Iowa FFY25 SNAP ET State Plan

2025 Third Amendment

IOWA | Health and Human Services

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A. Cover Page and Authorized Signatures

State: Iowa

State Agency Name: Iowa Department of Health and Human Services

Federal FY: 2024

Date Submitted to FNS (revise to reflect subsequent amendments): 5/21/25

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

Name	Title	Phone	Email
Laurie Doyon	E&T Program Manager	515-380-4891	ldoyon@dhs.state.ia.us
Stacie Gordon	FFWS Bureau Chief	515-229-7627	sgordon@dhs.state.ia.us
Tiffany Wickman	FFWS Team Lead	515-229-9407	twickma@dhs.state.ia.us

Certified By:

Amela Alibasic _____ 5/21/2025

Amela Alibasic, Economic Assistance Director Date

Certified By:

Minu Maviladath _____ 05/21/25

Minu Maviladath, State Agency Fiscal Reviewer Date

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

Amendment Number	Brief description of changes or purpose for amendment (If amendment includes budget changes, include in description)	Sections of Plan Changed (Highlight areas of plan with changes)	Date submitted to FNS	Date approved by FNS
1	Added $176,143 additional funds to 100% Admin. funding • Moved $87,240.50 Non- Federal Share Salary/Wage to Federal Share • Moved $831.00 Non-Federal Share Fringe/Benefits to Federal Share	Operating Budget and Section J. Budget Narrative and Justification	2/17/2025	2/20/2025
2	Addition of One City United and Change Course as new providers. *Added Acronyms : CC- Change Course OCU- One City United *Increasing Proposed Number of Participants from 580 to 659 * GWH total participant enrollments from 60 to 90 – no change in budget	C. Acronyms E. State E&T Programs, Operations and Policy I. E&T Summary II. Operating Budget * 2025 SNAP E&T Operating Budget Tab A, Contract-Partnership Matrix Tab A-1 Intermediary Subcontracts		

	* One City -24 *Change Course -25 *Updated Component Details for Job Retention, Career/Technical Education Programs or other Vocational Training, Work Readiness Training *Updated Provider Map	*Tables G III,VII, X *Appendix A		
3	• Addition of North Iowa Area Community College, and PIVOT Technology School as new providers • Added Acronyms: • NIACC-North Iowa Area Community College • PIVOT Technology School-PTS • Increasing the projected number of participants from 659 to 673 • NIACC-9 • PIVOT-5 • Updated Component Details for Supervised Job Search(SJS), Career/ Technical Education Programs or other Vocational Training, • Updated Provider Map • Updated component Details	C. Acronyms E. State E&T Programs, Operations and Policy I. E&T Summary II Operating Budget *2025 Operating Budget Tab A, Contract-Partnership Matrix Tab A-1 Intermediary Subcontracts Tables G III, VII, X *Appendix		

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
ABE	Adult Basic Education
CASAS	Comprehensive Adult Student Assessment Systems
CBO	Community Based Organization
CA	Cost Allocation
CC	Change Course
CCA	Child Care Assistance
CISS	Central Iowa Shelter and Services
DMACC	Des Moines Area Community College
E&T	Employment and Training
FFY	Federal Fiscal Year
FIP	Family Investment Program
FNS	Food and Nutrition Service
GA	General Assistance
GAP	Government Assistance Program for Tuition
GeoSol	Geographic Solutions
GWH	Goodwill of the Heartland
HCC	Hawkeye Community College
HCTN	The Help Center
HHS	Iowa Department of Health & Human Services
HiSED/ HiSET	High School Equivalency Diploma/Test
IABC	Iowa Automated Benefit Calculation
ITO	Indian Tribal Organization
IMW	Income Maintenance Worker-Iowa's eligibility workers
IWCC	Iowa Western Community College
IWD	Iowa Workforce Development
JRS	Job Retention Services
KCC	Kirkwood Community College
LiHEAP	Low Income Energy Assistance Program
NCRC	National Career Readiness Certificate
NIACC	North Iowa Area Community College
OCU	One City United
PACE	Pathways to Academic Career Education and Employment
PTS	Pivot Technology School

RCA	Refugee Cash Assistance

Acronym	Acronym Definition
SCC	Southeastern Community College
SNAP	Supplemental Nutrition Assistance Program
TANF	Temporary Assistance for Needy Families
USDA	United States Department of Agriculture
WIOA	Workforce Innovation and Opportunity Act
WISE	Worker Information System Exchange

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))	☒
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)	☒
III. State education costs will not be supplanted with Federal E&T funds. (7 CFR 273.7(d)(1)(ii)(C))	☒
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))	☒
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)	☒
VI. Contracts are procured through appropriate procedures governed by State procurement regulations. (7 CFR 277.14)	☒
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)	☒
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))	☒
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))	☒

Table D.II. Additional Assurances

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.	**Check Box**
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))	☒
II. The E&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&T State Plan which affect them; submit for comment all portions of the E&T State Plan that affect the Indian Tribal Organization (ITO); if appropriate and to the extent practicable, include ITO suggestions in the E&T State plan. (For States with Indian Reservations only.) (7 CFR 272.2(b)(2) and 7 CFR 272.2(e)(7))	☒

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

I. Summary of E&T Program

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.

The Iowa SNAP Employment and Training (E&T) program is built in alignment with the mission, vision, and guiding principles of the Iowa Department of Health and Human Services (HHS) as well as the vision of Iowa Workforce Development (IWD) as follows:
HHS Mission: Iowa HHS provides high quality programs and services that protect and improve the health and resiliency of individuals, families, and communities.
Societal Vision: Individuals, families, and communities are safe, resilient, and empowered to be healthy and self-sufficient.
Organizational Vision: Iowa HHS is a trusted leader and partner in protecting health and providing high quality, equitable services.
Guiding Principles:

- Data-Driven: We make informed, data-driven, and evidence-based decisions to drive quality and improve results.
- Accountability: We use public resources responsibly to improve lives through the programs and services we provide.
- Integrity: We generate trust through honest, respectful, and reliable work that we can be proud of.
- Equity: We actively identify and remove barriers to access and inclusion so that we can provide all individuals an opportunity to succeed.
- Communication: We communicate in a thoughtful and coordinated way to ensure individuals are well informed about our work.
- Collaboration: We facilitate meaningful partnerships that focus on the voices of the individuals and communities we serve.

IWD Vision: To create, enable, and sustain the most future ready workforce in the nation.

The program vision for Iowa E&T is based in the belief that "Every person deserves a pathway to success". The program will expand opportunities for Iowans and empower them to achieve sustainable wage employment through education and training, employment services, job readiness and retention activities.

The objectives of Iowa's E&T program demonstrate how the program: 1. increases the ability of SNAP participants to obtain regular employment; 2. meets State or local workforce needs.

The objectives for E&T are:
1. Provide a wide range of opportunities for SNAP recipients to have clear pathways to develop marketable and in-demand skills that increase employability resulting in career advancement and self-sufficiency. Thereby, increasing availability and accessibility of allowable E&T trainings and supportive services to E&T participants.

2. Establish a collaborative and inclusive environment for participants, providers, and communities to share a common vision and achieve positive outcomes for the individual, organization, and community. Thereby, increasing participant enrollments into E&T programs by offering opportunities that meet the needs, cultural considerations, motivations, and abilities of potential participants.

3. Strengthen fiscal capacity of network providers to expand essential supports and services by maximizing use of non-federal funding sources. Thereby, increasing the scope of E&T services offered and provided to eligible SNAP recipients by maximizing all provider available non-federal funding sources.

4. Demonstrate efficient, effective, and responsible practices that result in positive outcomes and contribute to economic growth of the state. Thereby, increasing employability and self-sufficiency of E&T participants to strengthen the workforce and promote economic growth.

Additionally, building an employer driven model for the E&T program is demonstrated through the E&T Service Provider application process. Applicants must:

- Describe how local labor market information is used to ensure that the programs and services provided address the local workforce needs in the community,
- Identify and rank the primary industry sectors relevant to the regions/service area in which the organization provides services, and
- Identify and describe how the organization engages with local employers in regard to program development and achieving positive outcomes.

Is the State's E&T program administered at the State or county level?

Iowa's SNAP E&T program is a state administered voluntary program available to Iowa residents who express an interest in for E&T where E&T services are available.

(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.

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.

E&T Services are provided through a collaborative E&T Service Provider Network, coordinated through intermediary administration by the Iowa Workforce Development Agency.

This network of contracted providers is comprised of five community colleges, four community-based organizations, and American Job Centers throughout the state. Physical services are available in 71 of Iowa's 99 counties, and virtual services are available in all 99 counties.

Counties served by community colleges align with the designated districts as follows:

- Des Moines Area Community College: Polk, Carroll, Boone, Story, Audubon, Guthrie, Dallas, Jasper, Madison, Warren, Marion
- Hawkeye Community College: Floyd, Chickasaw, Butler, Bremer, Grundy, Black Hawk, Tama
- Iowa Western Community College: Harrison, Shelby, Pottawattamie, Cass, Mills, Fremont
- Kirkwood Community College: Benton, Linn, Jones, Cedar, Johnson, Iowa
- Southeastern Community College: Washington, Henry, Louisa, Des Moines, Lee
- North Iowa Area Community College: Cerro Gordo, Floyd, Franklin, Hancock, Mitchell, Winnebago, and Worth. Parts of the following counties: Butler, Wright, Kossuth, and Chickasaw.

Counties served by Community Based Organizations include:

- Central Iowa Shelter and Services: Polk
- CodeX: all counties - virtual services
- Goodwill of the Heartland: Benton, Jones, Clinton, Scott, Muscatine, Washington, Louisa, Henry, Des Moines, Lee, Jefferson, Van Buren
- HELP Center: all counties - virtual services
- One City United: Blackhawk
- Change Course: Polk
- Pivot Technology School: all counties-virtual services

Current Counties served by American Job Centers include:
Black Hawk, Bremer, Buchanan, Butler, Grundy, Dubuque, Delaware, Clayton, Fayette, Allamakee, Winneshiek, Howard, Chickasaw, Mahaska, Keokuk, Monroe, Wapello, Jefferson, Appanoose, Davis, Van Buren, Lucas, Wayne, Plymouth, Cherokee, Ida, Woodbury, Monona, Pocahontas, Humboldt, Wright, Calhoun, Webster, Hamilton.

American Job Center locations were chosen either because providers have not been available or there is a need to develop partner agencies so that eventually all 99 counties are served. Additional AJC offices will be added throughout the year which will expand the counties served.

Iowa will continue expansion efforts this fiscal year using a continuous open panel application model to expand the E&T Service Provider Network with a goal of increasing accessibility, availability, and utilization of E&T services in all 99 counties.

Provide a list of the components offered.

Offered Components include:

- Supervised Job Search (SJS)
- Job Retention Services (JRS)
- Career and/or Technical Education Programs or Other Vocational Training (EPC)
- Work Readiness Training (EPWRT)
- Basic/Foundational Skills Instruction (includes High School Equivalency Programs) (EPB)
- Internship – Subsidized by E&T (WBLI – SUB)

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

E&T Employee Manual: https://hhs.iowa.gov/sites/default/files/7-M.pdf?081120221654

HHS E&T Website: https://hhs.iowa.gov/programs/programs-and-services/job-training/employment-training

IWD E&T Website: https://workforce.iowa.gov/jobs/worker-programs/snap

State Administrative Code: https://www.legis.iowa.gov/docs/iac/rule/10-05-2022.441.65.28.pdf

II. Program Changes

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

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.

In FFY24, Project Iowa and St. Vincent de Paul withdrew as E&T service providers due to staffing capacity for FFY25.

In FFY25, Iowa is adding two new providers: CodeX and the HELP Center, both of whom will provide virtual services and expand E&T services in Iowa to all 99 counties.

IWD's American Job Centers began providing services in FFY24, and more AJCs will onboard as E&T providers in the coming FFY.

In the 3rd quarter of FFY 25, One City United and Change Course are being added as new E&T Service Providers.

In the 4th quarter of FFY25, North Iowa Area Community College and Pivot Technology School will be added as new providers

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.

The State agency increased the accuracy of budget projections by presenting historical data to the provider network.

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.

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).

The Iowa Workforce Development (IWD) intermediary and HHS participate in the State workforce development board meetings. Information such as the Eligible Training Provider List and high demand jobs were used to target areas of educational and employment needs to develop the SNAP E&T program.

The IWD Bureau Chief of Partner Programs along with the E&T Program Manager met with the State Workforce Development Board virtually on May 15, 2024, during a State Workforce Development Board meeting to discuss and consult regarding the SNAP E&T program. During the meeting, SNAP E&T was presented to the State Workforce Development Board as a crucial piece of the puzzle in Iowa to help recruit and retain workers. As a result, members of the State Workforce Development Board have increased awareness of E&T and have reached out to express interest in collaborating in the coming FFY. Every member of the State Workforce Development Board received slides detailing the E&T program and contact information for next steps.

Both the IWD Bureau Chief of Partner Programs and the E&T Program Manager will continue to attend these meetings as scheduled on a quarterly basis.

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.

IWD regularly meets with private employers to assess the needs and to help provide programming to meet those needs. The IWD Business Engagement Division consults daily with private employers to understand workforce needs and provide information related to existing programs available in the Iowa workforce system as a whole. Additionally, IWD has representatives that are members of a number of different organizations including the Employers' Council of Iowa (ECI) and employer council group Society for Human Resource Management (SHRM) groups.
Economic Development groups, and local chambers of commerce.

IWD is in consultation at least quarterly with the local workforce development boards and serve as voting members on these boards. These boards are comprised of 50% of local employers.

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.

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.

N/A

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).

Historically, HHS has encouraged all E&T Service Providers to collaborate with WIOA staff for referrals and dual enrollments when necessary to receive services not provided by E&T or to supplement WIOA services when necessary to meet participant needs. Communication occurs, when necessary, with WIOA to ensure coordination and non-duplication of services. E&T Case Managers are required to document in the participant record as part of the Employability Plan and case notes how participants' needs are met, and to provide participant reimbursement for those supports not covered through WIOA. Moving forward with IWD as the Intermediary Administrator of E&T there will be greater integration of WIOA Title I programs serving E&T participants.

Iowa's intermediary contract with IWD includes the use of the SNAP module within their electronic data management system Geographic Solutions (GeoSol). Use of this system is required for all E&T partners and will allow for immediate eligibility determinations, case management, and improved accuracy. Immediate eligibility determinations are provided in the SNAP module by a real-time eligibility pull through the HHS IABC system, allowing E&T Providers to see if an individual is currently receiving SNAP. Iowa is working closely with IWD to ensure the system continues to meet the desired specifications of the E&T program. The use of this system will also enhance partnership opportunities with Iowa's Department of Labor agency, Iowa Workforce Development (IWD), who administer the Workforce Innovation and Opportunity Act (WIOA) program.

Although IWD uses GeoSol, E&T funds are used only to provide services specific to E&T. All costs related to the use of GeoSol are specific to E&T for the annual licensing fee and any system modifications determined necessary for administering E&T.

The SNAP E&T program coordinators presented SNAP E&T program information to the WIOA Title 1 providers and WIOA Title III career planners on March 15, 2024, during a virtual meeting. This presentation included discussion regarding opportunities for co-enrollment and the braiding of services. Processes for braiding services between the WIOA system partners will continue to be developed and enhanced.

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

☐ Yes

☒ No

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.

HHS administers Iowa's FIP (TANF cash assistance) program along with SNAP. FIP eligibility status is verified at both initial referral to E&T and on a monthly basis to ensure a participant is not receiving FIP simultaneously with E&T services. IWD is also the provider of Iowa's TANF employment and training programs. The IWD SNAP E&T program coordinators provided training to the TANF employment and training case manager teams on the SNAP E&T program for increased understanding of the program and transition opportunities. These virtual trainings were held on February 23; February 28; March 4; March 8; and March 26, 2024.

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).

The E&T Service Provider Case Managers include referrals to other programs when necessary to receive services not provided by E&T. With IWD as the Intermediary Administrator, E&T is directly connected to the services of WIOA and other federal and state employment programs.

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.

Meskwaki is Iowa's only federally recognized Indian tribe with a settlement located near Tama, Iowa.

On June 6, 2024, Iowa received FNS guidance from our regional office indicating that Iowa is not subject to the consultation guidance/memo since tribal members are currently not SNAP eligible. Members of the tribe receive income from the Meskwaki casino exceeding income limits for SNAP. FNS encourages continued consultation efforts and requests that efforts be included in the State Plan but will not be formally tracked.

On February 22, 2024, IWD SNAP E&T program coordinators met with 3 staff from the American Indian Council. Information was shared about the SNAP E&T program and the opportunities for tribal members in Iowa. The American Indian Council provided background information on tribal members in Iowa and a suggested approach with the Meskwaki Nation.

On March 18, 2024, IWD SNAP E&T program coordinators left a voicemail message for the Meskwaki Nation Tribal Council with program information and a request for return call to discuss opportunities.

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).

The Meskwaki tribe did not respond to collaboration attempts similar to previous years' efforts. The IWD SNAP E&T team will continue to make periodic outreach attempts to the Meskwaki Nation and will consult with the American Indian Council agency representatives regarding opportunities available for collaboration.

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.

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

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)

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)).

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.)

Iowa runs a voluntary E&T program, exempting all work registrants.

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

NA

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: Click or tap here to enter text.

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.

The Division of Community Access and Eligibility in HHS both administers the E&T Program and sets SNAP policy. The Economic Assistance Director within the Division is the contract owner for the IWD Intermediary Administrator contract. HHS retains responsibility and accountability for all aspects of the State's E&T program. HHS and IWD collaborate for policy and procedure development with the purpose of effectively operating and expanding Iowa's E&T program. HHS retains authority for all programmatic and policy decisions and provide oversight to ensure compliance with all State and Federal rules and regulations. IWD is the E&T program Intermediary Administrator via contract with HHS. The IWD Workforce Services Division Administrator is the contract owner for all E&T Service Provider contracts. The E&T Program Coordinators within the Workforce Services Division perform day to day operation responsibilities and monitor E&T providers.

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

Communication related to SNAP certification policy and E&T is on-going within the Financial, Food, and Work Supports Bureau in the Division of Community Access and Eligibility.

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.

Iowa communicates information and data specific to participants with E&T providers through the IowaWORKS (GeoSol) SNAP Module, phone, video calls, or email. Questions or concerns regarding eligibility, policy, processes, billing, etc. are emailed to appropriate E&T mailboxes, which are accessible to State E&T staff.

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.

WR, ABAWD status, and exemptions are all recorded in the IABC eligibility system and status determinations are narrated in WISE for each applicant/recipient and updated as circumstances change. WISE is the case narrative system utilized by all eligibility workers. IowaWORKS (GeoSol) SNAP Module houses all participant demographics and E&T documentation including assessments, employability plans, progress notes, provider determinations, ABAWD notifications, program outcomes, and supports provided for participant reimbursements.

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

HHS provides policy updates to IWD via email to be communicated with E&T Service Providers. E&T updates or information are shared with E&T Service Providers by IWD. Several methods of communication are used including email, virtual meetings, E&T resource material, and Provider Handbook updates. IWD holds quarterly All Provider virtual meetings to discuss status updates, policy, process changes/inquiries, problem solving, and discuss overall provider involvement in the E&T Program. IWD verbally communicates and discusses any updates at regularly scheduled monitoring meetings, upon request, or when need is identified. IWD emails any updated materials directly to all E&T Service 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.

Monitoring
The E&T Program Manager or designee will:

- Verify invoices and supporting documentation itemizing work performed prior to payment,
- Determine compliance with general contract terms, conditions, requirements, and
- Assess compliance with deliverables, performance measures, or other associated requirements based on the following:
    - HHS will periodically attend E&T Service Provider monitoring meetings and review meeting notes and IWD case record reviews on a quarterly basis. HHS will periodically conduct independent case record reviews by random sample.
    - HHS will monitor IWD intermediary administration at least quarterly, more often upon request of either party, to review participation levels, outcomes, and discuss issues that need to be resolved.
    - HHS will conduct annual compliance and fiscal reviews utilizing Food and Nutrition Service (FNS) Management Evaluation (ME) review guidelines.

As part of the review(s), HHS may require IWD to provide additional data, virtual or on-site reviews, and consider information from other sources.

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).

During monitoring, a sample of participant records are reviewed for quality assurance of services, participant progress, and compliance with overall program requirements. Written recommendations are provided to guide revisions and/or action items related to documentation, services, or practices to improve service quality ensure program compliance and positive outcomes for participants.

An outcome performance measure is included in the IWD contract and sub-recipient contracts to ensure participants completing E&T participation have attained program goals as set forth by HHS in the approved State Plan. Data is reviewed each quarter to evaluate success of participants exiting E&T.

VIII. Screening for Work Registration

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

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

Applicants are registered for work by signing the HHS Food and Financial Support Application. During the SNAP eligibility interview, circumstances for each household member are discussed via a verbal script to determine the Mandatory Work Registration (MWR), ABAWD status or possible exemptions of each member.

Iowa will substitute the SNAP work requirements with the Refugee Cash Assistance (RCA) work requirements for eligible refugees. Refugees who receive RCA are exempt from SNAP work requirements.

Non-exempt refugees receiving RCA must follow work requirements as determined by the Office of Refugee Resettlement (ORR) and provided by Bureau of Refugee Services (BRS). Through BRS, an employable refugee must:

- Register for employment with Iowa Workforce Development (IWD) within 30 days of the receipt of RCA.
- Participate in employment services provided by BRS within 30 days from receipt of assistance. Participation includes:
    - Developing an individual employability plan,
    - Participating in job search, where applicable,
    - Going to a job interview arranged by BRS, and
    - Participating in a social service or targeted assistance program which BRS determines to be available or appropriate.
- Apply for and accept an offer of employment meeting the standards described in Appropriate Work and Standards Applying to Both Work and Training. The refugee must accept such a job without regard to whether the job would interrupt a program of services planned or in progress, unless the refugee:
    - Is currently participating in a program in progress of on-the-job-training or vocational training approved as part of the refugee's individual employability plan, or
    - Is enrolled full time in a professional recertification program approved as part of the refugee's individual employability plan.
- Not voluntarily quit a job.
- Participate in any employability service program that is determined available and appropriate by the Department.

While job search is the primary focus, educational opportunities may be available. An applicant who has been determined to have failed to meet work requirements will be denied RCA. The first date of subsequent RCA eligibility is 31 calendar days after the

date of failure. A participant who has been determined to have failed work requirements is provided a conciliation period of not more than 30 days prior to the imposition of the sanction. If, after the conciliation period, the RCA recipient is determined to have failed or refused to cooperation, sanctions are imposed. The sanction is three payment months for the first occurrence, and six payment months for the second or subsequent occurrences. Specific language regarding RCA work requirements and sanctions can be found here: https://hhs.iowa.gov/sites/default/files/6-D.pdf?091220221653

The automated batch process between HHS and IowaWORKS, in coordination with E&T IMW, determines an E&T participant's on-going status throughout the duration of enrollment in E&T.

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.?

Work Registration Process:
Policy: By signing the application or recertification form, a SNAP applicant or recipient is considered to be registered for work. However, work requirements apply only to mandatory work registrants (MWRs) in the household.

Procedure: When a household has one or more members who are MWRs, their work registration code is entered in IABC. When a household member is determined an MWR, the SNAP Work Rules form is systematically generated to the household. Explain to the person who attends the interview: What work requirements are, the rights and responsibilities of MWRs, and the penalties for failing to comply with Work Requirements for MWRs.

MWR, ABAWD status and exemptions are all recorded in the IABC eligibility system and status determinations are narrated in WISE for each applicant/recipient and updated as circumstances change. State eligibility worker enters the work registration status of each household member on the ABC system each time it is determined. The following codes are used to work registration status:

- 3 Mandatory work registrants, not an able-bodied adult without dependents (ABAWD)
- 4 FIP recipient
- 9 Exempt from work registration and ABAWD work requirements
- F Central Office use only
- E Potential ABAWD – would be an ABAWD if not exempt for earnings
- L Mandatory work registrant and ABAWD who is not meeting the work requirement
- V Mandatory work registrant and ABAWD who meets the work requirement

Additionally, the status is documented in case note in WISE (the case narrative system utilized by all eligibility workers).

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

Eligibility workers review this status at application, at any verified reported change, and again at recertification. Participants who are determined MWR and/or ABAWD receive the oral notification at interview. In situations where an interview is not held, a minimum of two attempts are made to contact the household and orally explain the requirements. The written Consolidated Notice which explains their rights and responsibilities, SNAP work requirements, time limits, and exemptions is systematically issued to the household at time of application or recertification approval, or for already active cases, when a change is made to the applicable member's MWR or ABAWD code in IABC. This form also provides information for participants to learn about employment and training programs throughout the State of Iowa.

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.)*

Iowa's SNAP E&T program is a voluntary program available to Iowa residents meeting the following E&T participant criteria who express an interest in volunteering for E&T:

- A SNAP recipient or applicant with pending eligibility determination
- Not receiving Family Investment Program (FIP) assistance or other cash assistance under Title IV such as Tribal Temporary Aid to Needy Families (TANF)
- Age 18 or older (may be 16-17 if already have a high school diploma or working toward a high school diploma or equivalent) ready, able, and willing to work at the completion of E&T enrollment

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.

Individuals expressing an interest in the E&T program during certification and re-certification are provided contact information for the E&T Eligibility Specialist and the referral is documented via email to ETVerification@dhs.state.ia.us.

When the E&T Eligibility Specialist is contacted by an interested individual, an additional screening for component interest and appropriateness for E&T services is completed.

Documentation of the screening is entered into WISE.

The E&T Eligibility Specialist time is cost allocated between Certification and E&T by time study. Any screening and referral activities are charged to Certification.

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.

Upon receipt of a reverse referral request, the E&T Eligibility Specialist reviews the documentation and case narrative in the WISE system and IowaWORKS (GeoSol) SNAP Module to determine if the individual has been screened and referred by an eligibility worker and meets general E&T participant criteria. If screening and referral has not occurred, the E&T Eligibility Specialist completes the screening and referral prior to approving enrollment in E&T. The screening is documented as part of the E&T referral case note in WISE. The screening is also part of the eligibility verification email sent in response to the provider making the reverse referral request via email or mini-registration process in the IowaWORKS system.

If review of documentation identifies HHS information is inconsistent with information provided in E&T referral request, more information is needed from the participant to clarify appropriateness for E&T eligibility. The reverse referral request is pended, and a notification is sent to the requesting provider and IWD requesting them to have the participant contact the E&T Eligibility Specialist at the provided phone number. If additional information is not received within required timeframe, the E&T referral is denied. The requesting provider and IWD are notified via email with an updated reverse referral determination.

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?

Eligibility workers include notification of participant reimbursements during the E&T screening and referral process at time of application and recertification. If the screening and E&T referral are not included in WISE, at time of reverse referral request is received, the E&T Eligibility Specialist shall contact the participant to complete.

Exemption from mandatory E&T participation does not apply since Iowa is a voluntary E&T state.

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)?

Historically, Iowa has operated primarily on a reverse referral process. E&T Service Providers present a brief overview of E&T to potential participants who indicate they receive, have applied, or would like to apply for SNAP benefits. If a potential participant is interested in the program and meets all other E&T screening criteria, a reverse referral request is initiated by the E&T Service Provider. During the E&T enrollment process, providers are required to provide E&T Orientation using HHS developed materials explaining the program in more detail, including available supports and participant reimbursements, responsibilities and expectations, and potential benefits of the participating in the program.

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.?

At the time that the reverse referral request is received, the E&T Eligibility Specialist shall contact the participant to complete the screening and referral process if not already documented in WISE.

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.

Regardless of reverse or direct referral, participants who are interested in E&T contact the local provider in their area based on interest. Generally, the provider and the participant:

- Complete an HHS developed E&T Orientation process with the provider case manager via Power Point presentation, handout, and oral explanation and, with the exception of EPEL participants, view FNS developed videos on Self-Sufficiency and Economic Impact.
    - Discuss participant reimbursement

- Complete E&T Assessment
- E&T SNAP Application (IowaWORKS system required)
- Develop & sign E&T Employability Plan
- Case Manager completes IowaWORKS system enrollment process for E&T program and component

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?

Referral/enrollment information is communicated via case note in WISE by the eligibility worker or E&T Eligibility Specialist.

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?

All E&T referral information is communicated to the E&T Provider via email by the E&T Eligibility Specialist.

Reverse referral requests are initiated by the E&T Service Providers via the mini-registration process in the SNAP module of the IowaWORKS system. The E&T Eligibility Specialist creates/runs a report daily in IowaWORKS to access the reverse referral requests received. For any participant referred, the Eligibility Specialist reviews the case file to determine if the participant meets state specific criteria to approve the referral. Within one business day of the referral request, the Eligibility Specialist confirms or denies appropriateness for E&T enrollment via email to the E&T Service Provider assigned case manager. The Eligibility Specialist contacts the participant if additional questions are needed prior to approval.

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)

E&T Service Providers conduct the Employability Assessment. Upon contact with a provider, individuals will be assessed for program eligibility and determination of appropriate component. Ongoing assessments are performed when the participant has a change in circumstance, E&T component, or other aspects. Assessments are conducted in the most appropriate format for the participant. Information related to the completion of the Employability Assessment is gathered verbally, in-person, or virtually, and documented in the SNAP E&T Module of the IowaWORKS System.

All assessment information is available in the participant record of the SNAP Module within the IowaWORKS system. Case managers are required to use the IowaWORKS system for all E&T services. This allows all E&T Service Providers to prevent service duplication and the State Agency to monitor participant records to ensure participants receive services as necessary.

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.

All E&T Service Providers must ensure that Case Management services are provided to each E&T participant.

- Case Managers must maintain contact with participants:
  - At least once every 30 days in all components
  - Weekly if enrolled in Supervised Job Search
  - As needed to meet participant needs

IowaWORKS is used to document all case management services and supporting documents pertaining to E&T. This allows information to be shared and retained across providers, HHS, and IWD.

Currently all E&T Service Providers have established in-house case management services and utilize IowaWORKS as their case management system.

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:

SNAP eligibility staff:	Iowa's E&T Eligibility Specialist is a designated Income Maintenance Worker. All communication is through the SNAP Module of the IowaWORKS system or via email at ETVerification@dhs.state.ia.us. E&T Case Managers must notify IWD. IWD must notify HHS: • Anytime a Provider becomes aware that a person has a self-declared physical or mental issue impeding their ability to engage in component activities of the program which may qualify for an exemption. • Anytime an ABAWD participant is no longer attending or actively participating in a qualifying component education or training program. • A participant is not a good fit for enrolled component but determines the participant may be suitable for another program or component. The need for change in program or component at the time, but no later than 10 days, from the date of change. • A participant is enrolled in a component, but it is determined that the participant is no longer appropriate for the component, and the Provider does not have another appropriate component available for the participant. • All E&T participants ending E&T participation and exiting from E&T completed.
State E&T staff:	HHS E&T Program Managers will provide technical assistance to the Intermediary Administrator, IWD. E&T Case Managers communicate with IWD E&T Workforce Coordinators for technical assistance regarding service provision to participants, documentation requirements, program development and compliance, system access for staff, E&T policy questions, outreach and marketing, or for any other necessary assistance via email.
Other E&T providers:	E&T Service Providers may make referrals to other providers as necessary to meet the participant needs via email or phone call. In the event of a co-enrollment and the referral results in service provisions from more than one E&T Service Provider, the E&T Service Provider who initially enrolled the participant in E&T and completed the assessment and the employability plan is the primary E&T case manager: responsible for the overall collaboration of enrollments and supports to ensure the participant is not receiving the same supports from more

	than one provider, or duplicate requests for reimbursement on the same supports. In the event that a referral results in a warm hand-off between E&T providers, the initial E&T provider closes the component, reassigns the case to the subsequent provider, and the subsequent provider continues services for the participant.
Community resources:	E&T Service Providers make referrals to other community resources as necessary to meet the participant needs via email or phone call. When participants are dually enrolled in programs with non-E&T Service Providers, the E&T Case Manager will ensure that services are not duplicated.

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).

All Case Management services are tailored to the participant's specific needs, based on level of interest, skills, abilities, and support need as assessed during the E&T Assessment process.

The employability assessment is used to develop the E&T Employability Plan to provide a clear understanding of the responsibilities, expectations, and supports need for the participant to obtain employment goals.

The employability assessment and plan are reviewed as part of the monitoring process.

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.

NA

What is the length of the conciliation period?

NA

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

☒ Two 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.

Iowa Department of Health and Human Services, Title 7: SNAP Chapter C: Nonfinancial Eligibility, Page 28, Revised November 3, 2023, Work Requirements for MWRs, Verifying a Claim of Good Cause for Not Complying Legal reference: 7 CFR 273.7(i)(3) and 273.7(i)(4), 441 IAC 65.28(17), 65.28(12), and 65.27(234)

Policy: Do not disqualify an MWR for committing a work requirement violation when the person has good cause for not complying. A person has good cause for not complying when:

- ♦ There were circumstances beyond the person's control. Examples include the person's illness, illness of another household member requiring the person's presence, a household emergency, the lack of transportation, or the lack of adequate childcare for children ages 6 through 11. The household determines if adequate childcare or transportation is available.
- ♦ The job was unsuitable. See Determining if Employment Is Suitable for reasons that make a job unsuitable.
- ♦ The employment became unsuitable after the person accepted the job. See Determining if Employment Is Suitable to determine if the job was unsuitable.
- ♦ There was discrimination by an employer based on age, race, sex, color, handicap, religious beliefs, national origin, or political beliefs.
- ♦ The work demands or conditions make it unreasonable to continue employment, such as working without being paid on schedule.
- ♦ A person leaves employment to accept another job or enroll at least half time in a recognized school, training program, or institution of higher education.
- ♦ A person leaves employment because another household member accepted a job or enrolled at least half time in a recognized school, training program, or institution of higher education in another county or state, causing the household to move.
- ♦ A person under age 60 resigns and it is recognized by the employer as retirement.
- ♦ A person accepts a genuine job offer that provides at least 30 hours a week, or weekly earnings at least equal to the federal minimum wage times 30 hours, and which because of circumstances beyond the control of the person either:
  - • Did not materialize, or
  - • Resulted in employment of less than 30 hours a week or pay of weekly earnings of less than federal minimum wage times 30.
- ♦ A person leaves a type of employment that, due to its nature, requires workers to frequently move from one employer to another. Examples include migrant farm labor, or construction work.
- ♦ The job quit was not a voluntary quit.
- ♦ The reduction in hours of work was not a reduction of work effort.

Procedure: Always consider all the facts and circumstances when an MWR claims good cause for failing to comply with work requirements. When a good cause reason is based on circumstances beyond a person's control, the person's statement is sufficient verification. Document the person's claim of good cause in the case record. In the case of a voluntary quit, include information such as that submitted by the household member involved, the employer, employee associations, union

representatives, and grievance committees or organizations. If you cannot obtain requested proof to dispute an MWR's claim of good cause, grant the person good cause and do not deny or cancel SNAP benefits. This most often occurs when the person quits due to discrimination or unreasonable demands made by the employer, or when the employer cannot be located.

The E&T Eligibility Specialist makes the final determination for granting good cause from active participation in E&T, takes any needed action impacting SNAP benefits for non-exempt individuals, and provides guidance to E&T Providers on next steps related to E&T enrollment.

The E&T Eligibility Specialist will notify the participant of good cause determination for notice of any adverse action.

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

State criteria for good cause is:

- There were circumstances beyond the person's control including the person's illness, illness of another household member requiring the person's presence, a household emergency, the lack of transportation, or the lack of adequate childcare for children ages 6 through 11. The household determines if adequate childcare or transportation is available.
- The job was unsuitable.
- The employment became unsuitable after the person accepted the job.
- There was discrimination by an employer based on age, race, sex, color, handicap, religious beliefs, national origin, or political beliefs.
- The work demands or conditions make it unreasonable to continue employment, such as working without being paid on schedule.
- A person leaves employment to accept another job or enroll at least half time in a recognized school, training program, or institution of higher education.
- A person leaves employment because another household member accepted a job or enrolled at least half time in a recognized school, training program, or institution of higher education in another county or state, causing the household to move.
- A person under age 60 resigns and it is recognized by the employer as retirement.
- A person accepts a genuine job offer that provides at least 30 hours a week, or weekly earnings at least equal to the federal minimum wage times 30 hours, and which because of circumstances beyond the control of the person either:
    - Did not materialize or resulted in employment of less than 30 hours a week or pay of weekly earnings of less than federal minimum wage times 30.
    - A person leaves a type of employment that, due to its nature, requires workers to frequently move from one employer to another.

- The job quit was not a voluntary quit.
- The reduction in hours of work was not a reduction of work effort

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.

Iowa is a voluntary E&T state; therefore, this is not applicable.

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.

If a Provider finds a participant is not a good fit for one component but determines the participant may be appropriate for another component, the Provider may switch them to the other component. The Employability Plan must be updated with documented participant involvement and provided to the participant. When a participant is enrolled in a component, but it's determined that the participant is no longer appropriate for the component, and the Provider does not have another appropriate component available for the participant, HHS must be notified.

Provider determinations must be based on the participant's inability to meet program participation requirements and program enrollment criteria that establishes likelihood of successful participation.

A Provider must notify IWD at the time, no later than 5 days from the date, a Provider Determination is made using the HHS Notification function within the SNAP Module of IowaWORKS or via email.

IWD has a responsibility to notify HHS within 10 days of the provider determination.

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

The E&T Eligibility Specialist will make the required notification to the E&T Participant, within 10 days, and take one of the required actions:

1) refer the individual to an appropriate E&T component.

2) refer the individual to an appropriate workforce partnership, if available.
3) re-assess the individual's physical and mental fitness.
4) to the maximum extent practicable, coordinate with other Federal, State, or local workforce or assistance programs to identify work opportunities or assistance for the individual.

The Provider Determination notification is sent via mail to the participant and includes the following information:

- Reason for the provider determination.
- Available options and next steps E&T Eligibility Specialist will take as a result.
- Contact info for the E&T Eligibility Specialist.
- Explanation of how the determination will affect the participant's ABAWD time limits for SNAP benefits (when 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

I.	Estimated number of E&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. *State agencies should take into consideration the number of mandatory E&T participants projected in* Table H – Estimated Participant Levels in the Excel Workbook*, and the number of mandatory E&T participants likely to be exempted, if the State agency cannot provide sufficient participant reimbursements.*	673
II.	Estimated number of E&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.	-59 55 in first 9 months 59 in last 3 months

III.	Estimated budget for E&T participant reimbursements in upcoming FY.	$89,555 Federal $89,555 Non-federal $179,110 Total
IV.	Estimated budget for E&T participant reimbursements per month in upcoming FY. (Row III/12)	$7,463 Federal $7,463 Non-federal $14,926 Total
V.	Estimated amount of participant reimbursements per E&T participant per month. (Row IV/Row II)	$159 Federal $159 Non-federal $318 Total

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
E&T Service Providers are reimbursed for participant expenses necessary to be successful in each component only after the participants actually commence the component or receive the service from the E&T Service Provider.		E&T Service Providers are responsible to fully fund participant reimbursements. Case Managers issue services and supports to the participants. * Case Manager determines the most cost-effective suitable option available. Vendors are paid directly, or participants receive a voucher with specific limits, which are presented to a vendor.	Direct reimbursements to participants are rare. In some cases, E&T Service Providers reimburse participants for specific expenses related to their program, including DOT truck driving permits, and protective equipment/ clothing. For these items, participants are reimbursed for actual expenses. Participants also receive fuel cards for transportation assistance. E&T Service Providers may provide participants with an initial fuel card, and issue subsequent cards based on attendance. E&T Service

Allowable Participant Reimbursements	Participant Reimbursement Caps (optional)	Who provides the participant reimbursement?	Method of disbursement
			Providers reimburse for mileage based on number of miles and dates of class/program attendance.
Education/Industry specific workplace skills credentialing /Training Tuition/Training Program Costs	No Cap		
Transportation Costs: Rationale for providing this reimbursement & attendance verification for training or employment Must be documented in participant record Must be provided in the most cost-effective suitable option available • Fuel Cards • Mileage • Bus Pass/Public Transportation • Taxi/Ride Share Service • Other option (with prior Program Manager approval)	• No Cap • $0.50/mile - reimbursed @ 50%) • No Cap • No Cap • No Cap		

Allowable Participant Reimbursements	Participant Reimbursement Caps (optional)	Who provides the participant reimbursement?	Method of disbursement
• Emergency vehicle repairs to ensure employment retention, completion of training or support of self-sufficiency * Participant must produce valid copies of all listed: ** driver's license ** car registration ** insurance • Rationale for providing this reimbursement must be documented in participant record	• Limited to $1,000 total ($500 reimbursed) per enrollment with additional $1000 total ($500 reimbursed) available during Job Retention Service * Repairs costing more than half of the Kelley Blue Book value of the vehicle are not eligible.		
Books/Program Fees Training Materials	• No Cap		
Required & Safety Equipment/Tools of the Trade	• No Cap		
Uniforms/Clothing	• No Cap		
Personal Hygiene and Grooming Must be provided in the most cost-effective suitable option available. • Rationale for providing this reimbursement must be documented in participant record	• No Cap		
Test/Certification /Licensing/Bonding Fees	• No Cap		
National Career Readiness Certificate (NCRC)	• No Cap		
Items required of all participants in specific	• No Cap		

Allowable Participant Reimbursements	Participant Reimbursement Caps (optional)	Who provides the participant reimbursement?	Method of disbursement
field of training or employment including, but not limited to: • Background Checks • Fingerprinting • Essential Documents (i.e., Birth Certificate) • Drug Testing • Physical • Tuberculosis Test • Inoculations • Eye Exams/Glasses	Only medical expenses that cannot be reimbursed by a third party are eligible for reimbursement, this includes private insurance or Medicaid.		
Minor Dental Work • Rationale for providing this reimbursement must be documented in participant record	Annual total ($500) not to exceed $250 reimbursement and not covered by another third party, this includes private insurance or Medicaid.		
Housing assistance, after all other potential resources have been exhausted. • Rationale for providing this reimbursement must be documented in participant record	Rent only. Limited to one-time per E&T enrollment. Limited to one month, the current month, of participant's monthly housing cost		
Utility assistance, after all other potential resources have been exhausted. • Rationale for providing this	Limited to one-time per E&T enrollment Limited to billing one and the current billing period of		

Allowable Participant Reimbursements	Participant Reimbursement Caps (optional)	Who provides the participant reimbursement?	Method of disbursement
reimbursement must be documented in participant record	participant's monthly utility cost		

Technology and materials necessary to:
 	
• Maintain access to on-line programs
  • Hotspots
  • Internet access
• Actively participate in E&T, including maintaining communication with E&T Case Manager and employers
  ○ Cell Phone minutes or basic plan
 	
Must be provided in the most cost-effective suitable option available
 	
• Rationale for providing this reimbursement must be documented in participant record
	Equipment: limited to loaner program for:
	* Laptops, Tablets, or cell phone and requires pre-approval.
	Must be provided in the most cost-effective suitable option available.		

Child or Dependent Adult Care For participants who do not qualify for dependent care services from other programs or costs exceed allowable payment.	No Cap		

Allowable Participant Reimbursements	Participant Reimbursement Caps (optional)	Who provides the participant reimbursement?	Method of disbursement
* Historically E&T program participants are enrolled in the state's Child Care Assistance (CCA) program or have alternative sources of Childcare. Most participants who need dependent care are anticipated to be able to access these services from other sources at no cost to E&T. * $1,000 ($500 federal) has been set aside for Child or Dependent Adult Care reimbursement. Rationale for providing this reimbursement must be documented in participant record			

a) If providing dependent care, specify payment rates for childcare 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.

While Iowa offers dependent care reimbursements, historically this has been underutilized due to SNAP recipients being eligible to receive Child Care Assistance (CCA). Payment rates for childcare costs exceeding allowable CCA payments are reimbursed at local market rates.

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?

Iowa does not currently have a waiting list for services through CCA.

Case Managers work with participants to resolve dependent care needs.

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.

Iowa's MWR system is a subsystem of Iowa's IABC system. The MWR subsystem compiles a count of all active SNAP recipients who are coded as MWRs on IABC. A count is taken on September 30th of each year. A count of new MWRs is also compiled each month. Individuals registered more than once in a fiscal year are only reported as a work registrant once during that fiscal year, regardless of if they entered the program as an applicant or recipient.

b) Describe measures taken to prevent duplicate counting.

Iowa conducts a match of social security numbers to eliminate duplicate work registrants over the course of each fiscal year before reporting the work registrant data via the quarterly FNS-583 report. While the State does not have a secondary check in place for work registrants not possessing a social security number, a review of our data shows that duplication has not occurred. The State is reviewing systematic options to ensure duplicate reporting.

XIX. Outcome Reporting Measures

National Reporting Measures

Table E.III. National Reporting Measures

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

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

Iowa's Automated Benefit Calculation System (IABC)

Worker Information System Exchange (WISE)

SNAP E&T Module in IowaWORKS – Geo Solutions system

Iowa Workforce Development – Quarterly Wage Records

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).

NA

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.

NA

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).

SNAP E&T Module in IowaWORKS – Geo Solutions system

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).

NA

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.

NA

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.

NA

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

Component	Outcome Measure	Methodology including the timeframes being reported (e.g., denominator and numerator).
Example: Supervised Job Search	*Example: Number of people who obtain employment after completion of component.*	*Example: Numerator will include those participants who obtained employment after completing component during the period of 10-1-2019 to 9-30-2020* *Denominator will include the number of participants that participated in supervised job search during the period of 10-1-2019 to 9-30-2020.*
Supervised Job Search (SJS)	Number and percent employed upon closure of the component and completion of E&T participation or start of Job Retention Services.	Denominator will include the number of participants who finished participation in the component and ended E&T participation or began job retention services; excluding those who were exited for loss of eligibility, between 10/1/2024 and 9/30/2025. Numerator will include the number of participants who were employed upon closure of the component and

Component	Outcome Measure	Methodology including the timeframes being reported (e.g., denominator and numerator).
		ended E&T participation or began job retention services.
Job Retention Services (JRS)	Percentage of participants who received at least 30 days of JRS prior to ending active E&T participation that were employed. Percentage of participants who received at least 90 days of JRS prior to ending active E&T participation that were employed.	Denominator will include the number of participants that were enrolled in JRS between 10/1/2024 - 9/30/2025. The numerator will include the number of participants that remained enrolled & employed in JRS at the 30-day mark. The numerator will include the number of participants that remained enrolled & employed in JRS at and the 90-day mark.
Career and/or Technical Education Programs or Other Vocational Training (EPC)	Number and percent of participants who: obtained an industry recognized credential or certificate, diploma, or AA/AS degree upon closure of the component.	Denominator will include the number of participants who ended post-secondary education or occupational/vocational skills training program, excluding those who were exited for loss of eligibility between 10/1/2024 and 9/30/2025. Numerator will include the number of participants who: obtained an industry recognized credential or certificate, diploma, or AA/AS degree upon closure of the component.
Work Readiness Training (EPWRT)	Number and percent completing the component successfully upon closure of the component.	Numerator will include the number of participants who completed the training program successfully upon closure of the component;

Component	Outcome Measure	Methodology including the timeframes being reported (e.g., denominator and numerator).
		excluding those who were exited for loss of eligibility. Denominator will include the number of participants who completed the training program, excluding those who were exited for loss of eligibility between 10/1/2024 and 9/30/2025.
Internship – Subsidized by E&T (WBLI - SUB)	Number and percent employed upon closure of the component.	Numerator will include the number of participants who upon closure of the component were employed; excluding those who were exited for loss of eligibility. Denominator will include the number of participants with closure of the component, between 10/1/2024 and 9/30/2025.

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.

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.	☐
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.	☐
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 each month to remain eligible beyond the 3-month time limit.	☐
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.	☐
The State agency will be ready on October 1st 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.	☐

Where will the State agency offer qualifying activities?

☐ Statewide

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

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.

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

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

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

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).

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.

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.)

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

	Value
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?	

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.

V. 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	A Supervised Job Search (SJS) program requires development and tracking of a participant's progress in job search activities which fulfill the minimum requirement of weekly coaching and communication that occurs at State approved locations. The reasonable length of time required for a participant to find suitable employment varies based on many factors. The average enrollment period for SJS should not exceed 60 days. State Approved locations for SJS include: • Any location E&T services are provided, either in-person or virtually, such as community colleges, CBOs, provider-training sites, or public meeting locations identified by the Case Manager. • Job Search activities may be completed through an electronic system, such as the Iowa Workforce Development system. • Through another community organization, when the agency is able to provide verification of the participant's activities to the E&T Service Provider. To determine State approved locations for SJS, Iowa's criteria developed based on the premise of promoting participant choice. • Provides flexibility of service provision in accessible locations that will best meet the needs of the participant. • Provides flexibility for the mode of supervision that will best meet the needs of the participant. • Allowing the use of electronic systems, for job search activities provides the opportunity for remote based SJS, especially for participants facing long-distance travel for in-person services. ○ Case Managers must ensure that participants have access to all materials needed when identifying the location and mode of supervision for SJS. • Allowing a referral to another community resource that is able and better suited to meet the

	participant's needs, and able to provide verification of the participant's job search activities to the E&T Service Provider.
Direct link	Case Managers collaborate with the participant to develop job search activities based on the skills and interests identified in the E&T Employability Assessment and to align participant strengths with community employment opportunities. To ensure participants' activities and progress, weekly two-way coaching and communication is required. Case Managers document these sessions with case notes. Documentation may include: • Description of participant contacts on job search progress, • Description of Case Manager contacts with employers or workshop facilitators, • Description of Case Manager contacts with individuals to whom participants are referred for SJS supports and activities, i.e., IowaWORKS Business Services Representative, or • Log of job referrals, participants' job applications, participants' follow-up communication with employers to whom applications have been submitted.
Target population	Iowa is a voluntary state; therefore, all SNAP participants who meet the component eligibility requirements are included in the target population.
Criteria for participation	E&T Service Providers are in the best position to determine likelihood of success in their programs. Providers hold authority to set criteria to determine program requirements and participant readiness for enrollment into their programs. Participation in this component is primarily for participants who have been assessed and determined to be work-ready. E&T appropriate participants must be ready, willing, and able to attend weekly Case Management meetings for supervision and coaching.
Geographic area	This component is available virtually statewide, or in-person service provision based on geographic service area of the E&T Service Provider.

	See Appendix A: SNAP E&T Service Provider Network Map
E&T providers	SJS is an available component for all E&T Service Providers to offer participants. Providers indicating intent of SJS as an available component include: Goodwill of the Heartland Hawkeye Community College Central Iowa Shelter and Services Iowa Workforce Development - American Job Centers Iowa Western Community College Southeastern Community College North Iowa Area Community College
Projected annual participation	175
Estimated annual component costs	$41,941.50 Federal $41,941.50 Non-Federal $83,883.00 Total Review of current component cost and rate of expenditure has been completed. No additional funds are being requested at this time to serve this increased projected annual participation due to this review. Additional funding will be requested if estimated component costs increase.

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

Details	Job Search Training (JST)
Description of the component	NA
Target population	
Criteria for participation	
Geographic area	
E&T providers	

Projected annual participation	
Estimated annual component costs	

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

Details	Job Retention (JR)
Description of the component	A Job Retention Services (JRS) Program provides transitional supports including but not limited to, guidance, coaching, clothing/equipment, and other job-required fees, to participants who have secured employment, registered apprenticeship or other training to E&T participants who have completed participation in another E&T component. JRS must be offered for a minimum of 30 days up to a maximum of 90 days from the employment start date. E&T Service Providers demonstrate a good faith effort to provide at least 30 days of JRS through the collaborative development of a JRS Plan with participants enrolled in this component. The JRS Plan is incorporated into the overall Employability Elan as objectives under the JRS Goal that include, but are not limited to the following: • Identify 30 day timeframe • Schedule 30 day and exit appointments • Identify 90 day Job Retention/E&T exit date • Identify Employer, Start Date, rate of pay • Identify supports/services needed • Identify contact and communication expectation Documentation in participant record must contain participant progress information: • Participants must be contacted at least once every 30 days • For every contact or attempted contact, a case note must be made indicating progress made. If unable to maintain two-way communication with the participant, documentation must provide evidence that a reasonable effort was made to re-establish contact.
Target population	All E&T participants are eligible for JRS if they have secured and/or improved employment, or received a job offer as a result of participation in E&T activities or services.

Criteria for participation	All E&T participants are eligible for JRS if they have secured and/or improved employment, or received a job offer as a result of participation in E&T activities or services.
Geographic area	JRS is an available component for all E&T Service Providers to offer participants. This component is available based on geographic service area of the E&T Service Provider and virtually statewide. See Appendix A: SNAP E&T Service Provider Network Map
E&T providers	All E&T Service Providers have the option to make the component available in their respective service area. Providers indicating intent of JRS as an available component include: Goodwill of the Heartland Hawkeye Community College Southeastern Community College Central Iowa Shelter and Services Iowa Workforce Development - American Job Centers One City United
Projected annual participation	97
Estimated annual component costs	$19,309 Federal $19,309 Non-Federal $38,618 Total Review of current component cost and rate of expenditures no additional component costs are anticipated to serve increased participation. No additional funds are being requested at this time based. Additional funding will be requested if estimated component costs increase.

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

Details	Self-Employment Training (SET)

Description of the component	NA
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	NA
Target population	
Criteria for participation	
Geographic area	
E&T providers	
Projected annual participation	
Estimated annual component costs	

VI. 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

Details	Basic/Foundational Skills Instruction (includes High School Equivalency Programs) (EPB)
Description of the component	Basic Education programs increase an individual's basic literacy, math skills and financial literacy, or other activities necessary for the attainment of a secondary school diploma or its recognized equivalent; transition to postsecondary education and training; and obtain employment. In Iowa the Adult Basic Education Component is broken into two components: 1. Adult Basic Education (ABE): programs offer academic instruction and education services below the postsecondary level that increase the participant's employability by improving basic skills in areas of literacy, math, and finances, needed to comprehend all aspects of employment, and successfully gain and retain employment. 2. High School Equivalency Diploma/Test (HiSED/HiSET): a. HiSET Preparation Course – Prepares participants with basic skills needed in order to increase likelihood of successfully participating in a HiSET course and testing. b. HiSET Programs - evaluates basic academic skill levels and guides participants' preparation for successful completion of testing required to achieve a HiSED.
Target population	Iowa is a voluntary state; therefore, all SNAP participants who are not attending High School and have not attained a High School Diploma are included in the target population.
Criteria for participation	E&T Service Providers are in the best position to determine likelihood of success in their programs. Providers hold authority to set criteria to determine program requirements and participant readiness for enrollment into their programs. Iowa requires all test takers to receive instruction in an adult education classroom before taking the HiSET exam to ensure that participants are able to meet the literacy/numeracy levels needed in

	order to pass the HiSET. The amount of instruction varies by testing centers. E&T appropriate participants must: • Be at least 16 years of age • Not enrolled in high school • Meet the E&T Service Provider program criteria • Be willing to actively engage in required Case Management Services
Geographic area	See Appendix A: SNAP E&T Service Provider Network Map
E&T providers	All E&T Service Providers have the option to make the component available in their respective service area. Providers indicating intent of EPB as an available component include: Southeastern Community College
Projected annual participation	8
Estimated annual component costs	$850 Federal $850 Non-Federal $1,700 Total
Not supplanting	Community Colleges: ABE and high school completion programs are primarily funded by federal Title II funds, which are not used as a match source or included in reimbursement requests. All other funding streams must be exhausted before E&T fund are used for Program Costs.
Cost parity	Participants in ABE and high school completion are not charged for program tuition and no cost is assigned to SNAP E&T participants for reimbursement purposes.

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

Details	**Career/Technical Education Programs or other Vocational Training (EPC)**

Description of the component	Expanded Education programs are post-secondary programs that provide academic and/or technical knowledge and skills to develop necessary skills for education or careers in current or emerging employment sectors. Participants may enroll in short term certificate programs and credit degree programs towards an AA or AAS degree all in identified in-demand industries. Participants may also enroll in vocational/occupational skills programs providing skills necessary to increase employability and ideally lead to an industry-recognized certificate or credential. • Community Colleges (CC) provide post-secondary non-credit certificate programs and post-secondary credit programs leading to a diploma or Associate degree. • Community Based Organizations (CBO) provide occupational skills and vocational programs that lead to certificates or industry-recognized credentials.
Target population	Iowa is a voluntary state; therefore, all SNAP participants who meet the component eligibility requirements are included in the target population.

Criteria for participation	E&T Service Providers are in the best position to determine likelihood of success in their programs. Providers hold authority to set criteria to determine program requirements and participant readiness for enrollment into their programs.
	
	E&T appropriate participants must:
	
	• Express interest, abilities, and willingness to actively participate and fulfill training requirements in desired occupation
	• Meet the E&T Service Provider program criteria which may include, but not be limited to:
	  ○ Assessment results
	  ○ Educational Attainment
	  ○ Literacy /numeracy levels
	• Be willing to actively engage in required Case Management Services

Geographic area	All Community College E&T Service Providers and GWH Service areas; virtually statewide with CodeX and the HELP Center and Pivot Technology School

	See Appendix A: SNAP E&T Service Provider Network Map
E&T providers	All E&T Service Providers have the option to make the component available in their respective service area. Providers indicating intent of EPC as an available component include: CodeX Des Moines Area Community College Goodwill of the Heartland Hawkeye Community College The HELP Center Iowa Western Community College Kirkwood Community College Southeastern Community College Change Course North Iowa Area Community College Pivot Technology School
Projected annual participation	370
Estimated annual component costs	$637,602 Federal $637,602 Non-Federal $1,275,204 Total Review of current component cost and rate of expenditures has been completed. No additional component costs are anticipated to serve increased participation. No additional funds are being requested at this time based. Additional funding will be requested if estimated component costs increase.

Not supplanting	Community Colleges: For non-credit programs, college partners utilize state allocated GAP and PACE funds, verified non-federal community foundation funds, and/or SNAP E&T reimbursement funds for all educational, wrap around, and Case Management services. For credit programs, college partners utilize state allocated grant and scholarship funds, private college foundation funds, and/or SNAP E&T reimbursement funds for all educational, wrap around, and Case Management services. College partners also provide credit student account records to ensure reimbursement requests for Pell eligible participants do not include Pell funds or non-federal funds applied to student accounts before Pell.

	All other funding streams must be exhausted before E&T funds are used for Program Costs. Community Based Organizations: At time of application to become an E&T Service Provider the following assurances are made: • 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. • Program and fiscal staff consulted and agreed that non-federal funding is approved and available to initially fully fund E&T costs for the proposed agreement period. Providers complete a questionnaire and HHS reviews responses during the annual review process to answer the following: • Describe any policy or procedures in place to ensure Federal reimbursements are used to supplement, rather than supplant, state or local funding for existing education services or activities. Non-federal funds for E&T are allocated to a separate accounting line item, and reimbursements are drawn down from that account only.
Cost parity	Community Colleges: Tuition costs are verified for uniformity for all SNAP E&T and non-E&T participants through publicly available course cost information as well as accounting information for SNAP. Community Based Organizations: Participants are not charged tuition for occupational skills/vocational programs to participate in the program. Program costs charged to E&T for reimbursement are determined by dividing the total annual cost of providing the program by the total number of people, regardless of SNAP status, enrolled in the program.

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

Details	English Language Acquisition (EPEL)
Description of the component	NA
Target population	
Criteria for participation	
Geographic area	
E&T providers	
Projected annual participation	
Estimated annual component costs	
Not supplanting	
Cost parity	

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

Details	Integrated Education and Training/Bridge Programs (EPIE)
Description of the component	NA
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	Work Readiness programs provide skill and interest assessment and educational remediation services to prepare the participant for the workforce. Work readiness activities may focus on fundamental cognitive skills or non-cognitive, behavioral soft skills. Fundamental cognitive skills may include but are not limited to literacy, basic math, problem solving, and critical thinking. Behavioral soft skills may include but are not limited to workplace relationships, communication, integrity, and personal presentation. The HELP Center: Pathways to Employability is a virtual work readiness program comprised of 9 one-week modules which promote personal growth and skill development needed to gain and retain employment. Upon completion participants will have acquired the foundational skills and knowledge necessary to navigate the job market successfully and embark on a path toward sustained employment and career growth. Goodwill of the Heartland: The World of Work course is designed to help job seekers gain the foundational skills to meet the needs and expectations of businesses and build successful careers. Before beginning class, participants will work with a Career Navigator to identify skills and interests, learn how they relate to the local job market, and explore pathways that are a good match. Participants choose from more than 30 relevant workshops and complete at least 18 hours of coursework in a classroom setting in the areas of job search, digital skills, financial literacy, and success on the job. Central Iowa Shelter and Services: Work Readiness Training: Four-week program that helps clients develop good work habits that facilitate their ongoing success through basic employability skills including effective communication, problem solving, resume building, and interviewing. Daily sessions are practical real-life skills, such as housing applications, job searches, reverse job fairs, resume building, communication skills (behavioral and soft) to improve long

	term success, and health classes in addition to 2.5 hours of weekly individualized sessions with Case Managers. <u>Iowa Workforce Development – American Job Centers</u>: IowaWORKS Career Services Career Planners will develop an IEP with participants. Participants will be required to take the O*NET assessment and any additional assessments that will be beneficial to the participant. Referrals to other WIOA programs will be made to address any literacy, basic math, problem solving and critical thinking deficiencies. Participants will be required to participate in Virtual Job Club and Bring Your A Game to Work training to prepare them for entering the workforce. Additionally, career planners will provide ongoing mentoring, coaching, and counseling to ensure that participants are prepared for the world of work. Appropriate referrals will be made to WIOA programs and community resources based on the needs of the participant. <u>One City United;</u> Momentum provides eligible, unemployed, and underemployed people with job and life skills training to secure and maintain viable employment. Each Momentum graduate completes a rigorous six-week course, including 100 hours of in-class instruction and volunteer work experience. In addition, graduates are placed into good-paying jobs from the network of local employers. The program includes life skill services, workforce readiness training, and job placement services. Change Course A six-week personal development program focusing on soft skills, computer literacy, effective communication, life skills, overcoming individualized barriers, and more.
Target population	Iowa is a voluntary state; therefore, all SNAP participants who meet the component eligibility requirements are included in the target population.

Criteria for participation	E&T Service Providers are in the best position to determine likelihood of success in their programs. Providers hold authority to set criteria to determine program requirements and participant readiness for enrollment into their programs. E&T appropriate participants must: • Express interest in improving skills that will allow them to successfully gain and retain employment. • Meet the E&T Service Provider program criteria. • Be willing to actively engage in required Case Management Services
Geographic area	See Appendix A: SNAP E&T Service Provider Network Map
E&T providers	All E&T Service Providers have the option to make the component available in their respective service area and virtually statewide.

	Providers indicating intent of EPWRT as an available component include: The HELP Center Goodwill of the Heartland Central Iowa Shelter and Services Iowa Workforce Development- American Job Centers
Projected annual participation	172
Estimated annual component costs	$64,176 Federal $64,176 Non-Federal $128,352 Total Review of current component cost and rate of expenditures no additional component costs are anticipated to serve increased participation. No additional funds are being requested at this time based. Additional funding will be requested if estimated component costs increase..

Not supplanting	Community Based Organizations: At time of application to become an E&T Services Provider the following assurances are made: • 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. • Program and fiscal staff consulted and agreed that non-federal funding is approved and available to – initially fully fund E&T costs for the proposed agreement period. Providers complete a questionnaire and HHS reviews responses during the annual review process to answer the following: • Describe any policy or procedures in place to ensure Federal reimbursements are used to supplement, rather than supplant, state or local funding for existing education services or activities. Program costs charged to E&T for reimbursement are determined by dividing the total annual cost of providing the program by the total number of people, regardless of SNAP status, enrolled in the program. The HELP Center, GWH, AJCs, and CISS affirmed during the application process that all funding sources for

	programming for E&T are non-federal; funded through local, state, or private funding streams.
Cost parity	Community Based Organizations: Participants are not charged to be enrolled in Work Readiness programs. Program costs charged to E&T for reimbursement are determined by dividing the total annual cost of providing the program by the total number of people, regardless of SNAP status, enrolled in the program.

Table G.XI. Educational Program Details: Other

Details	Other (EPO): State agency must provide description
Description of the component	NA
Target population	
Criteria for participation	
Geographic area	
E&T providers	
Projected annual participation	
Estimated annual component costs	
Not supplanting	
Cost parity	

VII. 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	NA
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	NA
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)
Description of the component	NA
Target population	
Criteria for participation	
Geographic area	
E&T providers	
Projected annual participation	
Estimated annual component costs	

Table G.XV. Work Experience: Apprenticeship

Details	Apprenticeship (WBLA)
Description of the component	NA
Target population	
Criteria for participation	
Geographic area	
E&T providers	
Projected annual participation	
Estimated annual component costs	

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

Details	On-the-Job-Training (WBLOJT)
Description of the component	NA
Target population	
Criteria for participation	
Geographic area	
E&T providers	
Projected annual participation	
Estimated annual component costs	

Table G.XVII. Work Experience: Transitional Jobs

Details	Transitional Jobs (WBLTJ)
Description of the component	NA
Target population	
Criteria for participation	
Geographic area	
E&T providers	
Projected annual participation	
Estimated annual component costs	

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

Details	Work-based learning - Other (WBLO): State agency must provide description
Description of the component	NA
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.	☒
Operates in compliance with all applicable labor laws.	☒
Will not displace or replace existing employment of individuals not participating in E&T.	☒
Provides the same benefits and working conditions as non-E&T participants doing comparable work for comparable hours.	☒

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

Details	Internship – Subsidized by E&T (WBLI - SUB)
Description of the component	An internship is a planned, structured learning experience that takes place in a workplace, and the contract must be limited to a specific time required for a participant to become proficient in a specific occupation. The term of the training period should consider the skill requirements for the occupation, academic and occupation skill level of the participant, prior work experience, and the participant's employability plan (20 CFR 680.700). **Central Iowa Shelter and Services (CISS) internship programs:** *Mulberry Farm Vocational Job Training Program* is a 12-week internship program for clients from CISS' emergency shelter and apartments for an employment and vocational job training. Trainees are provided the opportunity to gain hands-on experience in aquaponics, income, soft skills, and certifications that meet industry standards. The program will be fully operational in the spring of 2023 and will make CISS the largest tilapia farmer in the state of Iowa as well as a local farmer for much needed produce year-round. Trainees will learn valuable skills in urban agriculture both in the greenhouse and throughout the CISS agrihood. Working to create a food secure community, the food co-op being constructed now serves as another avenue for trainees to learn valuable entrepreneurial skills for long term development. Mulberry Farms Vocational Job Training program provides technical knowledge and on-the-job training to develop necessary skills for agricultural workers and relevant work experience for employment in other industries to gain unsubsidized employment. Individuals complete an Employee, Recruitment Application and experience-building fact-finding interviews are conducted to assess skills, aptitude, interests, strengths, and needs. Curriculum for the program includes:

	Farm safety, employment skills and eight specific agriculture modules such as soil management, techniques, tools, pest and disease control, and landscaping. PSA Food Grower Safety Training is also available to earn an industry-recognized credential. CISS is the employer of record and compensates the participant at the rate of $8.00 per hour in accordance with the organization's payroll schedule and policies. The percentage of wage to be subsidized is 100%. Case managers and program supervisors track progress within the program and refer applicants to additional external supportive services. Along with monthly check-ins with training program supervisors, it is planned for the E&T case managers to meet with the individual on a weekly basis. If unsubsidized employment has not been gained upon completion of training program, clients are referred into the center's nine-month long job training program for additional supervised job search and job retention services. While E&T job retention services are offered for 90 days, the extended nine-month program allows participants additional support after completion of the E&T program. *Janitorial/Maintenance Vocational Job Training Program* is a 12-week internship program for clients from CISS' emergency shelter and apartments for an employment and vocational job training. The Janitorial Skills Training Program prepares job seekers for careers in custodial, janitorial, and environmental service positions across many industries. Trainees are provided opportunity to gain hands-on experience in facility cleaning, maintenance and upkeep, income, soft skills, and certifications that meet industry standards. Individuals complete an Employee, Recruitment Application and experience-building fact-finding interviews are conducted to assess skills, aptitude, interests, strengths, and needs. CISS is the employer of record and compensates the participant at the rate of $8.00 per hour in accordance

	with the organization's payroll schedule and policies. Percentage of wage to be subsidized is 100%. Case managers and program supervisors track progress within the program and refer applicants to additional external supportive services. Along with monthly check-ins with training program supervisors, it is planned for the E&T case managers to meet with the individual on a weekly basis. If unsubsidized employment has not been gained upon completion of training program, clients are referred into the center's nine-month long job training program for additional supervised job search and job retention services. While E&T job retention services are offered for 90 days, the extended nine-month program allows the participants additional support after completion of the E&T program.
Target population	Iowa is a voluntary state; therefore, all SNAP participants are included in the target population
Criteria for participation	E&T Service Providers are in the best position to determine likelihood of success in their programs. Providers hold authority to set criteria to determine program requirements and participant readiness for enrollment into their programs. E&T appropriate participants must: • Meet the E&T Service Provider program criteria • Be willing to actively engage in required Case Management Services
Geographic area	See Appendix A: SNAP E&T Service Provider Network Map
E&T providers	Central Iowa Shelter and Services
Projected annual participation	105
Estimated annual component costs	$211,760 Federal $211,760 Non-Federal $423,520 total
Length of time the SWBL will run	CISS-3 months
Other administrative costs associated with SWBL	Case Management

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

Details	Pre-Apprenticeship– Subsidized by E&T (WBLPA-SUB)
Description of the component	NA
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.XXI. Subsidized Work Experience: Apprenticeship – Subsidized by E&T

Details	Apprenticeship – Subsidized by E&T (WBLA- SUB)
Description of the component	NA
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	NA
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.XXIII. Subsidized Work Experience: Work-based learning - Other - Subsidized by E&T

Details	Work-based learning - Other -Subsidized by E&T (WBLO - SUB): State agency must provide description)
Description of the component	NA
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	

IOWA | Health and Human Services

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.

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

IOWA | Health and Human Services

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

Contract or Partner Name:	**Iowa Workforce Development Agency**
Service Overview:	Iowa HHS has entered into an agreement with the Iowa Workforce Development Agency to act as the Intermediary Administrator and direct service provision for E&T in FFY 2025 beginning October 1, 2024. Direct Services will be provided through American Job Centers.
Intermediary:	☒ Yes ☐ No
Components Offered:	SJS, JRS, EPB, EPC, EPWRT, SWBLI-SUB,
Credentials Offered:	Various Industry recognized Credentials, Short-Term Non-Credit Certificates, Diploma, and AAS degrees.
Participant Reimbursements Offered:	All SNAP E&T Participant Reimbursements are available
Location:	See Appendix A: FY25 E&T Service Provider Map
Target Population:	SNAP participants and applicants
Monitoring of contractor:	**Monitoring and communication with contractor:** The contractor is monitored on at least a quarterly basis by the State agency. The HHS E&T Program Manager or designee will: • Verify invoices and supporting documentation itemizing work performed prior to payment, • Determine compliance with general contract terms, conditions, requirements, and

Contract or Partner Name:	Iowa Workforce Development Agency

	• Assess compliance with deliverables, performance measures, or other associated requirements based on the following:
	  ○ HHS shall conduct at least monthly meetings with IWD.
	  ○ HHS shall monitor at least quarterly, more often upon request of either party, to review participation levels, outcomes and discuss issues that need to be resolved.
	
	Reimbursement request submissions are reviewed on a monthly basis by the contractor.
	
	Communication is via email, virtual or in-person meetings, and through the shared IWD Teams channel where E&T materials are housed.

Ongoing communication with contractor:	HHS communicates program changes and provides technical assistance through email, videoconference, and phone communications.
Total Cost of Agreement:	
Eligible for 75 percent reimbursement for E&T Services for ITOs:	☐ Yes ☒ No
New Partner:	☐ Yes ☒ 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

Salary/Wages: List staff positions in FTE and time spent on the project. Example: E&T Program Manager - $60,000 x .50 FTE = $30,000 5 E&T Counselors - $25,000 x 1.00 FTEs x 5 = $125,000	The salary/wages costs include one full time Program Manager, one Program Manager at 50% one E&T Eligibility Specialist, and HHS administration: $271,849. E&T Program Managers: (IMW6) allocations to E&T • One = 100% • One = 50% based on time study HHS Program Manager (IMW6): $85,500 x1.0 FTE = $85,500 HHS Program Manager (IMW6): $86,953 x0.5 = $43,477 HHS E&T Eligibility Specialist (IMW2) allocated at 20% of time to E&T based on FFY24 time study. $67,000 x 0.20 FTE = $13,400 HHS Administration and administrative costs: $129,472 Costs include salary and benefit amounts for Iowa's HHS director, fiscal management, legal services, etc. allocated to the program based on the department's cost allocation (CA) plan. .

	HHS utilizes cost allocation for administrative and administration costs which is utilized across federal programs consistently. The allocation is based on the PACAP. Approval letter from CAS has not yet been received as of this date. The allocation methodology is for Fiscal Management is Enterprise Expenses while the allocation for the rest of the administrative costs are based on Head Count across the enterprise Total Administrative Costs of $271,849 Federal: $271,849. • 100% $271,849
Fringe Benefits: If charging fringe and benefits to the E&T program, provide the approved fringe rate.	HHS does not have an approved fringe benefit rate. The fringe benefit amount is based on employee specific benefits selection: $66,455 Program Manager: $46,084 Program Manager: $25,862 x 0.5 = $12,931

	Eligibility Specialist: $37,200 x 0.20 = $7,440 Fringe benefit costs for HHS administration included in salary calculation. Total Administrative Costs of $66,455. Federal:$34,058.5 Non-Federal: $32,396.5
Contractual Costs: All contracts and partnerships should be included in the "contracts and partnerships" matrix of the E&T State Plan Operating Budget Workbook. Briefly summarize the type of services contractors/partners will provide, such as direct E&T program services, IT services, consulting, etc.	Total contractual costs of $1,429,237.50 Federal $1,027,112.50 Non-federal $2,456,350.00 Total (Federal share) include **c**osts of: IWD-Admin $402,125 (100% federal share) Two 100% allocated E&T Program Coordinators: • $106,191 • $104,739 One 50% allocated Bureau Chief: • $77,328 One 5% allocated Workforce Service Division Administrator: • $10,211 Other:

	• Equipment: $0 • Travel: $9,000 • Building Space: $24,448 • 23.03% Indirect: $68,708 • Supplies: $1500 IWD-Admin 50/50 Federal $1,027,112.50 Non-Federal $1,027,112.50 Total $2,054,225.00 Workforce Development include funds for the following: • Annual licensing fee to allow use of the GeoSol system specific to E&T services • Case Management • Program Costs/Tuition/Wages Case Managers complete time and attendance reports to document time spent on E&T participants. Case Manager time is not reimbursed when completing group activities that include both E&T and non-E&T Participants. All contracted E&T Service Providers provide the 50%

	non-federal dollars for the Case Managers and tuition/program/wage costs charged to administration.
Non-capital Equipment and Supplies: Describe non-capital equipment and supplies to be purchased with E&T funds.	Non-capital equipment and supplies are not purchased with E&T funds.
Materials: Describe materials to be purchased with E&T funds.	Iowa does not intend to use E&T funds for materials.
Travel & Staff Training: Describe the purpose and frequency of staff travel charged to the E&T program. This line item should not include E&T participant reimbursements for transportation. Include planned staff training, including registration costs for training that will be charged to the E&T grant.	These costs include travel expenses for HHS E&T staff administering the program. The E&T Program Managers will travel as necessary throughout the year for E&T program development and expansion. Travel includes mileage, hotel costs. In addition, the program manager will attend one conference in FFY25 specifically related to E&T services. Travel costs for the program manager will be $5000: Federal $2500 Non-federal $2500
Building/Space: If charging building space to the E&T program, describe the method used to calculate space value.	Building space is included in the department's cost allocation plan and is allocated based on the FTE's located in the state office building. 100% allocated staff: 1 E&T Program Managers (IMW6) $2,000 50% allocated staff:

	1 E&T Program Manager (IMW6) $1000 20% allocated staff: 1 E&T Eligibility Specialist (IMW2) $400 Total = $3,400 Federal: $1700 Non-Federal: $1700
Equipment & Other Capital Expenditures: Describe equipment and other capital expenditures over $5,000 per item that will be charged to the E&T grant. (In accordance with 2 CFR 200.407, prior written approval from FNS is required.)	Equipment and Capital Expenditures are not purchased with E&T funds. Utilization fees of equipment and capital expenditures are included with non-capital equipment and supplies

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.

The combined Health and Human Services(HHS) agency has transitioned to a PACAP with imbedded negotiated rate indirect components for specific legacy Public Health, Aging, and Human Rights units.

The E&T program fell outside the units to which the negotiated rates were utilized therefore there were no indirect expenses applied with an indirect rate. Rather allocations of indirect expenses (e.g. SWICAP) were based on headcount across the entire organization as indicated in the PACAP still pending approval from CAS.

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**.**

Dependent Care costs for participants while participating in an E&T component when other childcare programs are unavailable. Historically, E&T participants have been eligible for HHS childcare assistance. Costs of $1,000 are anticipated.

Federal $500
Non-Federal $500

Approved transportation and other supportive service costs while participating in an E&T component when other supportive service options are unavailable. For costs listed under participant reimbursements, costs of $178,110 are anticipated.

Federal $89,055
Non-Federal $89,055

Appendix A: FFY25 Iowa E&T Service Provider Map



Only virtual services, available statewide

Also offers virtual services

IWD American Job Centers

Code X/ The HELP Center (HCTN)
Pivot Technology School

IWD American Job Centers (AJC)

Central Iowa Shelter and Services (CISS)
Des Moines Area Community College (DMACC)
Change Course (CC)

Des Moines Area Community College (DMACC)

Hawkeye Community College (HCC)
Chickasaw, Fayette, Buchanan, Black Hawk, Bremer, Butler, Grundy, One City United (OCU)- Black Hawk Only

Kirkwood Community College (KCC)
Goodwill of the Heartland (GWH) – Benton and Jones (limited)

Kirkwood Community College (KCC)
Southeastern Community College (SCC)
Goodwill of the Heartland

Goodwill of the Heartland
Van Buren & Jefferson (limited for GWH, full service for AJC)

Southeastern Community College
Goodwill of the Heartland

Iowa Western Community College (IWCC)

North Iowa Area Community College (including parts of Butler, Wright, and Chickasaw Counties)