



**POLICY
NUMBER
P129**

Workforce Policy

Title:	Supplemental Nutrition Assistance Program (SNAP) Employment and Training (E&T) Program Components and Case Management Policy.
Type:	Programmatic
Program:	SNAP E&T
Effective:	08/21/2025

I. PURPOSE AND SCOPE

ABAWDs and mandatory work participants in the SNAP Education and Training (E&T) program are required to participate in activities operated by Local Workforce Development Boards (LWDBs) and local career centers. LWDBs deliver SNAP E&T components, including supervised job search, job search training, vocational and basic education, work experience, and job retention services. Timely access to SNAP E&T and other services is critical to removing barriers to participation and supporting successful employment outcomes.

This policy provides LWDBs with a comprehensive description of program components and activities required for operating the SNAP E&T program and requires LWDBs to ensure local SNAP E&T strategies and operations align with the Florida SNAP E&T Plan and the Workforce Innovation and Opportunity Act (WIOA) Combined Plan. LWDBs are also expected to align with Florida's workforce development priorities, focus on employment and training for ABAWDs and other mandatory work participants that lead to self-sustaining jobs, and implement data-driven accountability measures to enhance service delivery and outcomes.

II. KEY PROGRAM OBJECTIVES

Objectives of this policy include:

1. Promote economic self-sufficiency for SNAP E&T recipients, particularly those with barriers to employment, and the achievement of long-term economic independence through access to employment, education, training, and support services.
2. Align with the State's identified SNAP E&T services with Florida's broader workforce development system and ensure strategic alignment with WIOA's six core programs, including adult education, vocational rehabilitation, and employment services.
3. Support Job-Driven Training that prioritizes training and education programs that are responsive to labor market demands and equip participants with skills that lead to in-demand occupations and sustainable employment.
4. Enhance Service Delivery that leverages the expertise and infrastructure of Florida's LWDBs to deliver high quality and timely SNAP E&T services that are regionally tailored, accessible, and effective.
5. Ensure Simplified Access and High-Quality Customer Service for all eligible SNAP recipients, including youth and those facing barriers to employment.
6. Foster Innovation and Continuous Improvement including data-driven decision-making, and strategies that enhance program outcomes and participant success.
7. Comply with Federal and State Accountability Standards by maintaining rigorous documentation, performance tracking, and reporting in alignment with federal and state requirements to ensure transparency, accountability, and program integrity.

III. MEASURABLE PERFORMANCE OUTCOMES

Consistent with the requirements identified in Florida's approved SNAP E&T State Plan, all performance outcomes associated with this policy include:

1. Ensure SNAP participants who receive Supervised Job Search services are within monthly allowable hours targets of 39 hours for ABAWD and 59 hours for Mandatory Work Participants (MWP).¹
2. Track and document all SNAP components delivered to participants, including:
 - a. Number of participants served in each component.
 - b. Number of participants who complete these services and, in fact, move toward employment; and
 - c. Number of participants who receive work-related training services and offered participant reimbursements.

¹ [7 CFR 273.7\(e\)\(2\)](#) ("However, job search, including supervised job search, or job search training activities, when offered as part of other E&T program components, are acceptable as long as those activities comprise less than half the total required time spent in the components.").

3. Maintain documentation and methodology for all administrative costs, including the certification of the percentage of time and effort for staff working on the provision of SNAP E&T components and services.

LWDBs component activities performance data may be subject to technical assistance in the event individual LWDB data is inconsistent with the state's historical FNS-583 quarterly or annual reporting.

IV. BACKGROUND

The Florida SNAP E&T Program is a federally funded initiative that helps recipients gain skills, training, and work experience for long-term employment and economic self-sufficiency. The program is administered by the Florida Department of Children and Families (DCF), which determines eligibility and refers participants to LWDBs for services. The Florida Department of Commerce (FloridaCommerce) oversees service delivery through LWDBs and career centers. CareerSource Florida, the State Workforce Development Board, ensures alignment with statewide workforce goals, while LWDBs and career centers deliver program services, provide assessments, employment planning, component assignments, and other services. Collaborative efforts enhance engagement, compliance with federal and state requirements, and effective service delivery to support participant success and program accountability.

Under Title 7, Code of Federal Regulations (CFR), [sections 273.7](#) and [273.24](#), and [Chapter 414.455, F.S.](#), Florida operates a mandatory SNAP E&T program for Able-Bodied Adults Without Dependents (ABAWDs) and Mandatory Work Participants who do not meet an exemption. ABAWDs must meet specific work requirements to maintain benefits.²

V. POLICIES AND PROCEDURES

A. Program Access and Participant Engagement

1. Referral Process

Consistent with [7 CFR 273.7\(c\)\(1\)](#)³ DCF screens SNAP recipients and refers eligible individuals to LWDBs via the One-Stop Service Tracking (OSST) system. LWDBs must review referrals daily and initiate contact within 10 calendar days for ABAWDs. This process must be documented.

LWDBs should establish referral protocols with local DCF offices and relevant DCF staff, to ensure timely and accurate referrals to connect participants to wraparound services (e.g., housing, mental health, and

² [7 CFR 273.7\(l\)\(1\)\(i\)\(C\)](#)

³ [7 CFR 273.7\(c\)\(1\)](#).

substance abuse recovery) and promote a holistic approach to economic self-sufficiency. Staff must maintain regular communication with DCF partners and document referrals and outcomes in OSST.

2. Orientation and Initial Engagement

Individuals referred to the SNAP E&T program will receive an Employment and Training Referral (ETR) notification letter instructing the participant to complete specific steps via OSST within seven (7) days. The ETR provides participants with information to complete the orientation, assessment, and schedule options for the initial engagement appointment with a case manager. All steps must be completed within the seven (7) day window to avoid OSST beginning the automated consideration process with DCF to determine if the reason for being non-compliant is related to good cause. The orientation and assessment may be completed online or in-person for individuals who are not computer literate or do not have access to a computer or internet.

The orientation must outline why the participant is referred to the program, an overview of the SNAP E&T program components, participation expectation/requirements, and available support services. The orientation is a required activity for newly referred or reopened referrals for participants who have not completed orientation within the previous 12 months. Participants may also be required to complete orientation if there have been significant program changes, regardless of the time frame of last attendance.

Career center staff must inform participants of grievance procedures, their rights, responsibilities, and the consequences of noncompliance. In addition, the participant must acknowledge receipt of this information by signing the Opportunities and Obligations Form. Staff should maintain a copy of the signed form in the participant's case file and provide a copy to the participant for their records.

3. Eligibility Verification

Career center staff should confirm the participant's eligibility using DCF referral data housed in their management information system and OSST records to ensure the individual has been properly referred and does not appear to meet an exemption as outlined in the most current programmatic guidance and current federal law.⁴ Staff should confirm this information at the time of the initial engagement appointment prior to assigning the participant to a program component. If it is determined the participant may meet an exemption, staff must instruct the participant to notify DCF of their

⁴ [7 CFR 273.7\(a\)](#).

household changes to allow DCF to determine whether the participant continues to meet the requirements for referral to the SNAP E&T program.

B. Assessment and Employability Planning

As part of the online assessment, participants will answer questions that provide information on the participant's:

- academic and occupational skills
- career goals and interests
- personal needs/barriers
- employability skills
- work history

Staff must review the assessment information with the participant during the initial engagement appointment to ensure accuracy. The information will be used throughout the employability planning process culminating in the creation of an Individual Employment Plan.

LWDBs may use other assessment tools, in addition to the OSST Initial Assessment, to assist with employability planning/case management, such as Test of Adult Basic Education (TABE), My Career Shines, Career Scope, and the CLIFF Dashboard. Additional assessments should be scheduled or conducted at the initial engagement appointment, as determined appropriate, prior to the participant being assigned to a program component. Further, LWDBs may conduct additional assessments during program participation as the participants' needs change, or a new program component is being considered. In the event of a system outage, staff may conduct the assessment manually by using the [OSST Initial Assessment Form](#).

LWDBs must ensure that staff are trained in techniques to facilitate a productive experience to include motivational interviewing, employability planning, coordination of services, and methods of ongoing progress monitoring.

C. Documentation and Compliance

Staff must document case management activities, participation hours, support services, participant reimbursements, supporting documentation, and outcomes in OSST and the participant's case file in a timely and accurate manner. It is recommended that documentation of activities occur within two days of provision. Case files must include verification of participation (i.e., timesheets, attendance records, check stubs, etc.), documentation supporting participant reimbursements, support service referrals, and any correspondence related to the participant's progress or challenges. Documentation may be submitted to

staff either in-person or virtually (i.e., email, upload to document management system, etc.).

1. IEP Development

To ensure effective service delivery and alignment with participant goals, all participants must have an Individual Employment Plan (IEP) developed and maintained in the participant case file and a summary documented via case notes in OSST. IEP development should use the S.M.A.R.T. (Specific. Measurable. Achievable. Relevant. Time-Bound) principles and include sector strategies and career pathways principles as described in CareerSource Florida Workforce Policies [O3 – Sector Strategies Policy](#) and P10 – Comprehensive Employment Education and Training Strategy, and implemented in WIOA Local Plans.

2. IEP Processing Steps and Completion Timeline

The IEP must identify appropriate SNAP E&T components, support services, and co-enrollment opportunities with WIOA or other workforce programs. IEPs should reflect both short-term and long-term employment and educational goals, informed by labor market information and participant interests. The IEP must be initiated during the initial engagement appointment. Completion of the IEP means the IEP has been signed by the participant and staff or otherwise documented in OSST. All contact attempts made to complete or update the IEP must also be documented in case notes.

D. SNAP E&T Components

A qualifying SNAP E&T component is considered standalone and can count for part or all of the monthly work requirement for ABAWDs and MWPs.⁵ Career center staff must assign participants to appropriate SNAP E&T components (upon completion of assessment), document component assignments in OSST, and update the IEP accordingly.

Work components and activities under the SNAP E&T program are outlined in [7 CFR 273.7](#) and further defined in the SNAP E&T State Plan. Participants may be enrolled in one or more qualified components each month to satisfy the program's mandatory work requirement.

Note: Supervised job search and job search training are non-qualifying components unless paired with a qualifying activity.⁶ Supervised job search and job search training activities, when offered as part of other E&T program

⁵ See [7 CFR 273.24](#).

⁶ [7 CFR 273.7\(e\)\(2\)](#).

components, are acceptable as long as those activities comprise less than half the total required time spent in the components.⁷

Career center staff must assess participants for co-enrollment opportunities in WIOA and other workforce programs. Co-enrollment can fill service or funding gaps (e.g., training, support services), provide access to additional work-based learning (e.g., On-the-Job Training and apprenticeships), and maximize participant outcomes through layered support. Staff must document co-enrollment decisions in OSST and coordinate with WIOA case managers to align services.

Details on required components consistent with Florida's state plan include:

1. Supervised Job Search

Supervised Job Search (SJS) activities are guided and tailored to participant needs and employment goals and provide participants with increased opportunities to obtain employment. This component must occur at state-approved locations such as LWDB computer labs, LWDB community partner computer labs, public libraries, and on personal computers and/or devices while being supervised. Criteria that may be used to determine whether a location is deemed state-approved include:

- a. Locations that are open to the public with access to resources for job searching (i.e., computers/tablets, internet access, etc.)
- b. Locations that serve populations that are typically eligible for and/or recipients of food assistance benefits and fall into a barrier category such as ex-offenders, domestic violence victims, high school dropouts, disabled, etc.
- c. Locations that have an agreement with the state and/or LWDBs that defines mutually agreed upon services to SNAP eligible individuals.
- d. Locations that are willing to assist individuals who are actively seeking employment and have the means to monitor (supervise) and track time that an individual spends job searching.
- e. Locations that have qualified and sufficient staff to assist with job searching, as well as monitoring (supervising) and tracking the time an individual spends job searching.

⁷ *Id.*

Supervised Job Search may be conducted independently or within a group setting, and may also be conducted remotely, in-person, or a combination of both. LWDBs should tailor the delivery of supervised job search services to the needs of participants. Participation in this component must be tracked and reflected on the Job Participation Rate Screen and in case notes. Supervised Job Search activities must have a direct link to increasing the employment opportunities of participants. A participant in the Supervised Job Search program must be likely to find a job through the activity, and appropriate jobs must be available for that participant in the community. Effective case management requires that supervised job search is not established as continuous, year-round activity for the program participant.

Participants in supervised job search must have at least one meeting a month with a qualified staff member to review job search activities, get feedback, troubleshoot issues, and discuss next steps. This meeting may occur remotely or in-person and be synchronous with the job search activities or asynchronous and must be documented within OSST. Interactive software or other types of automated processes on a computer do not meet the requirement for engagement with a qualified staff person at least once a month. In between meetings with a qualified staff person, LWDBs may use other supervisory techniques, such as software that tracks time spent logged into a job search website or computer assessments that automatically identify next steps for the participant.

The hours assigned to Supervised Job Search for ABAWDs are limited to 39 hours monthly. If Supervised Job Search is combined with Job Search Training, the total combined hours cannot exceed 39 hours monthly. For MWP, the activity is limited to 59 hours monthly. If combined with Job Search Training, the total combined hours cannot exceed 59 hours monthly.

2. Job Search Training

Job Search Training is a component that enhances the job readiness of participants by teaching them job seeking techniques, increasing job search motivation, and boosting self-confidence. Job Search Training assists participants with development of essential job readiness/employability skills, through workshops or sessions to secure/retain employment. This component may consist of, but is not limited to, job skills assessments, classroom instruction, job development and placement services, and other direct training or support activities. It could also teach life and interpersonal skills, time management, decision making skills, appropriate dress for the workplace, career planning, and how to develop a resume.

The hours assigned to Job Search Training for ABAWDs are limited to 39 hours monthly. If combined with Supervised Job Search, the total combined

hours cannot exceed 39 hours monthly. For MWP, the activity is limited to 59 hours monthly. If combined with Supervised Job Search, the total combined hours cannot exceed 59 hours monthly.

3. Basic Education and Vocational Training

The basic education component includes a wide range of activities that improve basic skills and the employability of participants. Such programs include Adult Basic Education (ABE), basic literacy, English as a Second Language (ESL), high school completion or general education equivalency (GED), career and technical education (CTE), and other post-secondary education.

Education components can offer participants an opportunity to earn postsecondary credentials valued by employers and industry, including certificates and degrees, industry-recognized credentials, and licensures.

Vocational Training helps to improve the employability of participants through training in a skill or trade that will allow the participant to move directly into employment. Training is offered at the career centers, through community partners, and training providers who are approved by the LWDBs and/or CareerSource Florida.

An ABAWD can complete 80 hours monthly in basic education and/or vocational training to meet the mandatory work requirement. An MWP can complete 120 hours monthly in basic education and/or vocational training to meet the mandatory work requirement.

Participants assigned to education components (basic education/vocational training), may be allowed one hour of study time⁸ for each hour of class time completed, as long as documented verification is provided of the actual time spent in the classroom. Education may be provided onsite or through online classes. OSST must be updated with the number of hours completed (including study time) and documentation maintained in the participant's case file.

Education components (basic education/vocational training) may be combined with the following components:

- a. Supervised Job Search
- b. Job Search Training
- c. Work Experience

⁸ Study time must be documented via time logs or signed study activity forms and must be verified before being approved.

LWDBs are strongly encouraged to review program participants who are interested in Vocational Training for co-enrollment in the WIOA program.

4. Work Experience

Work Experience programs include a planned, structured learning experience that takes place in a workplace for a limited amount of time. These activities are designed to connect participants with employers to build employability skills or job-related skills through actual work experience or training at a worksite. In lieu of wages, participants receive compensation in the form of their monthly food assistance allotment. Work experience sites can be developed with not-for-profit, for profit, private, and public employers. Worksite agreements, as well as job descriptions for each work experience position, must be obtained by staff prior to assigning participants to a worksite.

Participants may identify a worksite that aligns with their career path. However, the participant will not be assigned to work experience at the worksite until an agreement with the site has been executed.

When a participant is assigned to a worksite, the employer cannot replace regular employees with participants performing work experience.⁹ The employer must also provide participants with the same or similar work conditions and assignments as regular employees and is required to supervise work activities and complete time sheets for participants.

Hours assigned to work experience must not exceed the allowable hours derived from the benefit calculation. To determine the benefit calculation, staff will use the participant's monthly food assistance allotment divided by the current state minimum wage which equals the monthly required hours. If there is more than one participant within a household, the monthly required hours will be further divided by the number of participants to derive the number of hours that each career seeker will need to complete monthly. If the number of hours determined by the benefit calculation is not enough to satisfy the work requirement for the participant type, additional program components must be assigned.

Work experience may be combined with the following components:

- a. Supervised Job Search
- b. Job Search Training
- c. Education Basic Education
- d. Vocational Training

⁹[7 CFR 273.7\(e\)\(2\)\(iv\)\(B\).](#)

In case there are additional members in the household receiving SNAP benefit, LWDBs must verify with DCF for an accurate number of hours for assigning under Work Experience.

5. Job Retention Services/Employment Retention Services (ERS)

The Job Retention Services (commonly known as Employment Retention Services or ERS) components are continued supportive services to help a SNAP E&T participant continue in their first months on their job. The activities help participants even if their new employment income makes them no longer eligible to receive SNAP benefits. Participants are eligible for at least 30 days and up to 90 days after securing employment and within 30 days of successful completion of a SNAP E&T program component. Participants are not eligible to receive ERS if they are leaving the SNAP E&T program due to a failure to comply with the general work requirement or an intentional program violation.

All reimbursements considered under ERS must be reasonable, necessary, and directly related to the participant's employment, such as uniforms/clothing required for the job, equipment or tools required for the job, and/or transportation. Other items may be considered for ERS if they meet the criteria.

E. Support Services and Participant Reimbursements

Participants may be provided reimbursement for costs associated with program participation, including transportation, work-related expenses, costs for books, supplies and tools, digital supports, clothing and uniforms, and other expenses, as needed and allowable. Career center staff must document participation hours, support services, participant reimbursements, supporting documentation, outcomes and ensure services are reasonable, necessary, and directly related to participation in program components.

LWDBs must obtain and retain documentation, including receipts, for verification and audit purposes. Self-attestation may be used in some circumstances to document expenses; however, staff should use this option as a last resort and must include a justification documented in case notes. Self-attestation forms will be used for items in value of \$100.00 or less. LWDBs should use the [SNAP Self-Attestation Form](#) Template for documentation purposes.

LWDBs staff must ensure all necessary information is in case notes related to GCC request for an exemption. This will allow DCF staff to make an appropriate and accurate E&T decision for SNAP participants.

F. Braiding Funding and Leveraging Resources

LWDBs are encouraged to braid SNAP E&T funds with WIOA and other local, state, or community resources to expand access and supplement service capacity to training and support services, increase reimbursement opportunities, and support innovative service delivery models.

Career center staff and LWDBs must actively pursue opportunities to braid SNAP E&T funds with other workforce and community resources to maximize participant access to training, support services, and employment opportunities; fill service gaps not covered by a single funding source; and increase the efficiency and impact of program investments.

LWDBs should establish clear agreements with their partners, define roles and responsibilities, and track outcomes to ensure transparency and accountability. LWDBs should also maintain documentation of such agreements and a list of applicable partnerships.

G. Provider Determination

There may be instances where a participant may be ill-suited for a particular Education and Training component, despite the participant's best efforts to remain in the program. Based on the case manager's assessment of the participant's fit with the work component and after documented efforts to explore all available alternative program components, the case worker may record the participant as failing the work requirement. All assessments of fit and documented efforts to identify an alternative work component must be maintained as part of case management prior to this determination and must contain documented supervisor approval. The SNAP E&T program, in accordance with 7 CFR 273.7(c)(18)(i)(A), allows for LWDBs to process a provider determination for DCF to consider an exemption.

H. Case Management and Compliance Monitoring

1. Ongoing Case Management

LWDBs must maintain regular contact with SNAP E&T participants to monitor progress and address ongoing barriers. Career center staff must update OSST with customer participation hours, progress notes, and changes in status.

2. Participation Tracking

Career center staff must enter participation hours, support services, participant reimbursements, supporting documentation, outcomes and applicable documentation in OSST as soon as possible but no later than by

the 10th business day following the end of the month. LWDBs must outline in local operating procedures the frequency at which participant's documentation will be received and entered in OSST.

Participants in partial month participation are required to participate (in any combination) in a minimum of 4 work hours per day, or 20 hours per week and MWP's are required to participate in a minimum of 6 work hours per day, or 30 hours per week. In this instance, the ABAWD/MWP will not be required to complete the required monthly participation hours. Participants in partial month participation who complete the partial hours for the given month will be considered compliant. For example, an ABAWD was referred for participation on June 9th with 15 business days remaining in the month. The ABAWD must complete 60 hours (15 days multiplied by 4 hours daily) to be considered compliant; anything less will be considered non-compliance.

3. Targeted Case Management

Case management must be proactive, participant-centered, and focused on achieving measurable outcomes. Updates must be documented in OSST, including progress notes, participation hours, and any changes to service strategies. Case managers must review and update the IEP based on the LWDB's LOPs or when there is a significant change in the participant's status, goals, or assigned activities. The approved IEP form may be accessed on FloridaCommerce's website.

4. Noncompliance and Good Cause Consideration

If a SNAP E&T participant fails to comply with the requirements of the program, LWDBs must initiate good cause consideration (GCC) review and document all issues.¹⁰ GCC participant cases must be referred to DCF for determination.

I. Data Entry and Reporting

1. OSST System Use

Career center staff must record all case management activities for participants including participation hours, support services, participant reimbursements, supporting documentation, and outcomes in OSST. All data must be accurate and timely to support performance reporting. It is recommended that data entry is completed within 2 business days from provision.

¹⁰ [7 CFR 273.7\(i\)](#).

2. Employ Florida Integration

Career center staff working with SNAP E&T customers must ensure the participant registers in Employ Florida for job seeking, uploading resumes, exploring labor market services, and to document job referrals, placements, and employment outcomes.

J. Exemptions

In accordance with 7 CFR 273.7(i), DCF is responsible for determining outcomes from a good cause review for a SNAP recipient who does not complete applicable SNAP work requirements. Outcomes of the review may result in a determination of good cause or a sanction. Allowable exemptions are subject to change based on programmatic guidance.

VI. IMPLEMENTATION

Oversight of Florida's SNAP E&T program is shared among FloridaCommerce, which monitors LWDB operations and provides technical assistance; DCF, a WIOA Combined Planning Partner which manages participant eligibility, referrals, and good cause determinations; and the CareerSource Florida Board of Directors, which sets statewide workforce policy and ensures alignment with Florida's broader workforce development goals. SNAP E&T is a required one-stop partner and contributes to infrastructure funding and service delivery.

LWDBs must establish clear local policies and procedures to guide the delivery of SNAP E&T services. These procedures must be in alignment with the state plan and include:

1. Identifying and co-enrolling eligible SNAP E&T participants in WIOA and other workforce programs to maximize access to training, support services, and employment opportunities.
2. Approving, documenting, and tracking support services.
3. Ensuring accurate and timely data entry in OSST and Employ Florida, including participation hours, case notes, and service delivery records.
4. Maintaining documentation for all services provided, including receipts and attendance logs, to support audit readiness and performance reporting.

LWDBs must also document and implement internal monitoring processes to ensure compliance with federal and state requirements including:

1. Conducting regular internal reviews of case files, documentation, and data entries.
2. Participating in state-led monitoring and technical assistance.
3. Taking corrective action when necessary to address identified issues.

This policy and any subsequent changes are effective upon approval by the State Workforce Development Board and issuance to the CareerSource Florida Network.

VII. AUTHORITIES

[H.R. 1 – One Big Beautiful Bill Act 119th Congress \(2025-2026\)](#)

[7 CFR § 273.7](#) – Work provisions for SNAP recipients.

[7 CFR § 273.24](#) – Time limits for ABAWDs.

[20 CFR §§ 676–681](#) – WIOA performance accountability and planning.

[20 CFR 678.410\(3\)](#) – One Stop Partners

[29 U.S.C. § 3101](#) – Workforce Innovation and Opportunity Act.

[Section 445.033, Florida Statutes](#) – FloridaCommerce and Department of Children and Families local performance accountability and reporting.

VIII. RESOURCES

[Florida SNAP E&T Plan](#)