

Item number and name: 5 - Employment & Training (E&T) Plan

Date of last update: Revised 9/2024

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# FFY 2025 SNAP E&T State Plan

*File Name: FY25 TN 5 ET Plan (Revised 9.27.2024 w/o highlights)*



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## A. Cover Page and Authorized Signatures

State: Tennessee

State Agency Name: Tennessee Department of Human Services (TDHS)

Federal FY: 2025

Date Submitted to FNS (revise to reflect subsequent amendments): 8/15/2024

**List State agency personnel who should be contacted with questions about the E&T State plan.**

| Name                 | Title  | Phone               | Email  |
|----------------------|--|---------------------|--|
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**Certified By:**

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State Agency Director (or Commissioner)

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State Agency Fiscal Reviewer

## B. Amendment Log

In accordance with 7 CFR 273.7(c)(8), State agencies must submit plan revisions to the appropriate FNS Regional office for approval if it plans to make a significant change. For a complete list of situations requiring an amendment to the E&T State plan, see Plan Modifications in the E&T State Plan Handbook. The State agency must submit the proposed changes for approval at least 30 days prior to the planned implementation.

Please use the log below to document the submission of an amended plan. A single line in the log should capture each time a plan is amended and resubmitted, not each individual amendment throughout the plan.

To expedite the review process for amendment changes, please highlight areas where text has been added or changed. After FNS approval of amendment changes, highlighting must be removed and a clean, updated plan submitted to FNS.

**Table B.I. Amendment Log**

| <b>Amendment Number</b> | <b>Brief description of changes or purpose for amendment (If amendment includes budget changes, include in description)</b> | <b>Sections of Plan Changed (Highlight areas of plan with changes)</b> | <b>Date submitted to FNS</b> | <b>Date approved by FNS</b> |
|-------------------------|---|--|------------------------------|-----------------------------|
|                         |   |  |                              |                             |
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## C. Acronyms

*State agencies may consider including acronyms for the SNAP State agency, SNAP E&T program name, State’s management information system, and SNAP E&T providers or contractors.*

Below is a list of common acronyms utilized within this plan. Please delete acronyms that do not apply and add additional acronyms in alphabetical order.

**Table C.I. Acronyms**

| Acronym | Acronym Definition   |
|---------|--|
| ABAWD   | Able-Bodied Adult without Dependents                                       |
| AE      | Adult Education  |
| AJC     | American Job Center  |
| CAP     | Corrective Action Plan   |
| CEO     | Center for Economic Opportunity  |
| CHAT    | Comprehensive Health Academy of Tennessee                                  |
| CGI     | Chattanooga Goodwill Industries, Inc.                                      |
| E&T     | Employment and Training  |
| EBMS    | Eligibility & Benefits Management System                                   |
| EPB     | Basic/Foundational Skills Instruction Component                            |
| EPEL    | English Language Acquisition Component                                     |
| EPC     | Career/Technical Education Programs or Other Vocational Training Component |
| EPWRT   | Work Readiness Training Component  |
| ETPL    | Eligible Training Provider List  |
| FFY     | Federal Fiscal Year  |
| FY      | Fiscal Year  |
| FNS     | Food and Nutrition Service   |
| GA      | General Assistance   |
| HiSET   | High School Equivalency Test   |
| HSE     | High School Equivalency  |
| IELCE   | Integrated English Literacy and Civics Education                           |
| IEP     | Individualized Employment Plan   |
| IET     | Integrated Education and Training  |
| IGA     | Interagency Grant Agreement  |
| ITO     | Indian Tribal Organization   |
| JR      | Job Retention Component  |
| JST     | Job Search Training Component  |
| LFPR    | Labor Force Participation Rate   |
| LWDA    | Local Workforce Development Area   |
| MOU     | Memorandum of Understanding  |
| MOV     | Men of Valor   |
| OSO     | One-Stop Operator  |

Tennessee SNAP E&T State Plan, FFY 2025

| Acronym | Acronym Definition   |
|---------|--|
| PAR     | Program Accountability Review                                    |
| SNAP    | Supplemental Nutrition Assistance Program                        |
| SWDB    | State Workforce Development Board                                |
| TANF    | Temporary Assistance for Needy Families                          |
| TCAT    | Tennessee College of Applied Technology                          |
| TDHS    | Tennessee Department of Human Services                           |
| TDLWD   | Tennessee Department of Labor & Workforce Development            |
| TN      | Tennessee  |
| TPP     | Third-Party Partner  |
| TWDS    | Tennessee Workforce Development System                           |
| USDA    | United States Department of Agriculture                          |
| UT      | University of Tennessee  |
| UWGN    | United Way of Greater Nashville                                  |
| VOS     | Virtual One-Stop, also commonly referred to as "Jobs4TN.gov"     |
| WBLA    | Work Based Learning, Apprenticeship Component                    |
| WBLPA   | Work Based Learning, Pre-Apprenticeship/Apprenticeship Component |
| WBLTJ   | Work Based Learning, Transitional Jobs                           |
| WIOA    | Workforce Innovation and Opportunity Act                         |

## D. Assurances

By signing on the cover page of this document and checking the boxes below, the State agency Director (or Commissioner) and financial representative certify that the below assurances are met.

**Table D.I. Assurances**

| Check the box to indicate you have read and understand each statement.   | Check Box                           |
|--|-------------------------------------|
| I. The State agency is accountable for the content of the E&T State plan and will provide oversight of any sub-grantees. (7 CFR 273.7(c)(4) and 7 CFR 273.7(c)(6))   | <input checked="" type="checkbox"/> |
| II. The State agency is fiscally responsible for E&T activities funded under the plan and is liable for repayment of unallowable costs. (7 CFR 271.4, 7 CFR 276.2, and 7 CFR 277.16)   | <input checked="" type="checkbox"/> |
| III. State education costs will not be supplanted with Federal E&T funds. (7 CFR 273.7(d)(1)(ii)(C))   | <input checked="" type="checkbox"/> |
| IV. Cash or in-kind donations from other non-Federal sources have not been claimed or used as a match or reimbursement under any other Federal program. (7 CFR 277.4(d)(2))  | <input checked="" type="checkbox"/> |
| V. Documentation of State agency costs, payments, and donations for approved E&T activities are maintained by the State agency and available for USDA review and audit. (7 CFR 277.17)   | <input checked="" type="checkbox"/> |
| VI. Contracts are procured through appropriate procedures governed by State procurement regulations. (7 CFR 277.14)  | <input checked="" type="checkbox"/> |
| VII. Program activities are conducted in compliance with all applicable Federal laws, rules, and regulations including Civil Rights and OMB regulations governing cost issues. (7 CFR parts 271, 272, 273, 274, 275, 276, 277, 281, and 282) | <input checked="" type="checkbox"/> |
| VIII. E&T education activities directly enhance the employability of the participants; there is a direct link between the education activities and job-readiness. (7 CFR 273.7(e)(2)(vi))  | <input checked="" type="checkbox"/> |
| IX. Program activities and expenses are reasonable and necessary to accomplish the goals and objectives of SNAP E&T. (7 CFR 277.4(d)(3))   | <input checked="" type="checkbox"/> |



**Table D.II. Additional Assurances**

| <p><b>The following assurances are only applicable to State agencies with the situations described below. If the condition applies, check the box to indicate you have read and understand each statement.</b></p>  | <p><b>Check Box</b></p>                    |
|---|--|
| <p>I. If in-kind goods and services are part of the budget, only public in-kind services are included. No private in-kind goods or services are claimed. (7 CFR 277.4(d) and (e))</p>   | <p><input checked="" type="checkbox"/></p> |
| <p>II. The E&amp;T Program is implemented in a manner that is responsive to the special needs of Indian Tribal members on Reservations. The State agency shall consult on an ongoing basis about portions of the E&amp;T State Plan which affect them; submit for comment all portions of the E&amp;T State Plan that affect the Indian Tribal Organization (ITO); if appropriate and to the extent practicable, include ITO suggestions in the E&amp;T State plan. (For States with Indian Reservations only.) (7 CFR 272.2(b)(2) and 7 CFR 272.2(e)(7))</p> | <p><input type="checkbox"/></p>            |

## E. State E&T Program, Operations, and Policy

### I. Summary of E&T Program

- a) Provide the vision and mission of the State E&T program. In addition, describe how your State agency's E&T program meets the purpose of E&T which is to: 1) increase the ability of SNAP participants to obtain regular employment; and 2) meet State or local workforce needs.

Tennessee Supplemental Nutrition Assistance Program Employment and Training (TN SNAP E&T) is a voluntary program that helps eligible participants achieve their vocational goals and increase self-sufficiency through funded education, skills training, and supportive services. TN SNAP E&T's goal is to provide participants with the opportunity to acquire skills, training, work experience, and/or an industry-recognized credential that provides a direct link to a successful career. TN SNAP E&T also aims to ensure that participants have the necessary skills for successful job search and the vocational readiness needed to obtain regular employment. These goals support the program's mission – to assist participants in finding a career that pays a self-sustaining wage – and vision – that Tennesseans receiving SNAP benefits achieve long-term economic self-sufficiency.

TN SNAP E&T services are a combined effort between the Tennessee Department of Human Services (TDHS), Tennessee Department of Labor and Workforce Development (TDLWD), and community partners across the state. TDHS and TDLWD collaboratively administer SNAP E&T in all 95 TN counties through an Interagency Grant Agreement (IGA) and intermediary model that leverages public and private resources within TN's workforce system. In Federal fiscal year (FFY) 2025, United Way of Greater Nashville (UWGN) will serve as TN's primary SNAP E&T intermediary partner under contract with TDLWD.

Each SNAP E&T participant is assessed during their initial interview with a SNAP E&T Case Manager and an Individualized Employment Plan (IEP) is created. Based on the participant's assessment and the career/employment goals established in the IEP, the SNAP E&T Case Manager will provide and/or refer the participant to supportive services to aid in the achievement of their goals. The participant may engage in multiple SNAP E&T components depending on their vocational/career goals. Participants who lack a high school diploma or equivalency are referred to local Adult Education (Title II) partners and encouraged to obtain this certification before (or concurrently while) taking the next steps into a career or technical training. Similarly, participants who lack soft skills, work readiness, or industry-recognized credentials (as requested by TN employers) are encouraged to seek training and/or complete activities that 1) have a direct link to employment, and 2) help build or strengthen skills which can ensure successful long-term employment.

SNAP E&T Case Managers also refer participants to WIOA partners and/or SNAP E&T intermediary and third-party partners for supportive services that help participants grapple with the competing life priorities that can derail progress toward training and career attainment, (ex: transportation). TDHS has also integrated child care services into the State’s SNAP E&T program by coordinating referrals to TN’s Child Care Payment Assistance program, helping participants and their children access opportunities that will increase their financial security, education and skills, social capital, and health and well-being.

SNAP E&T participants who demonstrate sufficient vocational skills and/or obtain the necessary credentials for their vocational goals may continue receiving assistance via Job Search Training (JST) and, when employment has been obtained, Job Retention (JR). TDLWD’s Workforce Services Division provides oversight of these services (also referred to as Job Search Training and Employment Retention supports), which are offered through TN American Job Centers (AJCs), SNAP E&T TPPs, and online via the Virtual One-Stop at [jobs4tn.gov](http://jobs4tn.gov) and/or through Coursera.

b) Is the State’s E&T program administered at the State or county level?

State level

c) (For county-administered States only) Describe how counties share information with the State agency (e.g. county E&T plans), and how the State agency monitors county operations.

N/A

d) Provide the geographic areas of the State where the E&T program operates, and describe the rationale for this selection. Designate which areas, if any, operate mandatory E&T programs.

TN SNAP E&T is a voluntary program operating in all 95 counties.

e) Provide a list of the components offered.

|     |   |
|-----|---|
| EPB | Educational Program, Basic Education and/or Foundational Skills Instruction (includes High School Equivalency programs) |
| EPC | Educational Program, Career and/or Technical Education Programs or Other Vocational Training                            |

|       |  |
|-------|--|
| EPEL  | Educational Program, English Language Acquisition      |
| EPWRT | Educational Program, Work Readiness Training           |
| JR    | Job Retention Services                                 |
| JST   | Job Search Training                                    |
| WBLA  | Work-based learning, Apprenticeship                    |
| WBLPA | Work-based learning, Pre-apprenticeship/Apprenticeship |
| WBLTJ | Work based learning, Transitional Jobs                 |

- f) Provide the web addresses (URLs) of State E&T policy resources such as handbooks and State administrative code, if available.

TN's FFY 2024 SNAP E&T State Plan is available at <https://www.tn.gov/humanservices/for-families/supplemental-nutrition-assistance-program-snap.html#:~:text=Employment%20and%20Education%20Resources>.

TN's SNAP E&T policy resources are not currently available online. See Attachments A, B, C, and D.

## II. Program Changes

*Please complete this section if applicable, and only include changes to the program for the upcoming Federal fiscal year (FY).*

- a) Summarize changes for the upcoming Federal fiscal year (FY) from the prior FY. Significant changes may include new initiatives, changes in funding or funding sources, policy changes, or significant changes to the number of partners or participants. Significant changes could include those made as a result of management evaluation findings or participation in program improvement initiatives, such as SNAP to Skills. It is not necessary to include changes made as a result of new Federal rulemaking.

Tennessee SNAP E&T has secured state funding from TDLWD's Office Of Reentry to support vocational training for justice-involved individuals enrolled with TDWLD E&T case managers, increasing the amount of 50/50 funding available to the State in FFY 2025.

In FFY 2025, TN will focus its E&T efforts on increasing the number of participants in work-based learning opportunities. This includes partnering with the TDLWD Office of Apprenticeship to:

- Identify pre-apprenticeship and apprenticeship programs, and
- Refer SNAP E&T participants to training that aligns with their employment goals. We will also work with registered apprenticeship employers to share information about SNAP E&T services, particularly Job Retention, so that employers understand the added value E&T provides for eligible apprentices to start and maintain engagement. This strategy will also support reverse referrals.

Other changes for FFY 2025:

- Continuing to refine the criteria used to evaluate which trainings are eligible for E&T tuition support to ensure funding is utilized effectively.
- Increasing Job Retention activities by training third-party partners (TPP) on effective use of the JR component through 90 days of employment and improved reporting that captures employment outcomes.
- Providing case management staff with standardized Job Search Training curriculum materials.

b) Highlight any changes from above that the State agency is making to the E&T program based on the prior year's performance, for instance changes made as a result of E&T outcome and participation data.

Tennessee is focused on developing quality SNAP E&T partnerships that produce outcomes that align with the State's programmatic goals. During FFY 2024, TDHS, TDLWD, and United Way of Greater Nashville collaboratively conducted an evaluation of each TPP and, accordingly, reduced the number of partners that will be retained in FFY 2025 from 16 to 12.

Due to low HiSET attainment percentages for individuals participating in Adult Education services, TN will begin obtaining quarterly progress reports from Adult Education partners for each enrolled SNAP E&T individual in FFY 2025. Case management staff will also receive training on how to conduct mandatory monthly follow-up engagements that include positive reinforcement for participants.

### **III. Consultation and Coordination with the Workforce Development System**

*State agencies must design the E&T program in consultation with the State workforce development board and operate the E&T program through the Statewide workforce*

*development system (7 CFR 273.7(c)(5)). The goal of this section is to explain the relationship between the State agency and other organizations it plans to consult and coordinate with for the provision of services, including organizations in the statewide workforce development system. The statewide workforce development system refers to a network of providers, which may include government and the public sector; community-based organizations and non-profits; employers and industry; occupational training providers; and post-secondary institutions, such as community colleges. Please note the State workforce development board is an entity that establishes regional strategic plans and sets funding priorities for their area. They are distinct from State workforce agencies.*

## **Consultation**

*Consultation with the workforce development system generally includes discussions to learn about services provided in the community and how each organization functions and coordinates with others in the community. State agencies can demonstrate they consulted with their State workforce development board by noting the dates of conversations, who they spoke with, what they spoke about, and how they incorporated this information into the design of their E&T program.*

- a) **Consultation with State workforce development board:** Describe how the State agency consulted with the State workforce development board in designing its SNAP E&T program. This description should include with whom the State agency consulted and the outcomes of the consultation. If the State agency consulted with private employers or employer organizations in lieu of the State workforce development board, skip to question (b).

Each year, program leadership consults with the Operations Committee of TN's State Workforce Development Board (SWDB) regarding design of the State's SNAP E&T program. The Committee's feedback has informed the plan's focus on program development/operations in rural counties and a focus on work-based learning activities. On September 6, 2024, the TDHS State Director for SNAP and TDLWD State Director for SNAP E&T presented the final FFY 2025 plan to the Operations Committee (led by Committee Chairman Stuart Price) during an in-person meeting. The Committee approved the planned components (particularly pre-apprenticeship and apprenticeship), increased focus on trainings approved by local workforce areas (particularly community colleges and TCATs on the State's Eligible Training Provider List), prioritization of health care and truck driving as high opportunity career fields (following their identification as in-demand occupations in local and regional WIOA plans).

Further, the SWDB (led by Board Chairman Tim Berry) also reviews and approves TN's WIOA Combined State Plan, of which SNAP E&T is an integral part. Under the Combined Plan, local areas and regional planning councils are required to address the unique needs and barriers of their respective areas, identifying strategies that will

be delivered to support and encourage regional alignment that meets industry demands. To ensure SNAP E&T is fully integrated within local workforce systems and partner program referral processes, SNAP E&T leadership and State Office staff review and provide feedback on all local and regional plans, ensuring that SNAP E&T participants are included as a skilled talent pool to support high-demand occupations.

- b) **Consultation with employers:** If the State agency consulted with private employers or employer organizations in lieu of the State workforce development board, document this consultation and explain the determination that doing so was more effective or efficient. Include with whom the State agency consulted and the results of the consultation.

N/A

## Coordination

*Coordination with the workforce development system consists of efforts to partner with workforce providers to directly serve SNAP E&T participants or to align the flow or types of services offered across programs.*

- c) **Special State Initiatives:** Describe any special State initiatives (i.e. Governor-initiated or through State legislation) that include SNAP E&T. Describe any efforts taken by the State agency to coordinate these programs, services, partners, and/or activities with the State's E&T program.

SNAP E&T is fully integrated within the Governor's workforce development vision for TN, which includes extending additional training and educational opportunities, leveraging and/or braiding resources, developing partnerships with TN Colleges of Applied Technology (TCATs) and community colleges, and fostering initiatives such as TN Reconnect and TN Promise, the State's last-dollar tuition support programs for nontraditional students (age 24 years and older) and recent high school graduates seeking technical certificates and associate degrees. Since TN Reconnect and TN Promise do not cover books, tools, uniforms, or required equipment, SNAP E&T assists with these costs for programs that are on the Eligible Training Provider List.

SNAP E&T supports the Governor's vision for justice-involved individuals through relationships with TPP that target the justice-involved population and by working with the TDLWD Office of Reentry.

- d) **Coordination with title I of WIOA:** Describe the extent to which the State agency is carrying out SNAP E&T programs in coordination with title I programs under the Workforce Innovation and Opportunity Act (WIOA).

Co-enrollment in SNAP E&T and WIOA Title I is encouraged when participants are enrolled in either program. By aligning SNAP E&T and WIOA, TN aims to identify more opportunities for SNAP recipients to benefit from WIOA services.

When SNAP E&T participants are referred to WIOA Title Partners for career and technical training, strategies are in place to guide participants toward training that helps meet targeted in-demand occupation pipeline needs. (In-demand occupations are identified utilizing data from local WIOA plans and Labor Market Information within jobs4tn.gov; training programs are approved by local workforce boards and a list of eligible training providers is available at jobs4tn.gov.)

Most participants are referred to WIOA Title Partners for career services within local workforce areas, including co-enrollment in training programs, skill-building/career development, and work experience assignments. One-Stop Operators (OSOs) within AJCs coordinate participant flow, local career service providers offer participants work-based learning opportunities to demonstrate competencies and employability skills in a workplace environment, and partnerships with TCATs and Community Colleges allow participants to select from a variety of short-term training programs.

When participants are co-enrolled in both WIOA and SNAP E&T, providers coordinate and track participation and supports via jobs4tn.gov to ensure that services are not duplicated. Participant needs assessments document all sources of available funding and how costs will be shared to cover unmet need. No WIOA programs are funded with SNAP E&T funds.

e) **WIOA Combined Plan:** Is SNAP E&T included as a partner in the State's WIOA Combined Plan?

Yes

No

f) **TANF/GA Coordination:** Describe how the State agency is coordinating with TANF/GA programs, services, partners, and/or activities. Describe any TANF/GA special initiatives targeting specific populations and any actions taken to coordinate with these efforts.

Staff ensure SNAP recipients transitioning off TANF cash assistance are aware of and can access SNAP E&T training opportunities once they become eligible for SNAP E&T services. Staff also ensure that SNAP participants with TANF "child-only" cases are aware of and can access SNAP E&T training opportunities if those customers are not included in TANF cases.



- g) **Other Employment Programs:** Describe how the State agency is coordinating its SNAP E&T program with any other Federal or State employment program (e.g. HUD, child support, re-entry, refugee services).

As a WIOA partner under the Combined State Plan, SNAP E&T can co-enroll participants in other WIOA Combined Plan activities or components. Under the WIOA Title Programs, E&T participants are connected to training and mandatory case management services. WIOA Title Partners may offer E&T participants the supportive services needed to complete their training programs. TDLWD SNAP E&T staff also attend AJC partner meetings to ensure that SNAP E&T program knowledge and coordination exists across the network.

#### IV. Consultation with Indian Tribal Organizations (ITOs)

*State agencies are required to consult with Tribes about the SNAP State Plan of Operations, which includes the E&T State Plan, per 7 CFR 272.2(b) and 272.2(e)(7). The consultations must pertain to the unique needs of Tribal members. State agencies are required to document the availability of E&T programs for Tribal members living on reservations in accordance with 7 CFR 273.7(c)(6)(xiii). The goal of this section is to describe how the State agency consulted with Indian Tribal Organizations (ITOs), describe the results of the consultation, and document the availability of E&T programs for Tribal members living on reservations.*

- a) Did the State agency consult with ITOs in the State?

- Yes, ITOs in the State were consulted. *(Complete the rest of this section.)*
- No, ITOs are located in the State but were not consulted. *(Skip the rest of this section.)*
- Not applicable because there are no ITOs located in the State. *(Skip the rest of this section.)*

- b) Name the ITOs consulted.

- c) **Outcomes:** Describe the outcomes of the consultation. Provide specific examples of how the State agency incorporated feedback from ITOs into the design of the E&T program (e.g., unique supportive service, new component, in-demand occupation).

- d) **Enhanced reimbursement:** Will the State agency be seeking enhanced reimbursement for E&T services (75%) for ITO members who are residents of reservations, either on or off the reservation?

Yes

No

## V. Utilization of State Options

*State agencies have the flexibility to implement policy options to adapt and meet the unique needs of State populations. Check which options the State agency will implement.*

- a) The State agency operates the following type of E&T program (*select only one*):

Mandatory per 7 CFR 273.7(e)

Voluntary per 7 CFR 273.7(e)(5)(i)

Combination of mandatory and voluntary

- b) The State agency serves the following populations (*check all that apply*):

Applicants per 7 CFR 273.7(e)(2)

Exempt members of zero benefit households that volunteer for SNAP E&T per 7 CFR 273.10(e)(2)(iii)(B)(7)

Categorically eligible households per 7 CFR 273.2(j)

- c) Does the State agency enable ABAWDs to regain SNAP eligibility through E&T and verify that the ABAWD will meet the work requirement within 30 days subsequent to application per 7 CFR 273.24(d)(1)(iv)?

Yes

No

## VI. Characteristics of Individuals Served by E&T

State agencies are required to include information about the categories and types of individuals they plan to exempt from mandatory E&T participation (7 CFR 273.7 (c)(6)(iv)), as well as the characteristics of the population they plan to place in E&T (7 CFR 273.7 (c)(6)(v)).

- a) Describe the categories and types of individuals the State will exempt from mandatory E&T participation. In accordance with 7 CFR 273.7(e), State agencies may exempt from mandatory E&T participation, categories of work registrants (e.g. all those in counties X, Y, Z, or those in their first 30 days of receipt of SNAP) and individual work registrants based on certain personal characteristics or circumstances (e.g. lack of transportation or temporary disability). These exemptions are in addition to the federal exemptions from work requirements at 273.7(b) and only applicable to the E&T requirement at 7 CFR 273.7(a)(1)(ii). Exemptions from Mandatory E&T must also be listed in Table H 'Estimated Participant Levels' Sheet of the Excel Workbook.

(Note: States than run all-voluntary E&T programs would note that they exempt all work registrants.)

TN operates a voluntary SNAP E&T program; all work registrants are exempt.

- b) How frequently will the State plan to re-evaluate these exemptions from mandatory E&T?

The State re-evaluates exemption policy annually (by March 1) while compiling the SNAP E&T State Plan.

- c) What are the characteristics of the population the State agency intends to serve in E&T (e.g. target population)? This question applies to both mandatory and voluntary participants.

- ABAWDs
- Homeless
- Veterans
- Students
- Single parents
- Returning citizens (aka: ex-offenders)
- Underemployed
- Those that reside in rural areas
- Other: Any TN SNAP recipient interested in E&T.

## VII. Organizational Relationships

*State agencies are required to include information on the organizational relationship between the units responsible for certification and the units operating the E&T components, including units of the statewide workforce development system, if available. For the purposes of the questions below, E&T providers are considered to include units of the Statewide workforce development system. FNS is specifically interested in ensuring that the lines of communication are efficient and that, if applicable, noncompliance with mandatory E&T is reported to the certification unit within 10 working days after the noncompliance occurs, per 7 CFR 273.7(c)(4). State agencies must also include information on the relationship between the State agency and other organizations it plans to coordinate with for the provision of services.*

The following questions are about how the E&T program is structured in your State agency.

- a) Please indicate who at the State agency directly administers the E&T program (i.e. establishes E&T policy, contracts for E&T services, monitors providers). For example, if the E&T program unit is separate from the SNAP certification unit, and if there are separate E&T units at the county level.

Within the SNAP Unit of TDHS' Division of Family Assistance, a State Office team (SNAP Director, Program Director for SNAP Subprograms, Program Manager for SNAP Subprograms, and SNAP E&T Program Coordinator) administers SNAP E&T.

The TDHS team works closely with TDLWD's E&T team (State Director, three Assistant Directors, and one Grant Manager) to operate TN SNAP E&T. TDLWD provides oversight of day-to-day program operations, including the State's network of SNAP E&T intermediary and third-party partners. TDHS State Office staff provide an additional level of oversight through both fiscal and programmatic monitoring of TN SNAP E&T activities. Timelines, training, and monitoring are a collaborative effort between TDHS and TDLWD.

TDHS Eligibility Counselors determine SNAP eligibility and systematically refer individuals interested in voluntary SNAP E&T participation to TDLWD for assessment and, if appropriate, enrollment. In turn, TDLWD submits regular reports to TDHS State Office regarding referrals, participant compliance with program expectations, and employment obtained through program participation.

TDLWD coordinates with UWGN to engage, support, and provide monitoring and oversight of third-party partners.

- b) How does the E&T unit coordinate and communicate on an ongoing basis with the units responsible for certification policy?

TDHS SNAP Unit staff work closely with TDHS Field Operations on policy communication and implementation (including development of training materials) and provide support for Field Management and eligibility staff, including coaching and guidance, as needed. State Office staff also conduct case monitoring to ensure participants' SNAP case records are updated timely and accurately.

c) Describe the State's relationships and communication with intermediaries or E&T providers (if applicable):

1. Describe how the State agency, intermediaries, E&T partners, share participant data and information. Include the names of any MIS systems (or other modes of communication) used.

TDLWD and the SNAP E&T partner network document and maintain participant records within VOS, TDLWD's MIS system (the department's Virtual One-Stop platform, also commonly referred to as Jobs4TN). TDLWD communicates with TDHS State Office staff regarding referrals, participant compliance with program expectations, and participant milestones via a combination of status notice correspondence sent through VOS, overnight data transfers between VOS and TDHS' Eligibility and Benefits Management System (EBMS), and established reporting cadences.

2. If the State uses an MIS system, describe the E&T related data that is tracked and stored in those systems (e.g. referrals, noncompliance with program requirements, provider determinations, etc.), and whether the system(s) interact with each other.

TDHS' EBMS system interfaces with TDLWD's case management system, VOS. TDHS Eligibility Counselors document E&T referral dates and upon exit, the reason for deregistration/deregistration date in E&T participants' SNAP case records. Overnight, EBMS sends batch referral and deregistration data to VOS and TDLWD sends provider determinations and compliance notices to TDHS via VOS-generated email messages.

3. Describe how the State agency shares new policies, procedures, or other information with the intermediary or other E&T partners.

TDHS coordinates with TDLWD and UWGN/UT Extension to disseminate programmatic information across the E&T partner network, including policies, procedures, program updates, and training resources via in-person and virtual meetings, formal memos, email, and/or telephone, as appropriate.

TDLWD provides a program manual that relays policies and procedures. This manual is updated annually and shared with all providers.

4. Describe the State agency's process for monitoring E&T partners' program and fiscal operations. Include plans for direct monitoring such as visits, as well as indirect monitoring such as reviewing program data, financial invoices, etc.

Both TDHS and TDLWD conduct fiscal and programmatic monitoring of SNAP E&T activities.

The TDLWD E&T team conducts monthly programmatic activity desktop reviews and/or site visits and invoice reviews via SmartSimple; the department's Program Accountability Review (PAR) team also conducts an annual review. TDLWD provides the monitoring tools, plans, schedules, and other supporting documents used to monitor all subrecipient program operations and financials to TDHS as well as processes for addressing observations and/or findings.

The TDHS SNAP Unit conducts programmatic activity desktop reviews and site visits as well as invoice reviews with a particular focus on:

- TPPs which had a Corrective Action Plan (CAP) during the prior program year (reviewed every year until findings are resolved),
- TPPs with a budget of less than \$250,000.00 (reviewed every other year unless the TPP is subject to a CAP),
- Providers with a budget of \$250,000.00 or more (reviewed every year),
- All SNAP E&T agreements that have personnel funded by 100% SNAP E&T funds (reviewed each year), and
- All intermediary partners (reviewed every year).

TDLWD/intermediary partners provide focused, proactive technical assistance and support to new TPPs during their first year of service delivery to ensure successful onboarding. TDHS begins monitoring TPPs during the second year of service delivery.

The TDHS SNAP Unit also reviews invoices and supporting documentation submitted by TDLWD to ensure that only allowable costs are reimbursed and collaborates with other TDHS State Office teams on case record monitoring (using a random sampling methodology and status notice data), reviewing cases for adherence to program policies.

5. Describe how the State agency evaluates the performance of partners in achieving the purpose of E&T (assisting members of SNAP households in gaining skills, training, work, or experience that will increase their ability to obtain regular employment and meets State or local workforce needs).

All participants served by the E&T partner network are registered in TDLWD's VOS system where participation, completion, retention, and employment are tracked to help TDLWD and TDHS evaluate the effectiveness of services provided.

Each partner will also be evaluated at the end of the second quarter to evaluate:

- Have the services they provided been linked to the individual's employment plan? This is determined by desk top reviews of each partner.
- Have they efficiently conducted case management for SNAP ET? This is determined by review of case notes and data entry into VOS
- Progress on the provider's submitted goals on their annual Scope of Work
- Number of participants served in relation to projected numbers
- Number of participants who earn a credential
- Number of E&T participants who obtain employment

Performance is also assessed by achievement of established annual SNAP E&T program goals.

## VIII. Screening for Work Registration

*State agency eligibility staff must screen for exemptions from work registration, per 7 CFR 273.7(a).*

- a) Describe how the State agency screens applicants to determine if they are work registrants.

TDHS determines SNAP recipients' work registration and work participation requirements. During SNAP intake and renewal interviews, TDHS Eligibility Counselors use the FNS-approved Work Requirements Oral Script & E&T Screening Tools (p. 4, 11 of Attachment B) and automated data matches to evaluate each customer for federal work registration exemptions.

- b) How does the State agency work register non-exempt individuals? For example, does the State agency make a notation in the file, do individuals sign a form, etc.?

TDHS Eligibility Counselors update the EBMS E&T submodule to document work registration.

- c) At what point in the certification process does the State agency provide the written explanation and oral notification of the applicable work requirements?

TDHS provides oral notification of applicable work requirements during SNAP intake and renewal interviews. When SNAP benefits are approved, a written explanation is provided to the household via the Consolidated Work Notice (Attachment C).

## IX. Screening for Referral to E&T

*The State agency must screen each work registrant to determine if it is appropriate, based on State specific criteria, to refer them to the E&T program per 7 CFR 273.7 (c)(2). State agencies may operate program components in which individuals elect to participate, per 7 CFR 273.7(e)(4).*

- a) List the State-specific criteria eligibility workers use to screen individuals to determine if it is appropriate to refer them to the State's SNAP E&T program. *(Note: This question is not asking about criteria that may be unique to each provider.)*

TDHS Eligibility Counselors (EC) screen work registrants during intake and renewal interviews and whenever customers request a referral to E&T. During interviews, ECs gather information about customers' current circumstances and review case information (including automated alerts) to determine if customers qualify for any federal exemptions, explore any barriers to employment customers may face, and discuss any resources that E&T may offer to help customers overcome those barriers.

ECs utilize the Work Requirements Oral Script as a guide to help identify work registrants and exemptions. Additionally, ECs explain the E&T program to customers, including participant reimbursements for transportation assistance, child care assistance, school supplies, testing fees, uniforms, tuition assistance, and personal



safety items and equipment. ECs ask customers a series of three screening questions to determine whether customers are appropriate for referral to E&T. These are:

- Do you want to work or go to school?
- Are you willing to commit your time to seek work or learning a new skill for work?
- After hearing about the E&T program, are you able and willing to volunteer for this program?

If a customer is deemed a good fit for the program and is able and willing to participate, an E&T referral is batched to TDLWD via overnight data transfer.

- b) Describe the process for screening during the certification and recertification process. Include the staff involved in the screening, how the staff conduct the screening, and when the screening occurs.

To ensure only valid referrals are processed, Eligibility Counselors evaluate customers according to the Screening Process for Employment & Training within the Work Requirements Oral Script & E&T Screening Tools prior to referring to E&T. If a customer is deemed a good fit for the program and is able and willing to participate, an E&T referral is batched to TDLWD via overnight data transfer.

Following referrals, TDLWD Case Managers conduct a secondary assessment during customers' Individualized Employment Plan (IEP) meeting.

- c) *(If applicable)* Describe the process for screening upon receipt of a request for referral to E&T from an E&T provider (reverse referral). Include the staff involved in the screening, how the staff conduct the screening, and when the screening occurs.

E&T TPP and TDLWD staff send reverse referral requests via Formstack for review. TDHS Field Operations staff confirm prospective E&T participants are current SNAP recipients and that screening occurred during the interview process. If appropriate, the TDHS E&T Field Operations staff process referrals to TDLWD via overnight data transfer.

- d) How and when are participants informed about participant reimbursements? In the case of mandatory participants, how and when does the State agency ensure individuals are exempted from mandatory E&T if the costs of participant reimbursements exceed any State agency cap or are not available?

TDHS Eligibility Counselors inform participants about reimbursements during SNAP eligibility interviews and through the Consolidated Work Notice. Participants are also informed about reimbursements and other program resources during their initial

assessment interviews with American Job Center and TPP staff. Information about participant reimbursements is also provided in an introductory video that outlines program resources on TDLWD's SNAP Employment & Training webpage (<https://www.tn.gov/workforce/jobs-and-education/services-by-group/services-by-group-redirect/snapet.html>).

## X. Referral to E&T

*In accordance with 7 CFR 273.7(c)(2), the State agency must refer participants to E&T.*

- a) What information does the State provide to E&T participants when they are referred and how is the referral communicated (e.g. information about accessing E&T services, case management, dates, contact information)?

During SNAP interviews, TDHS Eligibility Counselors follow the Work Requirements Oral Script and explain resources available through TN's voluntary SNAP E&T program to help household members find employment, gain job skills through training, and/or prepare for a skilled career with self-sustaining wages. Customers also receive the Consolidated Work Notice that contains information about E&T including participant reimbursements and program activities including job search training, work experience or training, work readiness training, career technical training, and adult education. Customers are also advised of their rights and responsibilities orally during the discussion surrounding E&T and in writing through the Consolidated Work Notice.

When customers volunteer for SNAP E&T, TDHS ECs process referrals to TDLWD via automated file transfer. Upon receipt, participants are notified by TDLWD that their initial E&T appointment will be conducted within 10 business days. AJC and TPP staff conduct these initial appointments with participants and provide additional information about E&T services including case management, components offered, program requirements, available resources, contact information, and important dates.

- b) If a State receives and approves a referral request from an E&T provider (reverse referral), how does the State communicate to the SNAP participant that they are in SNAP E&T and about their rights to receive participant reimbursements, etc.?

TDHS ECs discuss E&T resources, including participant reimbursements, with all SNAP customers during intake and recertification and confirm that documentation of the conversation exists prior to processing all E&T reverse referrals. Upon enrollment in SNAP E&T, each participant signs a voluntary participant agreement with TDLWD.

- c) After referral, describe what the E&T participant must do next. For instance, if the participant must report for an orientation describe who conducts the orientation, where the orientation occurs (e.g. in-person at a provider, log-in to a computer

program, telephone interview with a case manager), and what happens during the orientation. If the next step varies throughout the State, describe the most common next step.

Upon receipt of an E&T referral, TDLWD Case Managers attempt to contact the customer via telephone regarding their upcoming initial appointment, to be held within 10 business days. If the customer cannot be reached via telephone, TDLWD notifies the participant in writing (via postal mail) within two business day after the Case Manager attempts initial contact via telephone. During the initial appointment, the customer participates in an individual assessment that informs their Individualized Employment Plan (IEP) to address employment barriers and goals. Following creation of the IEP, participants enroll and begin work in their identified component(s).

d) How is information about the referral communicated within the State agency? For instance, is the information entered into an MIS by the eligibility worker and reviewed by an E&T specialist?

TDHS SNAP Unit staff collaborate with other TDHS State Office teams to conduct EBMS case record monitoring and review cases for adherence to E&T program policies, including appropriate referrals and documentation. TDHS SNAP Unit staff can review referral progress in VOS, including initial appointment outcomes, comprehensive intake assessments, individualized service plans, progress monitoring, and coordination among service providers. TDLWD also provides E&T participation status notices to TDHS.

e) How is information about the referral communicated to E&T providers, as applicable? If the State works with E&T providers outside the State agency, how does the E&T provider know a SNAP participant has been referred to them?

E&T partner providers are notified of referrals via VOS. Within VOS, providers can review and update referral progress including initial appointment outcome, comprehensive intake assessments, individualized service plans, and progress monitoring.

## **XI. Assessment**

*As a best practice, SNAP participants should be assessed after referral to ensure they receive targeted E&T services.*

a) Does the State require or provide an assessment?

Yes (*Complete the remainder of this section.*)

No (*Skip to the next section.*)

- b) If yes, describe the processes in the State, if any, to provide E&T participants with an assessment (e.g. who conducts the assessment, when are participants assessed, what tools *are* used, and how are the results shared with State agency staff, providers, and/or participants)

SNAP E&T participant assessments are conducted by TDLWD E&T, WIOA partner, and/or TPP staff during the initial SNAP E&T appointment using an approved assessment tool developed for the initial one-on-one appointment. Appointments can be conducted in person or virtually. Information provided by participants during the assessment helps staff determine which barriers require mitigation and aids in the development of the participant's Individual Employment Plan (IEP). The IEP maps the participant's path to achieve a desired employment outcome. Additional assessment tools within VOS can help evaluate employability skills/readiness for employment and determine employment matches based upon fields suitable for participants. Assessments and other relevant case data are housed in VOS where participant information can be reviewed by authorized TDHS, TDLWD, WIOA, and TPP staff.

## **XII. Case Management Services**

*The State E&T program must provide case management services to all E&T participants. In accordance with 7 CFR 273.7(c)(6)(ii), State agencies are required to include specific information about the provision of case management services in the E&T State plan.*

- a) What types of E&T case management services will the State agency provide?  
*Check all that apply.*

- Comprehensive intake assessments
- Individualized Service Plans
- Progress monitoring
- Coordination with service providers
- Reassessment

Other. Please briefly describe: Click or tap here to enter text.

- b) Describe how case management services are delivered in your State. For instance, in one model case management is provided by E&T specialists who provide assessments and other services after participants are referred to E&T. In other instances, case management is integrated into the component. If your State uses

more than one model, describe the one or two most common ways of delivering case management services.

Each Regional Local Workforce Office team includes TDLWD staff tasked with processing TDHS E&T referrals. At the point of entry, each E&T participant is assigned a Case Manager responsible for scheduling their initial appointment and ongoing case management.

Participants referred to SNAP E&T via TDHS receive case management services from TDLWD staff. Participants identified by Third Party Partners and enrolled via reverse referrals receive case management services from staff at the referring organization once eligibility is confirmed by TDHS. Information about the case manager responsible for the case management activity (i.e., TDLWD staff or TPP staff, depending on the referral source) is documented in VOS.

For all components, Case Management Services include:

- Initial assessment;
- Creation of Individual Employment Plan (with steps and goals updated at each subsequent interaction);
- Virtual or in person follow up meeting each 30 days to ensure there are no new barriers to participation, provide any participants reimbursements, and discuss progress toward the employment goal;
- Tracking all scheduled appointments in VOS;
- Updating Case Notes in VOS for each participant interaction;
- Component Participation tracking in VOS via activity codes;
- Providing referrals to any additional supports needed for component participation; and
- Sending status updates to TDHS at enrollment and each 30 days (at a minimum).

c) Using the table below, describe how E&T case managers coordinate with other staff and services. Coordination can involve tracking E&T participation, sharing information that may be relevant to participation in E&T (e.g. information related to good cause or a work exemption), and referral to additional services.

Communication/Coordination with:

|                                 |   |
|---------------------------------|---|
| <p>SNAP eligibility staff:</p>  | <p>Case managers share information about potential exemptions that a participant may qualify for. Status updates are sent via VOS to the designated TDHS E&amp;T primary county contact (Eligibility Counselors) for review and action. The status notice will include the participant's name, SNAP case number, date of most recent appointment, current status, and any ABAWD hours that the participant has gained through participation with E&amp;T.</p>   |
| <p>State E&amp;T staff:</p>     | <p>Communication/coordination occurs via email and a shared status spreadsheet (saved on an internal State drive accessible by approved State staff). To ensure timely response between TDHS/TDLWD, both agencies document and review feedback via shared spreadsheets on any issues noted during the referral process, including data entry and/or case management files. All SNAP E&amp;T staff have access to VOS which houses E&amp;T participant data to include appointments, case notes, and steps within the employment plan.</p>   |
| <p>Other E&amp;T providers:</p> | <p>Communication/coordination occurs via email, telephone calls, and regular (monthly and/or quarterly) meetings. Since all E&amp;T providers use the same system, all participant data can be viewed to ensure there is no duplication of services. A program procedure manual is also provided to all providers. TDLWD's three SNAP E&amp;T Assistant Directors coordinate service flow, oversee technical assistance, and monitor for program compliance across the state's E&amp;T system.</p>  |
| <p>Community resources:</p>     | <p>Communication/coordination occurs via email, telephone calls, and meetings. Each AJC has a list of community resources available in the area and hosts a quarterly cross training where available resources are often shared. SNAP E&amp;T staff also utilize United Way's 211 weblink to provide participants with specific resources. During the initial assessment, attempts are made to connect participants to resources based on the barriers indicated. Referrals are noted in the shared case management system. TDLWD's SNAP E&amp;T Assistant Directors also work to identify available community resources to share with case management staff.</p> |

- d) Describe how the State agency will ensure E&T participants receive targeted case management services through an efficient administrative process, per 7 CFR 273.7(c)(6)(ii).

Case management activities and/or services are targeted based on each participant's assessment, IEP, and ongoing progress monitoring. Referrals and coordination with service providers, communication to participants, and participant activities and outcomes are documented within VOS. All Case Managers operating within the One-

Stop system have the ability to view activities, case notes, and documentation. All communication to clients occurs via the customer's preferred contact method (reviewed and documented during the customer's initial assessment).

State program guidelines require participants to be engaged in follow-up each 30 days, at minimum. These follow-up discussions are conducted in coordination with any partner programs in which the individual is co-enrolled. Regular communication helps Case Managers ensure participants have the support they need to successfully progress through training and obtain/maintain employment.

Follow-up appointments focus on addressing any new barriers and monitoring program participation levels. Transportation reimbursements are also issued. Participant updates are documented in VOS and provided to TDHS via E&T Status Notice every 30 days and any time a participant's status changes.

### **XIII. Conciliation Process (if applicable)**

*In accordance with 7 CFR 273.7(c)(3), State agencies have the option to offer a conciliation period to noncompliant E&T participants. The conciliation period provides mandatory E&T participants with an opportunity to comply before the State agency sends a notice of adverse action. The conciliation process is not a substitute for the determination of good cause when a client fails to comply.*

a) Does the State agency offer a conciliation process?

Yes (Complete the remainder of this section.)

No (Skip to the next section.)

b) Describe the conciliation process and include a reference to State agency policy or directives.

c) What is the length of the conciliation period?

### **XIV. Disqualification Policy for General Work Requirements**

*This section applies to the General Work Requirements, not just to E&T, and should be completed by all States, regardless of whether they operate a mandatory or voluntary E&T program.*

*All work registrants are subject to SNAP work requirements at 7 CFR 273.7(a). A nonexempt individual who refuses or fails to comply without good cause, as defined at 7 CFR 273.7(i)(2), (i)(3), and (i)(4), with SNAP work requirements will be disqualified and subject to State disqualification periods. Noncompliance with SNAP work requirements includes voluntarily quitting a job or reducing work hours below 30 hours a month, and failing to comply with SNAP E&T (if assigned by the State agency).*

a) What period before application does the State agency use to determine voluntary quit and/or reduction in work effort without good cause per 7 CFR 273.7(j)(1)?

30 days

60 days

Other: Click or tap here to enter text.

b) For all occurrences of non-compliance discussed below, must the individual also comply to receive benefits again?

Yes

No

c) For the first occurrence of non-compliance per 7 CFR 273.7(f)(2)(i), the individual will be disqualified until the later of:

One month or until the individual complies, as determined by the State agency

Up to 3 months

d) For the second occurrence of non-compliance per 7 CFR 273.7(f)(2)(ii), the individual will be disqualified until the later of:

Three months or until the individual complies, as determined by the State agency

Up to 6 months

e) For the third or subsequent occurrence per 7 CFR 273.7(f)(2)(iii), the individual will be disqualified until the later of:

Six months or until the individual complies, as determined by the State agency

Time period greater than 6 months

Permanently



f) The State agency will disqualify the:

- Ineligible individual only
- Entire household (if head of household is an ineligible individual) per 7 CFR 273.7(f)(5)(i)

## XV. Good Cause

*In accordance with 7 CFR 273.7(i), the State agency is responsible for determining good cause when a SNAP recipient fails or refuses to comply with SNAP work requirements. Since it is not possible for FNS to enumerate each individual situation that should or should not be considered good cause, the State agency must take into account the facts and circumstances, including information submitted by the employer and by the household member involved, in determining whether or not good cause exists.*

- a) Describe the State agency process to determine if a non-exempt individual has good cause for refusal or failure to comply with a SNAP work requirement. Include how the State agency reaches out to the SNAP participant, employers, and E&T providers (as applicable), as well as how many attempts are made to reach out to the SNAP participant for additional information.

If an individual refuses or fails to comply with the general work requirements, the Eligibility Counselor must evaluate the individual to determine the next appropriate steps. When a voluntary participant or an individual who is exempt from work requirements fails to comply, there is no penalty. Only participants who voluntarily quit a job are subject to a good cause determination.

The State's SNAP Work Requirements Procedure Manual provides guidance regarding good cause determinations, including the procedures for determining good cause for non-exempt individuals who fail to comply with a SNAP work requirement.

1. The Eligibility Counselor must contact the household and determine whether good cause exists.

2. Good cause for failure to comply includes circumstances beyond the household member's control, such as, but not limited to:

- a. The individual's illness, or illness of another household member which requires the individual's presence;
- b. Household emergencies;
- c. Lack of transportation;

d. The household did not receive notification to appear for an interview, provide employment information, etc.; or

e. An individual cannot make satisfactory progress in an education program according to the Adult Basic Education (ABE) teacher and does not appear capable of earning an acceptable wage.

If employment hours for an individual subject to the ABAWD work requirement decrease below 20 per week/80 per month, then an EC must review the individual's circumstances to determine if good cause exists. An ABAWD shall not be considered to have met the work requirement if the absence is not temporary/the job is not retained. If an individual would have worked an average of 20 hours per week but missed some work for good cause, then the individual shall be considered to have met the work requirement. Good cause for failure to comply includes circumstances beyond the household member's control, such as but not limited to, illness, illness of another household member requiring the presence of the member, a household emergency, or the unavailability of transportation.

If a customer reports a change by telephone, then the EC assisting the customer discusses the reason for the change during the call. If a customer reports a change via another method, then TDHS requests verification of the change and associated circumstances.

Once staff receives the provider determination from TDLWD, staff must make two telephone attempts to reach the individual to advise them of the information provided by TDLWD. Staff will contact the participant within 10 days of receipt of the provider determination from TDLWD. If the customer cannot be reached after two telephone attempts, a notice will be sent to the customer. Staff will document the two telephone attempts and/or the notice in case notes. An ABAWD who has received a provider determination will not accrue countable months during the month during which the TDHS notifies the ABAWD of the provider determination

If the customer is unable to continue to participate in E&T, the customer must be de-registered from E&T. If a customer has been deregistered from E&T, then exemptions from work registration and the ABAWD requirements must be explored with the customer and documented in the case notes. If no ABAWD exemption exists, the customer will be given a countable ABAWD month in the following month (i.e., the month after action is taken).

When a determination is made that good cause did not exist for the voluntary quit or reduction in hours, the individual will be disqualified from participating in Supplemental Nutrition Assistance Program (SNAP), as follows:

- a. First Violation – one (1) month;
- b. Second Violation – three (3) months;

c. Third and Subsequent Violations – six (6) months.

The system will issue the household a notice of denial explaining the proposed period of disqualification and the right to a fair hearing.

b) What is the State agency's criteria for good cause?

TN's criteria for good cause includes circumstances beyond the individual's control, such as but not limited to: illness, illness of another household member that requires the presence of the noncompliant individual, a household emergency, or the unavailability of transportation.

c) Please describe the State agency's process to determine good cause if there is not an appropriate and available opening for an E&T participant.

Since TN began operating voluntary SNAP E&T, the State has always had appropriate and available openings for E&T participants in all components. Should there come a time when the State does not have available openings due to a lack of funding, TDHS and TDLWD State Office E&T staff will cease to make referrals, until the components are made available.

## XVI. Provider Determinations

*In accordance with 7 CFR 273.7(c)(18) a State agency must ensure that E&T providers are informed of their authority and responsibility to determine if an individual is ill-suited for a particular E&T component.*

a) Describe the process used by E&T providers to communicate provider determinations to the State agency.

TDLWD, United Way of Greater Nashville, University of Tennessee Extension and subcontracted partners communicate provider determinations to TDHS via E&T status notices, generated through TDLWD's system of record. Provider determinations include customer name, initial component, date of the provider determination, reason for the provider determination, new component (if applicable), and customer's next step.

b) Describe how the State agency notifies clients of a provider determination. Please include the timeframe for contacting clients after receiving a provider determination.

TDHS eligibility staff notify households of provider determinations within 10 calendar days of receipt. Staff must make two telephone attempts to the individual to advise them of the information provided by TDLWD or the TPP.

If a customer cannot be reached after two telephone attempts, staff are advised to send the following notice:

“We received notice of a provider determination. A provider determination is a determination by the Tennessee Department of Labor and Workforce Development that you are not compatible for your work activity. You are not being sanctioned and may have already been placed in another work activity; in which you are more compatible. If you are an Able-Bodied Adult Without Dependents (ABAWD), you can receive SNAP for three (3) months in a three (3) year or thirty-six-month period. You will receive your (1st, 2nd, or 3rd) countable month beginning xx/xxxx unless you meet or are otherwise not subject to the ABAWD work requirement. If you are still unsure about your activity participation; please contact the FASC at 1-866-311-4287 to discuss your exemption options.”

TDHS staff must document the two telephone attempts and/or the act of sending the notice in the running records.

If any E&T staff, Case Manager, training provider, or contracted TPP staff make a determination that an E&T participant is ill-suited for the activity, then the E&T Case Manager will send a status notice to TDHS via email and through the case management system.

The template below is provided in the TDLWD SNAP E&T Program Manual and must be used by the Case Manager when sending the status update to TDHS:

PROVIDER DETERMINATION: (Insert customer name) has been determined not a good for an E&T component.

- Provider name:
- Initial component:
- Date of provider determination:
- Next step:
- New work activity, if applicable:

## **XVII. Participant Reimbursements**

*In accordance with 7 CFR 273.7(d)(4), State agencies are required to pay for or reimburse participants for expenses that are reasonable, necessary, and directly related to participation in E&T. State agencies may impose a maximum limit for reimbursement payments. If a State agency serves mandatory E&T participants, it must meet all costs*

*associated with mandatory participation. If an individual's expenses exceed those reimbursements available by the State agency, the individual must be placed into a suitable component or must be exempted from mandatory E&T.*

**Table E.I. Estimates of Participant Reimbursements**

|   |  |
|---|--|
| <p>I. Estimated number of E&amp;T participants to receive participant reimbursements. This is an unduplicated count. If an individual participates in more than one month, they would only be counted once.</p> <p><i>State agencies should take into consideration the number of mandatory E&amp;T participants projected in Table H – Estimated Participant Levels in the Excel Workbook, and the number of mandatory E&amp;T participants likely to be exempted, if the State agency cannot provide sufficient participant reimbursements.</i></p> | <p>3,400</p>   |
| <p>II. Estimated number of E&amp;T participants to receive participant reimbursements per month. This is a duplicated count. This calculation can include the same individual who participates in more than one month.</p>  | <p>4,250</p>   |
| <p>III. Estimated budget for E&amp;T participant reimbursements in upcoming FY.</p>   | <p>\$1,226,558.00</p> <p>This amount includes federal and non-federal (i.e., state and partner match) funding.</p>   |
| <p>IV. Estimated budget for E&amp;T participant reimbursements per month in upcoming FY. (Row III/12)</p>   | <p>\$102,213.17</p>  |
| <p>V. Estimated amount of participant reimbursements per E&amp;T participant per month. (Row IV/Row II)</p>   | <p>\$ 24.05 per participant</p> <p>(Note: Since the State will also leverage funding beyond the SNAP E&amp;T grant to subsidize participant needs, this amount is based on the estimated E&amp;T cost allocation per participant.)</p> |

## Participant Reimbursement Details

Complete the table below with information on each participant reimbursement offered/permitted by the State agency (do not indicate information for each provider). A description of each category is included below.

- **Allowable Participant Reimbursements.** Every State agency must include child care and transportation in this table, as well as other major categories of reimbursements (examples of categories include, but are not limited to: tools, test fees, books, uniforms, license fees, electronic devices, etc.). Mandatory States must meet all costs associated with participating in an E&T program, or else they must exempt individuals from E&T.
- **Participant Reimbursement Caps (optional).** States have the option to establish maximum levels (caps) for reimbursements available to individuals. Indicate any caps on the amount the State agency will provide for the participant reimbursement.
- **Who provides the participant reimbursements?** Indicate if the participant reimbursement is provided by the State agency, a provider, an intermediary, or some other entity. The State agency remains ultimately responsible for ensuring individuals receive participant reimbursements, even if it has contracted with another entity to provide them.
- **Method of disbursement.** Indicate if the participant receives the participant reimbursement *in advance* or as a *reimbursement*. Also indicate if the amount of the participant reimbursement is an *estimated amount* or the *actual amount*.

**Table E.II. Participant Reimbursement Details**

*The following table should be completed with details that reflect the State agency’s policies on allowable reimbursements. If the response varies by E&T provider, include examples to illustrate this variation. Expenses must be listed in the State plan and approved by FNS to be allowable.*

| Allowable Participant Reimbursements                  | Participant Reimbursement Caps (optional)  | Who provides the participant reimbursement? | Method of disbursement   |
|---|--|---|--|
| School Supplies, School Books, and Training Materials | Reimbursement amounts vary based on the type of support requested. All costs must meet the reasonable and necessary standard. Vendors on the | TDWLD and TPP                               | 1. Participant receives reimbursement for the exact amount of the purchase via check or PEX card funds once receipt and/or |

| <b>Allowable Participant Reimbursements</b> | <b>Participant Reimbursement Caps (optional)</b>  | <b>Who provides the participant reimbursement?</b> | <b>Method of disbursement</b>  |
|---|---|--|--|
|   | State's approved vendor list are utilized.  |  | <p>documentation of purchase is verified valid on an allowable expense.</p> <p>OR</p> <p>2. A voucher with itemized participant needs is issued to the vendor or training provider that provides the item(s) or services necessary by the participant. Once the participant redeems the voucher, the vendor or training provider submits an invoice for items or services rendered in accordance with the issued voucher. Any payment due is then issued to the vendor or training provider directly by TDWLD or the TPP once receipt and/or other supporting documentation is verified valid and expense allowable.</p> |
| Testing Fees                                | Reimbursement amounts vary based on the type of support requested. All costs must meet the reasonable and necessary standard. Vendors on the State's approved | TDWLD and TPP                                      | Participant receives the exact amount via check, PEX card funds, or paid directly to the training provider once receipt/documentation is verified valid and expense allowable.   |

| Allowable Participant Reimbursements | Participant Reimbursement Caps (optional)   | Who provides the participant reimbursement? | Method of disbursement  |
|--------------------------------------|---|---|---|
|                                      | vendor list are utilized.   |   |   |
| Uniforms and/or Work Attire          | Reimbursement amounts vary based on the type of support requested. All costs must meet the reasonable and necessary standard. Vendors on the State's approved vendor list are utilized. | TDWLD and TPP                               | <p>1. Participant receives reimbursement for the exact amount of the purchase via check or PEX card funds once receipt and/or documentation of purchase is verified valid on an allowable expense.</p> <p>OR</p> <p>2. A voucher with itemized participant needs is issued to the vendor or training provider that provides the item(s) or services necessary by the participant. Once the participant redeems the voucher, the vendor or training provider submits an invoice for items or services rendered in accordance with the issued voucher. Any payment due is then issued to the vendor or training provider directly by TDLWD or the TPP once receipt and/or other supporting documentation is</p> |



| <b>Allowable Participant Reimbursements</b>  | <b>Participant Reimbursement Caps (optional)</b>  | <b>Who provides the participant reimbursement?</b> | <b>Method of disbursement</b>   |
|--|---|--|---|
|  |   |  | verified valid and expense allowable.   |
| Tools, Personal Safety Items, and Other Equipment Necessary for Employment or Training | Reimbursement amounts vary based on the type of support requested. All costs must meet the reasonable and necessary standard. Vendors on the State’s approved vendor list are utilized. | TDWLD and TPP                                      | <p>1. Participant receives reimbursement for the exact amount of the purchase via check or PEX card funds once receipt and/or documentation of purchase is verified valid on an allowable expense.</p> <p>OR</p> <p>2. A voucher with itemized participant needs is issued to the vendor or training provider that provides the item(s) or services necessary by the participant. Once the participant redeems the voucher, the vendor or training provider submits an invoice for items or services rendered in accordance with the issued voucher. Any payment due is then issued to the vendor or training provider directly by TDLWD or the TPP once receipt and/or other supporting documentation is</p> |

| Allowable Participant Reimbursements  | Participant Reimbursement Caps (optional)  | Who provides the participant reimbursement? | Method of disbursement   |
|---|--|---|--|
|   |  |   | verified valid and expense allowable.  |
| <p>Transportation Assistance (Gas Cards and Bus Passes) Associated with Training or Education</p> | <p>Reimbursement amounts vary based on the type of support requested. All costs must meet the reasonable and necessary standard. Vendors on the State’s approved vendor list are utilized.</p> | <p>TDWLD and TPP</p>                        | <p>Gas Cards: Provided in \$25 increments up to \$150 per 30 days of participation depending on the component and the level of participation. Depending on participant need, gas cards may be offered in advance to assist the participant or as a reimbursement after transportation costs are first incurred by the participant. (Qualifying program enrollment and attendance logs are provided.) TPP can provide transportation via method approved in their scope of work but must adhere to the cap of \$150 for each 30 days of participation.</p> <p>Bus Passes: Provided based on component attendance.</p> |
| <p>Tuition and Related fees (i.e., Course Registration, Student Activity, etc.)</p>               | <p>Reimbursement amounts vary based on the type of support requested. All costs must meet the reasonable and</p>   | <p>TDWLD and TPP</p>                        | <p>1. Participant receives reimbursement for the exact amount of the purchase via check or PEX card</p>  |

| <b>Allowable Participant Reimbursements</b>                   | <b>Participant Reimbursement Caps (optional)</b>   | <b>Who provides the participant reimbursement?</b> | <b>Method of disbursement</b>  |
|---|--|--|--|
|   | <p>necessary standard. Vendors on the State's approved vendor list are utilized.</p>   |  | <p>funds once receipt and/or documentation of purchase is verified valid on an allowable expense.</p> <p>OR</p> <p>2. A voucher with itemized participant needs is issued to the vendor or training provider that provides the item(s) or services necessary by the participant. Once the participant redeems the voucher, the vendor or training provider submits an invoice for items or services rendered in accordance with the issued voucher. Any payment due is then issued to the vendor or training provider directly by TDLWD or the TPP once receipt and/or other supporting documentation is verified valid and expense allowable.</p> |
| <p>Background, Union Dues, Licensing, and/or Bonding Fees</p> | <p>Participant reimbursement amounts vary based on the type of support requested. All costs must meet the reasonable and</p> | <p>TPP</p>   | <p>A voucher with itemized participant needs is issued to the vendor or training provider that provides the item(s) or services</p>  |

| <b>Allowable Participant Reimbursements</b>   | <b>Participant Reimbursement Caps (optional)</b>   | <b>Who provides the participant reimbursement?</b> | <b>Method of disbursement</b>   |
|---|--|--|---|
|   | <p>necessary standard. Expense must be required for the participant to gain employment.</p>  |  | <p>necessary by the participant. Once the participant redeems the voucher, the vendor or training provider submits an invoice for items or services rendered in accordance with the issued voucher. Any payment due is then issued to the vendor or training provider directly by TDWLD or the TPP once receipt and/or other supporting documentation is verified valid and expense allowable.</p> <p>Expense must have a direct link to and be a required element of the selected E&amp;T component.</p> |
| <p>Medical Expenses<br/>(Limited to vaccinations, physical exams, medical testing such as TB and other skin testing, etc., and/or drug testing)</p> | <p>Participant reimbursement amounts vary based on the type of support requested. All costs must meet the reasonable and necessary standard. Expense must be required for the participant to gain employment or approved training.</p> | <p>TDWLD and TPP</p>                               | <p>Participant receives the exact amount via check, PEX card funds, or paid directly to the training provider once receipt/documentation is verified valid and expense allowable. Expense must have a direct link to and be a required element of the selected E&amp;T component.</p>   |

- a) If providing dependent care, specify payment rates for child care reimbursements, established in accordance with the Child Care and Development Block Grant (CCDBG) and based on local market rate surveys. If alternative dependent care is provided by the State agency in lieu of reimbursement, describe these arrangements.

Child care payment assistance is coordinated through referrals to TDHS' CCDBG-funded Child Care Payment Assistance Program

- b) If dependent care agencies have a waiting list or otherwise cap the number of enrolled dependents, how will the State agency ensure E&T participants with dependent care needs receive dependent care?

TDHS' Child Care Payment Assistance Program has ample funding to support all eligible SNAP E&T participants. If a child care slot is not available with a family's preferred provider, parents may enroll their child(ren) with another agency until space becomes available at their preferred provider.

## XVIII. Work Registrant Data

*The SNAP general work requirements are described at 7 CFR 273.7(a). Individuals who do not meet an exemption from the general work requirements, as listed in 7 CFR 273.7(b)(1), are subject to the general work requirement and must register for work. In accordance with 7 CFR 273.7(c)(10), the State agency must submit to FNS the number of work registrants in the State as of October 1st. This information is submitted on the first quarter E&T Program Activity Report.*

- a) Describe the process the State agency uses to count all work registrants in the State as of the first day of the new fiscal year (October 1). Please provide information about how data is pulled from the eligibility system. For instance, how work registrants are identified and how counting is conducted.

TDHS uses a point-in-time report that counts all work registrants in the State as of the first day of the new fiscal year (October 1). This report provides unduplicated data from TDHS' automated eligibility system. Work registrants not captured in previous reports are added to the report each month. TDHS ECs identify work registrants during SNAP intake and recertification interviews, through data matches, and via case actions that change customers' work registration status and update this information in EBMS case records.

- b) Describe measures taken to prevent duplicate counting.

Every month, a list of newly identified individuals is compared against the year’s cumulative report. Individuals previously reported are not reported again; individuals not previously reported are included in the monthly report and added to the cumulative total individuals for the following month’s comparison.

## XIX. Outcome Reporting Measures

### National Reporting Measures

Table E.III. National Reporting Measures

| Source<br><i>[Check the data source used for the national reporting measures. Check all that apply]</i>                      | Employment & Earnings Measures                                      | Completion of Education of Training                                 |
|--|---|---|
| Quarterly Wage Records (QWR)   | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| National Directory of New Hires (NDNH)   | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| State Information Management System (MIS).<br><i>Indicate below what MIS system is used.</i>                                 | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| Manual Follow-up with SNAP E&T Participants.<br><i>Answer follow-up question below.</i>                                      | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Follow-up Surveys. <i>State agencies must complete the Random Sampling Plan section below, if follow-up surveys is used.</i> | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Other - Describe source: Click or tap here to enter text.  | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |

- a) If a State MIS is used, please indicate the system (e.g., SNAP eligibility system, State’s Department of Labor MIS).

Component and demographic data needed for federal reporting is located within TDLWD’s case management system, VOS/Jobs4TN.

- b) If a manual follow-up with SNAP E&T participants is conducted, describe the process for follow-up, including the contact method (e.g., verbal contact, email, or mail).

N/A

- c) If a State agency is not using Quarterly Wage Records (QWR) as the source for the national measures, describe the State agency's plan to move toward using QWR including a timeline for completion.

TN uses QWR as the source for employment and earnings measures.

### State Component Reporting Measures

- d) Check all data sources used for the State-specific component measures.

- Quarterly Wage Records (QWR)
- National Directory of New Hires (NDNH)
- State Management Information System. *Indicate the MIS used below.*
- Manual follow-up with SNAP E&T Participants. *Answer follow-up question below.*
- Follow-up Surveys. *Answer follow-up question below.*

- e) If a State MIS is used, please indicate the system (e.g., SNAP eligibility system, State's Department of Labor MIS).

Component and demographic data needed for federal reporting is located within TDLWD's case management system, VOS/Jobs4TN.

- f) If a manual follow-up with SNAP E&T participants is conducted, describe the process for follow-up, including the contact method (e.g., verbal contact, email, or mail).

Participants are contacted at least once each 30 days; follow-up appointments are conducted via phone call, email, or in-person. Outcome data obtained during follow-up appointments is entered into VOS via activity code and case notes.

- g) If follow-up surveys are used, please describe the sample frame. This description must include source, availability, accuracy, completeness, components, location, form, frequency of updates and structure.

N/A

- h) If follow-up surveys are used, please describe the sample selection. This description must include the method of sample selection, procedures for estimating caseload size, computation of sampling intervals and random starts, as appropriate, and a time schedule for each step in the sampling procedure.

|     |
|-----|
| N/A |
|-----|

Using the table below, indicate the outcome measure that will be used for each component that the State agency will offer that is intended to serve at least 100 participants in the FY. Explain in detail the methodology for acquiring the component data. Please ensure the component names listed here match the component names in the FNS-583 report and [Section G: Component Detail](#).

**Table E.IV. Component Outcome Measures**

| <b>Component</b>   | <b>Outcome Measure</b>  | <b>Methodology including the timeframes being reported (e.g. denominator and numerator).</b>   |
|--|---|--|
| Job Search Training (JST)  | Number and percent of total JST participants who begin component and obtain unsubsidized employment within the reporting period                                       | Numerator includes JST participants who obtain unsubsidized employment during the period of 10/01/2024 - 09/30/2025. Denominator includes the number of participants who enter the JST component during the period of 10/01/2024 - 09/30/2025. |
| Career/Technical Education Programs or Other Vocational Training Component (EPC) | Number and percent of total EPC participants who begin component and obtain a recognized credential within the reporting period                                       | Numerator includes EPC participants who obtain a recognized credential during the period of 10/01/2024 - 09/30/2025. Denominator includes the number of participants who enter the EPC component during the period of 10/01/2024 - 09/30/2025. |
| Work Readiness Training (EPWRT)  | Number and percent of total EPWRT participants who begin component and enter career/technical training component and/or obtain employment within the reporting period | Numerator includes EPWRT participants who successfully enter career/technical training and/or obtain employment during the period of 10/01/2024 - 09/30/2025. Denominator includes the number of participants who enter the EPWRT              |



| Component          | Outcome Measure   | Methodology including the timeframes being reported (e.g. denominator and numerator).   |
|--------------------|---|---|
|                    |   | component during the period of 10/01/2024 - 09/30/2025.   |
| Job Retention (JR) | Number and percent of total JR participants who begin component and maintain employment within the reporting period | <p>Numerator includes JR participants who are still employed after 90 days within the reporting period of 10/1/2024 to 9/30/2025.</p> <p>Denominator includes the number of participants who enter the JR component during the period of 10/01/2024 - 09/30/2025.</p> |

## F. Pledge to Serve All At-Risk ABAWDs (if applicable)

*The Act authorizes FNS to allocate \$20 million annually to State agencies that commit, or pledge, to ensuring the availability of education, training, or workfare opportunities that permit able-bodied adults without dependents (ABAWDs) to remain eligible beyond the 3-month time limit.*

*To be eligible for these additional funds (pledge funds), State agencies must pledge to offer and provide an opportunity in a work program that meets the participation requirements of 7 CFR 273.24 to every applicant and recipient who is in the last month of the 3-month time limit and not otherwise exempt. Individuals are exempt from the time limit if they meet an exception under 7 CFR 273.24(c), reside in an area covered by a waiver in accordance with 7 CFR 273.24(f), or who are exempted by the State under 7 CFR 273.24(g). ABAWDs who meet the criteria outlined in 7 CFR 273.7(d)(3)(i) are referred to as “at-risk” ABAWDs.*

a) Is the State agency pledging to offer qualifying activities to all at-risk ABAWDs?

Yes (Complete the rest of this section.)

No (Skip to Section G: Component Detail.)

**Table F.I. Pledge Assurances**

| Check the box to indicate that the State agency understands and agrees to comply with the following provisions, per 7 CFR 273.7(d)(3).  | Check Box                |
|---|--------------------------|
| The State agency will use the pledge funds to defray the costs of offering every at-risk ABAWD a slot in a qualifying component.  | <input type="checkbox"/> |
| The cost of serving at-risk ABAWDs is not an acceptable reason for failing to live up to the pledge. The State agency will make a slot available and the ABAWD must be served even if the State agency exhausts all of its 100 percent Federal funds and must use State funds.                                | <input type="checkbox"/> |
| While a participating State agency may use a portion of the additional funding to provide E&T services to ABAWDs who are not at-risk, the State agency guarantees that at-risk ABAWDs are provided with opportunities by the State agency <u>each month</u> to remain eligible beyond the 3-month time limit. | <input type="checkbox"/> |
| The State agency will notify FNS immediately if it realizes that it cannot obligate or expend its entire share of the ABAWD allocated funds, so that FNS may make those funds available to other participating pledge States within the fiscal year.  | <input type="checkbox"/> |
| The State agency will be ready on October 1 <sup>st</sup> to offer and provide qualifying activities and services each month an ABAWD is at-risk of losing their benefits beyond the 3-month time limit.  | <input type="checkbox"/> |

b) Where will the State agency offer qualifying activities?

- Statewide
- Limited areas of the State (*Complete questions c and d below.*)

c) Explain why the State agency will offer qualifying activities in limited areas of the State.

- ABAWD waiver for parts of the State
- Will use discretionary exemptions
- Other: Click or tap here to enter text.

d) If the State agency will be offering qualifying activities only in limited areas of the State, please list those localities/areas.

e) How does the State agency identify ABAWDs in the State eligibility system?

f) How does the State agency identify ABAWDs that are at-risk?

g) When and how is the offer of qualifying activities made? Include the process the State agency uses to ensure that at-risk ABAWDs receive an offer of a qualifying component for every month they are at risk, including how the offer is made.

*The next set of questions is intended to establish the State agency's overall capacity and ability to serve all at-risk ABAWDs during the fiscal year through the services available in SNAP E&T as well as through other qualifying activities available through other Federal or State employment and training programs. In addition to SNAP E&T components, qualifying activities for ABAWDs include programs that operate outside of SNAP E&T. Such as Optional Workfare programs, WIOA title I programs, programs under Section 236 of the Trade Act of 1974, Veterans employment and training programs offered by the Department of Veterans Affairs or the Department of Labor, and Workforce Partnerships in accordance with 7 CFR 273.7(n).*

h) What services and activities will be provided through SNAP E&T? (List the components and participant reimbursements.) This should be consistent with the components detailed in Section G, as well as Section E-XIV regarding participant reimbursements.

i) What services and activities will be provided outside of SNAP E&T? (List the operating program, such as title 1 of WIOA, services and activities.)

j) To pledge, State agencies must have capacity to offer a qualifying activity to every at-risk ABAWD for every month they are at-risk. What is the State agency's plan if more ABAWDs than expected choose to take advantage of the offer of a qualifying activity? For instance, how will the State agency ensure the availability of more

slots? What steps has the State agency taken to guarantee a slot through agreements or other arrangements with providers?

|  |
|--|
|  |
|--|

**Table F.II. Information about the size of the ABAWD population**

| Question  | Number |
|---|--------|
| I. How many ABAWDs did you serve in E&T in the previous FY?   |        |
| II. How many SNAP recipients are expected to be ABAWDs this fiscal year? This should be an unduplicated count. If an individual is an ABAWD at any time during the fiscal year, they would be counted only once. Note: This should be consistent with the projected number of ABAWDs shown on Table H row 11 in the Excel Workbook.)          |        |
| III. How many ABAWDs will meet the criteria of an at-risk ABAWD? This should be an unduplicated count. If an individual is an at-risk ABAWD at any time during the fiscal year, they would be counted only once. (Note: This should be consistent with the projected number of at-risk ABAWDs shown on Table H row 14 in the Excel Workbook.) |        |
| IV. Number of at-risk ABAWDs averaged monthly? This should be annual total from line (III) divided by 12.   |        |

**Table F.III. Available Qualifying Activities**

When considering all the qualifying activities that the pledging State agency intends to offer to at-risk ABAWDs, provide a projected estimate for each category below.

|  | Expected average monthly slots available to at-risk ABAWDs | Expected average monthly slots offered to at-risk ABAWDs | Expected monthly at-risk ABAWD participation for plan year |
|--|--|--|--|
| SNAP E&T                                     |  |  |  |
| All other programs outside of SNAP E&T       |  |  |  |
|  |  |  |  |
| Total slots across all qualifying activities |  |  |  |

**Table F.IV. Estimated cost to fulfill the pledge**

|  | <b>Value</b> |
|--|--------------|
| I. What is the projected total cost to serve all at-risk ABAWDs in your State?                     |              |
| II. Of the total in (I), what is the total projected administrative costs of E&T?                  |              |
| III. Of the total in (I), what is the total projected costs for participant reimbursements in E&T? |              |

k) Explain the methodology used to determine the total cost to fulfill the pledge.

## G. Component Detail

*The goal of this section is to provide a comprehensive description of E&T program components and activities that the State agency will offer. A State agency's E&T program must include one or more of the following components: supervised job search; job search training; workfare; work experience or training; educational programs; self-employment activities; or job retention services. The State agency should ensure that the participation levels indicated in this section align with other sections of the State Plan, such as the projected participant levels in Section H – Estimated Participant Levels.*

*Complete the following questions for each component that the State agency intends to offer during the fiscal year.*

### I. Non-Education, Non-Work Components

Complete the tables below with information on each non-education, non-work component that the State agency intends to offer during the fiscal year. ***If the State does not plan to offer one of the components in the table, please leave the cells blank.*** For each component that is offered, the State should include the following information:

- **Summary of the State guidelines implementing supervised job search (applies to SJS only).** This summary of the State guidelines, at a minimum, must describe: The criteria used by the State agency to approve locations for supervised job search, an explanation of why those criteria were chosen, and how the supervised job search component meets the requirements to directly supervise the activities of participants and track the timing and activities of participants.
- **Direct link (applies to SJS only).** Explain how the State agency will ensure that supervised job search activities will have a direct link to increasing the employment opportunities of individuals engaged in the activity (i.e. how the State agency will screen to ensure individuals referred to SJS are job ready and how the SJS program is tailored to employment opportunities in the community).
- **Description of the component (applies to JST, SET, and Workfare).** Provide a brief description of the activities and services.
  - **For JR Only:** Provide a summary of the activities and services. Include a description of how the State will ensure services are provided for no less 30 days and no more than 90 days.

- **Target population.** Identify the population that will be targeted. Include special populations such as ABAWDs, Returning Citizens, Homeless, Older Disconnected Youth, etc.
- **Criteria for participation.** What skills, knowledge, or experience is necessary for participation in the component? For example, literacy or numeracy levels, recent labor market attachment, computer literacy etc.
- **Geographic area.** Where will the component be available (statewide, regional, counties, localities not covered by ABAWD waivers, areas covered by American Job Centers, etc.).
- **E&T providers.** Identify all entities that will provide the service.
- **Projected annual participation.** Project the number of unduplicated individuals.
- **Estimated annual component costs.** Project only administrative costs

**Table G.I. Non-Education, Non-Work Component Details: Supervised Job Search**

| Details  | Supervised Job Search (SJS)                       |
|--|---|
| Summary of the State guidelines implementing SJS | TN will not offer this component during FFY 2025. |
| Direct link                                      |   |
| Target population                                |   |
| Criteria for participation                       |   |
| Geographic area                                  |   |
| E&T providers                                    |   |
| Projected annual participation                   |   |
| Estimated annual component costs                 |   |

**Table G.II. Non-Education, Non-Work Component Details: Job Search Training**

| Details                      | Job Search Training (JST)  |
|------------------------------|--|
| Description of the component | <p>This component helps participants develop and/or enhance skills needed to gain employment via instruction, guidance, and/or mentoring. Approved activities include case management to reduce employment barriers, job skills assessments, career coaching, job search techniques, training on utilizing technology during job search, resumé writing workshops and/or assistance, application assistance, interview skills workshops and/or practice sessions, assistance with appropriate dress, social skills-building, training on effective networking, job placement referrals and/or assistance, and other approved job search training activities offered within One-Stop American Job Centers and by TPPs. During each participant’s initial assessment, at least three activities are outlined and documented in the JST activity document.</p> <p>Approved JST activities are thoroughly evaluated and must directly enhance participants’ employability.</p> |



|                                  |  |
|----------------------------------|--|
|                                  | JST is not intended to be a long-term activity. This component usually includes three activities and is targeted for completion within 4 - 6 weeks.  |
| Target population                | All SNAP E&T participants for whom skills deficiencies are identified during the initial assessment and/or those who express a lack of skills necessary to gain employment are referred to JST. Participants who do not want to engage in specific education and/or training but need assistance with gaining employment are also referred to JST.   |
| Criteria for participation       | Participants must demonstrate significant employment barriers and/or express interest in enhancing their skills to gain employment. Information about each participant's abilities, knowledge, skills, and/or needs is gathered during the participant's initial assessment and through ongoing case management. This information is used to determine appropriateness of participation in this component. |
| Geographic area                  | Statewide  |
| E&T providers                    | TDLWD, WIOA, TPP, and/or State-approved vendors or providers   |
| Projected annual participation   | 475  |
| Estimated annual component costs | \$ 507,510.28  |

**Table G.III. Non-Education, Non-Work Component Details: Job Retention**

| Details                          | Job Retention (JR)   |
|----------------------------------|--|
| Description of the component     | <p>This component assists participants who gain new employment through participation in or completion of SNAP E&amp;T activities. JR services include case management, transportation assistance, and assistance obtaining or reimbursement for the purchase of necessary uniforms and/or other employment clothing, equipment, supplies, or tools required to perform the job, testing fees, and/or other necessities needed to maintain and achieve satisfactory performance in their newly acquired employment.</p> <p>Job retention services are offered for a minimum of 30 days up to a maximum of 90 days. An activity code is entered with a maximum of 90 days of participation as the end date able to be entered. Participants must work with approved vendors for supportive services.</p> |
| Target population                | SNAP E&T participants who gain and/or improve employment status through participation in SNAP E&T activities and/or services.  |
| Criteria for participation       | <p>Participants who gain new employment after participation in another component and/or receive other SNAP E&amp;T employment and/or training services are potentially eligible for JR. Participants must receive SNAP benefits during the month of/during the month prior to enrollment in JR. Ongoing case management and confirmation of JR eligibility from TDHS staff are used to determine appropriateness of participation in this component.</p>   |
| Geographic area                  | Statewide  |
| E&T providers                    | TDLWD, WIOA, TPP, and/or State-approved vendors or providers   |
| Projected annual participation   | 575  |
| Estimated annual component costs | \$ 1,013,366.33  |

**Table G.IV. Non-Education, Non-Work Component Details: Self-Employment Training**

| Details                          | Self-Employment Training (SET)                    |
|----------------------------------|---|
| Description of the component     | TN will not offer this component during FFY 2025. |
| Target population                |   |
| Criteria for participation       |   |
| Geographic area                  |   |
| E&T providers                    |   |
| Projected annual participation   |   |
| Estimated annual component costs |   |

**Table G.V. Non-Education, Non-Work Component Details: Workfare**

| Details                          | Workfare (W)                                      |
|----------------------------------|---|
| Description of the component     | TN will not offer this component during FFY 2025. |
| Target population                |   |
| Criteria for participation       |   |
| Geographic area                  |   |
| E&T providers                    |   |
| Projected annual participation   |   |
| Estimated annual component costs |   |

## II. Educational Programs

Complete the tables below with information on each educational program component that the State agency intends to offer during the fiscal year. ***If the State does not plan to offer one of the components in the table, please leave the cells blank.*** For each component that is offered, the State should include the following information:

- **Description of the component.** Provide a summary of the activities and services.
- **Target population.** Identify the population that will be targeted. Include special populations such as ABAWDs, Returning Citizens, Homeless, Older Disconnected Youth, etc.
- **Criteria for participation.** What skills, knowledge, or experience is necessary for participation in the component? For example, literacy or numeracy levels, recent labor market attachment, computer literacy etc.
- **Geographic area.** Where will the component be available (statewide, regional, counties, localities not covered by ABAWD waivers, areas covered by American Job Centers, etc.).
- **E&T providers.** Identify all entities that will provide the service.
- **Projected annual participation.** Project the number of unduplicated individuals.
- **Estimated annual component costs.** Project only administrative costs.
- **Not supplanting:** Federal E&T funds used for activities within the education component must not supplant non-Federal funds for existing educational services and activities. For any education activities, provide evidence that costs attributed to the E&T program are not supplanting funds used for other existing education programs.
- **Cost parity:** If any of the educational services or activities are available to persons other than E&T participants, provide evidence that the costs charged to E&T do not exceed the costs charged for non-E&T participants (e.g. comparable tuition).

**Table G.VI. Educational Program Details: Basic/Foundational Skills Instruction**

| <b>Details</b>                   | <b>Basic/Foundational Skills Instruction (includes High School Equivalency Programs) (EPB)</b>  |
|----------------------------------|---|
| Description of the component     | <p>This component helps participants prepare for CTE needed to further their career goals. Participants who lack a high school diploma or HSE are referred to local Adult Education (Title II) partners for High School Equivalency Test (HiSET) preparation and/or testing. TN’s Adult Education (AE) program is a three-level instructional system focused on building reading, writing, and math skills to bring participants’ functional levels up, helping them pass the HiSET and begin their desired career pathway.</p> <p>SNAP E&amp;T funding provides transportation assistance and supportive services. If needed, a referral to TDHS for child care assistance is provided but no E&amp;T funds are used. The State allocates funding for the HiSET if participants meet the testing criteria.</p> |
| Target population                | All SNAP E&T participants in need of a high school diploma or HSE, who have a TABE test score of 8.5-grade level or less, or possess a high school diploma or HSE and desire CTE but have a deficiency of basic skills as determined by standardized testing are eligible for EPB.  |
| Criteria for participation       | Participants must lack a high school diploma or HSE, have a deficiency of basic skills as determined by standardized testing, and/or express individual interest. Information about each participant’s abilities, knowledge, skills, and/or needs is gathered during the participant’s initial assessment. This information is used to determine appropriateness of participation in this component.  |
| Geographic area                  | Statewide   |
| E&T providers                    | TN Adult Education Division (WIOA Title II) and contract staff selected to provide AE services  |
| Projected annual participation   | 75  |
| Estimated annual component costs | \$ 67,554.29  |

|                        |   |
|------------------------|---|
| <p>Not supplanting</p> | <p>TDLWD Case Managers determine during each participant’s assessment if other funding options can be leveraged in support of educational costs before SNAP E&amp;T funds are used. Staff are required to provide appropriate documentation demonstrating that E&amp;T funds do not supplant non-federal funds (such as an invoice or other document showing education costs paid by another funding source). TDLWD State Office staff monitor and review these records periodically.</p>   |
| <p>Cost parity</p>     | <p>TDLWD Case Managers ensure that SNAP E&amp;T participants are charged the same costs for educational services and/or activities as nonparticipants. Staff are required to search for competitive pricing and/or alternative programming in local areas that aligns with participants’ wants or needs, local employment markets, and/or high-demand occupations. Cost parity is verified during vendor evaluation and during the management oversight process.</p> <p>All expenses are reviewed and vetted to confirm they are reasonable and necessary for participation in the component.</p> |

**Table G.VII. Educational Program Details: Career/Technical Education Programs or other Vocational Training**

| <p><b>Details</b></p>               | <p><b>Career/Technical Education Programs or other Vocational Training (EPC)</b></p>   |
|-------------------------------------|--|
| <p>Description of the component</p> | <p>This component helps participants gain academic and technical knowledge and skills needed to obtain industry-recognized credentials that allow them to better compete in the job market. EPC activities and services are provided through the One-Stop system, community/technical colleges, and/or community-based organizations. Approved CTE activities are thoroughly evaluated and must directly enhance participants’ employability and be aligned with local labor market needs and identified in-demand occupations. TN employs the following CTE standards:</p> <ul style="list-style-type: none"> <li>• Training programs must be 2.5 years or less. TN SNAP E&amp;T cannot support bachelor degree programs at this time.</li> </ul> |

|  |  |
|--|--|
|  | <ul style="list-style-type: none"><li>• Training must lead to an industry recognized credential, license, or certificate.</li><li>• For training programs provided by a Tennessee College of Applied Technology or Community College that are approved by Local Workforce Development Boards and appear on TDLWD’s Eligible Training Provider List (ETPL), tuition and any required school costs not supported via any other funding streams will be supported by one or more of the following: 100% funds (tuition only), 50/50 funds, braided funding under WIOA programs, or a TPP with CTE as an approved activity. Once the allocated state funding is exhausted, participants will be referred to any other funding source that can be identified.</li><li>• For other training programs that are approved by the Local Workforce Board and appear on the ETPL, SNAP E&amp;T state funds will support and/or share with Title I the participant cost of required book, tools, uniforms, and equipment. Approved TPP may cover tuition costs in addition to the required items, but the cost of tuition must be determined as reasonable by TDLWD.</li><li>• In addition to the providers on the ETPL, SNAP E&amp;T will support other providers for training in the truck driving and health services industries as these have been identified in the regional WIOA plans as high demand occupations. Training costs must be deemed reasonable in comparison to market prices for comparable training in the geographic area.</li><li>• Tuition and required training costs must not exceed total cost of \$6,500 per training term. If tuition costs exceed \$6,500 in a training term, SNAP E&amp;T’s costs are capped at \$6,500.</li><li>• To assist participants who need to take an entry-level employment opportunity as a first step towards self-sufficiency, TPP will provide approved CTE trainings with the below parameters:<ul style="list-style-type: none"><li>○ Training is approved by TDWLD in the Scope of Work.</li><li>○ Industry credential will be earned upon completion.</li></ul></li></ul> |
|--|--|



|                                       |   |
|---------------------------------------|---|
|                                       | <ul style="list-style-type: none"> <li>○ Participant agrees to seek employment in that field.</li> <li>○ Assessment/IEP documents how the training connects them to their employment goal.</li> </ul> <p>Eligible participants receive individualized case management through co-enrollment in WIOA Adult/WIOA Youth programming or by the contracted TPP. Training and participant support costs for SNAP E&amp;T/WIOA Title I co-enrollees are shared across both programs. SNAP E&amp;T funding provides transportation assistance or works with WIOA Title I to provide that support for co-enrolled participants. If needed, a referral to TDHS for child care assistance is provided but no E&amp;T funds are used.</p>   |
| <p>Target population</p>              | <p>All SNAP E&amp;T participants with a high school diploma or HSE (if required by the training provider), who do not have a current marketable skill and who want to gain knowledge and skills necessary for employment through an approved CTE program.</p>   |
| <p>Criteria for participation</p>     | <p>Participants must lack current marketable skills or demonstrate the need to upskill to move towards self-sufficiency, or otherwise meet the minimum criteria established by providers to demonstrate basic knowledge, skills, experience, and/or interest, as required. Information about each participant’s abilities, knowledge, skills, and/or needs is gathered during the participant’s initial assessment and through ongoing case management. This information is used to determine appropriateness of participation in this component.</p> <p>Costs are approved on a term-by-term basis. Ongoing assistance is dependent on continued eligibility for SNAP E&amp;T, available funding, and participant progress and cooperation as outlined in the Voluntary Agreement.</p> |
| <p>Geographic area</p>                | <p>Statewide</p>  |
| <p>E&amp;T providers</p>              | <p>WIOA partners, TPP, ETPL training providers, and/or State-approved vendors or providers</p>  |
| <p>Projected annual participation</p> | <p>1,690</p>  |

|   |   |
|---|---|
| <p>Estimated annual component costs</p> | <p>\$ 2,415,312.34</p>  |
| <p>Not supplanting</p>                  | <p>Participants may receive E&amp;T-funded assistance with transportation, textbook purchases, and other supportive services based upon assessed needs while enrolled in EPC. Staff determine during each participant’s assessment if other funding options can be leveraged in support of educational costs before SNAP E&amp;T funds are used. Staff are required to provide appropriate documentation demonstrating that E&amp;T funds do not supplant non-federal funds (such as an invoice or other document showing education costs paid by another funding source). TDLWD State Office staff monitor and review these records periodically.</p> <p>Participants receiving Federal student aid via the FAFSA are not eligible for tuition assistance via SNAP E&amp;T unless the awarded amount does not fully pay for selected training program costs. SNAP E&amp;T will support participants with gap funding if the award is not issued in time to support required costs. If the participant receives a refund from FAFSA for the training term, they will be expected to use those funds to pay for any off campus required costs for that term.</p> |
| <p>Cost parity</p>                      | <p>TDLWD and TPP Case Managers ensure that SNAP E&amp;T participants are charged the same costs for educational services and/or activities as nonparticipants. Staff are required to search for competitive pricing and/or alternative programming in local areas that aligns with participants’ wants or needs, local employment markets, and/or high-demand occupations. Cost parity is verified during vendor evaluation and during the management oversight process.</p> <p>All expenses are reviewed and vetted to confirm they are reasonable and necessary for participation in the component.</p>   |

**Table G.VIII. Educational Program Details: English Language Acquisition**

| Details                          | English Language Acquisition (EPEL)   |
|----------------------------------|---|
| Description of the component     | <p>This component provides services through AE’s Integrated English Literacy and Civics Education (IELCE) program. Through IELCE, participants also receive support with HiSET preparation, citizenship exam preparation, and/or pursue training through AE’s Integrated Education and Training (IET) program.</p> <p>SNAP E&amp;T funding supports transportation assistance. If needed, a referral to TDHS for child care assistance is provided but no E&amp;T funds are used.</p> |
| Target population                | All SNAP E&T participants who request language assistance, who do not speak English as their primary language, and/or for whom lack of English language skills is a barrier to employment   |
| Criteria for participation       | Participants must have a primary language other than English and/or express a desire to learn English to assist with training and obtaining employment. Information about each participant’s abilities, knowledge, skills, and/or needs is gathered during the participant’s initial assessment and through ongoing case management. This information is used to determine appropriateness of participation in this component.  |
| Geographic area                  | Statewide   |
| E&T providers                    | WIOA partners, TPP, and/or State-approved vendors or providers  |
| Projected annual participation   | 25  |
| Estimated annual component costs | \$ 22,518.10  |
| Not supplanting                  | Participants may receive E&T-funded assistance with transportation, textbook purchases, and other supportive services based upon assessed needs while enrolled in EPEL. Staff determine during each participant’s assessment if other funding options can be leveraged in support of educational costs before SNAP E&T funds are  |

|             |   |
|-------------|---|
|             | used. Staff are required to provide appropriate documentation demonstrating that E&T funds do not supplant non-federal funds (such as an invoice or other document showing education costs paid by another funding source). TDLWD State Office staff monitor and review these records periodically.   |
| Cost parity | <p>TDLWD Case Managers ensure that SNAP E&amp;T participants are charged the same costs for educational services and/or activities as nonparticipants. Staff are required to search for competitive pricing and/or alternative programming in local areas that aligns with participants' wants or needs, local employment markets, and/or high-demand occupations. Cost parity is verified during vendor evaluation and during the management oversight process.</p> <p>All expenses are reviewed and vetted to confirm they are reasonable and necessary for participation in the component.</p> |

**Table G.IX. Educational Program Details: Integrated Education and Training/Bridge Programs**

| <b>Details</b>                   | <b>Integrated Education and Training/Bridge Programs (EPIE)</b> |
|----------------------------------|---|
| Description of the component     | TN will not offer this component during FFY 2025.               |
| Target population                |   |
| Criteria for participation       |   |
| Geographic area                  |   |
| E&T providers                    |   |
| Projected annual participation   |   |
| Estimated annual component costs |   |
| Not supplanting                  |   |
| Cost parity                      |   |

**Table G.X. Educational Program Details: Work Readiness Training**

| Details                      | Work Readiness Training (EPWRT)   |
|------------------------------|---|
| Description of the component | <p>This component helps participants develop Personal Effectiveness Competencies (i.e. soft skills), including foundational cognitive skills such as reading for information, applied mathematics, locating information, problem-solving, and critical thinking. EPWRT activities also help participants develop personal characteristics and behavioral skills such as adaptability, integrity, cooperation, and workplace discipline which enhance participants' interpersonal interactions, job performance, and career prospects.</p> <p>EPWRT participants may be referred and/or co-enrolled in JST for resources and activities that strengthen participants' employment efforts.</p> <p>EPWRT is not intended to be a long-term activity. This component must be completed within 3 months but can be extended on a case-to-case basis in special circumstances as approved by TDLWD.</p> <p>If needed, a referral to TDHS for child care assistance is provided but no E&amp;T funds are used.</p> |
| Target population            | <p>All SNAP E&amp;T participants for whom lack of foundational skills is a barrier to gaining employment or being successful in maintaining long-term employment. TN SNAP E&amp;T further identifies justice-involved participants as a priority population.</p>  |
| Criteria for participation   | <p>Participants must demonstrate lack of foundational skills needed to enter employment, lack of foundational skills needed to maintain past employment, and/or express individual interest. Information about each participant's abilities, knowledge, skills, and/or needs is gathered during the participant's initial assessment and through ongoing case management. This information is used to determine appropriateness of participation in this component.</p>   |
| Geographic area              | Statewide   |
| E&T providers                | TPP and/or State-approved vendors or providers  |

|                                  |   |
|----------------------------------|---|
| Projected annual participation   | 475   |
| Estimated annual component costs | \$ 1,003,784.08   |
| Not supplanting                  | Participants may receive E&T-funded assistance with transportation, textbook purchases, and other supportive services based upon assessed needs while enrolled in EPWRT. Staff determine during each participant's assessment if other funding options can be leveraged in support of educational costs before SNAP E&T funds are used. Staff are required to provide appropriate documentation demonstrating that E&T funds do not supplant non-federal funds (such as an invoice or other document showing education costs paid by another funding source). TDLWD State Office staff monitor and review these records periodically. |
| Cost parity                      | TDLWD Case Managers ensure that SNAP E&T participants are charged the same costs for educational services and/or activities as nonparticipants. Staff are required to search for competitive pricing and/or alternative programming in local areas that aligns with participants' wants or needs, local employment markets, and/or high-demand occupations. Cost parity is verified during vendor evaluation and during the management oversight process.<br><br>All expenses are reviewed and vetted to confirm they are reasonable and necessary for participation in the component.  |

**Table G.XI. Educational Program Details: Other**

| <b>Details</b>               | <b>Other (EPO): State agency must provide description</b> |
|------------------------------|---|
| Description of the component | TN will not offer this component during FFY 2025.         |
| Target population            |   |
| Criteria for participation   |   |
| Geographic area              |   |
| E&T providers                |   |

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|                                  |  |
|----------------------------------|--|
| Projected annual participation   |  |
| Estimated annual component costs |  |
| Not supplanting                  |  |
| Cost parity                      |  |

### III. Work Experience (WE)

*Work experience is divided into two subcomponents per 7 CFR 273.7(e)(2)(iv): Work activity (WA) and Work-based learning (WBL). WBL activities like internships, apprenticeships, and on-the-job training, among others, may provide wages subsidized by the E&T program. In order to capture information about WBL activities that may be subsidized or unsubsidized by E&T, there are two sets of tables below for each kind of WBL activity – the first group of tables are for activities not subsidized by E&T (e.g. Work-based learning – Internships) and the second group of tables are for activities subsidized by E&T (e.g. Work-based learning – Internships - Subsidized by E&T). Note that subsidized means programs where E&T funding is used to subsidize wages of participants. Subsidized in this context does not mean programs where participants receive a subsidized wage from another source.*

#### Work Activity and Unsubsidized WBL Components

Complete the tables below with information on Work Activity and each unsubsidized WBL component that the State agency intends to offer during the fiscal year. ***If the State does not plan to offer one of the components in the table, please leave the cells blank.*** For each component that is offered, the State should include the following information:

- **Description of the component.** Provide a summary of the activities and services.
- **Target population.** Identify the population that will be targeted. Include special populations such as ABAWDs, Returning Citizens, Homeless, Older Disconnected Youth, etc.
- **Criteria for participation.** What skills, knowledge, or experience is necessary for participation in the component? For example, literacy or numeracy levels, recent labor market attachment, computer literacy etc.
- **Geographic area.** Where will the component be available (statewide, regional, counties, localities not covered by ABAWD waivers, areas covered by the American Job Centers, etc.).
- **E&T providers.** Identify all entities that will provide the service.
- **Projected annual participation.** Project the number of unduplicated individuals.
- **Estimated annual component costs.** Project only administrative costs.



**Table G.XII. Work Experience: Work Activity**

| Details                          | Work Activity (WA)  |
|----------------------------------|---|
| Description of the component     | SNAP E&T is a voluntary program in TN, thus TN will not offer this component during FFY 2025. |
| Target population                |   |
| Criteria for participation       |   |
| Geographic area                  |   |
| E&T providers                    |   |
| Projected annual participation   |   |
| Estimated annual component costs |   |

**Table G.XIII. Work Experience: Internship**

| Details                          | Internship (WBLI)                                 |
|----------------------------------|---|
| Description of the component     | TN will not offer this component during FFY 2025. |
| Target population                |   |
| Criteria for participation       |   |
| Geographic area                  |   |
| E&T providers                    |   |
| Projected annual participation   |   |
| Estimated annual component costs |   |

**Table G.XIV. Work Experience: Pre-Apprenticeship**

| Details                             | Pre-Apprenticeship (WBLPA)  |
|-------------------------------------|---|
| <p>Description of the component</p> | <p>This component is provided by Apprenticeship TN, a statewide initiative powered by the Tennessee Workforce Development System (TWDS) developed to create a greater awareness of apprenticeship opportunities for employers and workers in every area of Tennessee.</p> <p>The Tennessee pre-apprenticeship program is designed to assist individuals who do not currently possess the minimum (academic or skills) requirements for selection into an apprenticeship program to meet the minimum selection criteria established in a program sponsor’s apprenticeship standards required and which maintains at least one documented partnership with a Registered Apprenticeship program. It provides participants with:</p> <ul style="list-style-type: none"> <li>• Training and curriculum that align with the skill needs of employers in the economy of the State or region involved;</li> <li>• Access to educational and career counseling and other supportive services, directly or indirectly;</li> <li>• Hands-on, meaningful learning activities that are connected to education and training activities, such as exploring career options, and understanding how the skills acquired through the coursework can be applied toward a future career;</li> <li>• Opportunities to attain at least one industry-recognized credential; and</li> <li>• Assistance securing placement in a registered apprenticeship program (for individuals who complete the pre-apprenticeship program).</li> </ul> <p>Timeframe for pre-apprenticeship varies based on career path and/or field selected. Interested individuals that meet the criteria for participation will be referred to Apprenticeship TN.</p> <p>SNAP E&amp;T funding provides transportation assistance and supportive services. The State allocates funding for the pre-apprenticeship if participants meet the criteria.</p> |

|                                  |  |
|----------------------------------|--|
|                                  | <p>If needed, a referral to TDHS for child care assistance is provided but no E&amp;T funds are used.</p> <p>The list of TN’s registered apprenticeships can be found at <a href="https://www.tn.gov/content/tn/apprenticeship/tn/find-a-program.html">https://www.tn.gov/content/tn/apprenticeship/tn/find-a-program.html</a>.</p>  |
| Target population                | All SNAP E&T participants for whom want the opportunity to gain the skills and technical knowledge needed to become an expert in chosen trade field.   |
| Criteria for participation       | <p>Participants must have a high school diploma/HSE, or otherwise meet the minimum criteria established by providers to demonstrate basic knowledge, skills, experience, and/or interest, as required. In addition, demonstrate the need to upskill to move towards self-sufficiency, commit to the level effort required by the pre-apprenticeship program, ability to meet any other criteria specified by the pre-apprenticeship program (such as use of heavy machinery or computer literacy, etc.).</p> <p>Information about each participant’s abilities, knowledge, skills, and/or needs is gathered during the participant’s initial assessment and through ongoing case management. This information is used to determine appropriateness of participation in this component.</p> <p>Costs are approved on a term-by-term basis. Ongoing assistance is dependent on continued eligibility for SNAP E&amp;T, available funding, and participant progress and cooperation as outlined in the Voluntary Agreement.</p> |
| Geographic area                  | Statewide  |
| E&T providers                    | Approved programs with the office of Apprenticeship TN will offer the pre-apprenticeship programs for participants   |
| Projected annual participation   | 15   |
| Estimated annual component costs | \$ 13,510.86   |

**Table G.XV. Work Experience: Apprenticeship**

| Details                             | Apprenticeship (WBLA)   |
|-------------------------------------|---|
| <p>Description of the component</p> | <p>This component is provided by Apprenticeship TN, a statewide initiative powered by TWDS developed to create a greater awareness of apprenticeship opportunities for employers and workers in every area of Tennessee.</p> <p>The Tennessee apprenticeship program is designed to assist individuals earn experiential learning combining paid, on-the-job learning with related classroom instruction in order to increase an apprentice’s skill level and Wages. It provides participants with:</p> <ul style="list-style-type: none"> <li>• On-the-job training from an experienced mentor for typically not less than one year;</li> <li>• Technical education at one of Tennessee’s community colleges, technical schools, apprenticeship training schools, provided online or at the job site;</li> <li>• Training and curriculum that align with the skill needs of employers in the economy of the State or region involved;</li> <li>• Access to educational and career counseling and other supportive services, directly or indirectly;</li> <li>• Hands-on, meaningful learning activities that are connected to education and training activities, such as exploring career options, and understanding how the skills acquired through the coursework can be applied toward a future career; and</li> <li>• Opportunities to attain at least one industry-recognized credential.</li> </ul> <p>Timeframe for apprenticeship varies based on career path and/or field selected.</p> <p>Interested individuals that meet the criteria for participation will be referred to Apprenticeship TN.</p> <p>The list of TN’s registered apprenticeships can be found at <a href="https://www.tn.gov/content/tn/apprenticeshiptn/find-a-program.html">https://www.tn.gov/content/tn/apprenticeshiptn/find-a-program.html</a>.</p> |

|                                  |  |
|----------------------------------|--|
| Target population                | All SNAP E&T participants for whom want the opportunity to gain the skills and technical knowledge needed to become an expert in chosen trade field.   |
| Criteria for participation       | <p>Participants must have a high school diploma/HSE, or otherwise meet the minimum criteria established by providers to demonstrate basic knowledge, skills, experience, and/or interest, as required. In addition, demonstrate the need to upskill to move towards self-sufficiency, commit to the level effort required by the pre-apprenticeship program, ability to meet any other criteria specified by the apprenticeship program (such as use of heavy machinery or computer literacy, etc.).</p> <p>Information about each participant's abilities, knowledge, skills, and/or needs is gathered during the participant's initial assessment and through ongoing case management. This information is used to determine appropriateness of participation in this component.</p> |
| Geographic area                  | Statewide  |
| E&T providers                    | Approved programs with the office of Apprenticeship TN will offer the apprenticeship programs for participants.  |
| Projected annual participation   | 15   |
| Estimated annual component costs | \$ 13,510.86   |

**Table G.XVI. Work Experience: On-the-Job Training**

| <b>Details</b>                   | <b>On-the-Job-Training (WBLOJT)</b>               |
|----------------------------------|---|
| Description of the component     | TN will not offer this component during FFY 2025. |
| Target population                |   |
| Criteria for participation       |   |
| Geographic area                  |   |
| E&T providers                    |   |
| Projected annual participation   |   |
| Estimated annual component costs |   |

**Table G.XVII. Work Experience: Transitional Jobs**

| <b>Details</b>                 | <b>Transitional Jobs (WBLTJ)</b>   |
|--------------------------------|--|
| Description of the component   | <p>Justice-involved individuals will be connected to work experience sites to begin obtaining income stability and develop successful workplace habits to strengthen their employment history. Participants will receive on-the-job feedback on their work performance to encourage skill development.</p> <p>Once participants are deemed ready to obtain and sustain employment, they will be assisted with job development services leading to full-time job placement. Participants will be placed in Job Retention to ensure ongoing success.</p> |
| Target population              | Returning citizens: justice-involved individuals who are unemployed and seeking employment   |
| Criteria for participation     | Complete any assessment as required by provider, be able and willing to pursue permanent employment upon WBLTJ completion, and commit to the level of required participation hours   |
| Geographic area                | Davidson County, Hamilton County, Shelby County  |
| E&T providers                  | CEO and Project Return   |
| Projected annual participation | 80   |

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|                                  |              |
|----------------------------------|--------------|
| Estimated annual component costs | \$ 81,376.92 |
|----------------------------------|--------------|

**Table G.XVIII. Work Experience: Work-based learning - Other**

| <b>Details</b>                   | <b>Work-based learning - Other (WBLO): State agency must provide description</b> |
|----------------------------------|--|
| Description of the component     | TN will not offer this component during FFY 2025.                                |
| Target population                |  |
| Criteria for participation       |  |
| Geographic area                  |  |
| E&T providers                    |  |
| Projected annual participation   |  |
| Estimated annual component costs |  |



## Subsidized WBL Components

For assistance with developing the State’s E&T SWBL budget, please refer to the optional SWBL tool on the Operating Budget Excel Workbook.

| For all of the included subsidized components, the State agency attests to the following:                             | Check Box                |
|---|--------------------------|
| Will pay the individual a wage at least equal to the State or Federal minimum wage, whichever is higher.              | <input type="checkbox"/> |
| Operates in compliance with all applicable labor laws.  | <input type="checkbox"/> |
| Will not displace or replace existing employment of individuals not participating in E&T.                             | <input type="checkbox"/> |
| Provides the same benefits and working conditions as non-E&T participants doing comparable work for comparable hours. | <input type="checkbox"/> |

Complete the tables below with information on each subsidized WBL component that the State agency intends to offer during the fiscal year. **If the State does not plan to offer one of the components in the table, please leave the cells blank.** For each component that is offered, the State should include the following information:

- **Description of the component.** Provide a summary of the activities and services.
- **Target population.** Identify the population that will be targeted. Include special populations such as ABAWDs, Returning Citizens, Homeless, Older Disconnected Youth, etc.
- **Criteria for participation.** What skills, knowledge, or experience is necessary for participation in the component? For example, literacy or numeracy levels, recent labor market attachment, computer literacy etc.
- **Geographic area.** Where will the component be available (statewide, regional, counties, localities not covered by ABAWD waivers, areas covered by the American Job Centers, etc.).
- **E&T providers.** Identify all entities that will provide the service.
- **Projected annual participation.** Project the number of unduplicated individuals.
- **Estimated annual component costs.** Project only administrative costs.
- **Length of time the SWBL will run.** Indicate the maximum number of hour participants can receive SWBL (e.g. 300 hours). Indicated if there is variation in how many hours will be offered to participants.
- **What other administrative costs, if any, will be associated with the SWBL.** Examples include workers compensation, payroll taxes paid by the employer, and costs, direct or indirect costs associated with training and administering the SWBL.

**Table G.XIX. Subsidized Work Experience: Internship – Subsidized by E&T**

| <b>Details</b>                                  | <b>Internship – Subsidized by E&amp;T (WBLI - SUB)</b> |
|---|--|
| Description of the component                    | TN will not offer this component during FFY 2025.      |
| Target population                               |  |
| Criteria for participation                      |  |
| Geographic area                                 |  |
| E&T providers                                   |  |
| Projected annual participation                  |  |
| Estimated annual component costs                |  |
| Length of time the SWBL will run                |  |
| Other administrative costs associated with SWBL |  |

**Table G.XX. Subsidized Work Experience: Pre-Apprenticeship– Subsidized by E&T**

| <b>Details</b>                 | <b>Pre-Apprenticeship– Subsidized by E&amp;T (WBLPA-SUB)</b> |
|--------------------------------|--|
| Description of the component   | TN will not offer this component during FFY 2025.            |
| Target population              |  |
| Criteria for participation     |  |
| Geographic area                |  |
| E&T providers                  |  |
| Projected annual participation |  |

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|   |  |
|---|--|
| Estimated annual component costs                |  |
| Length of time the SWBL will run                |  |
| Other administrative costs associated with SWBL |  |

**Table G.XXI. Subsidized Work Experience: Apprenticeship – Subsidized by E&T**

| Details   | Apprenticeship – Subsidized by E&T (WBLA- SUB)    |
|---|---|
| Description of the component                    | TN will not offer this component during FFY 2025. |
| Target population                               |   |
| Criteria for participation                      |   |
| Geographic area                                 |   |
| E&T providers                                   |   |
| Projected annual participation                  |   |
| Estimated annual component costs                |   |
| Length of time the SWBL will run                |   |
| Other administrative costs associated with SWBL |   |

**Table G.XXII. Subsidized Work Experience: Transitional Jobs – Subsidized by E&T**

| Details                        | Transitional Jobs – Subsidized by E&T (WBLTJ - SUB) |
|--------------------------------|---|
| Description of the component   | TN will not offer this component during FFY 2025.   |
| Target population              |   |
| Criteria for participation     |   |
| Geographic area                |   |
| E&T providers                  |   |
| Projected annual participation |   |

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|   |  |
|---|--|
| Estimated annual component costs                |  |
| Length of time the SWBL will run                |  |
| Other administrative costs associated with SWBL |  |

**Table G.XXIII. Subsidized Work Experience: Work-based learning - Other - Subsidized by E&T**

| <b>Details</b>                                  | <b>Work-based learning - Other -Subsidized by E&amp;T (WBLO - SUB): State agency must provide description)</b> |
|---|--|
| Description of the component                    | TN will not offer this component during FFY 2025.  |
| Target population                               |  |
| Criteria for participation                      |  |
| Geographic area                                 |  |
| E&T providers                                   |  |
| Projected annual participation                  |  |
| Estimated annual component costs                |  |
| Length of time the SWBL will run                |  |
| Other administrative costs associated with SWBL |  |

## H. Estimated Participant Levels

*Complete the Estimated Participant Levels sheet in the Excel Workbook projecting participation in E&T for the upcoming Federal FY. Use the numbers in the Excel Workbook as a reference to answer the question below.*

- a) If less than 20% of E&T participants are expected to receive participant reimbursements, please provide an explanation.

TN estimates 3,400 E&T participants in FFY 2025, with 85% estimated to receive participant reimbursements.

Total Participant reimbursement funding allocation available for FFY 2025 is \$1,226,558.00, which is inclusive of federal and non-federal (i.e., State funding and partner match funding) shares. This is allocated for supportive services not to include participant tuition costs. These services will be offered to any participants enrolled in SNAP E&T components offered by the state and the partnering community-based organization during FFY 2025, with priority to participants not co-enrolled with WIOA Partners.

## I. Contracts/Partnerships

For each partner/contractor that receives more than 10% of the E&T operating budget, complete the table below. If all partners receive less than 10% of the budget, provide the information in the table for the five providers who receive the largest total amount of E&T funding. Partners are the entities that the State agency has contracted with or has agreements (MOUs or MOUAs) with for the delivery of E&T services. All partner contracts must be available for inspection by FNS as requested. (Note: All E&T partners and contracts will be included in the Contract and Partnership Matrix in the Operating Budget Excel Workbook.)

**Table I.I. Contractor/Partner Details**

| <b>Contract or Partner Name:</b> | <b>Tennessee Department of Labor &amp; Workforce Development (TDLWD)</b>  |
|----------------------------------|---|
| <b>Service Overview:</b>         | <p>TDLWD is the State’s primary SNAP E&amp;T administrator, responsible for:</p> <ul style="list-style-type: none"> <li>• Creation of TDLWD E&amp;T policies, procedures, and related training to be applied statewide, including: <ul style="list-style-type: none"> <li>○ Maintaining the SNAP E&amp;T Program Manual (Attachment D) which provides program guidance.</li> <li>○ Conducting annual training for all staff and contracted TPPs prior to the start of the fiscal year.</li> <li>○ Conducting monthly and/or quarterly trainings via interactive meetings or webinars.</li> <li>○ Providing daily technical assistance via <a href="mailto:SNAP.ET@tn.gov">SNAP.ET@tn.gov</a>.</li> <li>○ Providing onsite technical assistance to TPPs upon request.</li> <li>○ Ensuring all TDLWD E&amp;T staff and TPPs adhere to the E&amp;T State Plan.</li> </ul> </li> <li>• Serving as a direct service provider for enrolled E&amp;T participants and ensuring all TDLWD E&amp;T staff are: <ul style="list-style-type: none"> <li>○ Actively engaging participants and providing comprehensive services to guide, motivate, and support participants from first contact through job placement.</li> <li>○ Providing case management services include enrollment, assessment, development of IEP, providing information about available services (including referrals), placement in appropriate</li> </ul> </li> </ul> |



|   |  |
|---|--|
| <p><b>Contract or Partner Name:</b></p> | <p><b>Tennessee Department of Labor &amp; Workforce Development (TDLWD)</b></p>  |
|   | <p>component(s), career coaching, job search training or assistance, and ongoing participation tracking.</p> <ul style="list-style-type: none"> <li>○ Conducting the necessary monitoring to ensure SNAP E&amp;T processes for initial appointments, assessments, and component placements are followed and documented in VOS.</li> <li>○ Delivering standardized initial appointments and one-on-one assessments as detailed in the approved script and mini-assessment tool.</li> <li>● Subcontracting with a network of intermediary and third-party partners to deliver SNAP E&amp;T programming throughout the state:             <ul style="list-style-type: none"> <li>○ Establishing and maintaining the State’s TPP’s E&amp;T partnerships/contracts.</li> <li>○ Conducting ongoing monitoring of the SNAP E&amp;T partner network.</li> <li>○ Performing programmatic and fiscal monitoring activities through monthly desktop reviews, invoice monitoring within SmartSimple (i.e., TN’s SNAP E&amp;T subrecipient grant management system), and annual reviews.</li> <li>○ Conducting annual on-site program monitoring.</li> <li>○ TDLWD FFY 2025 direct TPPs are:                 <ul style="list-style-type: none"> <li>▪ University of TN Extension</li> <li>▪ United Way of Greater Nashville (UWGN)</li> </ul> </li> </ul> </li> <li>● Meeting at least quarterly with TDHS to strategize about program improvements, including those to identify and serve more SNAP recipients, and coordinate on:             <ul style="list-style-type: none"> <li>○ All SNAP E&amp;T marketing/outreach activities.</li> <li>○ Development of all SNAP E&amp;T recruitment strategies.</li> <li>○ Enhancements and/or growth of the program throughout the state.</li> </ul> </li> </ul> |
| <p><b>Intermediary:</b></p>             | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>   |
| <p><b>Components Offered:</b></p>       | <p>Job Search Training (JST)</p> <ul style="list-style-type: none"> <li>● Activities offered by AJCs and/or TPPs.</li> <li>● Activities may include resumé writing assistance and workshops, online job search training, interviewing skills</li> </ul>  |

|   |  |
|---|--|
| <p><b>Contract or Partner Name:</b></p> | <p><b>Tennessee Department of Labor &amp; Workforce Development (TDLWD)</b></p>  |
|   | <p>workshops and practice sessions, and other approved training.</p> <p>Job Retention (JR)</p> <ul style="list-style-type: none"> <li>• Services provided by AJCs and/or TPPs.</li> <li>• Activities include case management and reimbursement for required uniforms/other clothing for employment, equipment, supplies, and/or required tools, testing fees, and transportation.</li> <li>• Participants must work with approved vendors for supportive services.</li> </ul> <p>Basic/Foundational Skills Instruction (EPB)</p> <ul style="list-style-type: none"> <li>• Courses provided through local Adult Education (Title II) partners.</li> <li>• Adult Education (AE) is a three-level instructional system focused on reading, writing, and math skills development to improve customers' functional skills so they can pass the HiSET and begin their desired career pathway.</li> </ul> <p>Career/Technical Education Programs or other Vocational Training (EPC)</p> <ul style="list-style-type: none"> <li>• Training provided by state's school provider partners (typically TCATs, community colleges, or State-approved providers) following referral from American Job Center or TPP staff.</li> <li>• Activities include education services for participants pursuing industry-recognized credentials to better compete in local job markets.</li> </ul> <p>English Language Acquisition (EPEL)</p> <ul style="list-style-type: none"> <li>• Courses provided through AE's Integrated English Literacy and Civics Education (IELCE) program.</li> <li>• Through IELCE, participants also receive support with HiSET preparation, citizenship exam preparation, and/or pursue training through AE's Integrated Education and Training (IET) program.</li> </ul> |

|   |  |
|---|--|
| <p><b>Contract or Partner Name:</b></p> | <p><b>Tennessee Department of Labor &amp; Workforce Development (TDLWD)</b></p>  |
|   | <p>Work Readiness Training (EPWRT)</p> <ul style="list-style-type: none"> <li>• Training provided through WIOA Title Partners and approved TPPs.</li> <li>• Activities help participants obtain foundational cognitive and soft skills necessary for adaptability and longevity in the workplace.</li> </ul> <p>Work Based Learning</p> <ul style="list-style-type: none"> <li>• State approved programs help participants develop general skills, knowledge, work habits, and work experience while training in real work environments and earning basic certifications necessary to obtain employment.</li> <li>• Approved WBLO activities are thoroughly evaluated and must directly enhance participants’ employability, support participants’ IEPs, and be aligned with local labor market needs and identified in-demand occupations.</li> <li>• WBLO activities have planned start- and end-dates and can be coordinated within the private/for-profit sector, the nonprofit sector, and/or the public sector.</li> <li>• Provided by Title I, TN YEP WEX, and approved TPPs.</li> <li>• Activities to help participants obtain experience by training in real work environments through modified versions of:             <ul style="list-style-type: none"> <li>○ Pre-apprenticeship/Apprenticeship (WBLPA)</li> <li>○ Transitional Jobs (WBLTJ)</li> <li>○ On-the-job Training (WBLOJT)</li> </ul> </li> </ul> |
| <p><b>Credentials Offered:</b></p>      | <p>Credentials available to participant are aligned with the in-demand employment trends of the region and/or intended to promote self-sufficiency.</p> <p>Participants interested in vocational/technical training are connected with appropriate providers (typically TCATs, community colleges, or State-approved providers).</p> <p>Additional credentials can be obtained via TDLWD’s learning management platform, Coursera, available to E&amp;T participants.</p>  |

|  |   |
|--|---|
| <b>Contract or Partner Name:</b>           | <b>Tennessee Department of Labor &amp; Workforce Development (TDLWD)</b>  |
| <b>Participant Reimbursements Offered:</b> | Reasonable and necessary expenses directly related to participation in SNAP E&T components, including tuition, transportation (gas cards/bus passes), school supplies, materials, or necessary equipment (i.e., books, tools), testing fees, and uniforms. Child care payment assistance is coordinated through referrals to TDHS' Child Care Payment Assistance Program.   |
| <b>Location:</b>                           | Statewide   |
| <b>Target Population:</b>                  | All eligible SNAP recipients.   |
| <b>Monitoring of contractor:</b>           | <p>Per the TDHS/TDLWD SNAP E&amp;T IGA, TDHS must:</p> <ul style="list-style-type: none"> <li>• Monitor TDLWD at least once per Federal fiscal year.</li> <li>• Monitor contracts, agreements, and programmatic activities.</li> <li>• Conduct an annual fiscal management review of a sampling of reimbursement invoices.</li> <li>• Conduct an annual fiscal management review of sample invoices and supporting documents to determine allowable costs, especially participant reimbursements as outlined in this plan. Provide all monitoring tools, plans, schedules, and other supporting documents used to monitor E&amp;T program operations (including sub-recipients) as well as processes for addressing observations and/or findings.</li> <li>• Conduct on-site reviews of sub-recipients at least once every three (3) years.</li> <li>• Based assessment of the risk of noncompliance posed by the subrecipient, provide the sub recipients with training and technical assistance on program-related matters.</li> <li>• Monitor participant tracking, case management, invoicing, and documentation entered in VOS, on a monthly basis.</li> </ul> |

|   |   |
|---|---|
| <b>Contract or Partner Name:</b>  | <b>Tennessee Department of Labor &amp; Workforce Development (TDLWD)</b>  |
| <b>Ongoing communication with contractor:</b>                               | Email, telephone calls, ad hoc and scheduled meetings, regular reporting, and status notices/automated data transfers |
| <b>Total Cost of Agreement:</b>   | \$2,218,598   |
| <b>Eligible for 75 percent reimbursement for E&amp;T Services for ITOs:</b> | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No   |
| <b>New Partner:</b>   | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No   |

**Table I.II. Contractor/Partner Details**

|                                  |   |
|----------------------------------|---|
| <b>Contract or Partner Name:</b> | <b>University of Tennessee – Extension (UT Extension)</b>   |
| <b>Service Overview:</b>         | <p>UT Extension operates a comprehensive statewide SNAP E&amp;T program under the name Skill Up Tennessee in partnership with TDLWD. The purpose is to help participants gain the knowledge, skills, and support needed for employment, and ultimately to provide a direct link to job readiness and employment leading to self-sufficiency. Skill Up Tennessee is able to work with eligible participants from first interaction through employment. Funding will be used for ongoing planning, implementation, operating costs, and participant supportive services for a statewide program as a direct service provider as well as for activities that add value to the SNAP E&amp;T work already being performed by TDLWD, UT Extension, and other SNAP E&amp;T TPP. UT Extension will play a large role in SNAP E&amp;T outreach and recruitment and serve as an Intermediary as needed.</p> <p>Direct Service Provider: UT Extension will continue to build partnerships, recruit participants, and provide case management to enrolled participants in East, Middle, and West Tennessee. Up to capacity, comprehensive case management services will be provided to those recruited by UT Extension to</p> |

|   |   |
|---|---|
| <p><b>Contract or Partner Name:</b></p> | <p><b>University of Tennessee – Extension (UT Extension)</b></p>  |
|   | <p>guide, motivate, and support participants by continually assessing needs and barriers, identifying resources, and advising on career and training opportunities (U.S. Department of Agriculture, 2017). Case management services will be provided by state UT Extension Career Navigators and include enrollment, assessment and development of an individual employment plan, providing information about services available (including referrals), placement in appropriate component(s), career coaching, limited job search and job search assistance, and tracking participation each month. UT Extension will establish and maintain contact with participants from recruitment until the case is closed. Participant activity will be tracked in the Virtual One Stop (VOS) system. In FFY 2025, UT Extension will increase E&amp;T outreach and recruitment efforts and will refer interested individuals to be case managed by TDLWD once capacity is reached. Emphasis will be placed on rural counties and UT Extension will, to the extent possible, fund supportive service costs for those recruited and referred to TDLWD. This effort will utilize the strength of UT Extension for outreach to increase participation in SNAP E&amp;T while ensuring the individuals who are recruited can be provided case management and supportive services.</p> <p>Intermediary: UT Extension will serve as an intermediary with community-based organizations as needed and as opportunities arise. Once these partnerships are formalized through an agreement with UT Extension, their eligible spending will be included in the monthly 50/50 reimbursement request submitted to TDLWD. The reimbursement will be directed back to the partner agency, less an administrative fee. Eligible direct and indirect costs, as well as participant reimbursements/supportive services, will be included in the reimbursement request depending on the agreement with each partner. UT Extension will be onboarding Urban League Chattanooga this program year.</p> <p>Recruitment: Potential E&amp;T participants will be identified and recruited primarily through sites serving the limited-resource audience with a high likelihood of being eligible for SNAP E&amp;T. Examples include drug and alcohol rehabilitation centers, domestic violence shelters, housing organizations, faith-based organizations, food pantries, and youth sites serving low-income families where parents can be reached. Training providers such as TCATs and community colleges will also</p> |

|   |  |
|---|--|
| <p><b>Contract or Partner Name:</b></p> | <p><b>University of Tennessee – Extension (UT Extension)</b></p>   |
|   | <p>serve as recruitment sites. More emphasis will be placed on recruitment in rural counties in the coming year. Upon recruitment, individuals will complete a preregistration to sign up for the program. Reverse referrals will be requested through TDHS following established procedures to determine eligibility before being contacted by a UT Extension Career Navigator. It is estimated that at least 500 individuals will be served through the program. When we are at capacity for case management, additional individuals preregistering for the program will be sent directly to TDLWD for eligibility verification and case management.</p> <p>Training: Participants needing basic education/High School Equivalency will be encouraged to pursue this and referred to a local Adult Education provider as applicable. Those wishing to pursue vocational/technical training will be connected with an appropriate provider which is typically a TCAT or community college. Work Readiness Training can be offered by UT Extension agents when requested by participants. Job Search Training can be offered by Career Navigators and/or county Extension agents. Each TPP will offer training in accordance with their scope of work.</p> |
| <p><b>Intermediary:</b></p>             | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>   |
| <p><b>Components Offered:</b></p>       | <p>Work Readiness Training (EPWRT)</p> <ul style="list-style-type: none"> <li>• UT Extension and partners utilize a curriculum aligned with the State's established component guidelines to teach activities that focus on developing the knowledge, skills, attitudes, and aspirations that help participants successfully pursue, obtain, and maintain employment. EPWRT focuses on Personal Effectiveness Competencies such as interpersonal skills, integrity, professionalism, initiative, dependability, and reliability as well as communication skills and teamwork. JST activities that support EPWRT may also be included.</li> </ul> <p>Basic/Foundational Skills Instruction (EPB)</p>   |

|   |   |
|---|---|
| <p><b>Contract or Partner Name:</b></p>           | <p><b>University of Tennessee – Extension (UT Extension)</b></p>  |
|   | <ul style="list-style-type: none"> <li>• UT Extension supports participants in need of basic education/HSE through referrals to local AE providers.</li> </ul> <p>Career/Technical Education Programs or other Vocational Training (EPC)</p> <ul style="list-style-type: none"> <li>• UT Extension supports participants interested in vocational/technical training by coordinating referrals to appropriate providers, typically TCATs or community colleges.</li> </ul> <p>Job Search Training (JST)</p> <ul style="list-style-type: none"> <li>• UT Extension will be incorporating the newly developed Ready to Work curriculum for this activity.</li> </ul> <p>Job Retention (JR)</p> <ul style="list-style-type: none"> <li>• UT Extension offers JR for 30 - 90 days for SNAP E&amp;T participants who secure employment after participating in other E&amp;T components within the organization.</li> </ul> |
| <p><b>Credentials Offered:</b></p>                | <p>Credentials available to participant are aligned with the in-demand employment trends of the region and/or intended to promote self-sufficiency.</p> <p>Participants interested in vocational/technical training are connected with appropriate providers (typically TCATs, community colleges, or State-approved providers).</p>  |
| <p><b>Participant Reimbursements Offered:</b></p> | <p>Reasonable and necessary expenses directly related to participation in SNAP E&amp;T components, including but not limited to transportation (gas cards/bus passes) and other training, education, or work-related expenses such as uniforms, personal safety items or other necessary equipment, textbooks and training manuals, tuition/tuition-related fees, and testing fees.</p> <p>Child care payment assistance is coordinated through referrals to TDHS' Child Care Payment Assistance Program.</p>   |



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| <b>Contract or Partner Name:</b>  | <b>University of Tennessee – Extension (UT Extension)</b>  |
| <b>Location:</b>  | Statewide  |
| <b>Target Population:</b>   | SNAP-eligible individuals recruited from community-based organizations and training providers statewide  |
| <b>Monitoring of contractor:</b>  | <p>TDLWD’s Program Accountability Review (PAR) Team performs annual reviews. TDLWD’s Grant Program Director and regional SNAP E&amp;T staff provide technical assistance and conduct fiscal and program monitoring at least once per year. Monthly monitoring is conducted via reviews of invoices, partner reports, and case documentation.</p> <p>TDHS conducts subcontractor monitoring of subcontractors, reviewing scopes of services, executed contracts, fiscal records, invoice methodology and frequency, performance and outcome measures, and record retention.</p> |
| <b>Ongoing communication with contractor:</b>                               | Email, telephone calls, ad hoc and scheduled meetings, regular reporting, and status notices.  |
| <b>Total Cost of Agreement:</b>   | <p>\$2,008,130</p> <p>(\$523,000 100% funding + \$1,200,000 50/50 funding with \$285,135 for participant supports)</p>   |
| <b>Eligible for 75 percent reimbursement for E&amp;T Services for ITOs:</b> | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  |
| <b>New Partner:</b>   | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  |

**Table I.III. Contractor/Partner Details**

|                                  |  |
|----------------------------------|--|
| <b>Contract or Partner Name:</b> | <b>United Way of Greater Nashville (UWGN)</b>  |
| <b>Service Overview:</b>         | In FFY 2025, UWGN will continue to serve as TN’s primary statewide SNAP E&T intermediary partner responsible for |

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| <p><b>Contract or Partner Name:</b></p> | <p><b>United Way of Greater Nashville (UWGN)</b></p>  |
|   | <p>providing technical assistance, hands-on training, compliance monitoring, and program support to ensure partnering community-based organizations meet the key deliverables and outcomes as outlined in their State-approved SOW and budget. This will be tracked through completion of monthly desk monitors in Jobs4TN, submitted invoices, quarterly site visits, and partnership evaluations. UWGN will continue to regularly assess SNAP E&amp;T services offered by partners to ensure alignment with the State’s goals, quality services with a direct link to employment are offered to E&amp;T participants, and timely communication with the TDHS and TDLWD State Office teams concerning any potential compliance or performance related issues.</p> <p>Additionally, UWGN will continue to build its internal capacity through streamlining of internal processes, revision of internal policies and training tools, and development of a UWGN SNAP E&amp;T TPP webpage. UWGN will also develop a detailed project plan for expansion into the Eastern and Western regions of the state beginning FFY 2026 with a focus on vetting and onboarding new partner agencies that provide industry recognized credentials with a direct link to employment and services in rural communities.</p> <p>To ensure eligible individuals do not experience a gap in service should extenuating circumstances arise with a subcontracted partner, UWGN will be ready to assume any case management duties to include paying for a participant’s training costs and supports. Such activities will be discussed with and approved by TDLWD prior to any action taken.</p> <p>UWGN FFY 2025 subcontractors:</p> <ul style="list-style-type: none"> <li>• UpRise</li> <li>• Comprehensive Health Academy of TN (CHAT)</li> <li>• Project Return, Inc.</li> <li>• Pivot Technology School</li> <li>• GT Services, LLC AKA Slim and Husky’s</li> <li>• Monroe Harding</li> <li>• Olympic Career Training Institute (OCTI)</li> <li>• Men of Valor (MOV)</li> <li>• Center for Employment Opportunities – Memphis (CEO)</li> </ul> |

|                                  |  |
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| <b>Contract or Partner Name:</b> | <b>United Way of Greater Nashville (UWGN)</b>  |
|                                  | TN will notify FNS in writing and amend the E&T State Plan if/when additional subcontractors are identified during the program year.   |
| <b>Intermediary:</b>             | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  |
| <b>Components Offered:</b>       | <p>Work Readiness Training (EPWRT)</p> <ul style="list-style-type: none"> <li>• Training provided through partnering community-based organization</li> <li>• Activities help participants obtain foundational cognitive and soft skills necessary for adaptability and longevity in the workplace.</li> <li>• Offered programs have been reviewed by the State to ensure training contains core workplace competencies with soft-skills centered curriculum to ensure it addresses participant’s barriers to employment.</li> </ul> <p>Career/Technical Education Programs or other Vocational Training (EPC)</p> <ul style="list-style-type: none"> <li>• Training provided by partnering community-based organization or other school provider partners (typically TCATs, community colleges, or State-approved providers) following referral from American Job Center or TPP staff.</li> <li>• Activities include education services for participants pursuing industry-recognized credentials to better compete in local job markets.</li> </ul> <p>Job Search Training (JST)</p> <ul style="list-style-type: none"> <li>• Activities offered by partnering community-based organization</li> <li>• Activities may include resumé writing assistance and workshops, online job search training, interviewing skills workshops and practice sessions, and other approved training.</li> </ul> <p>Job Retention (JR)</p> |

|   |  |
|---|--|
| <p><b>Contract or Partner Name:</b></p> | <p><b>United Way of Greater Nashville (UWGN)</b></p>   |
|   | <ul style="list-style-type: none"> <li>• Services provided by partnering community-based organization</li> <li>• Activities include case management and reimbursement for required uniforms/other clothing for employment, equipment, supplies, and/or required tools, testing fees, and transportation.</li> <li>• Participants must work with approved vendors for supportive services.</li> </ul> <p>Work Based Learning</p> <ul style="list-style-type: none"> <li>• State approved programs help participants develop general skills, knowledge, work habits, and work experience while training in real work environments and earning basic certifications necessary to obtain employment.</li> <li>• Approved WBL activities are thoroughly evaluated and must directly enhance participants' employability, support participants' IEPs, and be aligned with local labor market needs and identified in-demand occupations.</li> <li>• WBL activities have planned start- and end-dates and can be coordinated within the private/for-profit sector, the nonprofit sector, and/or the public sector.</li> </ul> |
| <p><b>Credentials Offered:</b></p>      | <p>Credentials available to participant are aligned with the in-demand employment trends of the region and/or intended to promote self-sufficiency.</p> <p>Pathways offered by UWGN's subcontractors for FFY 2025 are:</p> <ul style="list-style-type: none"> <li>• Warehousing/Supply Chain</li> <li>• Medical Assistant</li> <li>• Dental Assistant</li> <li>• Pharmacy Tech</li> <li>• Clinical Billing and Coding</li> <li>• Commercial Driver's License</li> <li>• CNA Program</li> <li>• Construction Readiness Program</li> <li>• OSHA-10</li> <li>• Information Technology (IT)</li> <li>• Data Analytics</li> </ul>   |

|   |   |
|---|---|
| <b>Contract or Partner Name:</b>              | <b>United Way of Greater Nashville (UWGN)</b>   |
|   | <ul style="list-style-type: none"> <li>• Intro to Cybersecurity</li> <li>• Cybersecurity Bootcamp</li> <li>• CRM Admin Training</li> </ul>  |
| <b>Participant Reimbursements Offered:</b>    | <p>Reasonable and necessary expenses directly related to participation in SNAP E&amp;T components, including but not limited to transportation (gas cards/bus passes) and other training, education, or work-related expenses such as uniforms, personal safety items or other necessary equipment, textbooks and training manuals, tuition/tuition-related fees, and testing fees.</p> <p>Child care payment assistance is coordinated through referrals to TDHS' Child Care Payment Assistance Program.</p>   |
| <b>Location:</b>                              | Statewide   |
| <b>Target Population:</b>                     | SNAP E&T Eligible individuals with a special focus on rural communities and special populations   |
| <b>Monitoring of contractor:</b>              | <p>TDLWD's Program Accountability Review (PAR) Team performs annual reviews. TDLWD's Grant Program Manager and regional SNAP E&amp;T staff provide technical assistance and conduct fiscal and program monitoring at least once per year. Monthly monitoring is conducted via reviews of invoices, partner reports, and case documentation.</p> <p>TDHS conducts subcontractor monitoring of subcontractors, reviewing scopes of services, executed contracts, fiscal records, invoice methodology and frequency, performance and outcome measures, and record retention.</p> |
| <b>Ongoing communication with contractor:</b> | Email, telephone calls, ad hoc and scheduled meetings, regular reporting, and status notices.   |
| <b>Total Cost of Agreement:</b>               | <p>\$7,171,428</p> <p>(\$6,600,000 50/50 funding with \$571,428 for participant supports)</p>   |

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|---|---|
| <b>Contract or Partner Name:</b>  | <b>United Way of Greater Nashville (UWGN)</b>                       |
| <b>Eligible for 75 percent reimbursement for E&amp;T Services for ITOs:</b> | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <b>New Partner:</b>   | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |

## J. Budget Narrative and Justification

*Provide a detailed budget narrative that explains and justifies each cost and clearly explains how the amount for each line item in the operating budget was determined. Note that the E&T State plan is a public document and must be made available to the public upon request, so the budget should not identify individual names or salaries that are not subject to public disclosure requirements. State agencies should note that the direct costs noted below are exclusively those attributed to the State and local SNAP agencies.*

**Table J.I. Direct Costs**

|  |  |            |  |              |   |
|--|--|------------|--|--------------|---|
| <p><b>Salary/Wages:</b></p> <p>List staff positions in FTE and time spent on the project.</p> <p>Example: E&amp;T Program Manager - \$60,000 x .50 FTE = \$30,000</p> <p>5 E&amp;T Counselors - \$25,000 x 1.00 FTEs x 5 = \$125,000</p>   | <p>\$ 0</p>  |            |  |              |   |
| <p><b>Fringe Benefits:</b></p> <p>If charging fringe and benefits to the E&amp;T program, provide the approved fringe rate.</p>  | <p>\$ 0</p>  |            |  |              |   |
| <p><b>Contractual Costs:</b></p> <p>All contracts and partnerships should be included in the “contracts and partnerships” matrix of the E&amp;T State Plan Operating Budget Workbook. Briefly summarize the type of services contractors/partners will provide, such as direct E&amp;T program services, IT services, consulting, etc.</p> | <p>\$11,398,156.00</p> <p>Contractual costs include the agreement with TDLWD and subrecipient agreements with service providers, intermediaries, and partners. All costs included are based on historical program expenditures. All costs included for service providers, intermediaries, and partners have been reviewed and only operating costs specifically related to SNAP E&amp;T services are included as specified:</p> <table border="1" style="width: 100%; margin-top: 10px;"> <tr> <td colspan="2" style="background-color: #e0e0e0;">100% Admin</td> </tr> <tr> <td style="width: 50%;">a. Personnel</td> <td>Salaries for 20 program-specific staff:</td> </tr> </table> | 100% Admin |  | a. Personnel | Salaries for 20 program-specific staff: |
| 100% Admin   |  |            |  |              |   |
| a. Personnel   | Salaries for 20 program-specific staff:  |            |  |              |   |

|  |                       |  |
|--|-----------------------|--|
|  |                       | 5 Administrative State Office staff at 100%  |
|  |                       | 15 Direct Participant Service staff located throughout TN at 75%   |
|  | b. Fringe Benefits    | Benefits for 20 program-specific staff: Full benefits package at 35%   |
|  | c. Travel             | Program-specific travel including monthly staff visits/ outreach to assigned LWDA areas or counties and/or travel to participants unable to meet program staff at LWDA centers                                   |
|  | d. Equipment          | None   |
|  | e. Supplies           | Basic office supplies  |
|  | f. Contractual        | Administrative funding to be awarded to TPPs aiding the State with SNAP E&T outreach, case management, special projects, outreach in rural areas, development of E&T materials, and ongoing community engagement |
|  | g. Construction       | None   |
|  | h. Other              | Physical and organizational structures and facilities, computer software/programs necessary to operate the program, and funding exclusively allocated for E&T participant tuition                                |
|  | j. Indirect Charges   | Provisional approved rate of 13.29% – Total direct salaries and wages including all applicable fringe benefits   |
|  | 50/50 Admin (CBO/TPP) |  |
|  | a. Personnel          | None   |
|  | b. Fringe Benefits    | None   |
|  | c. Travel             | None   |



|  |   |   |  |
|--|---|---|--|
|  | d. Equipment  | None  |  |
|  | e. Supplies   | None  |  |
|  | f. Contractual  | TPP 50/50 administrative expenditures AND E&T participant supportive services. FFY 25 TPPs are: MOV, CEO, UT Extension, and UWGN. |  |
|  | g. Construction   | None  |  |
|  | h. Other  | None  |  |
|  | j. Indirect Charges   | None  |  |
|  | 50/50 Participant Supports (State)  |   |  |
|  | a. Personnel  | None  |  |
|  | b. Fringe Benefits  | None  |  |
|  | c. Travel   | None  |  |
|  | d. Equipment  | None  |  |
|  | e. Supplies   | None  |  |
|  | f. Contractual  | None  |  |
|  | g. Construction   | None  |  |
|  | h. Other  | State expenditures for E&T participant supportive services (i.e. transportation, books, supplies, etc.)                           |  |
|  | j. Indirect Charges   | None  |  |
|  | <b>Non-capital Equipment and Supplies:</b>                                  | \$ 0  |  |
|  | Describe non-capital equipment and supplies to be purchased with E&T funds. |   |  |

|  |             |
|--|-------------|
| <p><b>Materials:</b></p> <p>Describe materials to be purchased with E&amp;T funds.</p>   | <p>\$ 0</p> |
| <p><b>Travel &amp; Staff Training:</b></p> <p>Describe the purpose and frequency of staff travel charged to the E&amp;T program. This line item should not include E&amp;T participant reimbursements for transportation. Include planned staff training, including registration costs for training that will be charged to the E&amp;T grant.</p> | <p>\$ 0</p> |
| <p><b>Building/Space:</b></p> <p>If charging building space to the E&amp;T program, describe the method used to calculate space value.</p>   | <p>\$ 0</p> |
| <p><b>Equipment &amp; Other Capital Expenditures:</b></p> <p>Describe equipment and other capital expenditures over \$5,000 per item that will be charged to the E&amp;T grant. (In accordance with 2 CFR 200.407, prior written approval from FNS is required.)</p>   | <p>\$ 0</p> |

- a) **Indirect Costs.** Indirect costs (also called overhead costs) are allowable activities that support the E&T program, but are charged directly to the State agency. If using an indirect cost rate approved by the cognizant agency, include the approval letter as an attachment to the E&T State plan.

N/A

- b) **Participant Reimbursements (Non-Federal plus 50 percent Federal reimbursement).** Participant reimbursements should include the total participant reimbursement amount from the contracts/partners matrix of the E&T State Plan Operating Budget Excel Workbook, as well as any participant reimbursements the State agency plans to provide.

Transportation & Other Participant Supportive Services (Reimbursements):  
\$1,226,558.00

- \$ 370,000.00 allocated for participant supportive services. Services are mainly offered to participants enrolled in EPB, JST, JR, postsecondary education programs, participants not co-enrolled with WIOA Partners.
  - \$185,000.00 State funding + \$ 185,000.00 Federal match
- \$ 285,130.00 allocated for participant supports by UT Extension and partners.
  - \$142,565.00 partner funding + \$142,565.00 federal match
- \$ 571,428.00 allocated to UWGN and partners for participant supports.
  - \$ 285,714.00 partner funding + \$285,714.00 Federal match
  -