is essentially the same; the difference lies in that all work registrants are mandatory E&T participants unless exempted by the State agency, and State agencies may also serve individuals who elect to participate (work registrants and non-work registrants). Therefore, screening for referral to E&T is the process by which the State agency determines who is exempt from mandatory participation in E&T, who is required to participate, and who may volunteer to participate. Many State agencies exempt all work registrants from the requirement to participate in E&T and only serve individuals who elect to participate. State agencies must still screen against State criteria to determine if it is appropriate to refer to E&T an individual who volunteers to participate.

11. Is screening for referral to E&T the same thing as an assessment?

No. As defined in 7 CFR 271.2, screening for referral to E&T is the process whereby an eligibility worker determines if someone should be referred to E&T. An assessment is a much more comprehensive review of a participant's skills, knowledge, work experience, and potential barriers to success that takes place after an individual is referred to E&T. The

regulations at 7 CFR 271.2 define assessment as “an in-depth evaluation of employability skills coupled with counseling on how and where to search for employment. If combined with work experience, employment search or training, an assessment of this nature could constitute part of an approvable employment and training component.”

Eligibility workers are expected to screen individuals to determine if it is appropriate to refer them to E&T, but they are not required to perform comprehensive assessments. FNS encourages State agencies to conduct comprehensive assessments after referral, including as a part of E&T case management. These assessments could be performed by a State agency E&T staff member or an E&T provider. Information from the assessment can help determine the most appropriate E&T activities, case management services, and further target resources to help support successful E&T participation.

C. Developing a State Agency Process to Screen for Referral to E&T

12. What should the State agency consider when developing State-specific criteria to screen individuals for referral to E&T?

State agencies have flexibility to develop their own State-specific criteria to determine who will be referred to E&T. FNS encourages States to consider the following:

- **Who should be exempt from mandatory participation in E&T?** State agencies must exempt all individuals who fall into the categories listed in 7 CFR 273.7(b)(1). In addition, State agencies have flexibility to exempt other individuals, categories of individuals, or all individuals from participation in mandatory E&T. Many State agencies exempt all work registrants from the requirement to participate in E&T and only serve individuals who elect to participate. For example, if a State agency exempts individuals in certain age groups, parents with children between the ages of 6 and 12, or individuals experiencing chronic homelessness, their screening criteria could include questions pertaining to age, age of dependents, and access to stable housing. State agencies may also allow eligibility workers’ discretion to provide exemptions based on individuals’ unique circumstances.
- **What and how much will the State agency reimburse individuals for expenses associated with participation in E&T?** State agencies must determine what expenses they will reimburse and may a set cap on the amount. State agencies must exempt individuals whose expenses to participate in the E&T program exceed the amount the State agency is able to reimburse. If a State chooses to limit the participant reimbursements it offers (e.g. only transportation assistance) or caps the value of participant reimbursements (e.g. no more than \$25 per month), the State must still screen to determine if an E&T participant has costs that exceed what the State chooses to offer. For example, if a State agency can only provide a \$25 bus pass per month, the screening criteria could include an exploration of the participant’s

access to bus transportation and estimated monthly expenses. In this example, if an individual has participation costs other than transportation, if they don't have access to the bus, or if their transportation costs exceed \$25 per month, the State agency must exempt them from mandatory E&T.

- **What are the participation criteria of the E&T activities offered by the State agency?** It is important that individuals referred to E&T meet the basic participation criteria of one or more E&T activities offered by the State agency. FNS encourages State agencies to engage with their E&T providers to gather information about their program requirements. Most likely, E&T providers have already identified the basic criteria individuals must meet to participate in their programs, and these can serve as the basis for State-specific criteria. For example, if the E&T providers only serve individuals who meet certain literacy levels or who have a recent work history, the State agency's criteria could include literacy level and work history. It is best if the State agency's screening criteria crosswalk to the participation requirements of the E&T activities offered by the State's E&T providers. This is especially important in States that operate mandatory E&T programs.
- **Where are E&T activities available?** State agencies may provide E&T services statewide or only in certain counties, cities, or other areas. Therefore, if setting a statewide policy, State agencies must factor in the availability of E&T services where participants live. E&T activities may not be available in all geographic areas. Even with the increase of more virtual training options, there may be areas of the State that are not served by virtual providers. For example, if a State agency offers E&T services in all but four rural counties, the State agency's screening criteria could include zip codes or names of counties.
- **What are the lived experiences, needs, interests, education, and employment backgrounds of the potential E&T participant?** Ensuring equity in E&T programs includes understanding that there is no one E&T activity that is appropriate for all SNAP recipients as SNAP recipients have varied lived experiences, needs, interests, education, and employment backgrounds. SNAP recipients are likely to be more successful at obtaining skills and jobs if they are placed in E&T activities that align with their abilities, needs, and interests. Therefore, State agencies are encouraged to develop criteria that take an equity lens by considering individuals' needs and preferences. For example, if the State agency only offers workfare, but the individual wants to complete coursework for an industry-recognized credential for an in-demand occupation, rather than refer the individual to workfare, the State agency could encourage the individual to complete the credentialing program or refer the individual to workforce development programs other than SNAP E&T that offer this credentialing opportunity.

13. What are some examples of State-specific criteria?

The following are two examples of State-specific criteria for two different hypothetical E&T programs.

- A State agency operates a voluntary E&T program that offers supervised job search, basic education, and a career and technical education program. The State has determined through conversations with the E&T providers that the State activities and services can accommodate individuals with particular learning needs (e.g. the basic education component can accommodate individuals with low literacy, English as a second language, or minimal work history) The State-specific criteria could be but are not limited to work-registrants and non-work registrants, recent work history, individuals proficient in English and English-language learners, individual interest in programs offered, access to technology (if programs are virtual), and participant reimbursement needs.
- A State operates a mandatory E&T program that only offers supervised job search. The E&T providers have told the State agency that their supervised job search program would not be appropriate for individuals without a recent work history or who are not proficient with computers. The State-specific criteria could be but are not limited to work registrants with a recent attachment to work, ability to use computers, individual interest in the program offered, access to technology (if programs are virtual), and participant reimbursement needs.

14. Can you share an example of how a State agency might operationalize the screening and referral process?

State agencies must have a process to screen and refer individuals to E&T. While eligibility workers are not expected to do a complete assessment as part of the screening, they must use the State-specific criteria to determine if it is appropriate to refer individuals to E&T. The following are examples of how an eligibility worker can operationalize a screening process:

- Provide an overview of the State E&T program, including a brief summary of the types of training available. For instance, the eligibility worker could explain:
 - The State agency offers an E&T program that provides training free of cost to SNAP participants, and
 - The training opportunities available locally fall into three major areas: help looking for a job, basic education classes to improve reading and writing or to get a GED, and training for specific types of jobs in health care, building construction, and restaurants.

- Ask the individual if any of these training opportunities interest them.
- Ask the individual any questions pertinent to the State's screening criteria or pull that information from the participant's case file. For instance, has the individual been recently employed, is the individual an English language learner, does the individual have a high school degree, and where does the individual live?
- Inform the individual that the State agency will reimburse them for all their expenses related to participating in E&T, including transportation, child care, and any other expenses the State currently covers. In the case of a mandatory E&T participant, explain that the State agency must exempt the individual from mandatory E&T if the State agency cannot cover their actual costs of participation.
- Ask the individual if they have any expenses related to participating in E&T.
- In a State or area of the State that is implementing the time-limit for able-bodied adults without dependents (ABAWDs), explain that E&T can help ABAWDs maintain eligibility.
- In a State that serves volunteers, ask the individual if they would like to participate and be referred to E&T, and inform them that they cannot be disqualified for failure to comply.
- Once the eligibility worker determines it is appropriate to refer the individual to E&T, inform them of the next steps for accessing E&T, and if the individual is a work registrant, an ABAWD, and/or mandatory E&T participant provide them with an oral and written explanation of their work requirements.

Note that in the examples above, the eligibility worker did not ask deeply probing questions (i.e. can you read or write at an 8th Grade level), but allowed the participant to explain what their training interests are and any needs they may have. Using the information provided by the participant and information available in the case file, the eligibility worker can determine if the individual meets the State-specific criteria and if it is appropriate to refer the individual to E&T. If the individual does not meet the State-specific criteria to be referred, the individual must not be referred to E&T.

15. Why must the State agency ask about participant expenses during screening?

When a State agency refers an individual to E&T the State agency is required to reimburse them (or provide in advance) for actual expenses they incur that are reasonably necessary and directly related to participation in E&T (7 CFR 273.7(d)(4)). The State agency is required to

reimburse both mandatory and voluntary E&T participants. State agencies must inform individuals during screening they are entitled to participant reimbursements and inform them that they must be exempt from mandatory E&T if the State agency is unable to cover their actual expenses. A State agency must ask participants about expenses during screening to determine if they must be exempt from mandatory E&T. This is important for two reasons:

- Mandatory E&T participants could be disqualified for failing to comply due to no fault of their own, for example, if they lack the funds to pay for the cost to participate. Voluntary participants also need to know if the State agency will be able to cover their costs to make an informed decision about participating.
- Individuals may be more likely to engage in E&T after referral if they know their expenses will be covered.

16. How may the State agency provide participant reimbursements?

The State agency may provide the funds in advance (e.g. a bus pass), or explain the process for the individual to seek reimbursement after the expense is incurred. In many cases, it is the E&T provider that pays the participants. In this situation, it is the State agency's responsibility to ensure that the providers are implementing the requirements in compliance with Federal regulations. FNS encourages States that choose to reimburse participation costs to consider whether it is reasonable to require SNAP participants to cover such costs (e.g. child care) up front or if it makes more sense for the State agency to provide the funds in advance.

17. What additional information does the eligibility worker have to provide during referral?

Once an individual is referred to E&T, the eligibility worker must inform the participant of the next steps to access the E&T program. If the participant is referred to a mandatory E&T program, this can be incorporated into the consolidated written notice and oral explanation of work requirements.

18. What are some models of screening and referral for E&T in a State agency?

There are several models for screening and referral, and FNS encourages State agencies to work with FNS to find a model that will work in their State.

Direct Referral: The most straightforward process is a direct referral. Eligibility workers conduct the screening and referral during the certification process (i.e. when processing a SNAP application or recertification), and provide information about the next steps for accessing E&T (e.g. an orientation, case management services, or an E&T activity). As a reminder, as part of the certification process, State agencies must screen work registrants to

determine if it is appropriate to refer them to E&T and to refer them to E&T if appropriate.

Referral Request (also known as “reverse referral”): If an individual has not been screened and referred during the certification process – for example, a non-work registrant – but subsequently finds an E&T provider on their own, the E&T provider may ask the State agency to screen and refer the individual to that specific program. However, if the screening and referral process is delayed, the potential E&T participant may lose interest in E&T. This disadvantage can be overcome through the following approaches:

- The State agency can dedicate eligibility workers in a specialized unit to promptly screen and refer individuals for whom they receive a referral request and establish a Management Information Systems (MIS) that efficiently exchanges information with the provider.
- Eligibility workers can screen and determine appropriateness of referral during certification or recertification but hold off on making the actual referral until the State agency receives a referral request from an E&T provider. In this instance, the eligibility worker upon receiving the referral request can quickly ascertain, using the earlier pre-referral decision, if this individual should be referred, and make the actual referral. The individual is not an E&T participant until they have been screened and referred by an eligibility worker.

D. Interactions with Other SNAP Processes

19. How does the screening and referral process interact with the requirement to provide good cause if there is not an appropriate and available opening in E&T?

State agencies operating mandatory E&T programs are required to provide good cause to E&T participants if there is not an appropriate and available opening in E&T. Screening for referral to E&T is the State agency’s first step to ensuring it is appropriate for an individual to be referred to the E&T program. If a State agency is aware that there is not an appropriate and available slot before referral, States agencies are discouraged from referring individuals to E&T. Rather, State agencies should consider exempting such individuals.

After referral, as soon as a State agency knows there is not an appropriate and available slot, it must provide good cause until one is available.

FNS encourages States to implement a process to monitor the availability of slots, so that the State agency can exempt individuals from mandatory E&T if there is not an appropriate or available opening before referring an individual to an E&T program that will not meet their needs. In the event a State agency refers an individual to mandatory E&T and the individual fails to comply because there was not an appropriate and available opening, the State agency must determine the participant has good cause. FNS discourages State agencies from putting

the responsibility on participants to first attempt to access the program to determine if there is an appropriate and available slot for them. Rather the responsibility should be on the State agency to monitor for appropriate and available slots. If there is not an appropriate and available slot, the State agency must either 1) exempt an individual before referring them to E&T or, 2) refer them to E&T but provide good cause for failure to comply until an appropriate slot is available.

20. Is screening and referral to E&T the same thing as the provider determination process?

No. Screening for referral to E&T is a certification process to determine if it is appropriate to refer an individual to E&T. The provider determination process is initiated after an individual has already been referred to an E&T provider and the E&T provider determines that the individual is not a good fit for the E&T component. The State agency must then determine the next step for the individual among the four options at 7 CFR 273.7(c)(18)(i)(B). One of these options is to refer the individual to a new E&T component which involves re-screening the individual to determine if it is appropriate to re-refer them considering the suitability of the individual for any available E&T components. Alternatively, the State agency can re-assess the individual's mental and physical fitness, refer the individual to a workforce partnership, or coordinate with other Federal, State, or local workforce or assistance programs to identify work opportunities or assistance for the individual. For more information on provider determinations, see this [March 26, 2021 memorandum](#) and this [July 15, 2021 memorandum](#).

21. How does screening and referral interact with the requirement to provide a consolidated written notice and oral explanation of the applicable household work requirements?

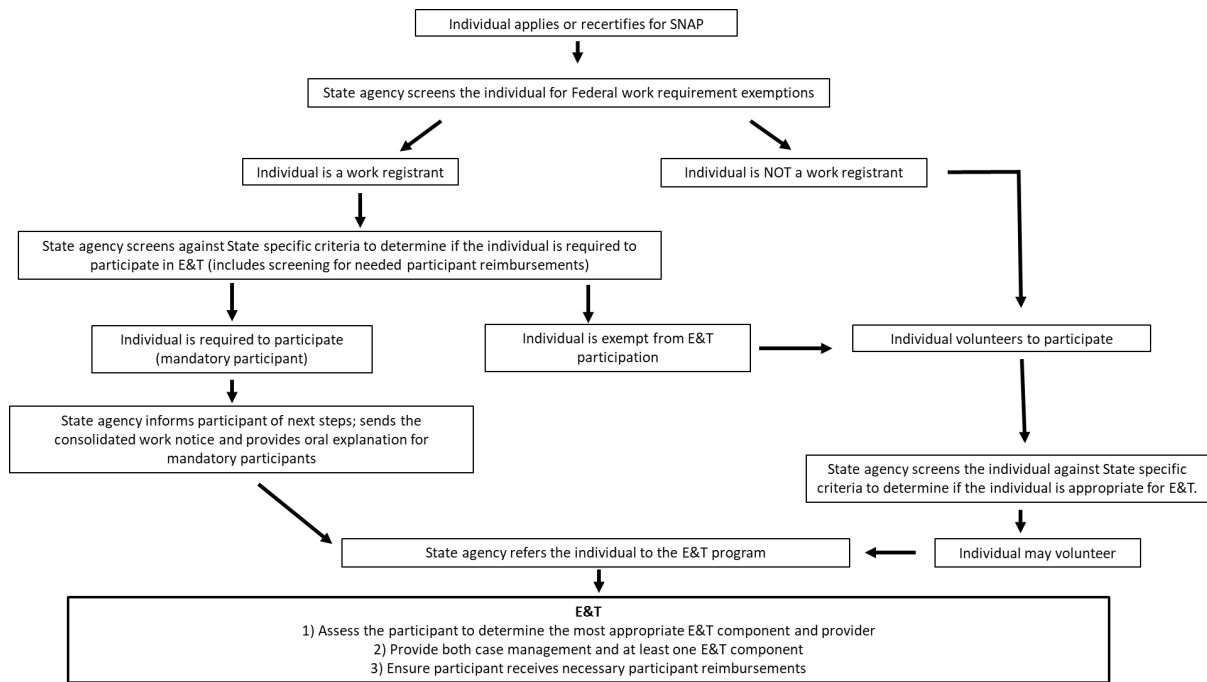
The State agency must provide the consolidated written notice and oral explanation as part of the certification and recertification process to any household where at least one member is subject to a work requirement, or when a household member loses an exemption, or a new member joins the household. Any household in which an individual is screened and referred to mandatory E&T must receive the consolidated written notice and oral explanation of work requirements that includes a description of the mandatory E&T requirement, as well as any other applicable work requirements in accordance with 7 CFR 273.7(c)(1). State agencies are required to provide the oral and written explanation of work requirements to individuals who volunteer to participate in E&T if they are subject to other work requirements.

22. Can a State agency conduct screening and referral for E&T as part of E&T case management?

No. In accordance with 7 CFR 271.2, screening and referral to E&T are certification functions to determine who is appropriate to refer to E&T. An individual is not an E&T participant unless they have been screened and referred to E&T. Case management that is

part of the E&T program can only be provided to E&T participants. As a result, E&T case management services must be delivered separately from the screening and referral process. See Appendix A for a flow chart depicting the screening and referral process.

Appendix A: Screening and Referral Flow Chart for E&T*



**Note E&T functions are depicted in bolded E&T box (the last box). All other depicted actions are certification (i.e. eligibility) steps and cannot be charged to E&T.*

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