

Part A: Cover Page and Authorized Signatures

County: *Enter the name of your County*

County Agency: *Enter the name of your County Food and Nutrition Services (FNS) E&T agency*

Federal FY: *Enter the Federal FY.*

Date: *Enter the date (revise to reflect subsequent amendments)*

Primary Contacts: *Complete the table with the name, title, phone and email address for those County agency personnel who should be contacted with questions about the FNS E&T plan. Add additional rows if needed.*

Name	Title	Phone	Email
<i>Insert more rows as needed.</i>			

Certified By:

<Signature of Authorized Person>

County Agency Director

Date _____

Certified By:

<Signature of Authorized Person>

County Agency Fiscal Reviewer

Date _____

County Employment and Training (E&T) Plan of Action
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SECTION A. DEFINITIONS, ACRONYMS, AND ABBREVIATIONS

Definitions, Acronyms, and Abbreviations

- **Able-Bodied Adult Without Dependents (ABAWD)** – An ABAWD is an Able-Bodied Adult between ages 18 and 49 who receive SNAP benefits without child/ren in the FNS household and does not meet any other exemptions. Local DSS staff determines if a person is deemed an ABAWD.
- **Adult Basic Education (ABE)**
- **Applicants** – Applicants refers to the organizations applying for FNS E&T funding in the RFA.
- **Code of Federal Regulations (CFR)**
- **Community Based Organization (CBO)**
- **Community College (CC)**
- **Component** – Specific allowable services offered for the FNS E&T program
- **Contractor** – The person or company that undertakes a contract to provide materials or labor to perform a service or do a job.
- **Employment & Training (E&T)**
- **English as a Second Language (ESL)**
- **Federal Fiscal Year (FFY)** - The Federal Fiscal Year runs from October 1 through September 30.
- **Food and Nutrition Act of 2008 (The Act)**
- **Food and Nutrition Services benefits (FNS)** - North Carolina DHHS DSS SNAP benefits.
- **Full Time Equivalent (FTE)**
- **General Education Diploma (GED)**
- **Local County - Department of Social Services (DSS)**
- **Office of Management and Budget (OMB)**
- **Recipients** – Recipients refers to people who are currently receiving SNAP benefits under North Carolina’s Food & Nutrition Services program.
- **Supplemental Nutrition Assistance Program (SNAP)** - Food nutrition benefits; Previously known as the food stamp program.

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- **Temporary Assistance for Needy Families (TANF, also known as Work First)**
- **United States Department of Agriculture, Food Nutrition Services (USDA FNS)** - Federal agency that administers the SNAP program.
- **Workforce Investment and Opportunity Act (WIOA)** - Includes job training services that are developed, managed, and administered by State agencies, local governments, and the business community. Activities include basic skills training (GED, literacy), occupational skills training, on-the-job training, work experience, job search assistance, and basic readjustment services.

SECTION B. INTRODUCTION

1. Introduction

In 1987, Congress established the Food Stamp Employment and Training (E&T) Program to assist able-bodied, food stamp recipients in obtaining employment. The food stamp program is now nationally known as the Supplemental Nutrition Assistance Program (SNAP). North Carolina's SNAP is known as Food and Nutrition Services (FNS).

The FNS E&T program helps FNS participants gain skills and find work that moves them forward to self-sufficiency. Through FNS E&T, FNS participants have access to training and support services to help them enter or advance in the workforce. These programs also help to reduce barriers to work by providing support services – such as transportation and childcare – as participants prepare for and obtain employment. Each state is required to operate a FNS E&T program and receives federal funding annually to operate and administer the program.

2. Purpose

The North Carolina Department of Health and Human Services (“NCDHHS” or “Department”) is soliciting applications for organizations to provide job-driven, skills-based training to eligible FNS recipients that leads to gainful employment.

3. Background

The FNS E&T program is part of the national SNAP program, administered by the United States Department of Agriculture (USDA) FNS. NCDHHS is the state agency that oversees the FNS E&T Program and is responsible for implementing the policies. Local county departments of social services (DSS) conduct activities directly related to recipients. E&T partners are agencies that contract directly with the Department to operate any portion of the E&T program.

Program participation is not mandatory and is administered via community-based and community college partnerships that are developed on a voluntary basis. The fiscal portion of the partnerships are required to comply with the Code of Federal Regulations (CFR) Title 2 Part 200.

4. Funding Source, Award Amounts, and Grant Term

- Individual agencies may only submit ONE application.
- **Applicants must provide a 50% match using non-federal funds.** The Department will pass-through the 50% Federal reimbursement funds to the applicant on a cost-reimbursement basis. No up-front or advance payments will be provided.
- The grant cycle will be for one year beginning October 1, 2022 through September 30, 2023. Contract renewal will be required annually and will be based on the availability of funding, contractor performance and contractual compliance. No carry over of unexpended funds is allowed from one federal fiscal year to another.
- Applicants must comply with cost parity and non-supplanting of funding requirements in accordance with USDA guidelines. Federal funds must not be used to supplant non-federal funds being used for existing services and activities.
- **Indirect Costs:** Selected organizations may request up to 10% in indirect costs on the modified total direct costs (unless the applicant has a current federally negotiated indirect cost rate). The approved federally negotiated indirect cost rate letter must be submitted with the application. These costs are included as part of the total amount awarded.
- **Allowable costs:** Allowable costs must be necessary and reasonable to provide the services. For more information about allowable costs, please see the 2 CFR Part 200 Subpart E - Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (<https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-E>). A cost is reasonable if, in its nature and amount, it does not exceed that which a prudent person would pay under the circumstances prevailing at the time the decision was made to incur this cost. Necessary costs are incurred to carry out essential functions, cannot be avoided without adversely affecting program operation, and do not duplicate existing efforts. E&T funds may not be used for FNS eligibility determination, sanction activities, recipient wages, or meals eaten away from home.

If a service is offered at no cost to non-E&T recipients and it is not allocated to any other grant, an applicant cannot charge the E&T program for this service. For example, a YMCA center has a computer lab open to the public at no

charge. The YMCA does not cost allocate the operating expenses of this lab to any grant. If an FNS E&T recipient uses this computer lab, the YMCA cannot charge the E&T program because no one else is charged for lab use. The services provided by an E&T applicant are reimbursable if the cost of these services is allowable and consistently charged to the general public or to other grants.

SECTION C. APPLICATION REQUIREMENTS

1. **Applicant Eligibility Requirements**

- A County DSS agency that is interested in participating in the FNS E&T program must meet the following requirements: Provide a non-federal 50% match which includes funding for recipient expenses
- **Note:** All subcontractors must be approved by NCDHHS. Applicants who propose to subcontract services must describe the services to be provided by the subcontractor. Services performed by the contractor shall not be duplicative of services performed by the subcontractor.

2. **Scope of Work**

Annually, the FNS E&T Program is awarded an allotment of federal funds to administer the program. FNS E&T funds are used to assist FNS recipients aged 16 and older, with a desire to work, in finding employment and/or education and training opportunities that lead to sustainable employment. All non-exempt FNS recipients must register to work. These work requirements can be found at: <https://www.fns.usda.gov/snap/work-requirements>. The E&T Program must include at least one of the following specific services or components:

➤ ***Non-Education, Non-Work Components***

- **Supervised Job Search Training** – strives to enhance job readiness skills by providing instruction in job seeking techniques. It may consist of job skills assessments, job placement services, or other direct training or support activities. Other activities may include resume writing workshops and learning to use online job search tools.
- **Job Retention Services** – provide support services for up to 90 days to recipients who have secured employment. Only recipients who have received other employment/ training services under the E&T program are eligible for job retention services. Job retention reimbursements must be reasonable and necessary and can include clothing required for the job, equipment or tools required for a job, relocation expenses, transportation and child care.

➤ **Education Components**

- Basic Education and/or Foundational Skills Instruction (includes High School Equivalency programs)
- Career and/or Technical Education Programs or Other Vocational Training
- GED preparation
- English as a second language classes

➤ **Work Components**

- Self-Employment Programs – help teach recipients how to design and operate a small business or another self-employment venture.
- Pre-Apprenticeships, Apprenticeships, and/or Internship Programs
- Work Experience – involves actual work experience and/or on-the-job-training. Placements can be with private, for-profit companies, in contrast to the workfare component.
- Workforce Investment and Opportunity Act (WIOA) - includes job training services that are developed, managed, and administered by State agencies, local governments, and the business community under the WIOA. Activities include basic skills training (GED, literacy), occupational skills training, on-the-job training, work experience, job search assistance, and basic readjustment services.
- Note: Approved educational components must establish a direct link to job readiness. E&T funds can be used to pay for tuition and mandatory school fees charged to the general public. *E&T funds cannot be used to pay for State or local education entitlements.* Vocational Training courses can be included as part of the E&T education component. These training programs improve the employability of recipients by providing training in a skill or trade, thereby allowing the recipient to move directly and promptly into employment. Acceptable vocational training programs should have a direct link to the local job market. Vocational training, books, uniforms, and other expenses that are reasonable and necessary can be paid directly for participation in the vocational training component.

3. Programmatic Requirements:

Successful applicants will have the following expectations:

- a. **E&T ACTIVITIES.** The applicant must offer appropriate and allowable E&T activities or have the ability to create new activities for FNS E&T participants.
- b. **ASSESSMENT.** FNS recipients must be assessed prior to placement in an E&T component. Assessment should include an in-depth evaluation of employability skills coupled with counseling on how and where to search for employment. This assessment can be done by an E&T counselor, case manager, or an E&T service provider.
- c. **CHECK FOR FNS ELIGIBILITY.** E&T participants must be an FNS recipient to receive E&T services. DSS agency will work with their E&T partners to ensure participants received FNS benefits in the month of E&T participation.
- d. **CHECK FOR TEMPORARY ASSISTANCE FOR NEEDY FAMILIES (TANF) PARTICIPATION.** Before placement in a component, local DSS agencies will ensure that the E&T participant is not a TANF Employment (Work First Employment) recipient. E&T funds cannot be used to serve TANF Employment recipients.
- e. **PLACEMENT.** After screening and assessment, an E&T participant is placed in a component. Activity placements must be appropriate for the individual's skill level, experience, and career goals.
- f. **PARTICIPATION TRACKING.** E&T participation must be reported through the NCWorks Geosol system. The level of participation by the FNS recipient depends on the component, and satisfactory compliance is defined by the Department.
- g. **FAILURE TO COMPLY PROCEDURES.** Ensure that recipients do not receive sanctions or penalties for failure to comply with an E&T program.
- h. **RECIPIENT REIMBURSEMENTS.** E&T recipients must be reimbursed for reasonable and necessary expenses directly related to participation in the E&T component as provided in Appendix 1.

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- i. **SUPPORT SERVICES.** The applicant shall provide support services. Support services may include case management, early intervention, career counseling, recipient reimbursements, referrals to additional programs and services.
- j. **MONITORING PARTICIPATION.** The applicant must monitor the participation of FNS E&T clients in the NCWorks Geosol system. This is important for State agency reporting to FNS and for the State agency to evaluate performance measures.
- k. **FEDERAL GRANT REQUIREMENTS.** The applicant must have the ability to manage and track Federal grant funds and guarantee that the source of matching funds is non-Federal and allowable.
- l. **COST ALLOCATION.** The applicant shall have the ability to allocate costs to between local, State and Federal grants. The applicant must provide a cost allocation plan and charge all grants consistently.
- m. **STAFF TIME.** The applicant shall have the capacity to track and invoice for staff time spent on the E&T program. The applicant must keep time records in order to bill for its staff.
- n. **RECORD RETENTION.** The applicant must have a records and retention policy and have the capacity to store records (digital storage is acceptable) for audits and reviews.
- o. **PERFORMANCE MEASURES.** E&T providers must meet 100% of their goals proposed and submitted in their application. Failure to meet these proposed goals may jeopardize continued funding. These goals (i.e., activities) must be reflected in the NCWorks Geosol system within three (3) business days of the activity start date.
- p. **CASE MANAGEMENT.** The USDA regulations require that all FNS E&T participants receive case management services which is defined as a set of services to guide and support E&T participants as they engage with an E&T program. Case management services can include, but are not limited to, comprehensive intake assessments, individualized service plans, progress monitoring, or coordination with service providers. All E&T participants must receive case management services and at least one (1) E&T component.

SECTION D. County E&T Program, Operations and Policy

Provide narratives in each of the areas below.

County E&T Program, Operations and Policy Overview	
Summary of the FNS E&T Program	
Program Changes for FFY2023	<i>Indicate “N/A” if your county has not previously operated an E&T Program.</i>
Workforce Development System	<i>Please describe your interaction with your local workforce development systems (e.g., WIOA, Wagner-Peyser, etc.). This includes any Workforce Development Boards your county may work with to administer your E&T Program.</i>
Other Employment Programs	<i>If applicable, please describe any other employment programs your county may work with to administer your E&T Program.</i>
Special Populations	<i>Please describe any specific populations your county intends to serve in its E&T Program. Some examples would be the homeless, veterans, justice involved populations, zero benefit households, etc.</i>
Screening and Referral Process	<i>Please describe the screening and referral process your county will use for both direct referrals and reverse referral requests.</i>
NCWorks Geosol process	<i>Please describe the role your county and your E&T partners will play in entering data into the NCWorks Geosol system.</i>

County E&T Program, Operations and Policy Overview	
Participant Reimbursements	<i>Please describe what reimbursements your county offers to FNS E&T recipients, if applicable</i>

Please complete the following E&T Component Table:

Activity Code	Activity Title	Description	Anticipated number of participants to be served during FFY 23
S01	E&T Orientation/ Pre-Enrollment Activities	Attendance in private or group program information session to individuals who have been referred to or who are inquiring about the program. Activities include making an explanation of the program and exploring with the individual the appropriateness of participation.	
S02	E&T Assessment	Activities to collect information about a client to evaluate the client's potential and suitability for FNS E&T participation. Activities include analyzing the client's work history, educational background, etc. and identifying barriers, strengths and supportive services needed.	
S03	E&T Case Management	Services provided to the individual exploring his current readiness or potential for employment and to assess the feasibility of seeking training or employment in relation to the total needs of the family. Activities also include follow-up counseling and services while the individual is eligible. This service must be provided in conjunction with another E&T component.	
S04	E&T Supportive Services	Payments, reimbursements, and services provided to individuals for reasonable, necessary, and approved expenses and fees required for participation. This service code may not be used for Job Retention services.	

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S05	E&T Job Search Training	Activities that strive to enhance job readiness skills by providing instruction in job seeking techniques and increasing motivation and self-confidence. Component may consist of job skills assessments, job finding clubs, job placement services, or other direct training or support activities.	
S06	E&T Work Experience	Work assignments with the goal of enabling participants to move to regular employment. Planned, structured learning experiences in the participant's chosen career path that occur in a workplace for a limited period of time and may be paid or unpaid.	
S07	E&T On-the-Job Training	Activities in which the participant is hired by a public or private employer, and while engaged in productive work, receives training that provides the knowledge and skills necessary to perform that job.	
S08	E&T Basic Education or Basic Skills Programs	Participation in education programs that improve basic skills and employability as well as establish a direct link to job readiness. Programs include, Adult Basic Education (ABE), Basic Literacy, English as a Second Language (ESL), high school equivalency (GED).	
S09	E&T Education Programs	Participation in post-secondary education programs that establishes a direct link to job readiness. Activities typically lead to the acquisition of a 2-year degree or similar.	
S10	E&T Vocational Training	Participation in vocational courses and programs that focus on teaching a specific trade that allows the participant to move directly and promptly into employment. This activity would include Human Resource Development, self-enrichment, or training with a direct link to job readiness.	
S11	E&T Certificate Programs	Participation in short-term training programs, typically offered by a degree area, that help participants develop and master knowledge and skills over a narrow subject area or topic.	
S12	E&T Testing	Interest and aptitude testing that evaluates the skills level or service needs of an individual. Also includes testing for third party credentialing or employment opportunities	
S13	E&T Self Employment Training	Activities that improve the employability of participants by providing training in setting up and operating a small business or other self-employment venture.	

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S14	E&T Pre-Apprenticeship	Activities that prepare individuals to enter and succeed in an Apprenticeship program. These activities promote a diverse and skilled workforce and prepare participants to meet the basic qualifications for entry into an apprenticeship.	
S15	E&T Apprenticeship	Activity that is an employer-driven and “learn-while-you-earn” program that combines on-the-job training, provided by an employer that hires the apprentice, with job-related instruction in curricula tied to the attainment of national skills standards.	
S16	E&T Job Retention	Supportive services provided for up to 90 days to participants who have secured employment. This component is meant to help achieve satisfactory performance, retain employment, or to increase earnings over time. This component must not be used in conjunction with any other service.	
S17	E&T Supervised Job Search	SJS occurs at State-approved locations and activities of participants shall be directly supervised and tracked. Supervision of SJS can be done remotely or in person, but by a skilled staff person and occur at least monthly. There must be a direct link to increasing employment opportunities	
S18	E&T Work Experience (Work Activity)	Work assignments with the goal of enabling participants to move to regular employment. Planned, structured learning experiences in the participant's chosen career path that occur in a workplace for a limited period of time and may be paid or unpaid.	

SECTION E. Partnerships

List each partner providing FNS E&T services. This list should include county agencies as well as third party providers. Indicate whether the partnership is secured by memorandum.

Name of Partner/Contract	Contract Type	Cost	Services provided
<i>Insert more rows as needed</i>			

Local Workforce Development Board

List all Local Workforce Development Board relationships and indicate whether the partnership is secured by memorandum.

Name of Local Workforce Development Board	MOU Yes/No
<i>Insert more rows as needed</i>	

SECTION F. Operating Budget

Instructions:

Complete the operating budget table, providing line-item detail and the program total. **If there are contracts, enter the total contract amount.** Cost categories outside of contracts apply only to the County FNS E&T agency expenses. Additional detail on contracts should be provided in the Contractor Detail Addendum.

	County cost	Federal cost	Total
I. Direct Costs:			
a) Salary/Wages			
b) Fringe Benefits* Approved Fringe Benefit Rate Used _____ %			
c) Contractual Costs			

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d) Non-capital Equipment and Supplies			
e) Materials			
f) Travel			
g) Building/Space			
h) Equipment & Other Capital Expenditures			
Total Direct Costs			
II. Indirect Costs:			
Indirect Costs*Approved Indirect Cost Rate Used: _____%			
Total Indirect Costs			
III. In-kind Contribution			
County in-kind contribution			
IV. Participant Reimbursement (County plus Federal):			
a) Dependent Care			
b) Transportation & Other Costs			
c) County Agency Cost for Dependent Care Services			
<u>V. Total Costs</u>			

Budget Narrative and Justification

Provide a budget narrative that explains and justifies each cost and clearly explains how the amount for each line item in operating budget was determined.

I. Direct Costs: Explain all direct costs to the program

- a) Salary/Wages**
- b) Fringe Benefits**
- c) Contractual Costs**
- d) Non-capital Equipment and Supplies**
- e) Materials**
- f) Travel & Staff Training**
- g) Building/Space**
- h) Equipment & Other Capital Expenditures**

II. Indirect Costs:

III. In-kind Contribution

IV. Participant Reimbursement (County plus 50 percent Federal match):

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Summary of Federal Fiscal Year Costs

Funding Category	Upcoming FY Budget
1. E&T Administrative Expenditures	
a. 50% Federal	
b. 50% County	
2. Participant Expenses:	
a. Transportation/Other	
50% Federal	
50% County	
b. Dependent Care	
50% Federal	
50% County	
3. Total E&T Program Costs (=1a+1b+2a+2b)	
4. Total Planned Federal FY Costs (Must agree with Part I-Table 5: Operating Budget	

SECTION G. Contractor's Signatures:

Each third-party entity your county partners with is required to sign off on this Plan. Add additional signature lines if needed.

Agency Name: _____

<Signature of Authorized Person>

Agency Director

Date _____

Agency Name: _____

<Signature of Authorized Person>

Agency Director

Date _____

Agency Name: _____

<Signature of Authorized Person>

Agency Director

Date _____