



November 2018

SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM

More Complete and
Accurate Information
Needed on
Employment and
Training Programs

GAO Highlights

Highlights of [GAO-19-56](#), a report to congressional requesters

Why GAO Did This Study

SNAP is the nation's largest federally funded nutrition assistance program. In fiscal year 2017, it provided about \$64 billion in benefits. To maintain eligibility for benefits, certain SNAP recipients must comply with the program's work requirements, which may include participating in a state's SNAP E&T program if required by the state.

This report examines (1) what is known about SNAP E&T program participants and outcomes over time and (2) the extent to which state SNAP E&T programs have partnered with other programs offering similar services. GAO reviewed relevant federal laws, regulations, and guidance; analyzed USDA data on SNAP recipients, work registrants, and SNAP E&T participants from fiscal years 2008 through 2016, the most recent data available; reviewed states' fiscal year 2017 SNAP E&T plans and outcome reports; and interviewed USDA officials and state officials in five states selected, in part, to reflect a range of SNAP E&T program characteristics.

What GAO Recommends

GAO is making four recommendations, including that USDA take additional steps to address SNAP E&T data reliability issues and to help states leverage available workforce development system resources. USDA officials generally agreed with our recommendations.

View [GAO-19-56](#). For more information, contact Kathryn Larin at (202) 512-7215 or larink@gao.gov.

November 2018

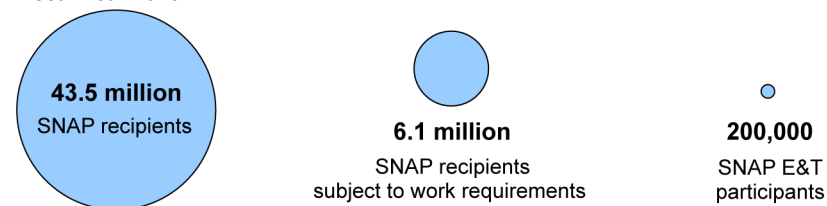
SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM

More Complete and Accurate Information Needed on Employment and Training Programs

What GAO Found

The Supplemental Nutrition Assistance Program's (SNAP) Employment and Training (E&T) programs, which are overseen by the U.S. Department of Agriculture (USDA) and administered by states, have served a small percentage of SNAP recipients over time, and information on participant characteristics and outcomes is limited. In an average month of fiscal year 2016, SNAP E&T served about 0.5 percent of the 43.5 million SNAP recipients. Further, since 2008, the percentage of SNAP recipients served by SNAP E&T has declined. Participation in SNAP E&T may be low, in part, because most SNAP recipients were exempt from work requirements, according to USDA data. In addition, SNAP recipients may participate in other activities to comply with work requirements. Although data on the number of recipients served in SNAP E&T are generally reliable, USDA lacks reliable data on participant characteristics and outcomes because of imprecise instructions on data collection forms and staff confusion at the state level. USDA has taken some steps to address these issues, but data reliability issues persist. As a result, USDA's ability to assess whether agency goals are being met through the SNAP E&T program is limited, as is the department's ability to monitor states' implementation of work requirements and ensure program integrity.

Supplemental Nutrition Assistance Program (SNAP) Recipients Subject to Work Requirements and Participating in SNAP Employment and Training (E&T) Programs in an Average Month of Fiscal Year 2016



Source: GAO analysis of U.S. Department of Agriculture data. | GAO-19-56

In fiscal year 2018, most state SNAP agencies partnered with workforce development system entities, such as community colleges and workforce agencies, to provide services to SNAP E&T participants, according to USDA data. Regional and state officials reported that state SNAP agencies often have used these partnerships to leverage non-federal funding sources and provide additional capacity and expertise to help expand SNAP E&T services. However, 3 states operated their own SNAP E&T programs without partnering with any other program, and a total of 20 states lacked partnerships with workforce agencies, according to USDA data for fiscal year 2018. Federal regulations require that SNAP E&T services be delivered through the state's workforce development system unless the services are not available locally through this system. USDA and state officials described challenges to forming effective partnerships with workforce agencies, including perceived disincentives to serving SNAP recipients. However, states that are not fully leveraging resources available through the workforce development system may miss opportunities to provide a wider variety of services to SNAP E&T participants and serve a greater number of SNAP recipients through SNAP E&T.

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Abbreviations

ABAWD	Able-bodied adults without dependents
E&T	Employment and Training
FNS	Food and Nutrition Service
SNAP	Supplemental Nutrition Assistance Program
USDA	U.S. Department of Agriculture
WIOA	Workforce Innovation and Opportunity Act

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November 20, 2018

Congressional Requesters

The Supplemental Nutrition Assistance Program (SNAP) is the largest federally funded nutrition assistance program in the United States. In fiscal year 2017, the program provided approximately \$64 billion in benefits to about 42 million individuals in more than 20 million households. SNAP is overseen by the U.S. Department of Agriculture's (USDA) Food and Nutrition Service (FNS) and administered by the states. To be eligible for benefits, certain SNAP recipients must comply with the program's work requirements, including registering for work and participating in certain work programs if required by the state agency.¹ For example, a state SNAP agency may assign a SNAP recipient to participate in a state-administered SNAP Employment and Training (E&T) program as a condition of SNAP eligibility. Federal requirements for such programs were first enacted in 1985, and these programs are intended to help individuals in SNAP households acquire skills, training, employment, or experience that will increase their ability to obtain regular employment. As such, FNS considers increasing participation in state SNAP E&T programs a strategy for helping SNAP recipients achieve self-sufficiency. State agencies have flexibility in designing SNAP E&T programs and may partner with local entities, such as nonprofit community-based social service providers and community colleges, to leverage existing services.

In recent years, the Congress and FNS have made changes to federal requirements for state SNAP E&T programs. For example, the Agricultural Act of 2014 required that states report additional data on SNAP E&T participant characteristics and outcomes.² You asked us to review several aspects of SNAP E&T.

¹The general SNAP work requirements apply to people ages 16 through 59, except for those who meet an exemption, such as those who are physically or mentally unfit for employment. In addition, per federal law, those who are employed for 30 or more hours per week or receive weekly earnings which equal the minimum hourly rate set under federal law multiplied by 30 are exempt from the work requirements. A state SNAP agency may assign a SNAP recipient to participate in a specific work program as a condition of SNAP eligibility. In addition to the general work requirements, certain recipients must meet additional work requirements in order to receive SNAP for more than 3 months in any 3-year period.

²Pub. L. No. 113-79, § 4022(a)(2), 128 Stat. 649, 805.

This report examines (1) what is known about SNAP E&T program participants and outcomes over time and (2) the extent to which state SNAP E&T programs have partnered with other programs offering similar services.

To address our first objective, we analyzed data on SNAP E&T participation from three FNS data sources, as well as data on participant outcomes from one of these sources.³ First, we analyzed aggregate data on SNAP E&T participants collected from state SNAP agencies for fiscal years 2008 through 2016, the most recent data available. Second, for the same time period, we analyzed Quality Control data on individual SNAP recipients, work registrants, and SNAP E&T participants.⁴ Finally, we also reviewed and analyzed aggregate outcome and participation data from state SNAP agencies' fiscal year 2017 outcome and participant characteristics reports. To assess the reliability of these data, we interviewed FNS and state officials, performed data testing, and reviewed relevant documentation. We determined these data to be sufficiently reliable to identify the number of average monthly SNAP E&T participants, work registrants, and SNAP recipients, and to assess change in the size of these groups over time.

To address our second objective, we reviewed all fiscal year 2017 SNAP E&T state plans and analyzed data from FNS on state SNAP agency partnerships for fiscal year 2018. To assess the reliability of these data, we interviewed FNS and state officials and reviewed relevant documentation. We determined these data to be sufficiently reliable for the purposes of this report.

To address both objectives, we reviewed relevant federal laws and regulations, as well as guidance and research from FNS, the USDA Office of the Inspector General, and our prior work on SNAP E&T programs.⁵ We interviewed relevant FNS officials from each of the seven

³For both of our objectives, we examined information from 53 state SNAP agencies, including the 50 states, the District of Columbia, Guam, and the Virgin Islands. We refer to all of these entities as "states" throughout our report. We excluded from our review the SNAP E&T pilot programs that were authorized by the Agricultural Act of 2014 because these are already being evaluated separately by FNS.

⁴The SNAP Quality Control database contains detailed demographic, economic, and SNAP eligibility information for a nationally representative sample of SNAP households.

⁵See, for example, GAO, *Food Stamp Employment and Training Program: Better Data Needed to Understand Who Is Served and What the Program Achieves*, [GAO-03-388](#) (Washington, D.C.: Mar. 12, 2003).

FNS regions. We also conducted interviews with SNAP state agency officials in five states, selected based on several criteria to ensure our sample included state SNAP E&T programs with different service delivery approaches and other program characteristics, as well as geographic diversity. We visited those states (four of the five) in which services are provided through partnerships with local providers and interviewed selected local program staff with knowledge of SNAP E&T program operations, participant characteristics, and coordination with the state SNAP agency. For additional contextual information on SNAP E&T program trends, we also conducted background interviews with state officials from seven other state SNAP E&T programs, as well as representatives from national organizations with knowledge of the SNAP E&T program. Information collected from state and local SNAP E&T officials during our site visits and interviews cannot be generalized to all SNAP E&T officials nationwide. For additional information on the report's scope and methodology, see appendix I.

We conducted this performance audit from September 2017 to November 2018 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

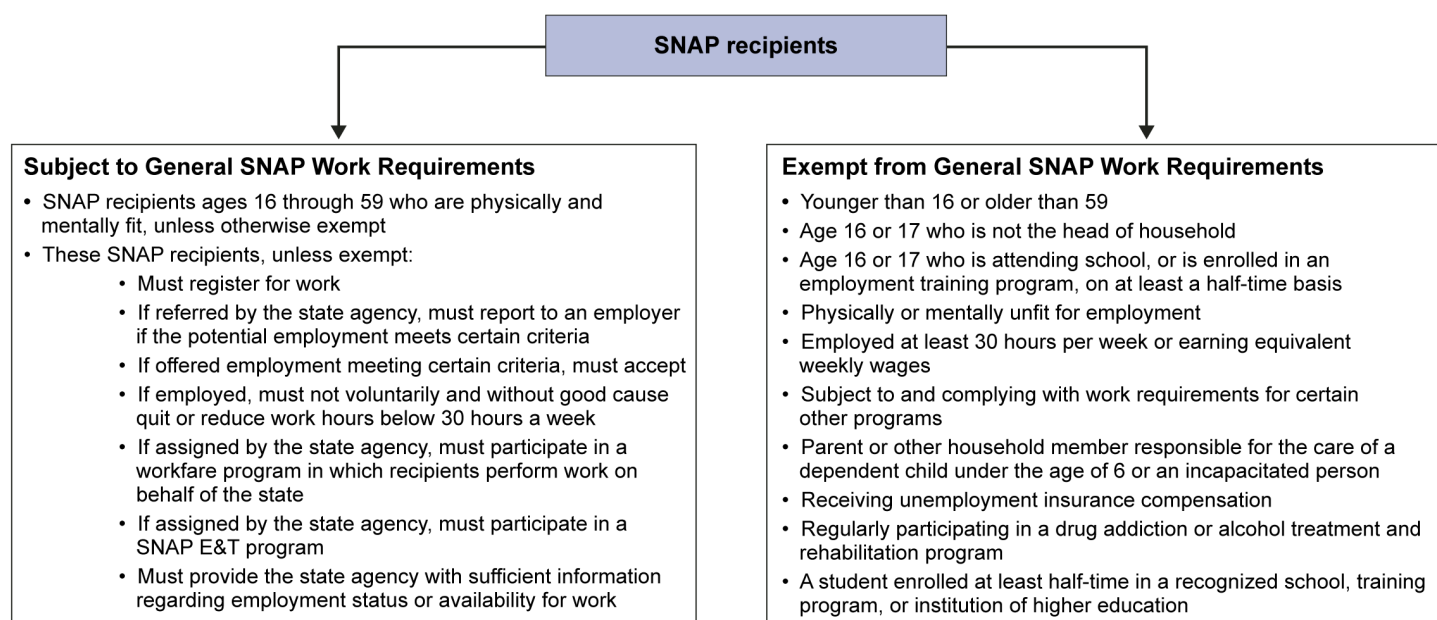
SNAP Work Requirements

All SNAP recipients ages 16 through 59, unless exempted by law or regulation, must comply with general work requirements. (See fig. 1.) These requirements generally include registering for work, reporting to an employer if referred by a state agency, accepting an offer of a suitable job, not voluntarily quitting a job or reducing work hours below 30 hours a week, or participating in a SNAP E&T program or a workfare program—in which recipients perform work on behalf of the state—if assigned by the state agency.⁶ SNAP recipients are exempt from complying with these work requirements if they meet certain criteria, such as being responsible

⁶Regarding work registration, SNAP recipients subject to work requirements are required to register for work or be registered by the state agency at the time of application and every 12 months after initial registration.

for caring for a dependent child under age 6 or an incapacitated person. In addition, per federal law, those who are employed for 30 or more hours per week are exempt from the work requirements.⁷ SNAP recipients who are subject to the work requirements—known as work registrants—may lose their eligibility for benefits if they fail to comply with the requirements without good cause.⁸

Figure 1: Supplemental Nutrition Assistance Program (SNAP) Recipients Subject to and Exempt from General Work Requirements



Source: GAO analysis of relevant federal law and regulations. | GAO-19-56

⁷SNAP recipients may also be exempt from work requirements by receiving weekly earnings which equal the minimum hourly rate set under federal law multiplied by 30. In fiscal year 2018, this rate was \$7.25.

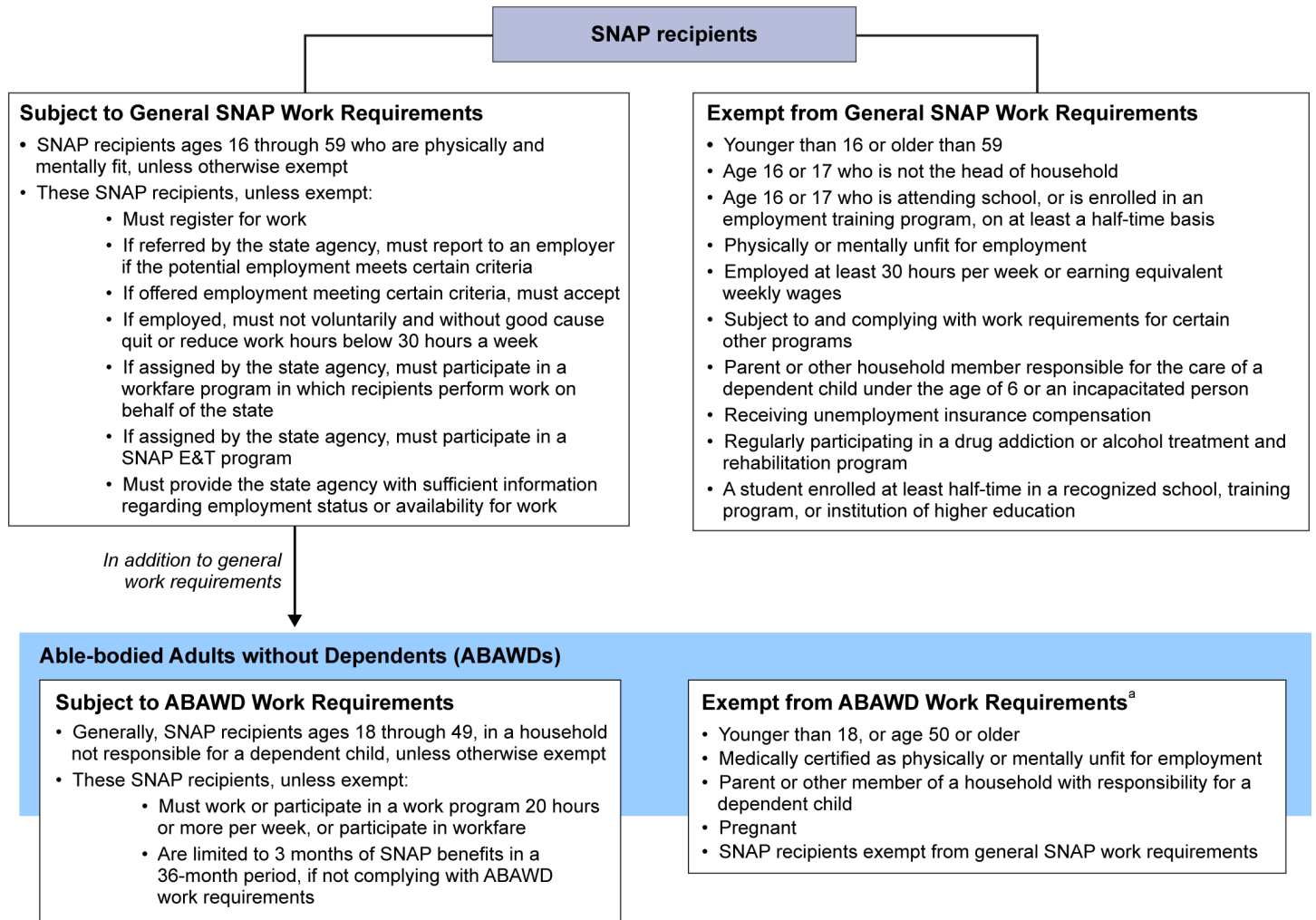
⁸Examples of good cause can include illness, household emergency, lack of transportation, and other circumstances. States must determine if a recipient has good cause for not complying with work requirements before disqualifying the recipient from benefits.

In addition to meeting the general work requirements,⁹ able-bodied adults without dependents (ABAWDs) must work or participate in a work program 20 hours or more per week, or participate in workfare, which is performing work to earn the value of their SNAP benefits.¹⁰ Participation in SNAP E&T, which is a type of work program, is one way for ABAWDs to meet the 20-hour-per-week ABAWD work requirement, but other work programs are acceptable as well. Unless ABAWDs meet these work requirements or are determined to be exempt, they are limited to 3 months of SNAP benefits in a 36-month period. (See fig. 2.)

⁹Certain SNAP recipients are subject to additional work requirements. Per federal law, those exempt from these additional requirements include individuals under 18 or 50 years of age or older, individuals medically certified as physically or mentally unfit for employment, and parents and other members of households with responsibility for dependent children. Those individuals who do not meet an exemption are referred to as able-bodied adults without dependents.

¹⁰In lieu of wages, workfare participants receive compensation in the form of their household's monthly SNAP allotment. According to FNS, workfare provides individuals with an opportunity to gain work experience and useful workplace skills at a supervised worksite, and such sites may include any public or private, nonprofit organization.

Figure 2: Supplemental Nutrition Assistance Program (SNAP) Recipients Subject to and Exempt from Work Requirements for Able-Bodied Adults without Dependents (ABAWDs)



Source: GAO analysis of relevant federal law and regulations. | GAO-19-56

^aABAWD work requirements do not apply to individuals living in an area with a waiver of the ABAWD time limit due to specific economic conditions. However, general work requirements still apply. In addition, state agencies may further exempt, on a month-to-month basis, 15 percent of ABAWDs who meet certain criteria, such as being ineligible for benefits because of the time limit.

At the request of states, FNS may waive the ABAWD time limit for ABAWDs located in certain areas of a state or an entire state when certain circumstances are met. For example, a waiver may be granted if the area has an unemployment rate of over 10 percent or the number of jobs available is insufficient to provide employment for these individuals. If

the time limit is waived, ABAWDs are not required to meet the ABAWD work requirement in order to receive SNAP for more than 3 months in a 36-month period, but they must still comply with the general work requirements.

SNAP Employment and Training Programs

Federal requirements for state SNAP E&T programs were first enacted in 1985 and provide state SNAP agencies with flexibility in designing their SNAP E&T programs, including whom to serve and what services to offer. The state can require some or all SNAP work registrants to participate in the SNAP E&T program as a condition of eligibility, an approach commonly referred to as a mandatory program. In mandatory programs, individuals can be sanctioned if they fail to participate in an assigned SNAP E&T activity. State SNAP agencies also may elect to exempt categories and individuals from participating in SNAP E&T, such as those living in rural areas or experiencing homelessness. In addition, states may exempt all work registrants from participation in SNAP E&T and only serve volunteers, an approach commonly referred to as a voluntary program. States also determine which types of services to provide participants through their SNAP E&T programs, although they must provide at least one from a federally determined list. This list includes job search programs, job search training programs, workfare, programs designed to improve employability through work experience or training, education programs to improve basic skills and employability, job retention services, and programs to improve self-sufficiency through self-employment.

There are three types of federal funding streams for state SNAP E&T programs: 100 percent funds—formula grants for program administration, including planning, implementing, and operating a SNAP E&T program;¹¹ 50 percent federal reimbursement funds; and ABAWD pledge funds—

¹¹Federal 100 percent funds are set at \$90 million annually by statute. Federal 100 percent funds are allocated to states based on a formula in which 90 percent of the state's allocation is based on the number of work registrants and 10 percent of the allocation is based on the number of ABAWDs in the state.

grants to states that pledge to serve all of their at-risk ABAWDs.¹² While the federal allocation for 100 percent funds has generally been capped at \$90 million over the last decade, some states do not obligate or expend their full allocation, and as a result, the following year FNS reallocates these funds to other states that request additional funds, according to FNS officials.¹³ Total federal expenditures on SNAP E&T programs increased from about \$282 million in fiscal year 2007 to about \$337 million in fiscal year 2016, according to FNS data (see fig. 3). Federal 50 percent reimbursement funds, which are generally not capped, constitute the largest portion of federal expenditures on SNAP E&T and were responsible for the majority of the increase in total federal SNAP E&T expenditures over the last decade.¹⁴ These funds are used for program administrative costs for operating SNAP E&T programs, as well as SNAP E&T participant expenses, such as transportation and dependent care costs.¹⁵

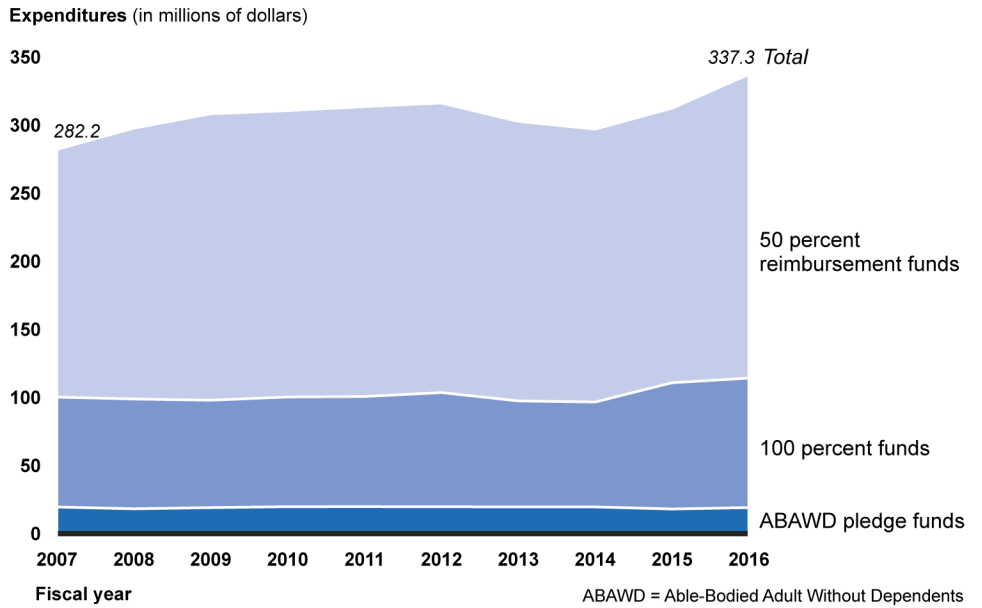
¹²ABAWD pledge funds are set at not more than \$20 million by statute. States receiving ABAWD pledge funds from the federal government must make and comply with a commitment, or pledge, to use these funds to offer all at-risk ABAWDs a position in an education, training, or workfare component that fulfills the ABAWD work requirement. At-risk ABAWDs are those in the last month of the 3-month time limit of SNAP eligibility and who meet other criteria. The ABAWD grants are allocated based on the number of ABAWDs in the states participating in the pledge. States may also use the other SNAP E&T funding streams to serve ABAWDs.

¹³Over the last decade, actual federal 100 percent expenditures have increased slightly, from nearly \$81 million in fiscal year 2007 to more than \$95 million in fiscal year 2016, as states have begun to spend a greater share of their 100 percent allocations. FNS officials told us that they have made efforts to encourage states to fully utilize available 100 percent funding, which they said may have contributed to the increase in federal 100 percent expenditures.

¹⁴Whereas 100 percent funds are fully federally funded, in the case of 50 percent reimbursement funds, state SNAP agencies or their partners may use non-federal funding to provide allowable E&T services and supports to SNAP recipients, and receive a federal reimbursement of 50 percent of these expenditures.

¹⁵States are required to reimburse participants for certain expenses that are reasonably necessary and directly related to participation in SNAP E&T.

Figure 3: Federal Supplemental Nutrition Assistance Program (SNAP) Employment and Training (E&T) Expenditures, Fiscal Years 2007 through 2016



Source: GAO analysis of Food and Nutrition Service SNAP E&T expenditure data. | GAO-19-56

Note: Data include the 50 states, District of Columbia, Guam, and the Virgin Islands.

Program Support and Oversight

In 2014, FNS created the Office of Employment and Training to provide support and oversight for the SNAP E&T program. Specifically, FNS expanded its headquarters staff dedicated to SNAP E&T from one to six full-time employees, and added a dedicated SNAP E&T official in each FNS regional office to provide technical assistance to states. FNS has also developed resources, such as a SNAP E&T Operations Handbook, intended to help states implement and expand their SNAP E&T programs.

To inform its program support and oversight, FNS collects information on SNAP recipients and work registrants, as well as SNAP E&T program participants, services, and expenditures. More specifically, FNS periodically collects data from states on the total number of work registrants, ABAWDs, SNAP E&T participants, and participants in each type of SNAP E&T service. FNS also collects data from states on a sample of all households participating in SNAP each month as part of the Quality Control process. The Quality Control data include characteristics of SNAP recipients, including whether they are work registrants, for example. In addition, as a result of requirements in the Agricultural Act of 2014, FNS began collecting annual SNAP E&T outcome and participant

characteristics data from states in January 2018.¹⁶ Furthermore, FNS collects quarterly information from states on SNAP E&T expenditures.

States are also required to submit an annual SNAP E&T plan to FNS, including information on the services they plan to offer during the year and their projected budget and program participation numbers. Guidance on plan requirements is provided in an FNS handbook for states. FNS national and regional officials review the plans to ensure compliance with requirements, and plans must be approved by regional officials before SNAP E&T funding is allocated to a state.

State SNAP E&T Programs Have Served a Small Percentage of Recipients over Time and Little Is Known about Participants and Outcomes

State SNAP E&T programs have served a small and decreasing percentage of overall SNAP recipients over time, and although these data are generally reliable, FNS data on SNAP E&T program participant characteristics and outcomes are not reliable. State SNAP E&T programs have served a small percentage of SNAP recipients over the last decade potentially due in part to certain policy changes during that time, such as the increasing number of states moving from mandatory to voluntary SNAP E&T programs. The number of SNAP recipients served by SNAP E&T programs has also potentially been low because a limited number of those referred to state programs go on to participate in services. FNS's lack of reliable SNAP E&T data, as well as the agency's lack of a plan for using newly reported participant characteristics and outcome data to assess program performance, constrain FNS's ability to understand the extent to which agency goals are being met.

¹⁶Specifically, FNS now requires states to report data on SNAP E&T participants' outcomes, such as the median quarterly earnings of certain program participants, and participant characteristics, such as the percentage of participants who have received a high school diploma. In addition, states are required to identify reporting measures for each of their SNAP E&T activities that serve a certain number of participants.

State SNAP E&T Programs Have Served a Small and Decreasing Percentage of SNAP Recipients over the Last Decade, Due to Various Factors

According to FNS data, among the approximately 43.5 million total SNAP recipients, only a small percentage—0.5 percent, or about 200,000—were served by state SNAP E&T programs in an average month of fiscal year 2016, due to several factors.¹⁷ (See fig. 4.) First, according to FNS data, most SNAP recipients are exempt from work requirements for various reasons, under federal law and regulation. For example, according to FNS data, almost two-thirds of SNAP recipients were children, elderly, or adults with a disability in an average month of fiscal year 2016, and these groups generally are exempt from work requirements.¹⁸ As a result of federal exemptions, in an average month of fiscal year 2016, about 14 percent of SNAP recipients, or about 6.1 million individuals, were work registrants who were subject to work requirements, according to FNS data.¹⁹ Further, state SNAP agencies may elect to exempt individuals for whom participation is judged to be impractical or not cost effective.²⁰ Moreover, SNAP work registrants may participate in other activities to comply with work requirements, such as other federal- and state-funded E&T programs.

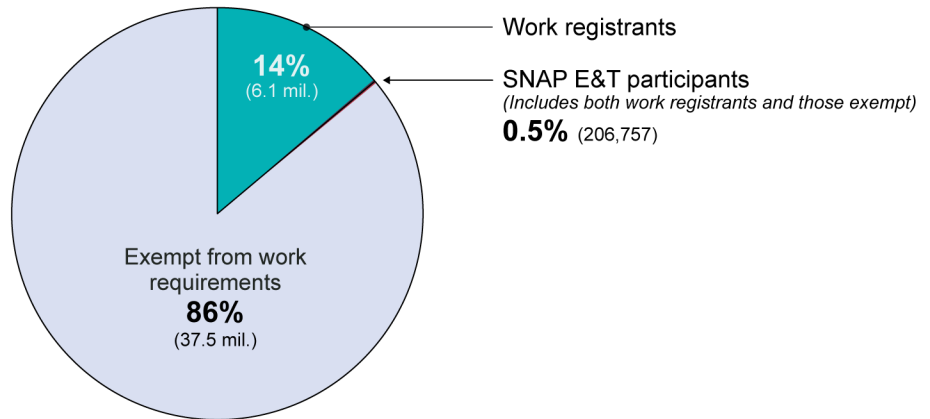
¹⁷To determine the average monthly number of SNAP recipients participating in SNAP E&T programs, we calculated the total number of recipients participating in SNAP E&T services across all months in fiscal year 2016 and divided by 12. According to FNS officials, the number of SNAP recipients who were served by SNAP E&T programs may include some individuals referred to the program who did not ultimately participate. However, FNS does not have data to allow us to calculate the number of such individuals.

¹⁸Adults who are already working at least 30 hours a week are also exempt from SNAP work requirements, and according to FNS data, more than 31 percent of non-elderly adult SNAP recipients were employed in an average month of fiscal year 2016. This includes employed adults with a disability. There are also other federal exemptions from SNAP work requirements, such as having responsibility for caring for a dependent child under age 6 or an incapacitated person, or complying with work requirements for certain other programs, such as Temporary Assistance for Needy Families.

¹⁹Although data on work registrants are available in two FNS datasets—the form FNS-583 data and the Quality Control sample—we determined that only the Quality Control data on work registrants were reliable. Estimates derived from the Quality Control sample data are subject to sampling error. See appendix I for more information on the Quality Control data, including our data reliability assessment and our estimates of sampling error.

²⁰According to FNS guidance, state exemptions may be based on categories of individuals, such as those who live in certain areas; characteristics of individuals, such as those with low literacy; or significant access barriers, such as a lack of transportation, dependent care, or computer access. For example, for fiscal year 2017, Virginia's SNAP E&T plan lists exemptions from SNAP E&T participation for individuals who are pregnant or living with a minor child, among others.

Figure 4: Supplemental Nutrition Assistance Program (SNAP) Recipients Subject to Work Requirements and Participating in SNAP Employment and Training (E&T) Programs, Fiscal Year 2016



Source: GAO analysis of Food and Nutrition Service SNAP Quality Control and E&T participation data. | GAO-19-56

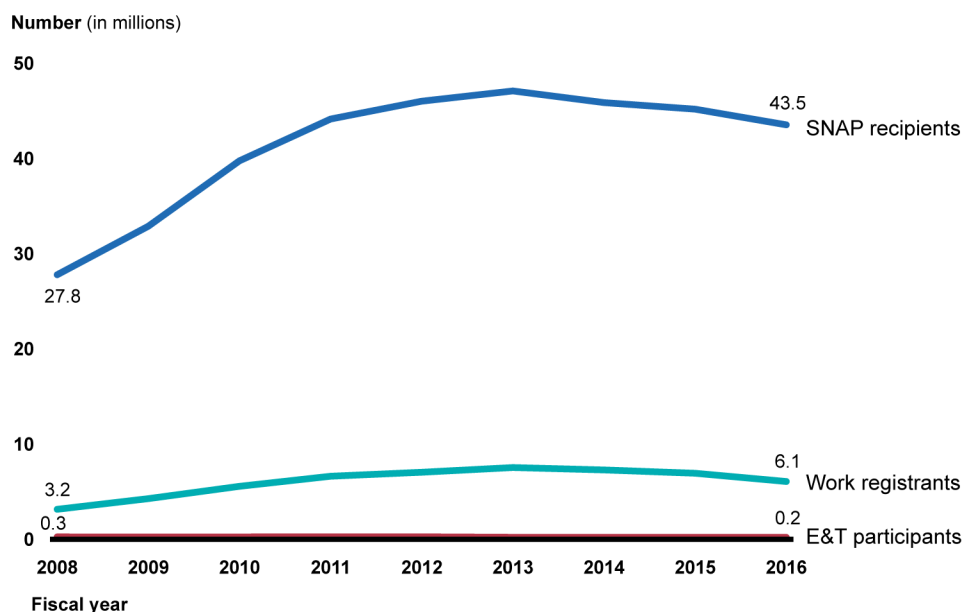
Note: Figure includes average monthly data for the 50 states, District of Columbia, Guam, and the Virgin Islands. According to FNS officials, some SNAP recipients who are exempt from work requirements may participate in SNAP E&T programs. Therefore, the 0.5 percent of SNAP recipients who are SNAP E&T participants may include both work registrants and those who are exempt.

In recent years, the number and percentage of SNAP recipients and work registrants participating in SNAP E&T programs has decreased, according to FNS data. From fiscal years 2008 through 2016, the average monthly number of SNAP E&T participants decreased from about 256,000 to about 207,000, or by 19 percent, according to state data on SNAP E&T participants that were reported to FNS. (See fig. 5.) However, the data also show that over the same time period, the average monthly number of SNAP recipients increased from about 27.8 million to about 43.5 million, and work registrants increased from about 3.2 million to about 6.1 million.²¹ As a result, the percentage of total SNAP recipients participating in SNAP E&T programs decreased from about 0.9 percent to about 0.5 percent, and the percentage of work registrants participating in

²¹According to FNS, the growth in SNAP participation during this time period is likely attributable to the 2007-2009 economic recession, as well as other factors. Because households must be low-income to receive SNAP benefits, participation typically increases during economic downturns as more people become eligible and apply. Although the recent recession officially lasted from December 2007 through June 2009, in the years immediately following it, unemployment remained at above average levels and SNAP participation continued to grow. Although total SNAP benefit costs similarly increased during this time, the amount of SNAP E&T 100 percent funding remained relatively constant.

these programs decreased from approximately 8.1 percent to approximately 3.4 percent.²²

Figure 5: Average Monthly Supplemental Nutrition Assistance Program (SNAP) Employment and Training (E&T) Participants Compared with Average Monthly Work Registrants and SNAP Recipients, Fiscal Years 2008 to 2016



Source: GAO analysis of Food and Nutrition Service SNAP Quality Control and E&T participation data. | GAO-19-56

Note: Data include the 50 states, District of Columbia, Guam, and the Virgin Islands. Work registrants are SNAP recipients who are subject to work requirements. According to FNS officials, some SNAP recipients who are exempt from work requirements may participate in SNAP E&T programs.

The decline in SNAP E&T participation in recent years may have been influenced by certain policy changes, including states' widespread use of waivers for ABAWDs. According to FNS data, from fiscal years 2008 through 2012, the number of states with statewide waivers due to economic conditions increased from 7 to 46 states, potentially enabling ABAWDs in these states to continue receiving SNAP benefits without

²²According to FNS officials, some SNAP recipients who are exempt from work requirements may participate in SNAP E&T programs. However, FNS does not have data to allow us to calculate the number of individuals who did so. As a result, these percentages may overstate the percentage of work registrants participating in SNAP E&T programs.

meeting ABAWD work requirements.²³ As a result, these waivers potentially reduced the number of ABAWDs nationwide who may otherwise have participated in SNAP E&T programs in order to continue receiving SNAP benefits.²⁴ Further, according to FNS data, from fiscal years 2011 through 2015, the majority of states continued to operate under statewide waivers of the ABAWD time limit.

According to FNS data, states have also increasingly moved from mandatory to voluntary SNAP E&T programs in recent years, another policy change that may have influenced SNAP E&T participation.²⁵ In fiscal year 2010, 36 states operated mandatory programs; however, by fiscal year 2017, 19 states operated mandatory programs. (See fig. 6.) When states move to a voluntary program, they generally experience a decline in SNAP E&T participation, according to FNS officials and our analysis of FNS data. Specifically, of the 21 states that changed from a mandatory to a voluntary program from fiscal year 2010 through fiscal year 2016, 13 experienced a decrease in SNAP E&T participation in the year following the change—ranging from a 21 percent decrease to a 93 percent decrease.²⁶ This trend was generally inconsistent with the trend in work registrants, as 9 of the 13 states that changed from a mandatory to a voluntary program and experienced a decrease in SNAP E&T participation also experienced an increase in their total number of SNAP

²³ABAWD work requirements do not apply to individuals living in an area with a waiver of the ABAWD time limit due to specific economic conditions. However, in areas with waivers, general SNAP work requirements still applied. For a list of these requirements, see figure 1.

²⁴According to FNS officials, the American Recovery and Reinvestment Act of 2009 suspended the time limit for ABAWDs from April 1, 2009 through September 30, 2010, a time period which included fiscal year 2010. As states' economies have improved, the number of states with statewide waivers has fallen in recent years. However, according to FNS data, the number of states operating under statewide waivers has continued to be greater than the 7 with such waivers in fiscal year 2008. According to FNS data, the 9 states with statewide waivers in fiscal year 2017 were Alaska, California, District of Columbia, Guam, Illinois, Louisiana, Nevada, New Mexico, and the Virgin Islands.

²⁵FNS categorizes state SNAP E&T programs as either mandatory or voluntary. Some states operate mandatory SNAP E&T programs in certain localities rather than statewide. These states are denoted as having mandatory programs.

²⁶During this time, some states changed from voluntary to mandatory while others changed from mandatory to voluntary. We reviewed data through fiscal year 2016 as these were the most recent data available on SNAP E&T participation at the time of our analysis.

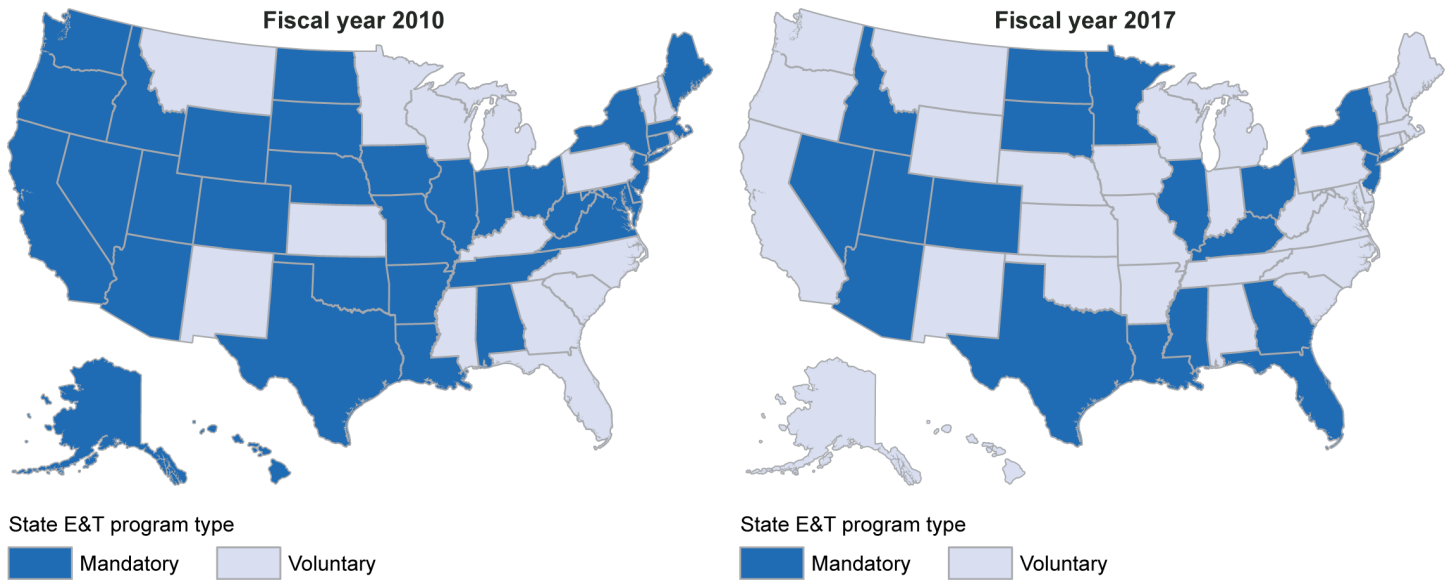
work registrants during the same time period.²⁷ Furthermore, voluntary programs are generally smaller overall than mandatory programs, according to our analysis of FNS data.²⁸ In fiscal year 2016, for example, the 31 states operating voluntary programs together served less than half of the total number of SNAP E&T participants served by the 22 states operating mandatory programs, although these two groups of states had similar numbers of new work registrants.²⁹

²⁷In the 8 additional states that changed from a mandatory to a voluntary program and experienced an increase in SNAP E&T participation, this increase ranged from 3 percent to 954 percent. In the latter case, participation in 1 state increased from 13 participants in fiscal year 2010 to 137 in fiscal year 2011.

²⁸Program size may be affected by multiple factors. SNAP recipients choose whether or not to participate in voluntary programs, but in mandatory programs some work registrants may fail to participate while others may be exempted from participation. For example, state SNAP agencies may elect to exempt from participation in mandatory E&T programs categories and individuals for whom participation is judged impractical or not cost effective. According to agency guidance, exemptions may be based on categories of individuals, such as those who live in certain areas; characteristics of individuals, such as those with low literacy; or significant access barriers, such as a lack of transportation, dependent care, or computer access.

²⁹In fiscal year 2016, the 31 states operating voluntary programs had a combined 2.9 million new work registrants and the 22 states operating mandatory programs had a combined 3.2 million new work registrants. Furthermore, states operating voluntary programs served an average of nearly 7,000 SNAP E&T participants per state, while states operating mandatory programs served an average of 22,000 SNAP E&T participants per state.

Figure 6: Supplemental Nutrition Assistance Program (SNAP) Employment and Training (E&T) Program Type, Fiscal Years 2010 and 2017



Sources: GAO analysis of Food and Nutrition Service SNAP E&T program data. MapInfo (map). | GAO-19-56

Note: Some states operate mandatory SNAP E&T programs in certain localities rather than statewide. These states are denoted as having mandatory programs in the figure. The District of Columbia, Guam, and the Virgin Islands are not included in the figure. In fiscal year 2010, the District of Columbia and the Virgin Islands operated mandatory programs, and Guam operated a voluntary program. In fiscal year 2017, the District of Columbia and Guam operated voluntary programs, and the Virgin Islands operated a mandatory program.

FNS officials told us that there are various reasons states may move to voluntary programs. For example, FNS officials said that many states have reported to them that offering employer-driven, skills-based, intensive employment and training services, such as vocational training or work experience, through voluntary programs yields more engaged participants with stronger outcomes. FNS officials stated that they have been actively encouraging states to offer these types of services because they believe these types of services are more effective in moving SNAP recipients, who may be more likely to have barriers to employment, toward self-sufficiency. However, they noted that SNAP E&T funding may not be sufficient to provide these types of services in mandatory programs that require participation by SNAP recipients and thus have higher participation. In addition, FNS officials told us that voluntary programs are less administratively burdensome than mandatory programs, as they allow states to focus on serving motivated participants rather than sanctioning non-compliant individuals.

In addition, participation rates are low for SNAP recipients referred to the SNAP E&T program, according to FNS officials, state program officials, and available data, regardless of whether the state operates a mandatory or voluntary program. FNS officials said that engaging SNAP recipients who are referred to the program is a challenge across all states—a point confirmed by the states we selected and available data.³⁰ Among the 11 states that reported data to FNS on SNAP E&T participation by those referred to the program, which included states operating mandatory and voluntary programs, the percentage of SNAP recipients who were sent a referral letter but did not participate in any activity ranged from 35 to 98 percent in fiscal year 2017.³¹ For 8 of these states, about 70 percent or more of SNAP recipients who were sent a referral letter did not participate in any activity.

FNS officials, state officials, and SNAP E&T service providers in our selected states indicated that participation by SNAP recipients referred to SNAP E&T may be low for various reasons. For example, FNS officials told us that some recipients face barriers to participation, such as a lack of transportation, childcare, or treatment for mental health issues, yet they have not been exempted by the state. For example, SNAP E&T providers and state officials in our selected states noted that SNAP recipients in rural areas, in particular, experience challenges participating in the E&T program due to a lack of transportation to E&T services, as well as the limited range of available services and employment opportunities. State officials and providers in all five of the states we selected also noted that SNAP recipients with mental health needs or substance abuse issues usually require additional services to participate in the SNAP E&T program, such as intensive case management or treatment. Lack of awareness of E&T services may also affect participation, as three SNAP E&T providers we spoke with said that SNAP recipients can be transient, and as a result, may not receive referral letters provided by mail. Further, some SNAP recipients may decide not to participate, despite the potential loss of SNAP benefits, or others face certain barriers to employment that may deter them from participating. For example, formerly incarcerated

³⁰SNAP recipients are generally referred to participate in SNAP E&T by state SNAP officials. Officials in all five states we selected for our review said that engaging SNAP recipients referred to the SNAP E&T program is a challenge.

³¹Eight of the eleven states reported these data specifically for at-risk ABAWDs—those at risk of losing their SNAP benefit due to work requirements. In these states, the percentage of SNAP recipients who were sent a referral letter but did not participate in any activity ranged from 35 to 98 percent.

SNAP recipients may be discouraged from participating in SNAP E&T due to past struggles finding employers willing to hire those with a criminal background.³²

Low participation rates are common across other employment and training programs serving similar populations, and although FNS has not researched how to address this issue in SNAP E&T, other agencies have assessed ways to improve participation in these programs. For example, in our past work, we found that states faced challenges with low participation in employment and training activities by Temporary Assistance for Needy Families cash assistance recipients.³³ Recognizing that states would benefit from strategies on how to increase engagement in such activities, the U.S. Department of Health and Human Services contracted for research on behavioral interventions that affect attendance rates for employment and training services.³⁴ Researchers found that strategies such as sending text messages to participants—in addition to letters in the mail—could increase the likelihood that they would attend program activities, particularly when communications encouraged recipients to make a detailed plan to participate. FNS officials stated that they are aware of research on strategies to address low participation in E&T programs; however, they noted that they have not researched causes of low participation in the SNAP E&T program. FNS officials added that they believe states could take steps to make enrolling and participating in SNAP E&T activities less burdensome for SNAP recipients.

³²We found that criminal convictions can result in numerous collateral consequences for individuals, including limiting their employment opportunities. GAO, *Nonviolent Drug Convictions: Stakeholders' View on Potential Actions to Address Collateral Consequences*, [GAO-17-691](#) (Washington, D.C.: September 7, 2017). Consistent with this finding, providers in four states we spoke with said that SNAP E&T participants with criminal backgrounds need assistance with finding employers willing to hire them.

³³GAO, *Temporary Assistance for Needy Families: Implications of Recent Legislative and Economic Changes for State Programs and Work Participation Rates*, [GAO-10-525](#) (Washington, D.C.: May 28, 2010).

³⁴For example, researchers found that in one state, approximately half of all Temporary Assistance for Needy Families cash assistance recipients assigned to a work activity did not attend their first meeting or orientation. Office of Planning, Research and Evaluation, Administration for Children and Families, U.S. Department of Health and Human Services, *Nudging Change in Human Services: Final Report of the Behavioral Interventions to Advance Self-Sufficiency (BIAS) Project* Report 2017-23 (Washington, D.C.: May 2017).

Further, FNS officials acknowledged that states could potentially benefit from technical assistance on increasing the rates at which referred SNAP recipients participate in SNAP E&T activities, but the agency's SNAP E&T technical assistance resources have generally not focused on this issue. In a recent policy brief, FNS indicated that collecting data on SNAP E&T participation can help state agencies and providers determine where attrition is occurring and point towards processes or services that need improvement. However, the brief did not provide strategies for improving processes or services to reduce attrition, and FNS officials acknowledged that they generally have not focused their resources on getting recipients to initially engage with service providers.³⁵ Rather, FNS has focused its technical assistance resources on an approach intended to improve participation among those recipients who engage with the SNAP E&T program. Specifically, according to FNS officials, the agency's resources have focused on encouraging SNAP E&T providers to offer more intensive services, including skills-based training, as these services may be better able to address SNAP recipients' barriers to employment. Officials noted that they believe these types of services may be more responsive to SNAP recipients' needs, which could increase participation in E&T.

Assisting state efforts to increase the level of participation for SNAP recipients who are referred to the E&T program could help FNS achieve agency goals, as well as help SNAP recipients move toward self-sufficiency. Specifically, USDA's fiscal year 2018 strategic plan includes increased participation in SNAP E&T as a strategy for supporting SNAP recipients in achieving self-sufficiency.³⁶ Similarly, in a 2016 letter to states, FNS noted that expanding SNAP recipients' access to employment and training services is critical to helping them transition off the SNAP program by becoming economically self-sufficient. If states continue to struggle with low participation in SNAP E&T, and FNS does not expand its technical assistance to include a broader array of strategies to increase participation, both FNS's ability to meet its strategic

³⁵Although this has not been the agency's focus, FNS's *SNAP Employment and Training Toolkit* contains several bulleted tips for increasing the visibility of the SNAP E&T program for states that operate a voluntary program. Four of the bulleted tips could be used to increase participation amongst referred, voluntary SNAP E&T participants.

³⁶USDA's Strategic Goal 7 is to provide access to safe and nutritious food for low-income people while supporting a pathway to self-sufficiency. Increasing participation in SNAP E&T is listed as one strategy for achieving this goal. USDA, *USDA Strategic Plan FY2018-2022* (May 2018).

goals, and the program's ability to help recipients achieve self-sufficiency, will be hindered.

Information on SNAP E&T Participant Characteristics and Outcomes Is Not Reliable

Although data on the number of overall participants in SNAP E&T programs in an average month from one FNS dataset are generally reliable, data on SNAP E&T program participant characteristics and outcomes are not reliable, according to our analysis of state data on SNAP E&T programs reported to FNS and our discussions with FNS and state officials. Specifically, in our review of the three FNS datasets that include state-reported information on SNAP E&T, we found several issues that affect the reliability of these data.³⁷ According to our analysis, these data reliability issues include widely varying counts of SNAP E&T participants, ABAWDs, and work registrants across the datasets;³⁸ missing or incomplete data on work registrants, ABAWDs, SNAP E&T participant characteristics and outcomes, and SNAP E&T services within the datasets;³⁹ and inconsistencies within and between quarterly and annual reports of SNAP E&T participants in one of the datasets. For example, according to FNS officials, some states inaccurately reported participation in a single SNAP E&T service that exceeded the state's total number of SNAP E&T participants.

FNS has taken steps to address some of the SNAP E&T data limitations, including providing additional training and guidance to states. For example, FNS provided training to states in July 2014 and September 2018 on how to accurately report SNAP E&T participant information

³⁷The three sources of state-reported data on SNAP E&T programs are the form FNS-583, which is used by states to report quarterly and annual counts of SNAP E&T participants; FNS Quality Control data, which are used to help ensure program integrity; and the newly required SNAP E&T outcome reporting measures mandated by the Agricultural Act of 2014. FNS officials noted that these datasets were designed for different purposes. For additional information on these sources and the data they contain related to SNAP E&T, see appendix I.

³⁸For example, according to the dataset identified by FNS as the most reliable source of information on SNAP E&T program participants, there were about 200,000 SNAP E&T participants in an average month of fiscal year 2016, which we cite in this report. However, another FNS dataset indicates there were more than 2.5 million mandatory and voluntary SNAP E&T participants in an average month of fiscal year 2016. FNS officials explained that they believe states incorrectly included SNAP recipients participating in any E&T program in the latter dataset.

³⁹Although two quarters of outcome data were not collected by FNS in fiscal year 2017, we also identified missing or incomplete outcome data for the quarters that data were collected.

through one of the state-reported datasets on SNAP E&T. In addition, in response to state questions regarding how to collect new outcome measures on SNAP E&T required by the Agricultural Act of 2014, FNS issued two memoranda in 2016 and 2017 providing additional policy clarifications.⁴⁰ Recently, in 2018, FNS issued two memoranda providing clarifications on work requirements for ABAWDs and on SNAP E&T, in part to improve the reliability of data collected.⁴¹

Even with these efforts, our analysis suggests that FNS continues to lack reliable data on SNAP E&T programs for at least two reasons: imprecise instructions on data collection forms and staff confusion at the state level.

- **Imprecise instructions on data collection forms.** According to our analysis, state-reported data on SNAP E&T participants and characteristics are not reliable due to imprecise instructions on the respective data collection forms. For example, the form used by states to collect information on SNAP recipients nationwide asks states to indicate if recipients are work registrants, and if so, participate in employment and training programs. Although FNS officials told us that this was intended to capture SNAP E&T participants alone, the form does not specify this. As a result, FNS officials explained that they believe states are incorrectly reporting SNAP recipients participating in any E&T program. Without a reliable link to SNAP E&T participation, FNS is unable to use this source, which provides detailed information on SNAP recipients' demographic, educational, and economic characteristics, to analyze SNAP E&T participant characteristics. Similarly, in the case of another state-reported data

⁴⁰USDA, Food and Nutrition Service, *Supplemental Nutrition Assistance Program – Section 4022 of the Agricultural Act of 2014 – Questions and Answers (Part I)* (Alexandria, VA: July 26, 2016) and USDA, Food and Nutrition Service, *Supplemental Nutrition Assistance Program (SNAP) – Clarification of Employment and Training Outcome Reporting Requirements – Questions and Answers (Q&A) Part II – May 2017* (Alexandria, VA: May 15, 2017).

⁴¹USDA, Food and Nutrition Service, *SNAP – Best Practices and Resources for Informing Households of ABAWD Rules* (Alexandria, VA: May 25, 2018) and USDA, Food and Nutrition Service, *Supplemental Nutrition Assistance Program – Clarifications on Work Requirements, ABAWDs, and E&T – May 2018* (Alexandria, VA: May 25, 2018). These memoranda were issued in response to a September 2016 USDA Office of Inspector General audit that recommended FNS develop best practices for implementing complex ABAWD provisions and ensure that valid, accurate, complete, and timely information was included in FNS's data system. USDA Office of Inspector General, *FNS Controls Over SNAP Benefits for Able-Bodied Adults Without Dependents* (Washington, D.C.: Sept. 29, 2016).

source, we found that the form used to collect data on the types of SNAP E&T services participants receive does not list or define required services. According to FNS officials, states report widely varying SNAP E&T services within the same categories.⁴²

- **Staff confusion at the state level.** According to FNS officials, there has been widespread confusion among states regarding the need to track ABAWDs when waivers are in place. Consequently, some states were not tracking ABAWD participation or properly documenting SNAP recipients' ABAWD status in recent years, according to FNS officials and some of the state SNAP agency officials we spoke with. FNS noted the importance of accurately tracking ABAWDs following the expiration of the waivers and reinstatement of the time limit in a March 2015 memorandum to regional directors. Further, FNS officials told us that states should have continued to track ABAWDs even if the state was under a statewide ABAWD waiver. FNS noted in its 2015 memorandum that states that failed to accurately track ABAWDs risked potential overpayments, as ABAWDs who fail to meet work requirements are ineligible for benefits.⁴³ Further, although we found generally reliable SNAP E&T participation data in one FNS dataset, staff confusion has also likely affected these participation data. FNS officials told us that some states may mistakenly include those referred into SNAP E&T programs who did not participate in a program activity in their count of SNAP E&T participants.⁴⁴ Finally, in the case of SNAP E&T data on outcomes, FNS regional officials told us that state-level staff were confused by the two different definitions for completion of a SNAP E&T activity used by FNS—an issue which may have affected the reliability of the outcome data.

⁴²The automated system through which states provide these data includes a list of allowable SNAP E&T services. FNS also recently took steps to help improve the consistency of data reported on participation in each type of SNAP E&T service. In August and September 2018, FNS updated the data system in which states report these data and discussed the updates in a webinar for states.

⁴³USDA, Food and Nutrition Service, *Supplemental Nutrition Assistance Program – Expiration of Statewide ABAWD Time Limit Waivers* (Alexandria, VA: March 4, 2015). Specifically, FNS noted that an ABAWD who fails to comply with the SNAP work requirement within the time period is no longer eligible for SNAP and that if the non-compliant ABAWD is not properly identified, this could lead to an overpayment.

⁴⁴We found that although FNS's form asks states to report SNAP E&T participants, it does not clearly define participation, and, as a result, some states may be confused regarding the definition. FNS officials stated that they believe this dataset is a reliable source of data on SNAP E&T participation.

FNS has acknowledged that it is important to have reliable data on the SNAP E&T program for program oversight. Recently, in August and September 2018, FNS presented information to states at a national conference and in a webinar regarding the interactions of the different state-reported SNAP E&T data sources, and the importance of these data for funding and planning purposes. In a July 17, 2009 memorandum, FNS also stated that it is important that the agency collect reliable data on SNAP E&T to satisfy the increasing demands of Congress, advocacy groups, and the public for an accurate picture of the types of activities provided and participation patterns in those activities.⁴⁵ This is generally consistent with federal internal control standards and our previous work on SNAP E&T. Federal internal control standards state that agencies should maintain quality data in order to produce and share quality information with stakeholders to help achieve agency goals.⁴⁶ Further, in our 2003 report on SNAP E&T, we found that no nationwide data existed on whether SNAP E&T programs helped participants obtain employment, and we recommended that FNS collect nationwide data on program participants and require states to collect outcome measures.⁴⁷

However, at present, the lack of reliable state-reported data on SNAP E&T participant characteristics and outcomes hinders FNS' ability to effectively oversee and monitor the SNAP E&T program. Without such information, states, FNS, and the Congress are unable to fully assess whether agency goals are being met through the SNAP E&T program. Further, the lack of reliable state-reported data on work registrants and ABAWDs affects FNS's ability to monitor states' implementation of program rules, including work requirements, and ensure program integrity. In addition, as data on work registrants and ABAWDs are used

⁴⁵USDA, Food and Nutrition Service, *Completing the FNS-583, Employment and Training Program Activity Report* (Alexandria, VA: July 17, 2009).

⁴⁶GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: Sept. 10, 2014).

⁴⁷[GAO-03-388](#).

to allocate federal funds to states for SNAP E&T, unreliable estimates of these groups have funding implications.⁴⁸

FNS's ability to understand the extent to which agency goals are being met is further hampered because FNS has not yet determined how it will use newly reported data to assess the performance of state SNAP E&T programs. As a result of provisions in the Agricultural Act of 2014, FNS required states to report new data on SNAP E&T participants' outcomes, such as the median quarterly earnings of certain program participants, and participant characteristics, such as the percentage of participants who have received a high school diploma.⁴⁹ In addition, the Act requires that FNS assess the effectiveness of states' performance. In the preamble to the relevant interim final rule, FNS described at a high level how it intends to use the data, including identifying which program activities are most successful at moving individuals into employment.⁵⁰ However, FNS officials told us that they were not yet certain how they will use the data to make such determinations. In addition, regional officials we spoke with stated that the current data might not allow FNS to answer questions about whether the program is achieving its goals.⁵¹

Similarly, state SNAP E&T officials we spoke with during our review did not know how the recently collected data related to program performance. Specifically, state officials in all five states we selected indicated that they were not certain how FNS will use these data to assess states'

⁴⁸Federal 100 percent funds are allocated to states based on a formula in which 90 percent of the state's allocation is based on the number of work registrants reported by states on the form FNS-583, and 10 percent of the allocation is based on the number of ABAWDs in the state, according to Quality Control data. As previously noted, although data on work registrants are available in two FNS datasets—the form FNS-583 data and the Quality Control sample, we determined that only the Quality Control data on work registrants were reliable, which is the data we cite in this report. See Appendix I for more information on our data reliability assessment.

⁴⁹In addition, states are required to identify reporting measures for each of their SNAP E&T activities that serve a certain number of participants. The Agricultural Act of 2014 further requires that USDA ensure that state reporting measures are appropriate to identify improvements in skills, training, work and experience for SNAP E&T participants.

⁵⁰81 Fed. Reg. 15,613, 15,616 (Mar. 24, 2016).

⁵¹For example, officials from two regional offices said that data on the number of program participants no longer receiving SNAP due to an increase in earnings could be useful in assessing program performance. However, these data are not collected as part of the outcome measures and no states chose to report this measure.

performance. Officials in three states also said that a lack of clarity about how these data relate to program goals has led to confusion.

FNS officials told us that they have not determined how they will use the newly reported data or whether the current data are sufficient, in part, because the agency has instead focused its resources on assisting the states in submitting the data to meet the new reporting requirements. According to FNS regional and national officials, states required extensive technical assistance to obtain the requisite data and calculate the reporting measures. For example, one regional official said that his office had been providing the states technical assistance for a year and a half to prepare them for the new reporting requirements. States we spoke with also indicated that the data were time-consuming and challenging to obtain.⁵² For example, many states struggled to obtain data sharing agreements with workforce agencies for the required employment data. According to FNS officials, after receiving the first round of reports in January 2018, FNS officials continued to provide technical assistance to states to improve the quality of the data, and FNS required states to submit revised reports in May. However, as of August 2018, one state and one territory had not submitted the required reports to FNS, according to FNS officials.

In the absence of FNS taking steps to determine how it will use the newly reported data to assess state effectiveness, questions about whether SNAP E&T programs meet their goals will remain unanswered. Further, states may continue to be challenged to report these data, and without information from FNS on how state performance will be assessed, states may lack clarity on how collecting these data will help contribute to program goals. As of October 2018, FNS officials said that they are exploring ways to improve their ability to collect and analyze all of the program data necessary to do a comprehensive assessment of state SNAP E&T. Our prior work has emphasized the importance of establishing how performance data relates to program goals.⁵³ In

⁵²Officials in three of the five states said that they found the data time-consuming and challenging to obtain. Additionally, we spoke with other state SNAP directors, and some expressed the same view.

⁵³We reported that organizations need to have performance measures that provide useful information for decision making in order to track how their programs and activities can contribute to attaining the organization's goals and mission. We also discussed attributes of successful performance measures, such as measurable targets, in GAO, *Tax Administration: IRS Needs to Further Refine Its Tax Filing Season Performance Measures*, [GAO-03-143](#) (Washington, D.C.: Nov. 22, 2002).

addition, federal internal control standards state that management should determine whether performance measures for the defined objectives are appropriate for evaluating the agency's performance in achieving those objectives.⁵⁴ Federal internal control standards also state that management should communicate necessary quality information to relevant internal and external parties to help the agency achieve its objectives.

States Have Increasingly Partnered with Various E&T Providers, but Some States Have Not Leveraged Available Workforce Development System Resources

States Have Increasingly Partnered with Other Entities to Provide SNAP E&T Services

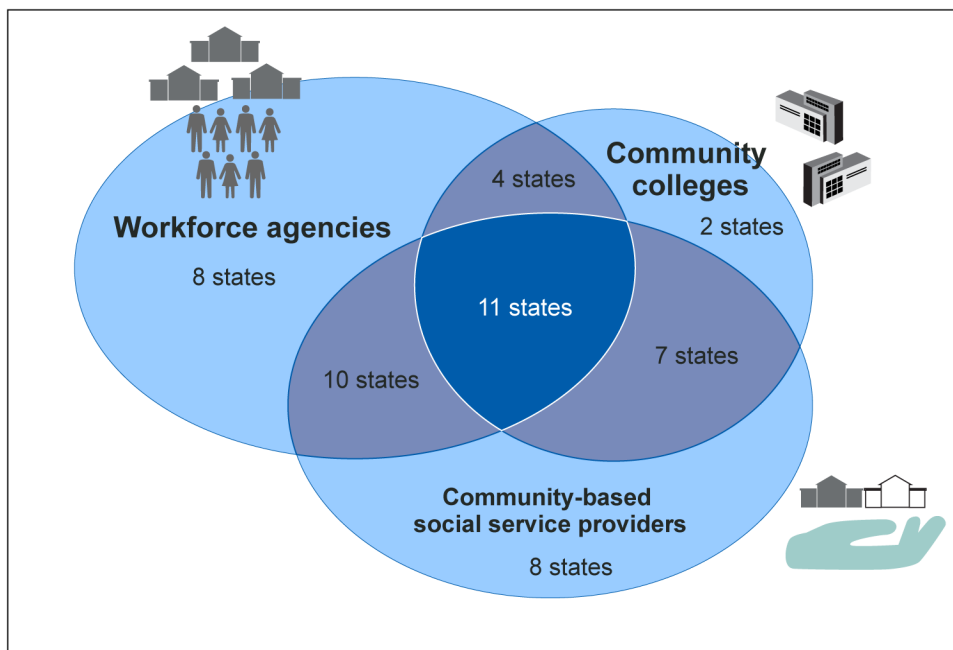
In recent years, state SNAP agencies have increasingly partnered with other state and local organizations, such as nonprofit community-based social service providers, community colleges, and workforce agencies, to provide services to SNAP E&T participants, according to FNS officials and states we selected for our review. In fiscal year 2018, 50 state SNAP agencies partnered with at least one other organization to deliver SNAP E&T services, with the majority partnering with more than one, according to an analysis by FNS (see fig. 7).⁵⁵ In that year, 36 states partnered with community-based social service providers, 33 states had partnerships

⁵⁴GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: Sept. 10, 2014).

⁵⁵We examined partnership information from 53 state SNAP agencies, including the 50 states, the District of Columbia, Guam, and the Virgin Islands. Kansas, New Hampshire, and New Mexico administer SNAP E&T programs that are solely operated by their state SNAP agencies.

with workforce agencies, and 24 states partnered with community colleges.

Figure 7: State Supplemental Nutrition Assistance Program Employment and Training Program Partnerships, Fiscal Year 2018



Source: GAO analysis of Food and Nutrition Service data on state workforce development system partnerships. | GAO-19-56

FNS officials in all seven regions said that states have increasingly used an approach FNS refers to as third party partnerships in recent years to leverage outside funding to serve SNAP E&T participants. In this model, according to FNS officials, third party organizations use non-federal funding to provide allowable E&T services and supports to SNAP recipients, and state SNAP agencies are then eligible for a federal reimbursement of 50 percent of these expenditures.⁵⁶ FNS has promoted this third party partnership model through various technical assistance resources provided to states, including an operations handbook and webinars, and has added a dedicated position for a SNAP E&T official in

⁵⁶These non-federal funding sources can include state training funds for specific populations, county and city funds, foundation or corporate funds, and social enterprise funds, according to FNS officials. According to FNS officials, states determine whether and how much of the federal reimbursement to pass on to third party providers.

each regional office, in part, to help develop these partnerships. Federal 50 percent reimbursement funds expended increased from nearly \$182 million to more than \$223 million, or by 23 percent, from fiscal year 2007 to fiscal year 2016.

According to FNS national officials as well as officials in some FNS regions and states, partnerships play a critical role in SNAP E&T programs because state SNAP agencies may lack the capacity, resources, and expertise to provide the type of intensive employment and training services FNS considers most likely to lead to self-sufficiency for SNAP recipients. For example, two of our selected states reported that they have partnered with community colleges to train participants for local in-demand occupations, including information technology, healthcare, and welding. According to officials in one FNS regional office, community-based social service providers and community colleges may have staff with expertise in workforce development, which SNAP agencies may not have, and this enables SNAP agencies to expand their programs and services without the expense of growing their own staff. According to officials in some FNS regions and some of our selected states, partnering with workforce agencies has enabled some states to provide training to participants using Workforce Innovation and Opportunity Act (WIOA) funds and supportive services using SNAP E&T funds, maximizing their ability to address participants' needs.⁵⁷ Officials in one of the states we visited also said that partnering with the workforce agency allows them to ensure basic E&T services, such as job search assistance, are available to SNAP recipients across all counties in their state. (See fig. 8.)

⁵⁷The Workforce Innovation and Opportunity Act aimed, in part, to increase coordination among federal workforce development programs.

Figure 8: Resource Room and Job Listings at an American Job Center That Serves Supplemental Nutrition Assistance Program Employment and Training Participants



Source: GAO. | GAO-19-56

FNS officials also said that these partnerships better position states to improve their program outcomes by tapping into providers currently serving communities that include SNAP recipients. For example, one of our selected states partnered with nonprofit community-based social service providers experienced in working with homeless and previously incarcerated populations. Officials in this state said that the providers tailor E&T services based on their knowledge of these populations' unique barriers to employment. Further, officials in three of our five selected states said that some of the community-based social service organizations they partner with provide SNAP E&T participants with additional supportive services, including transitional housing, clothing, financial advising, and mental and physical health services, to address a broader set of barriers to employment.

Some States Do Not Leverage Workforce Development System Resources for SNAP E&T, and FNS Has Not Assessed State Efforts to Utilize these Resources

Although states are increasingly partnering with external entities to provide SNAP E&T services, according to FNS data for fiscal year 2018, 20 state SNAP agencies have not partnered with workforce agencies for SNAP E&T. According to FNS officials, the nationwide network of more than 2,500 American Job Centers, which are operated by state and local workforce agencies, can help to fill service gaps in areas lacking community based organizations or community colleges.⁵⁸ However, despite the broad availability of E&T services such as job search assistance through American Job Centers, 12 state SNAP agencies directly provided job search or job search training for their SNAP E&T programs, according to their fiscal year 2017 state SNAP E&T plans.⁵⁹

In addition, some states have not yet fully leveraged resources from the broader workforce development system, which includes workforce agencies, community-based organizations, and community colleges, to provide SNAP E&T services. For example, FNS data for fiscal year 2018 show that three states' SNAP agencies operated their own SNAP E&T programs in fiscal year 2018 and did not involve existing workforce development system entities in the provision of these services. According to their fiscal year 2017 state plans, these states each offered one or two types of SNAP E&T services, and the services they offered—primarily job search and job search training—are considered less intensive by FNS officials. In contrast, states with workforce development system partnerships offered a broader range of services, as well as more intensive services, such as vocational education. For example, all 36 state SNAP agencies that offered vocational education did so through workforce development system partnerships.⁶⁰ As previously noted, FNS officials have said that intensive services are likely more effective in moving SNAP E&T participants, who may be more likely to have barriers to employment, toward self-sufficiency.

⁵⁸Funded through the Department of Labor's Employment and Training Administration, American Job Centers provide a range of employment-related services, such as training referrals, career counseling, and job listings, to job seekers under one roof.

⁵⁹Of these 12 state SNAP agencies, 5 did not have partnerships with workforce agencies, and 7 partnered with workforce agencies to provide other types of services.

⁶⁰Five of these states provided vocational education services through both the state SNAP agency and another partner. The other 31 state SNAP agencies contracted out the provision of these services to partner organizations.

Overlap and a lack of coordination in federally-funded E&T programs is a long-standing concern, and relatedly, state SNAP agencies are required to make use of workforce development system resources for SNAP E&T, when possible. In our prior work, we found that SNAP E&T was 1 of 47 federally funded E&T programs, nearly all of which overlapped with at least one other program by providing similar services to similar populations.⁶¹ We noted that overlap among federal E&T programs raises questions about the efficient use of resources, and we highlighted the value of coordination between these programs to ensure efficient and effective use of resources.⁶² Consistent with our findings, federal regulations require that each component of a state agency's SNAP E&T program be delivered through its statewide workforce development system, unless the component is not available locally through such a system.

FNS national and regional officials, as well as state officials, described challenges states face in forming effective workforce development system partnerships. FNS officials said that challenges are often caused by differences in workforce agency and SNAP E&T program target populations and service delivery approaches. According to FNS, SNAP E&T participants often have more barriers to employment, such as low literacy and limited work experience, than the broader population served by workforce agencies.⁶³ Because those with employment barriers could adversely impact the workforce agencies' employment and earnings performance, which could jeopardize agencies' workforce program funding, workforce agency staff are sometimes reluctant to serve SNAP E&T participants, according to FNS national and regional officials in three

⁶¹All but 3 of the 47 programs we surveyed overlapped with at least 1 other program, in that they provided at least one similar service to a similar population. However, even when programs overlap, the services they provide and the populations they serve may differ in meaningful ways. GAO, *Multiple Employment and Training Programs: Providing Information on Colocating Services and Consolidating Administrative Structures Could Promote Efficiencies*, [GAO-11-92](#) (Washington, D.C.: Jan. 13, 2011).

⁶²[GAO-11-92](#).

⁶³A 2017 FNS study that surveyed SNAP E&T participants about their barriers to obtaining or retaining employment found that while 20 percent of respondents reported no barriers, 28 percent reported one barrier, and 52 percent reported two or more barriers. The most frequently reported barriers were transportation issues, physical or mental health issues, lack of education, and having a criminal record. Rowe, Gretchen, Elizabeth Brown, and Brian Estes. *SNAP Employment and Training (E&T) Characteristics Study: Final Report*. Prepared by Mathematica Policy Research for the U.S. Department of Agriculture, Food and Nutrition Service, October 2017.

of the seven regions, as well as officials in one of our selected states.⁶⁴ For example, officials in one region said that workforce agency staff had stopped serving SNAP E&T participants in the past when they realized the participants needed more supportive services or time in workforce programs to meet employment goals.⁶⁵

Recognizing these challenges, in recent years, USDA has urged state SNAP agencies to collaborate with workforce agencies and others to improve coordination of E&T services. For example, in March 2016, USDA and the Department of Labor issued a joint letter encouraging state SNAP agencies and state and local workforce agencies to work together to develop shared strategies to better connect SNAP recipients with E&T opportunities through American Job Centers.⁶⁶ FNS has also provided states with technical assistance materials on SNAP E&T and WIOA partnerships, which describe respective program requirements and how

⁶⁴WIOA introduced changes to the way these workforce program performance levels are determined that may reduce financial disincentives for workforce agencies to serve those with employment barriers. Specifically, WIOA requires that state performance levels be adjusted using a statistical model that accounts for economic conditions and participants' characteristics. For example, if a state program is serving more individuals who lack work experience, have low literacy or English proficiency, or are ex-offenders, the state's program performance level may be adjusted downward. The Department of Labor is in the process of negotiating performance levels for states. FNS officials said that they have not yet analyzed the potential implications of these changes for the SNAP E&T program.

⁶⁵In our prior work on this program, we reported that officials from over half of the states we contacted suggested that because SNAP recipients may be difficult to employ, local workforce program staff might be reluctant to provide intensive services through workforce program-funded employment and training programs out of concern that they would adversely affect the workforce program's performance measures. [GAO-03-388](#).

⁶⁶Further, in an April 2016 letter, USDA and 12 other federal agencies expressed a joint commitment to improved collaboration and coordination across programs and funding sources to support career pathways, an approach to training and education that connects adult basic education, occupational training, postsecondary education, career and academic advising, and supportive services. The other agencies are the U.S. Departments of Commerce, Defense, Education, Energy, Health and Human Services, Housing and Urban Development, Interior, Justice, Labor, Transportation, Veterans Affairs, and the Social Security Administration. This letter encouraged state and local policymakers to align their public workforce, education, and social and human services systems.

SNAP E&T and WIOA-funded workforce programs can complement one another.⁶⁷

However, FNS has not ensured that all states take steps to identify potential workforce development system partners. Federal internal control standards state that agencies should collect complete and reliable information to ensure effective monitoring.⁶⁸ FNS officials told us that they do not independently assess the availability of states' workforce development system partners but instead rely on states to document this information in their state SNAP E&T plans, a key tool used by FNS for program monitoring. However, we found that 24 states did not provide information in their fiscal year 2017 SNAP E&T plans that would allow FNS to verify whether these states had assessed available workforce development system providers. For example, the states' plans did not describe existing workforce development services in the state, despite FNS guidance that directs states to describe the statewide workforce development system and identify the E&T services that will be delivered through this system in their plans.

States that are not fully leveraging resources available through the workforce development system may miss opportunities to provide a wider variety of services to SNAP E&T participants and serve a greater number of SNAP recipients through SNAP E&T programs. If state SNAP agencies do not assess workforce development system resources available in their state, they may lack awareness of potential partners and the resources they offer, potentially leading to an inefficient use of resources. In addition, without complete and reliable information on states' available workforce development system resources, FNS is not able to ensure that states are complying with the requirement to deliver SNAP E&T services through their state workforce development systems.

Conclusions

FNS has made strides in recent years to provide additional support and oversight of states' SNAP E&T programs, yet the agency lacks complete

⁶⁷FNS officials also said they participated in the working group that developed the requirements for WIOA state plans, which are 4-year strategic plans for states' workforce development systems. At the regional level, officials help to review "combined" WIOA state plans—plans that include WIOA core programs and one or more partner program—and participate in other collaborative activities with their counterparts from other federal agencies, according to FNS officials.

⁶⁸[GAO-14-704G](#).

and accurate information on these programs, which may limit the effectiveness of its efforts. For example, SNAP E&T programs have served a small percentage of SNAP recipients over time, and while FNS recognizes that states lack information on strategies for increasing participation among those referred to the SNAP E&T program, it has not provided technical assistance in this area. As a result, FNS may miss opportunities to help more SNAP recipients receive program services intended to increase their self-sufficiency, a USDA strategic goal. FNS's ability to assess whether the program is assisting the department in meeting this goal is also hindered because FNS lacks reliable data on SNAP E&T participant characteristics and outcomes. Without reliable data on SNAP recipients subject to work requirements and participation in SNAP E&T, the agency's ability to monitor states' implementation of program rules to ensure recipients are not receiving benefits for which they are ineligible is also limited. Further, because FNS has not yet determined how it will use the newly required outcome and participant characteristics data to assess state SNAP E&T programs, questions about program performance remain unanswered. In addition, without information from FNS on how state performance will be assessed, states will continue to lack clarity on how reporting these data will help contribute to program goals. Finally, because partnerships can be a crucial source of additional capacity, resources, and expertise for SNAP E&T programs, states that are not fully leveraging available workforce development system resources may miss opportunities to serve a greater number of SNAP recipients through SNAP E&T and provide a wider variety of services to SNAP E&T participants. In addition, states may provide overlapping or duplicative services and use resources inefficiently, because FNS has not ensured that all states take steps to identify potential workforce development system partners.

Recommendations for Executive Action

We are making the following four recommendations to FNS:

The Administrator of FNS should identify and disseminate strategies to states and service providers for increasing the participation of SNAP recipients referred to the SNAP E&T program. (Recommendation 1)

The Administrator of FNS should take additional steps to address data reliability issues in the state-reported data on SNAP E&T participant characteristics and outcomes, including steps to address imprecise instructions on data collection forms and staff confusion at the state level. (Recommendation 2)

The Administrator of FNS should determine and communicate to states how the agency will use newly reported outcome and participant characteristics data to assess the effectiveness of state SNAP E&T programs. (Recommendation 3)

The Administrator of FNS should take additional steps to assist states in leveraging available workforce development system resources. Such steps should include ensuring that state SNAP E&T plans provide the agency with sufficient information to verify that states have assessed available workforce development system providers. (Recommendation 4)

Agency Comments

We provided a draft of this report to USDA for review and comment. On November 5, 2018, the Deputy Associate Administrator for SNAP and FNS officials from SNAP's Office of Employment and Training provided us with the agency's oral comments. FNS officials told us that they generally agreed with the recommendations in the report. They noted that they have been implementing strategies to help states improve their SNAP E&T programs, including expanding the reach of the programs and improving the reliability of state reported data. FNS officials stated that the agency plans to build on these current efforts to address the recommendations. We acknowledge the agency's ongoing efforts in our report but continue to believe that additional action is necessary to address our recommendations. FNS also provided technical comments, which we incorporated into the report as appropriate.

As agreed with your offices, unless you publicly announce the contents of this report earlier, we plan no further distribution until 30 days from the report date. At that time, we will send copies to the Secretary of the USDA, congressional committees, and other interested parties. In addition, this report will be available at no charge on the GAO website at <https://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-7215 or larink@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page

of this report. GAO staff who made key contributions to this report are listed in appendix II.

A handwritten signature in black ink that reads "Kathryn A. Larin". The signature is written in a cursive style with a large, prominent initial "K".

Kathryn A. Larin, Director
Education, Workforce, and Income Security Issues

List of Requesters

The Honorable Trey Gowdy
Chairman
Committee on Oversight and Government Reform
House of Representatives

The Honorable Mark Meadows
Chairman
Subcommittee on Government Operations
Committee on Oversight and Government Reform
House of Representatives

The Honorable Jim Jordan
Chairman
Subcommittee on Health Care, Benefits, and Administrative Rules
Committee on Oversight and Government Reform
House of Representatives

The Honorable Gary Palmer
Chairman
Subcommittee on Intergovernmental Affairs
Committee on Oversight and Government Reform
House of Representatives

Appendix I: Objectives, Scope, and Methodology

This appendix discusses in detail our methodology for addressing our two research objectives examining (1) what is known about Supplemental Nutrition Assistance Program (SNAP) employment and training (E&T) program participants and outcomes over time and (2) the extent to which state SNAP E&T programs have partnered with other programs offering similar services. We scoped our review of state SNAP E&T programs to include the 50 states, the District of Columbia, Guam, and the Virgin Islands.¹

In addition to the methods we discuss below, to address both our research objectives, we reviewed relevant federal laws, regulations, and guidance; interviewed United States Department of Agriculture (USDA) Food and Nutrition Service (FNS) officials in its headquarters and seven regional offices; and reviewed relevant research from FNS and the USDA Office of Inspector General, as well as our prior work on SNAP E&T programs. Further, we interviewed representatives of a range of nationwide organizations knowledgeable about SNAP E&T and state officials from seven state SNAP E&T programs: Idaho, Louisiana, New York, Pennsylvania, Tennessee, Washington, and the District of Columbia.² We also analyzed SNAP E&T expenditures using form FNS-778 data for fiscal years 2007 through 2016, the most recent data available. The form FNS-778—Federal Financial Report—is a form used by FNS to collect quarterly expenditure data for state SNAP E&T programs. To assess the reliability of these data, we interviewed FNS and state officials, performed data testing, and reviewed relevant documentation. We determined these data to be sufficiently reliable for the purposes of our report. We excluded from our review the SNAP E&T pilot programs that were authorized by the Agricultural Act of 2014 because these are being evaluated separately by FNS.

We conducted this performance audit from September 2017 to November 2018 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for

¹We refer to all of these entities as “states” throughout our report.

²These organizations include the American Public Human Services Association, the Center for Law and Social Policy, the Center on Budget and Policy Priorities, the Foundation for Government Accountability, and the National Skills Coalition. The state officials we interviewed were all members of the American Association of SNAP Directors, which assisted us in setting up the interview. Information collected from state SNAP E&T officials during our interviews cannot be generalized to all SNAP E&T officials nationwide.

our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

SNAP E&T Program Data

To address our first objective, we analyzed data on SNAP E&T participation from three FNS data sources. First, we analyzed aggregate data on SNAP E&T participants collected from state SNAP agencies for fiscal years 2008 through 2016, the most recent data available. Second, for the same time period, we analyzed Quality Control data on individual SNAP recipients, work registrants, and SNAP E&T participants. Finally, we reviewed and analyzed aggregate participation data from state SNAP agencies' fiscal year 2017 outcome and participant characteristics reports.

Form FNS-583 Data

We analyzed the average monthly number of SNAP recipients participating in SNAP E&T using the form FNS-583 data. The form FNS-583—U.S. Department of Agriculture Food and Nutrition Service SNAP Employment and Training (E&T) Program Activity Report—is used by FNS to collect quarterly and annual participation data for state SNAP E&T programs. To assess the reliability of these data, we interviewed FNS and state officials, performed data testing, and reviewed relevant documentation. Data testing included checks for missing data elements, duplicative data, and values outside a designated range. We determined the data were sufficiently reliable to identify the number of average monthly SNAP E&T participants and to assess change over time.

To further examine what is known about participation in SNAP E&T, we also assessed form FNS-583 data on work registrants and able-bodied adults without dependents (ABAWDs) participating in SNAP E&T for fiscal years 2008 through 2016. To assess the reliability of these data, we interviewed FNS and state officials, performed data testing, and reviewed relevant documentation. We determined these data to be unreliable for the purposes of our report. As described above, for example, FNS officials learned in recent years that there was widespread confusion among states regarding the need to track ABAWDs when waivers were in place. Consequently, some states were not tracking ABAWD participation or properly documenting SNAP recipients' ABAWD status.

FNS Quality Control Data

We analyzed SNAP Quality Control data on individual SNAP recipients, work registrants, and SNAP E&T participants. The SNAP Quality Control

database contains detailed demographic, economic, and SNAP eligibility information for a nationally representative sample of SNAP households. We estimated the number of SNAP recipients and work registrants for fiscal years 2008 and 2016 using the public use Quality Control dataset and calculated confidence intervals to determine if the change over time was statistically significant (see table 1).³ To assess the reliability of these data, we interviewed officials from FNS and the contractor responsible for maintaining the Quality Control dataset, as well as state officials; reviewed relevant technical documentation; and conducted data testing.⁴ For example, we compared the estimates we produced for fiscal years 2008 and 2016 to the publicly reported estimates in the annual *Characteristics of Supplemental Nutrition Assistance Program Households* reports for those years. We determined that the data, and the corresponding estimates in these reports, were sufficiently reliable for our purposes. As a result, for fiscal years 2009 through 2015, we relied on the estimates of SNAP recipients and work registrants published in the reports.

Table 1: Estimates of Supplemental Nutrition Assistance Program (SNAP) Recipients and Work Registrants, Fiscal Years 2008 and 2016

Fiscal year	Estimate of SNAP recipients	Estimate of work registrants	Percent of SNAP recipients who were work registrants	95% Confidence interval
2008	27.8 mil.	3.2 mil.	11.34	11.08 – 11.61
2016	43.5 mil.	6.1 mil.	13.95	13.60 – 14.30

Source: GAO analysis of SNAP Quality Control data. | GAO-19-56

We also analyzed SNAP Quality Control data on SNAP E&T participants for fiscal year 2016. To assess the reliability of these data, we interviewed officials from FNS and the contractor responsible for maintaining the

³The SNAP Quality Control sample is stratified by year, month, and state. Technical documentation for the SNAP Quality Control public use dataset includes sample weights that allow users to replicate total monthly caseloads reflected in SNAP Program Operations data, as well as a weight for yearly totals, which is the weight for monthly caseloads divided by 12. To calculate confidence intervals, we used the surveyfreq procedure in SAS, stratifying by year and month, using the sample weights for yearly totals provided in the technical documentation.

⁴According to Mathematica Policy Research, since 1976, they have been under contract with FNS to publish information on the characteristics of a nationally representative sample of households and individuals participating in SNAP in a given fiscal year, excluding those who received SNAP benefits mistakenly, as well as those who received SNAP benefits for disaster assistance.

Quality Control dataset, as well as state officials; reviewed relevant technical documentation; and conducted data testing. For example, we compared the estimate of SNAP E&T participants from the SNAP Quality Control dataset to the number of SNAP E&T participants reported by states on the FNS-583, which we had determined was reliable. From our review, we determined the Quality Control SNAP E&T participation data to be unreliable for the purposes of our report. As described above, for example, the form used by states to collect information on SNAP recipients nationwide asks states to indicate if recipients participate in employment and training programs. Although FNS officials told us that this was intended to capture SNAP E&T participants alone, the form does not specify this, and FNS officials said that some states are incorrectly reporting SNAP recipients participating in any E&T program.

To determine the percentage of SNAP recipients and work registrants that participate in SNAP E&T, we used the data that we had determined were reliable. Specifically, we used the Quality Control data on SNAP recipients and work registrants, as well as the form FNS-583 data on SNAP E&T participants, for fiscal years 2008 through 2016.

SNAP E&T Outcome and Participant Characteristics Data

We also reviewed and analyzed fiscal year 2017 outcome and participant characteristics data reported by state SNAP agencies in the SNAP E&T Annual Report Federal Fiscal Year 2017. These data include information on SNAP E&T participants' outcomes, such as the median quarterly earnings of program participants, and participant characteristics, such as the percentage of participants who have received a high school diploma. Certain outcome data were only collected by FNS for two quarters of fiscal year 2017, whereas participant characteristics data were collected for the entire year. We received copies of these data reports from FNS as states submitted their initial reports to FNS in early 2018. Subsequent to FNS' review of these initial reports and their efforts to help states improve the accuracy and consistency of their reporting, FNS provided us with updated versions of the reports for many of the states. We used the reports to describe rates at which SNAP recipients referred to the SNAP E&T program participated in services—data that were reported by 11 states. We did not validate the accuracy of these data.

State SNAP E&T Plans and FNS Program Characteristics Data

To address our second objective on the extent to which state SNAP E&T programs have partnered with other programs offering similar services, we reviewed fiscal year 2017 SNAP E&T state plans for all 53 state SNAP agencies. Specifically, we reviewed the plans to determine which

services states planned to offer through partnerships with other programs in that year and the extent to which states documented their use of available workforce development system resources. To supplement our review of the plans, we also analyzed fiscal year 2018 summary data from FNS on the number of state SNAP agencies that partnered with community-based organizations, workforce agencies, and community colleges, as well as the number with state SNAP agency-operated SNAP E&T programs. We also analyzed fiscal year 2010 and 2017 summary data from FNS on mandatory and voluntary programs to determine how the number of state SNAP agencies with each program type changed over time. To assess the reliability of the FNS summary data, we interviewed FNS and state officials and reviewed relevant documentation. We determined these data to be sufficiently reliable for the purposes of this report.

State Interviews and Site Visits

To help inform both of our objectives and gather additional information about state SNAP E&T programs, we selected five states: Delaware, Oregon, Kansas, Texas, and Virginia. We selected these states based on several criteria to ensure our sample included state SNAP E&T programs with different service delivery approaches and other program characteristics, as well as geographic diversity. Specifically, we considered state SNAP E&T participation and expenditures, including utilization of federal 50 percent reimbursement funds. In addition, we considered whether the state operated a mandatory or voluntary SNAP E&T program, a county- or state-administered program, and opted to be an ABAWD pledge state. We also considered whether the state submitted its SNAP E&T plan as part of a Workforce Innovation and Opportunity Act Combined State Plan.

Using semi-structured questions, we interviewed officials from the state agencies responsible for administering SNAP in the five selected states. We gathered information on SNAP E&T administration at the state level, including information on partnerships; program participation and expenditures; data collection efforts, including those related to assessing program outcomes; and any challenges to administering the program, as well as efforts to address such challenges.

We conducted site visits to our selected states in which services are provided through partnerships with local providers—Delaware, Oregon, Texas, and Virginia—and interviewed selected local program staff with knowledge of SNAP E&T program operations, participant characteristics, and coordination with the state SNAP agency who provide SNAP E&T

services in both urban and rural areas. We conducted these visits in February and March 2018. During each site visit, we used semi-structured questions to gather information on the goals and mission of the providers' organizations, types of services provided to SNAP E&T participants, needs and characteristics of SNAP E&T participants and how these might differ from those of other clientele, sources of funding used to provide services to SNAP E&T participants, and efforts to coordinate with the state SNAP agency. The local program staff we interviewed included representatives of workforce agencies, non-profit community-based organizations, a for-profit company, and community colleges. Information collected from state and local SNAP E&T officials during our site visits cannot be generalized to all SNAP E&T officials nationwide.

Appendix II: GAO Contact and Staff Acknowledgments

GAO Contact

Kathryn A. Larin, (202) 512-7215 or larink@gao.gov

Staff Acknowledgments

In addition to the contact named above, Rachel Frisk (Assistant Director), Kristen Jones (Analyst-in-Charge), Morgan Jones, and Kelly Snow made key contributions to this report. Also contributing to this report were Alex Galuten, Mimi Nguyen, Sam Portnow, Julia Robertson, Monica Savoy, Almeta Spencer, Jeff Tessin, Kathleen van Gelder, Nicholas Weeks, and Jessica L. Yutzy.

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