

SNAP EARN

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



PROGRAM POLICY AND PROCEDURES MANUAL

**COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF HUMAN SERVICES
Office of Income
Maintenance Bureau of
Employment Programs**

PROGRAM YEAR 2026-2027

Contents

SECTION 1 – INTRODUCTION	5
Program Overview	5
Eligibility Criteria.....	5
SECTION 2 – REFERRALS.....	6
CAO Referrals	6
Reverse Referrals.....	7
Project Referral Rejection Codes.....	8
SECTION 3 - ENROLLMENTS.....	9
Initial Program Enrollment.....	9
Individualized Employment Plan (IEP).....	12
Determining Hours of Participation.....	21
SECTION 4 - EMPLOYMENT AND TRAINING ACTIVITIES.....	22
E&T Activity Codes, Subproject Codes and Descriptions	22
Pathway To Success.....	23
Remote Activities and Service Provision	25
Supervision.....	25
E&T Activity Codes and Definitions	26
Subproject Codes.....	33
Credentialing and Training Services.....	35
Credentialing	35
Other Vocational Activities (not credentialed)	36
Activity Closing Codes.....	39
SECTION 5 – TRACKING PROGRAM PARTICIPATION & RECORD KEEPING	39
Tracking Participation	39
Community Service.....	40
Absences.....	41
Excused Absence Time and Holiday Hours	41
Make-Up Time	42
Banking Hours.....	42
Employment Documentation	42
Retention.....	43

Earned Income Verification.....	43
Retention Services	44
CWDS Access/Termination.....	44
Data Entry Requirements.....	44
SNAP EARN Case Record Requirements.....	46
Internal Data Reconciliation	46
SECTION 6 – TERMINATIONS.....	47
Project Termination.....	47
Banning Participants	48
Project Termination Codes.....	50
SNAP Provider Determinations.....	51
SECTION 7 - PERFORMANCE REQUIREMENTS & STANDARDS	53
Performance Outcomes	53
Assessment and IEP	53
Personal Service Navigator.....	53
Case Management	53
Monthly Case File Reviews.....	54
Secondary Equivalent and Credentialing	54
Successful Referral to Educational Programming.....	54
Employment Path.....	54
Employment with hourly wage of \$2 an hour above minimum wage	55
Retention (90 days).....	55
SNAP Reporting Measures	56
Monitoring.....	56
Continuous Improvement	56
SNAP EARN Validation.....	57
Validation Process	57
Required Documentation.....	58
Measurement.....	60
Technical Assistance	61
Program Implementation Plan.....	61
SECTION 8 - PROGRAM OVERSIGHT	62

Staffing	62
Training	62
Americans with Disabilities Act of 1990 (ADA)	62
USDA Non-Discrimination Statement	62
Limited English Proficiency (LEP).....	63
Confidentiality.....	63
Disposition of Equipment.....	64
SNAP E&T Outcome Reporting	68
Participant Incentives/Reimbursements	68
Promotional Program Materials.....	68
Supportive Services.....	68
Direct Service Team (DST) Meetings.....	69
Local Management Committee (LMC) Meetings	70
Supplemental Services	69
DST	70
LMC.....	70
Contacts	70

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 participants toward family economic stability. The program is based on human-centered design and includes a 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) or via Reverse Referral.

Human-Centered Design is a framework for systems and services that places the needs and problems of those accessing the systems or services at the forefront. It allows for individuals or teams who design the systems and services to use empathy and creativity to understand the individual, their needs, and problems from their perspective to create plans for solutions to meet their goals.

Eligibility Criteria

CAO staff will determine eligibility for the SNAP EARN program and refer participants to SNAP EARN based on CAO policy and procedures. CAO staff, along with the SNAP participant will then complete the Employment Development Plan (EDP) to determine the participant's needs and pathway.

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 the CAO.

PEERs are Pennsylvanians with Employment and/or Engagement Requirements. These non-exempt participants must meet work requirements by participating in an Employment & Training Program for a total of 20 hours per week or 80 hours per month.

Family Works Initiative (FWI) are SNAP participants who are found eligible for a DHS work program and referred to the SNAP EARN Program by the CAO.

FWI must meet these criteria:

Non-Financial Requirements are:

- Pregnant
- Custodial or non-custodial parent of a child under the age of 18

Financial Requirements are:

- Not receiving TANF and
- Under the FPIG of 235% (single or married)

FWI is braided funding (combo of SNAP and TANF funding): These participants are receiving SNAP. Their funding will be both SNAP and TANF funded. These participants are eligible for SPALs. The CAO will determine if the participant meets a PEER or Non-Peer work requirement.

NOTE: The CAO will determine a participant's eligibility and record the required weekly hours on the EDP.

SECTION 2 - REFERRALS

CAO Referrals

SNAP EARN staff will partner closely with local CAOs to ensure successful participant enrollment into services. 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. If the initial contact attempt is unsuccessful, programs must make a minimum of 2 additional attempts to reach the participant. Documentation of contact attempts is required and is to be entered on the participants' CWDS Referral Details screen. Programs are required to develop a plan for referral outreach and share it 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 participant 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 participant may be done via phone or other electronic means. The participant 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 participant at a time and location

that does not interfere with the participant's scheduled work hours.

It is expected that the program will continue to communicate with the CAO before rejecting a referred participant. Local procedures should be established and followed to ensure the best interests of the participants are considered and addressed. The outreach plan, submitted via the PIP, should align with local procedure.

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 participants 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 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 Electronic Client Information System (eCIS)

A recipient does not need to provide a PA 1951 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 SNAP E&T, complete or update the 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 EDP and submitting an electronic referral via eCIS if the activity is approved. A face-to-face

appointment is not required. The 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 (oral or physical) is not received by the CAO within 10 calendar days of the date the EDP 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 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 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. The Reverse Referral Tracking Report is due by the last day of the month and is to be sent to the BEP EARN resource account: RA-BEPEARNPOLICY@pa.gov.

Project Referral Rejection Codes

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

Referral rejection codes will be used to track the reason a participant'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 and the

participant indicates a refusal to enroll)

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 participant in the program the date they report to or agree to participate via phone or other electronic means. Data entry of the participant's enrollment in CWDS must be completed within three working days of the date of enrollment.

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

To enroll a participant (Project Code SD/BD or SN/BN for Philadelphia), the SNAP EARN service provider will enter an enrollment date in CWDS. After enrolling the participant in the program, the SNAP EARN service provider must open Activity Code 92 in addition to at least one other activity code to track participation. Under no circumstances is a participant 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 participant'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
- If the participant was enrolled previously, prior case progress notes should be reviewed
- 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, including:

- The goals and purpose of the program
- The overall approach to reaching these goals includes participation in a joint planning process to identify needs and appropriate activities
- Attendance requirements include hourly requirements, holidays and excused 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)
- SPAL needs to support participation such as transportation, childcare or clothing needs.

The assessment shall be completed within 14 business days after the enrollment date. The assessment should be conducted in a private setting to the fullest extent possible. The socioeconomic and health factors include but are not limited to:

Socioeconomic and health factors:

- Family goals
- Employment and income goals
- Skills and aptitude testing
- Executive function testing
- Health goals
- Unemployment
- Job insecurity
- Work Conditions

- Criminal history preventing employment
- Work skills and experience
- Income and social protection
- Educational (for all family members)
 - Current level completed
 - Current licenses, degrees, or certifications
 - Education needs and aspirations
- Language(s) and literacy (to include English learner level if not the first language)
- Life skills and parenting (family budgeting, banking, and credit rating)
- Basic education or education refresher
- Education assessment(s)
- Digital Literacy
- Housing and utilities, including internet
- Availability
- Safety
- Physical condition of the home
- Does everyone feel safe in the home
- Food insecurity
 - Access to nutritional education and other nutrition
 - Access to Women, Infants and Children (“WIC”)
 - Receiving free or reduced school meals
- Clothing
- Transportation
 - To and from work opportunities
 - To and from educational and training opportunities
 - To and from medical appointments
 - To and from Department appointments
- General physical and mental health
 - Access to affordable health care
 - Access to quality health care
 - Participant expresses interest in resolving a drug or alcohol dependency

The SNAP EARN program will develop the Individualized Employment Plan (IEP) based on the results of the completed assessment. The SNAP EARN program will then determine the next appropriate activity.

Providers must upload the completed full family assessment to the participant case in CWDS. Staff will document the assessment discussion in the case progress notes and record all barriers surmountable or not in the IEP.

Assessments for Returning Participants. Provider will conduct a new assessment to review any changes to the participant's circumstances. Review and update the Individualized Employment Plan (IEP) including but not limited to goals, barriers, and objectives. Staff will address prior enrollments and reasons for return to the program.

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

NOTE: The provider must not ask additional Family Violence (FV) or Domestic Violence (DV) questions remotely. If an individual discloses DV during the course of remote participation EARN staff will verify the individual is at a safe location and is free to discuss without anyone listening.

Individualized Employment Plan (IEP)

The SNAP EARN service provider will use the family assessment as a blueprint to coordinate with the participant to create and execute a service plan called an Individual Employment Plan (IEP) in CWDS. The IEP will be a living document that follows the participant throughout their enrollment. During the participants' enrollment, it is expected that the IEP will be updated, no less than quarterly, as goals, interests, barriers, and objectives are met and/or changed.

In coordination with the participant, the EARN service provider shall develop and use the IEP as the comprehensive plan to:

- Describe goals, objectives, barriers, interests, and planned services for the participant, as determined from the assessment
- Promote strategies to be instituted to facilitate the participants' barriers and achieve goals to gain and maintain family economic security such as:
 - Interventions (including crisis mitigation and barrier remediation);
 - Education;
 - Training and credentialing;
 - Work experience (such as unpaid pre-apprenticeship, unpaid apprenticeship, unpaid entrepreneurship, or other unpaid work experience). Please note, SNAP-funded enrollees are not eligible to participate in these activities.
 - Community service opportunities;
 - Job readiness and skills (such as soft skills and employment tools, basic life skills, barrier remediation, career exploration, assessments, and aptitude testing)
 - Treatments (including substance use disorder treatment, mental health treatment, and other rehabilitative treatments)
- 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

- Have a plan to identify critical needs, crisis situations, and have access to skilled professionals who can address them.
- Facilitate and provide referrals to any social services, religious, or non-profit organization that may additionally be able to assist the individual and family no later than 30 business days after discovering the need; and
- Continue to offer services and support throughout the retention period based on needs until the individual is terminated from the E&T program
- For SNAP Participants: SNAP Job Retention (AC 93) includes activity for 90 days after a new employment is obtained while participating in an E&T activity, regardless of whether SNAP closes.

Document attainment of goals and objectives, including specific outcomes that demonstrate stabilization of the participant's barriers and needs, the time frame(s) for achieving them, the resources available, as well as the services and supports provided. Information collected in the IEP will be used to determine Performance Outcomes and Reporting Measures (see Section V. and Section VI.).

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 participant must agree to the terms of the IEP. While staff and participants are encouraged to sign the document at the time of completion, it is not required. Updated staff and participant signatures are encouraged to be obtained when there is a change or addition to the goal or objective but not required.

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. **Maintain on-going contact with participants.** Ongoing contact is defined as **weekly** contact that can be done via face-to-face meetings, telephone 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:

- Intensive, individualized case management, such as warm hand offs to support and services. Intensive case management is a minimum contact of once per week.
- Coaching
- Peer-to-peer experiences

2. Identify and refer the participant and/or their family to the appropriate local community resource(s) to achieve goals identified in the IEP, such as:

- Housing and Shelter assistance
- 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 (ITAs)
 - Registered pre-apprenticeships
- Legal Assistance
 - Legal services
 - Criminal background inquiries and checks
 - Criminal record expungement
 - Pennsylvania Legal Aid Network
- Life skills, including:
 - Financial literacy
 - Parenting
 - Nutrition
 - Other appropriate information
- Another Employment & Training Provider
 - EARN program in another area
 - KEYS
 - ELECT
 - SNAP JETS

3. Advocate for the participant when connecting to local community resources by providing participants with:

- Maintaining active connection and point of contact for all community partners in CWDS
- Warm handoffs that are expected when assisting participants with applications and possible scheduling when connecting with community-based resources. A case progress note is to be entered.
- Ongoing case management and services while participant engages with the community resource(s)
- 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. **Provide ongoing case management.** SNAP EARN shall provide ongoing support to participants as they work through their IEP. This support may be provided in-person or virtually and can include but is not limited to case management, job development, coaching, and peer-to-peer experiences. Case management services should include a review of participants IEPs, including updating the IEP no less than quarterly when circumstances have changed. Coaching services should include teaching new skills, competencies and knowledge to assist an individual reach goals or objectives as well as barrier resolution. Peer-to-peer experiences should include participant networking through workshops and/or classroom activities that are participant led. For ongoing case management, there is a requirement to have at least one documented contact with the enrollee per week in addition to establishing methods for daily supervision of activities in which enrollees participate. Daily supervision is provided by the employment and training contractor, an accredited educational provider, or an accredited internet-based educational institution. Daily supervision does not mean daily in-person contact. The supervision may be by telephone or electronic contact and ensures that the individual participates and progresses in his/her assigned activities. This daily supervision and required weekly contact to ensure the enrollee is supported and making progress in their established goal plan.

5. **Provide activities and programs that lead to acquiring job-related and job readiness skills** in addition to education and employment activities. 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
- Digital literacy
- Resume writing
- Interview techniques
- Education on regional High Priority Occupations and local job market: [High Priority Occupations](#)

6. **Personal Support Navigators (PSN):** The provider will employ, or have access to, at least one qualified Personal Service Navigator (PSN) which may consist of licensed professional counselors, social workers, therapists, allied health professionals, or a combination of these professionals. Additional PSNs may be necessary dependent upon actual or anticipated enrollment numbers to allow each participant to be referred to and enrolled with the PSN.

The PSN is to review participant assessments, provide services or resources to address identified barriers and act as a social service coordinator between the EARN, participant, and outside resources. The PSN is to coordinate and refer the client to any appropriate ongoing services and supports the work performed by the PSN should be separated from the scope of work being performed by other staff.

7. **Provide or refer participants to formal credentialing programs or training courses,** which may include:

- Industry skill certifications to achieve and demonstrate skills necessary for specific occupations
- Upgrades of a participant'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
- Baccalaureate degree programs including those that result in a Bachelor of Arts, Bachelor of Science, or a Bachelor of Applied Science degree
- Organized educational programs that are directly related to the preparation of participants for employment in current or emerging occupations requiring training other than a degree

- High School Equivalency, GED, Adult Basic Education, and English as a Second Language programs as stand-alone activities or as part of a career pathway in which 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

8. **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:

- **Keystone Education Yields Success (KEYS)** is a collaborative program between the Pennsylvania Department of Human Services (DHS) and Pennsylvania Community Colleges. The program includes an appropriate combination of case management, coaching, and peer-to-peer experiences to develop a career pathway through upskilling, certificate, and/or associate degree program completion. The EARN service provider shall transfer to the [KEYS program](#) those participants who have enrolled or are interested in enrolling at a Pennsylvania community college to pursue an education activity that leads to receipt of a diploma, certificate, license, or industry recognized credential. The EARN service provider shall coordinate educational activities at community colleges with the KEYS program and shall terminate the EARN participants who meet all requirements for KEYS and desire to participate in KEYS. The EARN service provider shall facilitate the referral and transfer to KEYS. The EARN service provider may not terminate EARN participants who have expressed interest in community college but have not yet enrolled. The EARN service provider shall coordinate with the [KEYS Program Coordinator](#) when participants express a desire to enter community college. If such participants subsequently enroll in a community college, the EARN service provider shall terminate the EARN participant who meets all requirements to enroll in KEYS and shall facilitate the referral and transfer to KEYS. The KEYS program will request an updated AMR and referral to KEYS from the CAO using the reverse referral process.
- **Education Leading to Employment and Career Training (ELECT)** is a joint initiative between the Department and Pennsylvania Department of Education that enables school districts and intermediate units to help pregnant and parenting teens earn a high school diploma or HSE credential, become better parents and transition to employment, career training or higher education. Their services are available to high school students aged 22 and younger and individuals in High School Equivalency (HSE) age 24

and younger. An ELECT referral must be completed before a high school student turns 22 and an HSE student turns 24. The EARN service provider shall coordinate educational activities with the ELECT programs and shall terminate the EARN participation of TANF participants who meet all requirements to enroll in ELECT and desire to do so and shall facilitate the referral and transfer to ELECT. The ELECT program will request an updated AMR and referral to ELECT from the CAO.

9. **Place participants in unsubsidized employment.** To identify and fill employment opportunities, the 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 EARN service provider will require participants to meet in person with potential employers, where appropriate. The EARN service provider shall advocate and advise their participants to accept employment consistent with their IEP even if the employment will not result in an employment with wage outcome measure.

The EARN service provider achieves employment with wage outcome measure when a participant is working in unsubsidized employment (AC 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 for all qualifying hours worked. Once the participant is placed in employment and has entered the retention period, the EARN service provider shall contact the participant bi-weekly for the first month and then a minimum of once per month thereafter or as often as needed based on the participant's IEP.

10. **Build job readiness skills.** SNAP EARN must provide activities, workshops, and programs that build job readiness skills critical to success in the workplace. SNAP EARN must provide activities, workshops, and programs to meet and fulfill hourly participation requirements. SNAP EARN shall develop and provide additional incremental activities and workshops to build upon skills, knowledge, and experience. Workshops offered should include beginner, intermediate, and advanced levels, and align with the enrollee's IEP. SNAP EARN shall provide activities, workshops, and programs which support the following job-related and job readiness skills, to include but not limited to:

- Time management
- Analytical thinking
- Executive function and decision making
- Verbal and written communications
- Leadership
- Professional behaviors and attire

- Workplace culture
- Career exploration
- Aptitude testing
- Interpersonal communication
- Collaboration
- Problem solving
- Financial literacy
- Resume writing
- Interview techniques
- Job specific skills
- Education on regional High Priority Occupations and local job markets: [High Priority Occupations](#)
- Digital Literacy

11. Provide vocational education, technical skill building or credential-bearing job training programs. SNAP EARN shall provide, or refer participants to training services designed to increase the participants' job skills and employment opportunities that meet the following requirements:

- **Secondary Equivalent:** the participation in and completion of an accredited High School Equivalency ("HSE") program. SNAP EARN shall determine whether the structure of the HSE program is suitable for the participant's knowledge base and learning style based on the assessment. HSE can be obtained through the General Equivalency Diploma exam or High School Equivalency Test ("HiSET"). This activity is supported by enrolling the participant in AC-82 (adult basic education) and AC-83 (general equivalency diploma).
- **Post-Secondary Education:** a license issued by the Pennsylvania Department of State or Federal Government, an industry-recognized certificate or certification, or a certificate or associate or baccalaureate degree issued by an accredited career and technical school, college, or university. This activity can be supported by enrolling the participant in AC-84 (skill/vocational education) or AC-86 (paid work experience).
- **Credentialing Programs:** job training designed to develop marketable job skills leading to a High Priority Occupation recognized in the participant's local or job search area. The SNAP EARN shall submit proposed credentials to Bureau of Employment Programs ("BEP") for review prior to implementation. In its sole discretion, BEP will approve the credentials. This activity can be supported by enrolling the participant AC-84 (skill/vocational education).

- **Other Department E&T programs:** coordinate the successful transfer to additional Department education and training programs, including:
 - KEYS - A collaborative program between the Department and the Pennsylvania Community Colleges. This activity is supported by AC-87 and cannot be supported by the SNAP EARN program.
 - ELECT - A collaborative program between the Department and the Pennsylvania Department of Education (“PDE”)
 - SNAP JETS Partnerships (for SNAP participants only).
- **ESL programs:** increase English-learner level for non-native English speakers to support IEP goals. This activity is supported by enrolling the participant in AC-81.

The SNAP EARN shall identify a plan that explains how these services will be provided for the anticipated number of participants they will serve, and how they will ensure participants are aware of these program options.

SNAP EARN shall partner with employers to develop industry recognized credentialing programs that lead to career advancement and work with local industry to strengthen employment placement opportunities that offer career advancement and connection to high priority or in-demand occupations.

SNAP EARN shall require participants to meet with potential employers. SNAP EARN shall advocate and advise their participants to accept employment consistent with their IEP even if the employment will not result in Employment plus hourly wage measure. See Sections V and VI.

12. Provide wraparound services. Wraparound services are SNAP E&T services specific to individuals who are receiving SNAP benefits and are employed but not meeting federally required hours with employment. SNAP EARN shall provide wraparound services to participants to engage in additional allowable activities to fulfil their SNAP hourly work requirements.

13. Retention Services. SNAP EARN shall facilitate participant’s employment retention through ongoing engagement with both participants and employer partners designed to help participants achieve satisfactory job performance, retain employment, and increase their earnings over time.

SNAP EARN shall provide participant-focused retention services including, but not limited to,

SNAP EARN shall also provide services to partner employers that support participant's employment retention, including, but not limited to, shared resources to assist employees with regular check-ins with job holders, supporting on-the-job issues, job coaching and continued workforce upskilling opportunities.

Retention is defined as a period of 90 days from the first day of employment for SNAP Participants. Once the participant is placed in employment and enters the retention period, the SNAP EARN shall conduct participant contacts bi-weekly for the full 90 days of the retention period. This activity is supported by enrolling the participant in AC-93 (SNAP Job Retention).

14. **Engage Employers.** SNAP EARN shall foster partnerships with local employers to simultaneously meet critical talent needs and connect participants to unsubsidized employment opportunities. SNAP EARN shall work with local industry to strategically consider local labor market information, hiring trends, and growth opportunities while designing employment and training programs that drive job placement, job retention, and wage promotion opportunities specific to regional workforce needs. SNAP EARN must prioritize employer engagement that benefits enrollees with employment placements that provide opportunities for career advancement in high-priority, in-demand, or high-priority and in-demand occupations to improve long-term employment retention, earning potential, and family economic mobility.

Determining Hours of Participation

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

Non-PEERS: Individuals who are exempt or geographically waived from PEERS 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.

PEERS: Individuals who are not exempt or geographically waived from PEERS 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.

PEERs 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 participants to report those hours to the CAO.

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

SECTION 4 - EMPLOYMENT AND TRAINING (E&T) ACTIVITIES

[E&T Activity Codes, Subproject Codes and Descriptions](#)

E&T Activity Codes will be used to track the activities in which the SNAP EARN participant 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 participant 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 participants can remain in their educational track. SNAP EARN service providers should encourage and support participants as they seek to improve themselves through education. See the self-initiated student section below.

NOTE: Self-initiated participants 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](#).

The Employment and Training Program Monitoring, Oversight and Reporting Measures final rule was issued on November 18, 2024. In the final rule two measures were added, attainment of a credential and measurable skill gains.

Previously, unsupervised job search activities within SNAP KEYS and SNAP JETS programs were not trackable. BEP has enhanced CWDS to enable tracking of these activities using subproject codes. (table will follow in later pages)

Pathway To Success

Once the IEP and full family assessment are complete, provider staff and the participant will mutually agree on the pathway placement and enroll into one of the four pathways based on their goals, strengths, and barriers. Participants can move between pathways based on their individual accomplishments, needs, or setbacks and path guidelines with case manager approval.

The following Paths will be identified by corresponding Goal types in the IEP. Participants can engage in all allowable activities but at least one activity code identified in the Paths below must be open. Only one Goal type can be open at a time.

Individual Development Path:

This path is designed for participants who:

- Do not have significant barriers; or
- Have limited work experience;
- Are not interested in the Education Path.

The Individual Development Path is time-limited to 60 calendar days.

SNAP PEERs are only able to fulfill work requirements via this path in Community Service activities. Additionally, there is no time limit for SNAP PEERs in Community Service activities.

FWI participants without SNAP benefits will be billed to TANF funding. Braided funding at a ratio of TANF 80% and SNAP E & T 20% is allowable for participants who are FWI eligible when they are also receiving SNAP benefits. This specific group will be determined and referred to the EARN Program by CAO using a different code. Please review Payment

Provisions and the updated EARN manual for additional guidance. These distinct funding streams are woven together to ensure gaps are filled without duplicating services. Example: FWI-only individuals are not eligible for special allowances (“SPALs”) including childcare due to being a TANF non-assistance program. Braiding it with SNAP E & T funds for eligible individuals allows for the provision of SNAP SPALs when there is a demonstrated need.

Participants must be engaging in:

- Job Readiness (AC 80)
- Community Service (AC 90)

Vocational Path:

This path is designed for participants who:

- do not have significant barriers other than education; and
- are interested in or currently participating in educational activities.

Participants must be making satisfactory progress as defined by the training or education provider.

The Vocational Path is time-limited in accordance with Department’s vocational education time policy.

Enrollees must be participating in vocational educational training including:

- ESL (AC 81)
- ABE (AC 82)
- KEYS (AC 87)
- post-secondary education (AC 88)
- other vocational education (AC 84) such as a credentialing program and
- high school HSE, GED or GED prep (AC 83)

Employment Path:

This path is designed for participants who:

- do not have significant barriers to employment; or
- indicate or demonstrate they are ready for employment by virtue of completing another path or presenting as employable.

SNAP EARN supervised job search (AC 89) is limited to one period of up to 60 days in 12 months.

After the Supervised Job Search activity is completed, the individual is not eligible for this activity again for 12 months. AC89 can only be implemented once in a calendar year. It will be a rolling year meaning when it is open, that becomes the beginning of the year for this activity.

Note: For SNAP PEERs supervised job searches must not exceed 10 hours per week.

Remote Activities and Service Provision

While in-person participation is encouraged as it promotes engagement, contracted providers are responsible for developing a remote participation plan for everyone who will be using this option as part of the PIP. Review the E&T Activity Codes and Descriptions chart for methods on how to log and verify each type of activity conducted remotely.

The PA 1895 (Employment and Training Weekly Activity Verification Form) must be used to log their activities, including the date of the activities, type of activity, their E&T case manager's contact information, and the beginning 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 participant 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 ensure 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 Definitions

E&T Activity Codes will be used to track the activities in which the SNAP EARN participant 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 EDP must agree. 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 the durational time limits and important notes.

Note: AC 92 cannot be used as a standalone activity, however it must be opened concurrently with another activity for the duration of enrollment.

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

Unpaid Activities		
Activity Code	Definition	Limitations
AC 09 - Assessment	Comprehensive assessment must identify participant strengths and barriers to employment and family economic security. As part of the assessment, the participant's social indicators of health (SIOH) shall be identified	Completed within 14 business days after enrollment
AC 80 - Job Readiness/Preparation	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).	A person subject to the SNAP time limit may use up to 10 hours a week in job readiness/preparation in conjunction with other activities other than Job Search, to meet their required average of 20 hours per week.
AC 81 – English-as-a-Second Language	ESL includes any formal education training specifically designed to improve an individual's proficiency in English needed to compete in the current job market.	
AC 82 – Adult Basic Education	ABE provides an individual with a basic literacy level, equivalent to successful completion of grade eight to fulfill an employment goal.	
AC 83 – SNAP Satisfactory Attend GED/HSE	GED/High School/Remediation is an education activity designed to prepare a person to qualify for a high school diploma or equivalency certificate. This includes any formal educational 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.	

AC 84 – Skill/Vocational Education	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/HP Os/Pages/default.aspx The individual may be credited with one hour of unmonitored study time for each hour of instructional time.	24 months with six-month extensions available.
AC 87 – KEYS Postsecondary Education	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/HP Os/Pages/default.aspx. The individual may be credited with one hour of unmonitored study time for each hour of instructional time.	24 months with six-month extensions available.

AC 88 – Non-KEYS Postsecondary Education	Educational activity that leads 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/HP_Os/Pages/default.aspx. The individual may be credited with one hour of unmonitored study time for each hour of instructional time.	24 months with six-month extensions available.
AC 89 – Supervised Job Search	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 in 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. Participants should be credited with one hour for each job contact they make. A person receiving time-limited SNAP may only use up to 10 hours a week (half of required time) in Supervised Job Search in conjunction with other activities, other than Job Readiness and Job Preparation, to meet their required average of 20 hours per week.	One period of up to 60 days in a 12-month period. After the Supervised Job Search activity is completed, the individual is not eligible for Supervised Job Search again for 12 months. AC89 can only be implemented once in a calendar year. It will be a rolling year meaning when it is open, that becomes the beginning of the year for this activity.

AC 90 – Community Service	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 a PEER 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. Note: A PEER may not combine Community Service with any other E&T activity to meet the PEER Work Requirement	A participant's community service hours are subject to a special calculation based on the household's monthly SNAP allotment and are indicated on the EDP in addition to the required hours of participation. If a participant whose community service hour calculation is less than 80 hours monthly and they are meeting the required number of community service hours under the special calculation, the participant is still considered as meeting their work requirements through community service.
AC 92 – Case Management	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.	AC 92 should remain open for the duration of the enrollment

Verification Requirements

An individual's participation in work experience is verified by contracted providers who maintain attendance records such as paper or electronic time sheets, time clocks, swipe card systems, telephone time, official Commonwealth forms, and/or other attendance systems.

All methods include the participants' identifying information including name and/or ID number and are to be signed or verified by a case manager, instructor, or supervisor.

Methods of verification from the Provider Website could include:

- Completion of Employment and Training Activity Verification Form (PA 1895)
- A preapproved contractor attendance sheet that contains the same data captured in the PA 1895; or
- Work Experience Verification Form (PA 1980)

Paid Activities		
Activity Code	Definition	Limitations
AC 85 – Vocational Work Experience (VWE)	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. 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.	Participation in this activity is limited to a 12-month period
AC 86 – Paid Work Experience	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. 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.	Participation in this activity is limited to a 12-month period.

AC 93 – Retention	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. 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 during the retention period, even if SNAP benefits close, as long as the closure was not due to a sanction or disqualification. 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	90 days
-------------------	--	---------

Verification Requirements

Below is a list of allowable methods to document and verify paid activities:

- A copy of at least one pay stub that was current, if it is representative of ongoing income, at the time it was used to project hours (for no more than six months).
- A letter or statement from the employer that enumerates hours and includes gross pay amounts and pay dates;
- A copy of an attendance record as verified by the employer that enumerates hours and includes gross pay amounts and pay dates;
- State or contractor employment verification (EVF) form that contains historical gross pay amounts, pay dates, and pay rate;
- Time sheets as verified by the employer that enumerate hours of employment and include gross pay amounts and pay dates;
- A letter stating the details of the work provided as income-in-kind to include the number of hours or total value of the goods or services;
- Collateral contacts including employee's supervisory, payroll, or management staff but not a co-worker (obtain name, phone number, and title of the employer's representative providing the information); or
- Independent verification sources such as employee's pay account (via phone, email, or digital device), and Commonwealth-contracted verification providers.
- Statement from the self-employed individual showing gross income earned (less allowable business expenses) such as business ledgers, invoices, expense reports, or a representative tax return.

Subproject Codes

Attainment of a Credential and Measurable Skill Gain will be tracked in CWDS using subproject codes data-entered by E&T contractors.

Subproject Code Name	Corresponding Activity Code	Credential Subproject Code	Measurable Skill Gain Subproject Code
Career/Technical Education	AC 84 - Skill/Vocational Education AC 87 - KEYS Post Secondary Education AC 88 - Non-KEYS Post Secondary Education	SUBP 6	SUBP 7
Work Experience	AC 85 - Vocational Work Experience AC 86 - Paid Work Experience	SUBP 14	SUBP 15
ABE/GED	AC 82 - Adult Basic Education (ABE) AC 83 - General Equivalency Diploma (GED)	SUBP 16	SUBP 17
ESL	AC 81 - ESL - English as a Language	SUBP 18	SUBP 20

Measurable Skill Gain

The E&T contractor must be able to identify when a participant has achieved a measurable skill gain in one of the activities listed in the above table. This measure is an interim progress measure, completing the activity is not considered to have a measurable skill gain.

A measurable skill gain can be, but is not limited to:

- Documented achievement of at least one educational functioning level
- Documented attainment of a secondary school diploma or recognized equivalency as part of, but not the completion of the activity
- Second or post-secondary transcript or report card that shows a participant is meeting the State's academic standards
- Satisfactory or better progress towards established milestones from a training provider
- Successful passage of an exam that is required for a particular occupation or;
- Attaining technical or occupational skills as evidenced by trade-related benchmarks.

NOTE: Measurable skill gains will be further defined depending on the specific SNAP E&T program.

How to open a credential and/or measurable skill gain subproject When an E&T contractor identifies that a SNAP E&T participant has attained a credential or a measurable skill gain, the contractor will:

- Open the subproject
- Close it the following day
- Use Subproject Outcome Code 3 when closing. If multiple achievements occur under the same activity within the program specific timeframes, one subproject may be opened to represent them.
- Subprojects should not remain open for more than one day Program specific guidance can be found in the following links:
 - SNAP JETS Examples [SNAP JETS Credential-Measurable Skill Gain Flowchart](#),
 - KEYS SNAP Credential/Measurable Skill Gain Flowchart [SNAP-KEYS-Credential-Measurable-Skill-Gain-Flowchart](#) and
 - EARN SNAP Credential/Measurable Skill Gain Flowchart [SNAP EARN Credential-Measurable Skill Gain Flowchart](#)

Dual-Enrolled WIOA – Subproject Code 8 – (SUBP 8)

SUBP 8 is used to identify when a participant is dual enrolled in WIOA Title I and SNAP E&T. The subproject code will open simultaneously to when the activity corresponding to the WIOA Title I activity is opened. When opening an activity to represent the activities WIOA Title I programming, the SNAP EARN needs to determine under which activity code the activity mostly closely matches the majority of the activities the participant will participate in for one of the follow activities Vocational Education (AC 84), Vocational Paid Experience (AC 85), Paid Work Experience (AC 86), KEYS Post Secondary Education (AC 87), Non-KEYS Post Secondary Education (AC 88).

SUPB 8 should remain open as long as the activity under WIOA Title 1 remains open and close when the activity under WIOA Title 1 closes. All hours that the participant participates

in the WIOA Title I activity will be entered into the activity that represents best the WIOA Title I activity. Any additional hours such as for case management, Supervised Job Search, Job Readiness Prep, or any other applicable activity will be entered into the appropriate activity.

The closing code is Subproject Outcome Code 3.

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 to become a Nursing Assistant, you would list all the subjects you will cover such as hygiene, infection control, vitals, nutrition, and emergency procedures 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 participant 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.

A credential can be one of the following:

- Secondary school diploma or recognized equivalent (GED or High School Equivalency)
- Associate degree
- Bachelor's degree
- Occupational licensure, certificate, or certification
- Other industry recognized credential

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-BEPEARNPOLICY@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-credential 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>

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 in CWDS. This document identifies the number of study 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.

Activity Closing Codes

The SNAP EARN service provider is required to data enter an appropriate activity closing code when ending the participant'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 participant's project enrollment.

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

Activity Termination Code 1: Not employed, Did not complete the activity, Failed to cooperate or Refused to cooperate

Activity Termination Code 4: Successful Term – Obtained employment but did not complete the activity

Activity Termination Code 5: Completed the activity and Employed – Activity End Date Required

Activity Termination Code 9: Completed the activity, Not employed – Activity End Date Required

Activity Termination Code C: Credential Received (available for AC 84, 87 & 88)

The CWDS service record must accurately represent a participant's scheduled activities. If a participant 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 - TRACKING PROGRAM PARTICIPATION & RECORD KEEPING

Tracking Participation

Participation hours in all activities except SNAP job retention must be tracked by the SNAP EARN program staff. Forms that are acceptable include the E & T weekly activity verification form, vocational education/skills training weekly attendance forms, or by the SNAP community service verification form ([Employment and Training Weekly Activity Verification Form](#)) 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 participant 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 participant participated. To ensure continued participation in off-site locations, it is required that documentation be collected weekly. Participants 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 participant and community service site when a participant is participating in community service (See Attachments [CS Agency Agreement](#) and [CS Verification](#)). The maximum number of allowable hours that a participant 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 participant's file. This document identifies the number of study 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 participant 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 SNAP 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 participants 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 participant to make-up the hours during the month in which the hours were missed. If participants 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 participant 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 participant'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 Job Retention is a triggered activity which begins when a participant starts (i.e. the first day of work) in new unsubsidized employment while enrolled in at least one SNAP activity, other non-case management (AC 92) and non-assessment (09). Upon notification that a SNAP EARN participant has obtained employment, the SNAP EARN service provider should close the open activities except AC 92 Case Management and open AC93. 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 participant'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 determine why the SNAP benefits have closed. If the closure is correctable (failed to turn in appropriate paperwork or interview) and the participant wants to continue to receive benefits, the SNAP EARN should attempt to facilitate the efforts to return to SNAP benefits. If the closure is due to sanction or disqualification or incarceration, then the SNAP EARN should close the Job Retention with an Activity Termination code 1 and the case with the appropriate project termination code. If the closure is due to any other reason (including a correctable reason), the SNAP EARN should use the Extended Hold status for the remainder of the 90-day SNAP Job Retention period. AC 93 cannot be opened when a participant is already employed and becomes enrolled in a program.

If the Job Retention is not opened in a timely manner, the SNAP Job Retention trigger is missed, and the SNAP EARN will have to wait until the next trigger to open SNAP Job Retention

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

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 one document per user access request.

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-BEPEARNPOLICY@pa.gov of the employee's departure within three business days. You may choose to utilize the [Onboarding/Offboarding Checklist](#). Staff access will be reviewed annually during monitoring.

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 corrective action.

Data Entry Requirements

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

The Department has instituted restrictions on timeframes for the data entry and upload of participant information, hours, and verification 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 participants' eligibility for benefits or continued participation in EARN. The Grantee shall complete data entry into the appropriate systems as follows:

Reporting Element	System of Record	Reporting Deadline
Program Implementation Plan	CWDS	45 business days following the start of the Program Year ("PY")
Assessment	Case Record	14 calendar days following the date of enrollment
IEP	CWDS	14 business days following the date of enrollment
Annual Monitoring and Technical Assistance	CWDS	Ongoing
Referrals by PSN	CWDS	30 calendar days following the discovery of need
Unsubsidized Employment	CWDS	15 calendar days into the second calendar month after information date (i.e. if hours are from 10/2026, data needs to be entered by 12/15/2026)

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

Mathematical rounding will be used to round participants' 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 data-enter information accurately into CWDS. It is essential to capture all participant 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. 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.

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 upload all participant documentation to the participant record in CWDS. If the SNAP EARN program maintains a physical case record, it must be kept in a secure location with limited accessibility. Staff not associated with the SNAP EARN case may not have access to the SNAP EARN Case Records.

- The SNAP EARN service provider will document the following in the SNAP EARN Case Records: date, time, and location of all SNAP EARN related contacts
- purpose and outcome of all SNAP EARN related contacts
- any changes in the participant's conditions or circumstances
- solutions offered and the participant'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 case notes using the CWDS Create Case Progress Notes screen. All case progress notes are to be entered within 30 calendar days following contact. Additionally, it is suggested to identify case notes with specific topics, for example "Assessment."

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

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

Documents must be retained for a period of six years from the case closure date.

Internal Data Reconciliation

The SNAP EARN program is evaluated based on eCIS 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 participant secured employment or not. The SNAP EARN service provider must include the reason for termination in the narrative of the participant'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 participants 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 participants that miss three consecutive scheduled days of program activity. If a participant does not respond to the outreach efforts and does not report on the fourth day the participant must be terminated from the program. Participants 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 participant 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 participant 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 participant for them to be re-engaged immediately, the participant 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 participant without approval from the CAO and contact with the participant.

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

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.

Participants 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. Participant obtained 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. Participant 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. Participant withdraws from the program without good cause or fails to comply with the contractor' s absence policies. This includes participants 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 participant 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. Participant 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. Participant' s reason for termination does not fit other termination codes listed here.	7	

SNAP Provider Determinations

A provider determination occurs when an E&T contractor terms an E&T participant using certain case termination codes.

What codes correspond to a Provider Determination?

A provider determination occurs when an E&T contractor closes a SNAP E&T participant's case with one of the following Case/Project Termination Codes in CWDS:

- Case Termination Code 3
- Case Termination Code 7 – SNAP 50/50 use only
- Case Termination Code X – SNAP EARN use only
- Case Termination Code W or Y – SNAP KEYS use only

What action must E&T contractors take after a Provider Determination?

The E&T contractor must complete and submit all information as required on the Provider Determination Form to the CAO within **10 days** of closing the case in CWDS. This information can be provided through local processes, such as Direct Service Team (DST) or other CAO and provider communication, CWDS case progress notes, or by securely emailing the CAO the Provider Determination Form (Attachment).

What Information is required after a Provider Determination?

Regardless of the local process to transmit the provider determination, the E&T contractor must include, at minimum, the following information:

- Reason for termination; and
- Whether the E&T contractor has knowledge that the participant wishes to re-engage in E&T or transfer to or engage with another E&T provider; and
- Whether the E&T contractor has knowledge that the participant may be disabled or incapacitated or may meet an exemption from the Pennsylvanian with Employment and/or Engagement Requirements (PEER) work requirement.

In addition, the E&T contractor should enter a CWDS Case Progress Note to indicate how the provider determination information was transmitted to the CAO.

How do I complete the Provider Determination Form?

If the local process implemented includes the use of the Provider Determination Form, the contractor will indicate the participant's name and county/record number, the date the participant was terminated, the reason for the termination, and if the contractor is aware that the participant is interested in re-engaging with their or another E&T provider. Contractors will also check all applicable checkboxes. This assists the CAO in determining which follow-up step to take.

What about Cross-Program Transfers?

When a SNAP E&T participant expresses a desire to an E&T contractor to participate with a different contractor, the contractor must coordinate with the other contractor and the CAO to determine if a transfer is appropriate. As part of this coordination process, the losing contractor must relay all required provider determination information to the CAO and enter a CWDS Case Progress Note about the coordination. If a transfer is appropriate, the losing contractor must follow the instructions in their Program Manual for terming a participant in the event of a program transfer. This process will indicate to the CAO that the E&T participant is ready for referral to the gaining contractor.

What happens after I submit the Provider Determination Form?

The CAO will take one of three actions upon reviewing the provider's determination information and communicating with the E&T participant:

1. Refer the SNAP recipient back to the SNAP E&T program (if appropriate), or to a different SNAP E&T program;
2. Reassess the SNAP recipient for new exemptions from the PEER time limit and/or general work requirements; or
3. Inform the SNAP recipient that additional non-DHS sponsored workforce development services are available at PA CareerLink® Centers.

NOTE: SNAP E&T remains a voluntary program in Pennsylvania. The CAO will only take action on #1 (refer an individual to a SNAP E&T program) following a provider determination if the individual volunteers to participate.

What happens to PEERs?

E&T contractors must ensure that all SNAP recipients, including PEERs, are termed from programs promptly and in accordance with the rules outlined in the program manual. The CAO will use information from the provider determination process to help determine whether a PEER has become exempt from the work requirement, started to meet the work requirement another way, or wishes to re-engage with the SNAP E&T program or another qualifying workforce development program.

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 2026-2027 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.

Assessment and IEP

- **Description:** The Assessment and IEP performance measure depends upon the Assessment (AC 09) activity code closing successfully, the assessment document upload occurring, and the IEP being updated to include a goal and objective within 14 business days from the case begin date.
- **Measurement:**
 - **Numerator:** Number of newly enrolled cases where an AC 08 is closed with a successful termination code (4, 5, 9) and an IEP has been updated with a goal and objective within 14 business days from case begin date.
 - **Denominator:** Number of new enrollments in the program year.
 - **Expectation:** 90% of all participants newly enrolled with the Provider have an assessment completed, uploaded and an IEP updated including a goal and objective within 14 business days.

Personal Service Navigator

- **Description:** The PSN will be measured by a service authorization to the PSN within 30 calendar days when a need is identified and a barrier added to the IEP.
- **Measurement:**
 - **Numerator:** Number of PSN activities closed successfully within 30 calendar days in the program year.
 - **Denominator:** Number of PSN activities closed within the program year.
 - **Expectation:** 75% of all enrollees who reported a barrier or barriers, or crisis situation or situations, will have PSN facilitate and track community referrals and outcomes within 30 calendar days of the community referral

Case Management

- Case management will be measured by reviewing the monthly case files sampled to determine if weekly contact is made with a quality case progress note.

Monthly Case File Reviews

- Monthly case file reviews will be completed and measured for supporting documentation of data entry points.

Secondary Equivalent and Credentialing

- **Description:** A participant must receive a diploma or certification that will provide the participant with an industry- recognized certificate or certification and marketable skill directly related to their employment goals listed in their AMR and IEP. AMR and IEP associations are monitored via validations.
- **Measurement:**
 - **Qualifying Activities:** Activity Codes 81, 83, 84, 87, 88
 - **Numerator:** Activities that close within the program year in the above codes with a termination code 4, 5, 9, or C.
 - **Denominator:** Activities that close within the program year in the above activity codes with any termination code.
- **Expectation:** 50% of all enrolled participants in an approved credentialing activity that results in the achievement of a credential.
- **Associated Report:** RPT 292

Successful Referral to Educational Programming

- **Description:** Measured by cases terminated, code X, followed by a successful enrollment into a KEYS program within 90 calendar days.
- **Measurement:**
 - **Numerator:** All X terminations who were referred successfully to a KEYS (SK, BK) or SNAP JETS (SZ) project within 90 calendar days from case end date.
 - **Denominator:** All X terminations for cases that closed within the program year.
- **Expectation:** 90% of those terminated from SNAP EARN with Project Termination Code X go onto enroll with SNAP JETS or KEYS program within 90 days.

Employment Path

- **Description:** The Employment Path will be measured by the associated Employment goal type in the IEP and job search (AC 89) activity. The 60-day count begins when the goal type and activity are opened.
- **Measurement:**
 - **Numerator:** Number of Employment goals closed successfully within 60 days.
 - **Denominator:** All employment goals open during the program year at least 60 days prior to the end of the program year.
- **Expectation:** 75% of all participants will have their IEP Goal of employment closed within 60 days in conjunction with an opening of an unsubsidized employment activity (AC 33).

Employment with hourly wage of \$2 an hour above minimum wage

- **Description:** Provider shall place participants in unsubsidized employment, for an average of 20 hours each of four consecutive weeks, with a wage at least two (\$2) dollars above the higher of the federal or state minimum wage as of July 1 of the program year.
- **Measurement:** Total number of participants that open in employment (AC 33) that earn \$2 above minimum wage and complete 20 hours a week. Data entry must also be verified through the validation process.
- **Numerator:** Count of AC 33 activities on cases/enrollments that have not yet attained this measurement in the year that began 22 days or more prior to the end of the program year where an average of 20 hours per week across a consecutive four-week period
- **Denominator:** Count of distinct cases/enrollments with an AC 33 that began 22 days or more prior to the end of the program year where the case/enrollment has not yet met a performance measure as defined by this section in a previous program year, based on past reporting.
- **Expectation:** 65% of all enrolled participants who become employed achieve employment with hourly wage greater than \$2/hour above minimum wage.

Retention (90 days)

- **Description:** Total number of participants that had an open employment activity (AC 93), that achieved retention at 90 days
- **Measurement:** Total number of participants that had an open unsubsidized employment (AC 93) and subproject code 01 that remains open for 90 consecutive days
 - **Numerator:** Number of cases where sub-project 01 has crossed the 90 consecutive day threshold
 - **Denominator:** Number of cases where sub-project 01 was opened that *may have* crossed the 90 consecutive day threshold in the program year. (For example, a case with a sub-project code that opened for 1 day, where a case then closed altogether, would be counted in this denominator.)
- **Expectation:** 50% of all enrolled participants who met the employment reporting measure at six months will achieve the benchmark

SNAP Reporting Measures

Employment- Measured by the number of valid placements data entered and validated.

Employment related to High Priority Occupations (HPO)- Measured by placement data entry and a corresponding SOC code that is identified as an HPO.

Employment related to IEP and Goals- Measured by employment gained directly tied to the employment goal listed on the participant IEP.

Employment related to education and training- Measured by employment gained directly tied to the education and training goal listed on the participant IEP.

Monitoring

The Department will monitor compliance requirements at least annually but may conduct more frequent monitoring at its discretion. The SNAP EARN Program must expeditiously correct deficiencies cited. If the Department identifies any deficiencies, the program must submit a corrective action plan to the Department within 14 business days of notification of the deficiency. In its discretion, the Department may extend the time for the submission of a corrective action plan.

In its discretion, the Department may also monitor any subcontractors and sub-grantees. The SNAP EARN Program shall require that its subcontractors and sub-grantees provide information as may be required by the Department. The Program, in consultation with the Department, shall require the subcontractor or sub-grantee's expeditious correction of any deficiencies cited. The Program shall submit a corrective action plan within 14 business days from the receipt of notice of a deficiency

Continuous Improvement

The provider shall build the capacity of its staff and subcontractors to effectively deliver services and maximize successful participant outcomes. Program staff shall develop and implement local professional development plan for staff and its subcontractors to meet local needs. Specific training may include, but not limited to, topics such as:

- Trauma-informed care;
- Motivational interviewing;
- Customer service;
- Employer engagement strategies; or
- Safeguarding Participation Information and Data.

The provider must establish specific mechanisms by which stakeholder feedback - including participants, subcontractors, service and employer partners, and the Department - is integrated into program design and has at least one local supplemental outcome measure to promote continuous improvement.

SNAP EARN Validation

The Bureau of Employment Programs (BEP) is responsible for monitoring DHS/Office of Income Maintenance (OIM) employment and training programs to ensure compliance with applicable federal, state, and DHS regulations, as well as contract provisions. As part of the contract provision monitoring process, BEP completes monthly validation reviews for contracted EARN, SNAP EARN and Work Ready providers. The purpose of the reviews is to validate the performance measures reported during contractor data entry. These performance measures include placement (employment with hourly wage), retention, and secondary equivalent and credentialing. These measures require additional action to validate and ensure contractual compliance. This process ensures that quality service is being provided to program participants. All participants reported as meeting a performance standard will be reviewed before a participant's achievements are considered as "valid".

Validation Process

The standard procedure for the performance measures herein, the validation process is as follows:

1. CWDS Reports will run during the first week of any calendar month to collect the finalized data on the performance measure in question from three (3) months prior. Reports run after this date may reflect additional qualifying participants, but those additional entries will not be considered for performance measure purposes. **Only data entered timely will be documented.*
2. Contractors and partners will pull the most recent report for all performance measures by the end of the first full business week (where Monday – Friday fall within the same calendar month) monthly.
 - RPT 290 correlates to Placements
 - RPT 292 correlates to Credentials
 - RPT 291 correlates to TANF Retentions
 - RPT 261 correlates to SNAP Retentions
3. Contractors should reference the below "Required Documentation" section for each performance measure report listed and provide the required documentation appropriately for every individual listed on the report. This documentation should be

uploaded to CWDS in their program's Performance Measure Validation file, in the correct folder by year and month, by the 15th of the calendar month.

4. Bureau of Employment Programs (BEP) staff will review the documentation. After review, the documentation the contractor uploaded will have a comment in CWDS denoting the status of the validation as either "Approved" or "Disapproved." If the validation is noted as "Approved," no further action is needed. Any "Disapproved" entry will have comments explaining the reason it has failed validation.

*If additional information is needed an e-mail will be sent providing details on what is needed to be re-reviewed. If the program contact confirms validation is unable to be met, BEP staff finalizes the disapproval. If the program believes additional clarification and/or documentation may be available to rectify the disapproval, the contractor has until the 15th of the month following the calendar month where the report was pulled to provide the explanation and documentation in CWDS and notify BEP staff once completed.

5. Any final corrections are reviewed by BEP and finalized on the 15th of the month after the calendar month where the report was pulled, and the results are documented in CWDS as well as provided to the program monitoring units for ongoing performance data.

Required Documentation

Employment with Hourly Wage or Placement:

- A participant has 4 consecutive weeks averaging 20 hours or more in the month, and has had a wage of \$2/hr. or more above minimum wage established in a previous month,
- A participant has a wage of \$2/hr. or more above minimum wage established in the report month, and has 4 consecutive weeks averaging 20 hours or more in a prior month, or
- Both 4 consecutive weeks of hours and a wage of \$2/hr. or more above minimum wage established in the current month.

BEP will review case accuracy to ensure all data entry (including hours) has been completed, and placement (employer) information is correct.

Verification that the participant obtained unsubsidized employment and worked an average of 20 hours per week in a four consecutive week period. Verification of continued employment is required if the participant did not work, or documentation is not provided for the 4th consecutive week. Additionally, the pay documentation provided must show that the participant is earning \$2.00 an hour greater than the minimum hourly wage for the duration of the four-week period. CWDS reports will be seeking average hourly wages for all weeks in the period to have an hourly wage at, or above, \$2.00/hour more than the minimum wage. The following document types are acceptable verification:

- Paystubs / Wage Documentation;

- Submit all pay stubs for four consecutive weeks showing pay periods leading up to the date the placement was met; or at least two pay stubs: one from the start of the four consecutive weeks of employment and one from the fourth week. These must include enough year-to-date hours or wages to confirm work during weeks two and three. If year-to-date information is not included, 4 weekly or 2 biweekly pay stubs must be submitted. All paystubs must include identifying information such as participant name and pay periods.
- Representative Pay for ongoing employment as defined by Cash Assistance Handbook CAH 167.2; or;
- DHS approved EVF or Letter from Employer, the form must be completed entirely and include all contact information for the employer provided wages/hours or;
- Work Number Screen Prints, or;
- Commonwealth Workforce Development System (CWDS) Error Screens (if applicable), and;
- CWDS Hotline Ticket # Documentation (if applicable).

SNAP Retention

SNAP Retention occurs, for performance purposes, when AC 93 has been open for 90 days (or was closed positively on next business day if day 90 falls on a holiday or weekend).

**Participants can only meet once per enrollment. Enrollment must be closed after retention is complete. Documents for validation purposes can be uploaded to CWDS after case closure as they are linked to Participant ID #'s and not to case status, therefore closure will not prevent future validation review.*

The following documentation must be provided & will be reviewed for SNAP Retention:

- A paystub or other wage documentation showing ongoing employment over the day where the retention standard was achieved. This paystub must also show the hourly wage as of the day of retention if being submitted to prove wage increase, or Valid representative Pay for ongoing employment as defined by Cash Assistance Handbook CAH 167.2; and;
- A paystub or other wage documentation verifying the point in time where the individual was working an average of 20 hours a week over a 4 consecutive week period.

NOTE: This only needs to be provided in instances where the individual did not also meet the “Employment with Hourly Wage” performance measure earlier in the same enrollment. In instances where the participant met the performance standard prior to or overlapping the beginning of the retention period, that documentation will be referred to for validation purposes.

- DHS approved EVF or Letter from Employer, the form must be completed entirely and include all contact information for the employer provided wages/hours

Credentialing

Credentials occur, for performance purposes, when a participant has closed an associated activity (including PWE or Sub. Emp.) successfully with activity term. code 9 or C in the calendar month.

- SNAP: AC 83, AC 84 (if terminated code C only), AC 85, AC 86, AC 87, AC 88

The following documentation must be provided & will be reviewed for Secondary Equivalent and Credentialing:

- Verification the participant has received a credential that is in alignment with the specific goals stated for the participant in their AMR/EDP and/or IEP.

Placement in employment prior to the participant earning their credential will not disqualify them from earning this performance measure, if there is a clear, documented connection between upskilling within their place of employment and the credential achieved.

Acceptable verification includes:

- Copy of the Certificate from the course the participant has completed;
- If the credential is an in or out of house credential offered directly by the program, and not a vocational educational, technical school, collegiate, or other established post-secondary institution, documentation showing that the program has been reviewed, and approved, by BEP.
- SNAP EARN activities AC 85 and AC86: a completed EVF or work agreement from the employer stating correlation with established goals and interests in participant's IEP can be submitted for review. EVF form must be completed entirely and include all contact information for the employer provided wages/hours

Measurement

Post-Validation Procedure

Once validation has been completed, it must be reconciled against the total amount of individuals who have met the performance measure for the program year-to-date (YTD). This provides data that will be given to programs quarterly, and at the end of each program year during monitoring. It is meant to provide insight on where the programs may be experiencing strength, or demonstrating room for improvement, regarding the quality of the data entry and documentation process they are engaging in. BEP Data Unit staff:

1. Record all validation results in spreadsheets maintained by BEP.

2. Once final reviews are completed, compiles the previous month's decisions into one spreadsheet after the final reviews are completed. For any given calendar month, the final
3. Determination record will be updated around the 15th of the following month. This date may vary as the Data Unit works internally to confirm finalized findings, or due to observed holidays. (For example, the July report for April data would have finalized data entered on or around the 15th of August.)
4. Notify BEP Program Monitor Staff of the updated data when it is available for review.

Technical Assistance

Technical Assistance (TA) will be provided throughout the year. TA can be in the form of one-on-one conversations or done in a group setting such as the EARN monthly calls. TA can cover a variety of topics including but not limited to:

- A review of performance goals or standards
- Policy or procedural training
- Collaborative roundtable discussions
- DST support

A provider may request TA at any time throughout the program year.

Program Implementation Plan

At the beginning of each program year, every provider will be required to submit a Program Implementation Plan 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

Staffing

Provider staff must notify DHS via the EARN resource account at RA-BEPEARNPOLICY@pa.gov within 3 business days of any staffing changes whether the individual is leaving the organization or has a change in title or responsibilities. Reporting staffing changes pertains to both the contractor of record and any subgrantees. The program must notify BEP immediately through email and submit the [onboarding checklist](#). Staff changes may require a budget revision.

All Provider Staff

1. Request access to the Provider Resource Website to utilize all EARN/Work Ready resources.
2. Complete self-registration process to obtain eCIS access, when appropriate.
3. Review the manual and any applicable training courses at least annually.
4. Complete required trainings during the program year and sign acknowledgments for confidentiality, Limited English Proficiency (LEP), and nondiscrimination annually.
5. Attend DHS meetings, trainings, and conferences to increase knowledge of program procedures

Training

The following trainings must be completed annually by all program staff. New program staff must complete these trainings within 30 days of their employment begin date. Proof of training completion must be recorded and submitted to the Department upon request.

Americans with Disabilities Act of 1990 (ADA)

The ADA prohibits discrimination and ensures equal opportunity for people 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 SharePoint: [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 SharePoint: [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, audiotope, 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 SharePoint: [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 participants must be assured that the personal data they provide will be confidential.

The provider will keep all participant information 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.

Per the Health Insurance Portability and Accountability Act (HIPAA) Privacy Rule (45 CFR Parts 160 and 164) all personal health information should be retained for a period of six years. All 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 be 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 on the Provider SharePoint: [Safeguarding Participant Information](#). The SNAP EARN provider will provide yearly safeguarding information training to staff and maintain documentation of all staff trained.

The EARN program is required to ensure that any personally identifiable information (PII) shared electronically is done via secure email.

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 \$10,000.

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.

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

Facilities

The SNAP EARN Program shall comply with the following:

- a. Signage – SNAP EARN shall provide program signage that is clearly marked at the building entrance, in the lobby, or on a mobile unit. The SNAP EARN Program shall have clearly visible and well-lit entrances and exits.
- b. Location –The program shall provide services at a building that is located along a public transportation route (where available), in communities where the program is contracted to service, and that provides adequate privacy, security, and parking availability. If the program utilizes mobile units or public buildings, they shall park the unit in a meeting location that is in a safe, private, and well-lit location. Regardless of the location, the SNAP EARN program shall provide all services in adherence with privacy and security requirements as outlined in the Confidentiality section of the Statement of Work (SoW).
- c. Americans with Disabilities Act (“ADA”) Compliance – The SNAP EARN Program shall provide services in a building and with technology that is ADA compliant and shall provide any necessary accommodations.
- d. Operations – The SNAP EARN Program shall offer traditional and non-traditional hours, and remote or mobile services. Remote and mobile services may only be used to supplement in-person services. The SNAP EARN Program shall make in-person services available at the enrollees request or need.

Grant Administration

SNAP EARN Program shall directly, or using subgrants or subcontracts, provide the services described in this Work Statement within its geographical area. The SNAP EARN Program's responsibilities include but are not limited to:

- A. Administer grant funds appropriately;
- B. Provide services in accordance with the approved budget and the laws and regulations that govern the associated Department funding streams;
- C. Be accountable for all expenditures, including those of any SNAP EARN Programs and subcontractors, and which includes only charging eligible expenditures to the program;
- D. Maintain proper records and documentation for the Department’s review, including but not limited to:
 - Grant expenditures;
 - Verification of dates, times, and attendance for mandatory staff training;
 - Verification of all participation for any hour of participation in any activity data entered into CWDS. Attendance documentation must be made available upon request by the Department by indicated deadlines. This includes, but not limited to, program evaluation, monitoring, validations, monthly case file reviews and monthly TANF sample requests
- E. Be responsible for both the programmatic and fiscal performance of SNAP EARN

Programs and subcontractors, if used;

- F. Respond to findings of non-compliance or performance deficiencies including but not limited to the repayment of the Department of funds relating to any such findings;
- G. Monitor expenditures including those of SNAP EARN Programs and subcontractors for inappropriate spending and make immediate repayment to the Department if found;
- H. Prepare and provide to the Department detailed monthly and ad hoc financial reports including a detailed quarterly financial report for each SNAP EARN Program and subcontractor funded through the grant in a format prescribed by the Department;
- I. Perform periodic programmatic and fiscal monitoring of services provided;
- J. Conduct on-site visits of each SNAP EARN Program and subcontractor providing EARN services at least annually;
- K. Provide technical assistance to SNAP EARN Programs and subcontractors providing EARN services regarding fiscal and programmatic issues as necessary;
- L. Since the new law passed to end the waiver for work requirements, the programs must now ensure that participants are meeting 20 hours per week or 80 hours per month of work or participation in an employment and training program if they do not meet an exemption. ([SNAP-Work-Requirements-Website](#))
- M. Have available upon request of the Department a monthly schedule of employment and training activities as well as an annual schedule;
- N. Make all programmatic and fiscal records along with program staff available to the Department or its designee upon request and include this provision and the Department's audit clause in agreements with SNAP EARN Programs and subcontractors;
- O. Review the examination and monitoring reports of the SNAP EARN Programs and subcontractors and follow up on any items that require attention or corrective action;
- P. Make the Department aware of any fiscal integrity or performance deficiencies, including those of SNAP EARN Programs and subcontractors as well as the strategy that will be implemented to correct them;
- Q. Enter data into CWDS in accordance with the timeframes outlined in the EARN and SNAP Policy and Procedure Manuals;
- R. Preserve program records securely until expiration of five years after the Grant has expired or terminated or until any litigation, claims, or exceptions have reached final disposition. This provision is also applicable to all SNAP EARN Programs and subcontractors;
- S. Provide grant services that are available and accessible within the communities the SNAP EARN Program is required to serve;
- T. Report changes of program staff (including SNAP EARN Program or subcontractor staff or contracts), location, or methods for how services are provided 60 days prior to the change along with a transition plan. **NOTE:** Reporting changes to the CAO is insufficient

for the purpose of grant compliance. Changes must be reported via RA-BEPEARNPOLICY@pa.gov or to your assigned program advisor.

- U. Follow supplemental guidance, instructions, and rules provided by the Department in the EARN Manual, Contractor Letters, or other communications.
- V. Provide the Department with a transition plan 90 days prior to the expiration of this Grant for the Department's review and approval. As part of the transition plan, the SNAP EARN Program shall: include a plan for continuity of services, identify responsible parties, identify all materials and any other information and documentation that should be transferred, and recommend time frames for the transfer. In addition, SNAP EARN Program shall submit an inventory of all property and supplies purchased with grant funding. If additional requirements are identified after the plan is approved, SNAP EARN Program shall add these transition needs to the transition plan.

SNAP EARN Program shall pay all costs relating to the transfer of materials and responsibilities to the Department. The SNAP EARN Program shall provide necessary information to a new SNAP EARN Program or the Department during the transition period to provide for a smooth transition of responsibility. The Department will define the information required during this period and timeframes for submission. The Department will have the final authority for determining the information and timeframes required.

In the event of earlier termination of the Agreement, the SNAP EARN Program shall provide the Department with a transition plan as directed by the Department.

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

Participant Incentives/Reimbursements

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

Promotional Program Materials

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 participants. Participants may continue to be eligible for CAO-issued special allowances. The SNAP EARN provider may assist participants 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 participant; 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 participant eligible for the SPAL, the participant 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 participant.

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 participants and reconcile records.

The DST must consist of at least a representative from the CAO and a staff member 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-BEPEARNPOLICY@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.