

COMMONWEALTH OF VIRGINIA



**SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM
EMPLOYMENT AND TRAINING**

**STATE PLAN OF OPERATIONS
FEDERAL FISCAL YEAR 2011**

PART I
SUMMARY OF VIRGINIA'S SUPPLEMENTAL NUTRITION
ASSISTANCE PROGRAM (SNAP)
EMPLOYMENT AND TRAINING (E&T)

A. Abstract of the State E&T Program

The Virginia SNAP Employment and Training (E&T) Program is an important part of the Commonwealth's coordinated workforce development system. The Workforce Investment Act (WIA) requires that the local Workforce Investment Board (WIB) and the chief local elected official develop and enter into a local memorandum of understanding (MOU) between the WIB and the local partner programs. The SNAP E&T Program is a state mandated partner; the social services and workforce development systems in the Commonwealth are dedicated to providing high quality workforce services to all SNAP participants in selected areas of the State. The Virginia Social Services System will continue helping unemployed individuals-including E&T participants-find meaningful employment. The services outlined in this state plan support this important objective. When approval is received, the Federal Fiscal Year (FFY) 2011 state plan will be placed with previous state plans on the Virginia Department of Social Services (VDSS) web site at: (<http://spark.dss.virginia.gov/divisions/bp/fs/plans.cqi>).

Virginia's E&T Program will provide the following services in select counties and cities to mandatory and voluntary participants: Job Search, Basic Employment Skills Training (Job Readiness), Community Work Experience, Vocational Training and Education including e-learning.

Virginia will continue the process of supplementing the existing E&T service infrastructure at local departments of social services (LDSS) through several agreements at the state and local levels. Online learning services for E&T participants will continue to be provided through a contract with NICCE, LLC. Educational services online include basic skills training, career readiness leading to a Career Readiness Certificate (CRC), and preparatory courses for the General Educational Development (GED) certificate, as well as information on demand occupations and non-traditional jobs for women. Online learning is a sub-part of the education component.

In addition, VDSS will continue its contract with the Virginia Department of Criminal Justice Services (VDCJS), a state agency, to collaborate with re-entry organizations receiving state funding through DCJS to offer employment and training services to ex-offenders who are E&T mandatory, as well as volunteers.

1. Program Changes

With the continuation of the suspension of the Able-Bodied Adults Without Dependents (ABAWD) work requirements through September 30, 2011, and the ongoing increase in Supplemental Nutrition Assistance Program (SNAP) participants, Virginia will continue to prioritize clients in the E&T program. The State is allowing each locality to determine priority of service, as they are more familiar with existing local circumstances. Each E&T locality includes its priority and its reason for the selection in its local plan submitted to the State.

Beginning October 1, 2008, Virginia began offering job retention services to E&T participants for a period not to exceed 90 days after employment. These services include: training and education needed to maintain and advance in employment (100 percent federal funds are used for these costs) and supportive services such as transportation (These costs are supported with 50 percent funds). With the popularity and success of the job retention services, Virginia will continue to offer them during the 2011 federal fiscal year.

The greatest need after employment comes in the days before the first paycheck. Often employees who were E&T recipients are unable to afford the cost of transportation and/or dependent care during this transition from unemployment to employment. Most will not receive help with these costs after the first several weeks of work, when a paycheck is received. Training and education may be advisable for a longer period of time (up to 90 days) to help the employee retain a job.

Beginning in March 2008, local E&T agencies began using the new automated reporting and case management system to capture participant information. This system is part of the Virginia Department of Social Services Employment Services Program Automated System (ESPAS) that is also used for the employment portion of the Temporary Assistance for Needy Families (TANF) Program. As of federal fiscal year (FFY) 2009, local reports and federally required quarterly reports have been produced in the Virginia Department of Social Services' Data Warehouse by using information available through ESPAS. Reports are available for local and state use including monthly individual agency reports, agency characteristic reports and federally required quarterly reports.

2. ABAWD Population

- a. Virginia's ABAWD population
As ABAWD numbers were not captured due to the waiver exempting them from the time-limit restrictions, state fiscal year (SFY) 2010 numbers are not available. The E&T program during state fiscal year 2010 was offered in 22 local departments of social services operating in 25 localities.¹
- b. Characteristics of the ABAWD population
Although Virginia currently has a statewide waiver to exempt from time-limited benefits all ABAWDs, this population continues to face severe barriers to employment including chronic substance abuse and mental illness. In addition, the lack of basic workplace skills and illiteracy play a major part in preventing employment. VDSS is using its partners at the Department of Behavioral Health and Developmental Services to address the former challenges. E&T staff, third party service providers and the use of on-line learning are addressing the latter barriers.
- c. ABAWDs in high surplus labor markets
Currently, Virginia has a waiver to exempt from time-limited benefits all ABAWDs in the state without regard to a scarcity of available jobs or a 10 percent or higher regional unemployment rate.

3. Additional Allocation for "Pledge" States

Virginia will not be a pledge state.

4. Program Components

The Virginia E&T Program will offer the following components:

- Job Search;
- Community Work Experience;
- Education, including e-learning;
- Vocational Training;
- Basic Employment Skills Training (Job Readiness); and
- E&T for Ex-offenders (can include several of the components listed above).

¹ Some local departments of social services serve more than one locality. As of SFY 2010, Virginia operates a full E&T program in a total of 22 local departments of social services covering 25 localities.

5. Sequencing of Components

Assignment of participants to components is based on individualized assessment and the development of an Individual Plan of Participation. The plan outlines the specific sequence of component activities to which the participant is assigned. Initial assignments may be any one or a combination of components.

The ultimate goal for all E&T participants is to gain employment and become self-sufficient. To reach this goal, it is necessary to accurately identify and overcome the myriad barriers that may be present. Virginia is committed to addressing these barriers so that E&T participants can obtain and maintain employment. The services offered will vary based on individual situations and needs.

The number of hours and choice of program components for individual participants will vary according not only to the employment needs of the individual, but the services available.

6. Other Employment Programs

Virginia's E&T Program is a formal partner in the state's workforce development system. The local departments of social services inform E&T participants of the full breadth of services provided by all service providers in the One-Stop System.

7. Workforce Development System

Virginia's E&T Program is part of the Commonwealth's Workforce Development System. Each local department of social services should enter into a MOU with the Workforce Investment Board and other mandated partners. Several of the local departments of social services act as comprehensive or satellite One-Stop Centers. The partners in the workforce system will continue to work together to offer financial and non-financial assistance to E&T participants. Services and relationships vary by community.

8. Outcome Data

Statistical data on the types of employment found is now being captured in our Data Warehouse System. The majority of employment obtained by E&T participants fall in the following categories:

- Food Service
- Sales, Retail and Other
- Computer Operations
- Secretarial
- Cashier/Teller

- Clerical/Receptionist
- Construction Laborer
- Public Safety/Security
- Housekeeping/Janitorial
- Driver/Delivery
- Teacher/Aide
- Nurse Aide/Companion
- Barbering/Cosmetology
- Building and Grounds/Maintenance
- Warehouse/Stock Clerk
- Child Care
- Mechanic/Machinery Repair
- Production Work/Assembly
- Electronics/Office Equipment Service and Repair

B. Component Summaries

The following component summaries describe the activities which will be offered at local E&T agencies. As ABAWD requirements have been waived, all participant data is combined.

1. Job Search

Description of component

Job Search participants are required to contact employers either via face-to-face interviews or by submission of applications or resumes. In order to count as an employer contact, the contact must be with an employer who ordinarily employs persons in areas of work for which the participant is reasonably qualified.

Type of component

Job Search will be a work component when offered through the Commonwealth's Workforce System operated under Title I of the Workforce Investment Act or Section 236 of the Trade Act. Job Search will be a non-work component when offered by other than those listed above.

Anticipated number of participants who will begin this component

It is estimated that 9,000 will enter Job Search.

Level of participant effort

Participants will spend up to 30 days in Job Search and be required to report on the number of job contacts made.

Targeted population

All E&T participants based on employability assessment and labor market conditions.

Organizational responsibilities

Job Search will be operated by the E&T agency, a service provider, or another One Stop Partner in the state's workforce system. The entity responsible will vary by community and by the individual needs of the participant. In all cases, progress and compliance will be reported to the local department of social services. Local agencies will be responsible for the imposition of sanctions for non-compliance.

Method for monitoring job contacts

Participants will be monitored by the component provider and will be required to submit a signed form listing job search contacts made. Local agencies will assume responsibility for program compliance.

Per participant cost of reimbursement

It is estimated that 8,000 participants will receive a maximum of \$25 per participant per month in transportation assistance for up to 1 month-8,000 x \$25 x 1 month = \$200,000. It is estimated that 170 participants will incur temporary child care costs of approximately \$250 (\$42,500). Total: \$242,500

Total cost of the component and cost per participant

An estimated \$2,235,797 (\$1,993,297 in administration and \$242,500 in reimbursements) will be expended on Job Search. The average cost per participant will be \$248.42.

2. Community Work ExperienceDescription of component

In this component, participants gain work experience and new job skills through unpaid work in a public or private non-profit agency. The primary focus of work experience is to help the participant develop good work habits, additional job skills, positive work attitudes and an understanding of the employee-employer relationship. Participants may be offered Community Work Experience opportunities if they are preparing to enter the workforce and it is determined that additional guidance is required to yield sufficient employment opportunities.

Type of component

Work component

Anticipated number who will begin this component

It is estimated that 250 will enter Community Work Experience.

Targeted population

The Community Work Experience component is designed to develop and reinforce good work habits and yield positive future job references. Assignment to this component will take into consideration the results of the

Individual Plan of Participation, prior training, experience, skills and employment goal(s) of the participant.

Level of participant effort

The number of hours a participant is required to participate in any one month is determined by dividing the household's SNAP allotment by the federal minimum wage, minus hours of participation in other work components. No participant will work more than 30 hours per week or eight hours in a given day without his/her consent. The employer will determine the length of the placement.

Organizational responsibilities

E&T service provider(s) will assume responsibility for ensuring that Community Work Experience opportunity development, participant assignment and monitoring are carried out within the guidelines established by the state. In all cases, local agencies will be responsible for the imposition of sanctions for non-compliance.

Per participant cost of reimbursement

It is estimated that 200 participants will receive \$25 per person per month in transportation assistance for an average of 6.0 months (200 x \$25 x 6 months = \$30,000). It is estimated that 40 participants will incur temporary child care costs of \$250 (\$10,000).

Total: \$40,000

Total cost of the component and cost per participant

An estimated \$101,843 (\$55,593 in administration, \$6,250 in Workers' Compensation premiums, and \$40,000 in reimbursements) will be expended on Community Work Experience. The average per participant cost will be approximately \$407.37.

3. Education

Description of component

E&T participants will be referred to education based on individual need and assessment. Web-based courses will be used in addition to traditional adult education.

Included are education-level assessment, GED, and pre-GED courses. All participants using web-based courses have access to personal mentors that guide their progress, answer questions, etc. VDSS has entered into a partnership agreement with NICCE, LLC, to offer an extensive web-based program including a component for individuals who read between the 3rd and 6th grade level.

Type of component

Non-work component

Type of education activities

Educational programs to which participants are assigned include, but are not limited to, Adult Basic Education, GED, Career Readiness Certificate (CRC) preparation, short-term vocational education, community college programs and post-secondary education. When appropriate, web-based education courses are utilized. Participant progress in web-based education are monitored and attested to by the web-based education service provider.

Anticipated number who will begin this component

It is estimated that 1,300 E&T participants will enter this component as several of the local providers will concentrate on the attainment of a GED and/or CRC for mandatory participants while the ABAWD time-limit is lifted.

Targeted population

E&T participants will be assigned to an educational component if educational deficits are a primary barrier to employment.

Level of participant effort

Participant effort will vary with the type of educational experience provided. Participation in education programs will be limited to the amount of time required to complete the curriculum scheduled in the Individual Plan of Participation. Component participants will spend a minimum of 20 hours per week in education unless combined with other components.

Organizational responsibilities

E&T service providers will offer or sub-contract courses. Progress will be monitored by the E&T service provider and the local agency E&T case manager. In all cases, local agencies will be responsible for the imposition of sanctions for non-compliance.

Link to employment

When it is determined that education is a primary barrier to employment, assignment to an educational component is appropriate. At the completion of this component, the participant may be assigned to individual job search to facilitate immediate job entry.

Per participant cost of reimbursement

Because of the availability of web-based education, transportation costs and temporary child care costs associated with this component are reduced.² It is estimated that 608 participants will receive \$25 per person per month in

² Those with transportation and child care barriers will be provided access to online education.

transportation assistance for an average of 4.0 months (608 x \$25 x 4 months = \$60,800). It is estimated that 40 participants will incur temporary child care costs of \$250 (\$10,000).

Total: \$70,800

Total cost of the component and cost per participant

An estimated \$482,053 (\$211,253 in administration, \$200,000 in contractual costs and \$70,800 in reimbursements) will be expended on Education. The average cost per participant will be approximately \$370.81.

4. Vocational Training

Description of component

Vocational training includes occupational assessment, customized training, institutional skills training, upgrade training, and vocational education. As available, some vocational education and training may be offered on-line.

Other components of this training will be evaluated and may include vocational training of participants to provide child care for other participants.

Type of component

Non-work component

Anticipated number who will begin this component

It is estimated that 700 will enter this component.

Level of participant effort

Participation effort will vary with the type of training provided. Most training will be three to six months in duration. Component participants will spend a minimum of 20 hours per week in vocational training unless combined with other components.

Targeted population

E&T participants will be considered for vocational training if it appears that training is needed in order to improve the participant's employability.

Organizational responsibilities

When it is necessary, the E&T service provider will refer a participant to vocational training. The vocational training provider may be a community college, Workforce Investment Board/One Stop contractor, Rehabilitative Services agency, or an on-line learning provider. Progress will be monitored by the E&T service provider and the local agency case manager. In all cases, local agencies will be responsible for the imposition of sanctions for non-compliance.

Per participant cost of reimbursement

It is estimated that 300 participants will receive \$25 per person per month in transportation assistance for an average of 5 months ($300 \times \$25 \times 5 \text{ months} = \$37,500$). An estimated 22 participants will incur temporary child care costs of \$250 (\$5,500).

Total: \$43,000

Total cost of the component and cost per participant

It is estimated that \$242,008 (\$128,208 in administration, \$70,800 in contractual services and \$43,000 in reimbursements) will be expended on vocational training. The average cost per participant will be \$345.73.

5. Basic Employment Skills Training (BEST)Description of component

Basic Employment Skills Training will include activities that may consist of job skill assessments, occupational exploration, training and counseling in personal preparation for employability, training and counseling in techniques for identifying and pursuing employment opportunities (including information on local emerging and demand occupations and job placement services).

Type of Component

Non-work component

Anticipated number who will begin this component

It is estimated that 1,800 will enter Basic Employment Skills Training.

Targeted population

Participants who do not have severe barriers to employment, but are not employment-ready, will be assigned to this component.

Level of participant effort

The number of hours of participation will be based on need.

Organizational responsibilities

E&T service providers will offer Basic Employment Skills Training. Progress will be monitored by the E&T service provider and the local agency case manager. In all cases, the local agency will assume the responsibility for the successful operation of the component and for imposition of sanctions for non-compliance.

Per participant cost of reimbursement

It is estimated that 656 participants will receive a maximum of \$25 per participant per month (up to three months) in transportation assistance ($656 \times \$25 \times 3 = \$49,200$). It is estimated that 42 participants will incur \$250 in temporary child care costs (\$10,500).

Total: \$59,700

Total cost of the component and cost per participant

An estimated \$301,335(\$191,635 in administration, \$50,000 in contractual services and \$59,700 in reimbursements) will be expended on Basic Employment Skills Training. The average cost per participant will be approximately \$167.41.

6. Education and Training for Ex-Offenders

Description of component

E&T for Ex-Offenders is offered in partnership with VDCJS through its re-entry program. This component will include activities that may consist of job skill assessments, occupational exploration, training and counseling in personal preparation for employability, training and counseling in techniques for identifying and pursuing employment opportunities (including information on local emerging and demand occupations and job placement services), as well as the sharing of costs for education and vocational training and supportive services. Match funding for this component comes from VDCJS and are state funds.

Type of Component

Non-work component

Anticipated number who will begin this component

It is estimated that 600 will enter this component.

Targeted population

Ex-offenders who are E&T mandatory and are not employment-ready will be assigned to this component where services are available.

Level of participant effort

The number of hours a participant is required to participate in any one month is based on need.

Organizational responsibilities

Service providers in Virginia's Re-entry Program will administer this component. Participant progress will be monitored by the service providers and the local case manager.

Per participant cost of reimbursement

It is estimated that 400 participants will receive a maximum of \$25 per participant per month (up to six months) in transportation assistance (400 x \$25 x 6 = \$60,000). It is estimated that 50 participants will incur \$250 in temporary child care costs (\$12,500).

Total: \$72,500

Total cost of the component and cost per participant

An estimated \$600,000 (\$527,500 in administration and \$72,500 in reimbursement) will be expended on ex-offenders in this component. The average cost per participant will be approximately \$1,000.

7. Job Retention

The costs associated with this new service will be primarily used for administration and supportive services. A total of \$60,978 is being projected to continue this service in FFY 2011. If training or education is indicated, this will come out of the existing training and education components. It is estimated that 400 will take advantage of this service.

Per participant cost of reimbursement

It is estimated that 300 participants will receive \$25 per person per month in transportation not to exceed 3 months (90 days) (300 x \$25 x 3 months = \$22,500). An estimated 26 participants will incur temporary child care costs of \$250 (\$6,500).

Total: \$29,000

Total cost of the component and cost per participant

It is estimated that \$68,478 (\$39,478 in administration and \$29,000 in reimbursements) will be expended on job retention. The average cost per participant will be \$171.20.

8. Other Activities

In order to best meet recipient and local social service department needs and promote creative program design, localities will be given authority to establish additional activities to those already specified in this plan. Such programs shall be described in local employment plans and shall conform with the federal requirement that they be designed to move individuals to self-sufficiency. Plans specifying such alternative activities will be available for USDA review. Virginia will report such activity information as required.

C. Geographic Coverage

Virginia operates the E&T Program in 25 localities served by 22 local departments of social services.

PART II PROGRAM PARTICIPATION AND EXEMPTIONS

A. Work Registrant Population

1. Number of Work Registrants

- a. Number of work registrants receiving SNAP expected to be in the state as of October 1, 2010:

160,759

- b. Anticipated number of new work registrants to be added between October 1, 2010 and September 30, 2011:

137,000

- c. Total number of work registrants in the state between October 1, 2010 and September 30, 2011:

297,759

2. Unduplicated Work Registration Count

The estimated number of work registrants is based on an unduplicated work registrant count provided from data input into the Application Benefit Delivery Project (ADAPT) by the eligibility worker when the client's mandatory status for E&T is determined.

3. Characteristics of Work Registrants

Data can be extracted from the system through the data warehouse initiative. Local agencies determine the characteristics of the work registrants in their respective localities in order to develop their local plan of operation. These plans are provided to the state each year.

B. Exemption Guidelines

1. Exemption Criteria Justification

- a. Categorical Exemptions – Geographic
Currently, Virginia has a waiver to exempt from the time-limit all ABAWDs in the State; those who would be ABAWDs without the waiver are required to participate in areas with E&T programs.

- b. Individual and Personal Exemptions
In accordance with federal regulations at 7 CFR II §§ 273.7 (b) (1) (ii), 273.7 (e) (2) and 273.24 (c) (2) (ii), Virginia exempts the following individuals:

Virginia does not exempt any categories of work registrants from participation in E&T, where available on a permanent basis; however there are temporary exemptions that are reassessed after the period of assignment is complete. These exemptions include: the unavailability of dependent care; the unavailability of transportation; second and third trimester pregnancies; medical problems that would make participation impractical; significant family issues; homelessness; and migrant or seasonal farm workers away from the home base following the work stream.

Temporarily exempted participants are re-evaluated as dictated by their temporary exemption and at any time the E&T case manager learns of changes in the participant's circumstances that led to the initial exemption.

- c. Number of Work Registrants Exempt from the E&T Program
See Table 1.
- d. Planned E&T Program Participation
See Table 2.
- e. ABAWD Information
See Tables 1 and 2.

PART III PROGRAM COORDINATION

A. Program Coordination

1. Narrative Coordination Statement

The linkage between the SNAP eligibility functions and the E&T functions is as follows:

At every application, reapplication, and recertification for SNAP, the eligibility unit/worker will screen each person to determine if (s) he is subject to the time limit and work registration provisions of federal regulations. (This process has been temporarily suspended until October 1, 2011 due to the statewide waiver in the ABAWD requirements.)

The E&T case manager or service provider will monitor the participant's compliance with the component requirements. Every attempt will be made

to facilitate participants' compliance. In the event of non-compliance, the E&T case manager will:

- Request an explanation of why the participant did not carry out the specific program requirement;
- Explain to the participant what must be done in order to comply with the program requirement and the date by which he/she has to respond;
- Provide the phone number and name of the E&T case manager to contact; and
- Explain the consequence of non-compliance.

Mandatory participants who fail to comply with work requirements have five working days from the date the request to comply is mailed to contact the E&T case manager or service provider. The participant, during this time period, can respond by providing evidence of good cause for not complying with the requirement or the participant can actually comply with the component assignment.

Should the participant not respond within the required time period, the beneficiary will lose SNAP Program eligibility. In such an event, the eligibility worker will send the client a Notice of Adverse Action (NOAA) in compliance with SNAP eligibility guidance.

In order to comply with the component requirement, the mandatory participant will be required to perform a verifiable act of compliance. Under ordinary circumstances, verbal commitment will not be sufficient unless the participant is prevented from complying by circumstances beyond the participant's control.

2. Information Coordination

At the state and local levels, eligibility and E&T Program staff work together in a number of ways to attempt to improve coordination and information flow. Examples of these cooperative efforts include:

a. State level

- Joint meetings are held to develop guidelines and procedures and to resolve issues;
- Guidelines and procedures are exchanged while in draft form to allow comments and revisions;

- Forms are jointly designed; and
- Information releases to locality staff are made jointly when possible.

b. Local level

- Joint meetings are held to familiarize staff with the guidelines of their counterparts, to resolve specific guidance issues, and to facilitate coordination within the agency;
- Local staff participate in joint training; and
- Partner agencies report client activity to local departments of social services including any instance when a client is not meeting their work requirement.

3. Coordination Time Frames

The eligibility worker will notify the E&T case manager or service provider of a participant's work registration within five days of approval of an application/reapplication or recertification for SNAP benefits.

The E&T case manager or service provider will conduct screening for barriers to employability and assess employment and training needs within 30 calendar days of receipt of notification of the participant's referral to E&T.

When the E&T case manager or service provider determines that non-compliance has occurred, a Notice of Sanction is sent to the registrant. The non-compliant individual has five working days to contact the E&T case manager or service provider to provide evidence of good cause for not complying or to actually comply. If evidence of good cause is not shown, the E&T case manager or service provider will notify the eligibility worker within two days of the end of the good cause period. The eligibility worker will issue the NOAA within ten days of the receipt of the notification from the E&T case manager or service provider of the individual's failure to comply without good cause. The eligibility worker will notify the E&T case manager or service provider when the NOAA has been sent. The individual may comply at anytime, including after the NOAA is sent. Compliance occurs when the individual performs a verifiable act of compliance. Verbal commitment will not be sufficient unless the participant is prevented from complying by circumstances beyond the participant's control. If the individual complies, the E&T case manager or service provider will notify the eligibility worker within five working days of the date of compliance.

B. Interagency Coordination

Interagency coordination occurs at the state and local levels. All E&T service providers coordinate their operations with the employment services component of the TANF Program. In addition, local operations have linkages with WIBs, One-Stop Centers, Rehabilitative Services and other agencies or programs, as appropriate. The methods of coordination are dependent upon the needs of the participant and the services available in the localities, including, but not limited to interagency agreements, memorandums of understanding and contracts for provisions of services.

(See Table 3, Summary of Interagency Coordination)

C. Contractual Arrangements

The VDSS and local agencies will enter into contractual partnerships with organizations that provide workforce services. Procurement of services will conform to existing state and local procurement laws and regulations.

All local agency contracts are available for review by the Department of Social Services upon request. VDSS will maintain information on the following:

- Name and location of the contractor;
- Amount of the contract;
- The contract management approach that will be followed;
- The basis for charging for contractual services;
- Number of persons expected to be placed through the contract;
- Whether the contract was competitively awarded or procured via sole source; and
- Method of monitoring contract and results of monitoring.

PART IV PROGRAM COSTS AND FINANCIAL MANAGEMENT

A. Planned Costs of the State E&T Program

1. Operating Budget

For FFY 2011, a total state administration expenditure of \$4,031,514 is projected. See Table 4.

2. Sources of E&T Funds

See Table 5.

3. Justification of Education Costs

Virginia does not supplant state education costs from the state to the federal government. The state E&T guidelines state that program funds to support educational activities will only be used when such services cannot be secured within the community at no cost. The costs attributable to the educational component are mainly those associated with E&T staff time involved in referring participants to educational programs in the community and tracking their progress in these programs.

B. Contracts

The Virginia Department of Social Services does not at this time have contractual partnerships with non-profit employment services providers. However, VDSS does have Memorandums of Understanding with NICCE, LLC, a small, woman-owned for-profit company, and VDCJS to offer services to E&T participants. NICCE is providing e-learning through its Adult Career Education (VAace) project. VDCJS, through its re-entry program, is offering all aspects of services to ex-offenders who are mandatory E&T participants. The service providers will be responsible for all component content, while the local departments of social services will provide local oversight and case management services.

(See Part III. C., Contractual Agreements, for additional information)

C. Participant Reimbursement

In the Virginia E&T Program, localities and their contractual partners are responsible for assessing the participant's need for child care, arranging for the provision of child care and reimbursement of the child care provider. The type of child care provided for participants will usually fall into one of the three following types: in-home child care, family child care or child care center. The in-home child care involves utilizing a provider who is responsible for the supervision and care of a child in the child's own home. The family child care involves the use of a person who is responsible for the supervision or care of children in the provider's home. A child care center is a facility operated for the purpose of providing care, protection and guidance to a group of children separated from their parents during a part of the day.

In Virginia's system, the localities pay the child care provider for services provided. The service worker will negotiate, in advance, with the provider and parents the type of service to be provided and the rate of payment. Costs are based on \$250.00 in temporary child care costs per participant needing the service, as funds are limited.

The referral process to the child care service provider operates as follows. The participant chooses a child care provider from an approved list made available by the service worker. If the participant chooses a provider who is not on the list, the service worker will help the provider to obtain state and/or local approval. The parents and provider then sign a Child Care Information and Agreement form which details the type of child care arrangement agreed upon. The service worker is responsible for tracking the children's participation in the child care center.

As with child care, the local agency is responsible for verifying the need for other dependent care and for paying the dependent care provider. Unlike child care, the participant is responsible for all arrangements, though the agency can provide assistance if needed.

1. Method of Reimbursement

For transportation, service providers are paid directly or participants are provided with vouchers for transportation assistance. Participants are not required to incur out-of-pocket transportation expenses. For child care, reimbursement for actual expenses, up to the market rate, will be made to the service provider, not the participant.

2. Procedure for Reimbursement

The E&T Program pays the child care provider for actual expenses incurred up to the market rate. Other non-child care providers of dependent care are reimbursed for actual expenses. Under the current system, the localities send a purchase order for services to the dependent care provider that specifies the name of the dependent, rate of pay and period of time for which the dependent care provider will be paid. The dependent care provider then submits an invoice at least monthly that specifies the amount of dependent care service provided. The locality then reviews the invoice to determine if it is accurate, meets the specifications of the purchase order and does not exceed the market rate.

For transportation, service providers are paid directly or participants are provided with vouchers for transportation assistance. The average reimbursement is \$25.00 per month per participant in need. Participants are not required to incur out-of-pocket transportation expenses. For child care, reimbursement for actual expenses, up to the market rate, will be made to the service provider, not the participant. Expenditures for both transportation and child care are reported by the local agency to the Locality Automated System for Expenditure Reimbursement (LASER), a system that tracks local agency expenditures and provides reimbursements to the local agency.

D. Cost Allocation

At the local level, the time spent on E&T is captured using the Random Moment Sampling process and administrative costs are charged accordingly. Many localities have a dedicated E&T case manager or service provider who is not administering other programs. SNAP, including E&T, are included in the state's cost allocation plan. The cost allocation plan is submitted to and approved by the United States Department of Health and Human Services, our federal cognizant agency.

PART V PROGRAM REPORTING AND MANAGEMENT INFORMATION

A. Method for Obtaining Initial Count of Work Registrants

An initial count of work registrants will include work registrants on-board as of October 1 and those added through October 31 as required by federal regulations. An automated report showing the numbers of work registrants on-board as of October 1 is produced, as previously noted, using the ADAPT system. An automated report is generated to count those added between October 1 and October 31 and each month thereafter.

B. Method for Ensuring an Unduplicated Work Registrant Count

In all agencies, the cases are "flagged" on October 1 so that even if those persons register again during the fiscal year, they will not be counted as new work registrants more than once. Notation is made in the case record at the time a person first becomes a new registrant for a program year. At the end of any subsequent registration, the person's earlier status is noted and the person is then counted separately as an E&T re-entrant. These persons are not included in the counts relating to new work registrants or E&T participants.

C. Methods for Meeting On-Going Federal Reporting Requirements

1. Management Information System (MIS) Method

- a. Type of MIS
SNAP application and eligibility data is maintained in ADAPT. E&T case data is now part of the automated system (ESPAS) that is used to capture information on the Virginia Initiative for Employment not Welfare (VIEW), the employment part of TANF. The new system is now available for case management and reporting for the E&T Program. All required program reports (monthly and quarterly) have been produced using this system beginning with the 2008 4th quarter.

Local financial reporting continues to be automated through LASER.

b. Local reporting requirements

- (i) Non-financial:
- (a) E&T participants newly registered;
 - (b) Work registrants by temporary exemption category;
 - (c) E&T participants who volunteer for and commence participation in an approved component, broken out by type of component begun;
 - (d) E&T mandatory participants who actually commence a component;
 - (e) The number of persons sent a NOAA for failure to comply with E&T requirements; and
 - (f) The number of ABAWDs entering a qualifying component will be distinguished from non-ABAWDs. (ABAWD requirement waived until October 2011.)

The information obtained from the monthly reports produced in the Data Warehouse and from other data available in the Data Warehouse is used to complete the FNS-583.

- (ii) Financial:
- (a) Local agencies are required to maintain financial reports on total local expenditures and submit reimbursement requests for total expenditures by category;
 - (b) Participant reimbursement will be reported for each client with the federal, state and local shares of the costs identified. State office staff will monitor total E&T expenditures on a monthly basis; and
 - (c) Cost information for ABAWDs and non-ABAWDs will be distinguished separately as appropriate. (ABAWD requirements waived until October 2011.)

The Division of Finance completes the FNS-269 report utilizing expenditure data from LASER.

2. Organizational Responsibility for E&T Reporting

Non-Financial

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Financial

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TABLE 1**ESTIMATED PARTICIPANT LEVELS FOR FISCAL YEAR 2011**

A.	Anticipated number of work registrants in Virginia during the fiscal year.	
		297,759
B.	Planned exemption categories and the number of work registrants expected to be included in each:	
	1. Persons 17 years of age and younger or 50 years of age and older;	
		694
	2. Individuals who, at the time of evaluation, are medically certified as unfit for regular employment, as determined by VDSS;	
		29,681
	3. Individuals who reside in a household with a minor child;	
		192,096
	4. Pregnant women;	
		8,097
	5. Individuals who reside in an exempt locality.	
		29,648
	TOTAL EXEMPTIONS	260,216
C.	Percent of all work registrants exempt from E&T	87%
D.	Number of E&T mandatory participants	37,543
E.	Anticipated number of ABAWDs in Virginia during the fiscal year (waived until October 2011)	0
F.	Anticipated number of ABAWDs residing in waived areas of Virginia during the fiscal year (waived)	0
G.	Anticipated number of <i>case-month exemptions</i> under the State's 15% exemption allowance during the fiscal year	0
H.	Number of at-risk ABAWDS expected in Virginia (waived)	0

TABLE 2

**ESTIMATED E&T PLACEMENTS
FISCAL YEAR 2011**

Total number of applicants and recipients VDSS expects to participate in a component each month during the fiscal year.

1,202**ESTIMATED INDIVIDUAL PARTICIPATION
FISCAL YEAR 2011**

Unduplicated Number of individuals expected to participate in the E&T Program during the fiscal year:

11,973

TABLE 3**SUMMARY OF INTERAGENCY COORDINATION FOR THE E&T PROGRAM IN FISCAL YEAR 2011**

Areas of Coordination	Agencies Involved	Number of E&T Placements Expected	Methods of Coordination
1. Delivers an E&T component:	E&T service provider(s) Local Dept. of Social Services; Community Colleges; Virginia Tech; DCJS; Non-Profits	13,950	Contractual (MOA and MOU)
2. The E&T Program delivers a service for another agency or program:	N/A		
3. Joint component of the E&T Program and another agency or program: 600	Refugee Resettlement Organizations Through VDSS Newcomer Services (MOU)		
4. Referral of individuals from the E&T Program to another program or agency:	VA Dept. of Rehabilitative Services VA Employment Commission	2, 000	Referral (MOU)
5. Other forms of coordination	N/A		

TABLE 4**OPERATING BUDGET – FISCAL YEAR 2011**

Components	State Agency Costs			Participant Reimbursement (State plus Federal)		State Agency Cost for Dependent Care Services	Total
	Salary & Benefits	Other Costs	Contractual Costs	Dependent Care	Transportation		
Job Search	\$1,993,297.00			\$42,500.00	\$200,000.00		\$2,235,797.00
Community Work Experience	\$55,593.00	\$6,250*		\$10,000.00	\$30,000.00		\$101,843.00
Education	\$211,253.00		\$200,000.00	\$10,000.00	\$60,800.00		\$482,053.00
Vocational Training	\$128,208.00		\$70,800.00	\$5,500.00	\$37,500.00		\$242,008.00
Basic Employment Skills Training	\$191,635.00		\$50,000.00	10,500.00	\$49,200.00		\$301,335.00
E&T for Ex-Offenders	N/A		\$527,500.00	\$12,500.00	\$60,000.00		\$600,000.00
Job Retention Services	\$39,478.00			\$6,500.00	\$22,500.00		\$68,478.00
Total Component Costs							\$4,031,514.00
Total State E&T Costs							\$4,031,514.00

* Cost of Workers' Compensation Insurance (\$50 per participant)

TABLE 5**PLANNED FISCAL YEAR COSTS OF THE STATE E&T PROGRAM BY CATEGORY OF FUNDING****FISCAL YEAR 2011**

Funding Category	Approved FY 2011 Budget	Fiscal Year 2011
1. 100 Percent Federal E&T Grant		\$2,138,642.00
2. Share of \$20 Million ABAWD Grant		
3. Additional E&T Administrative Expenditures		\$1,335,372.00
50% Federal		\$667,686.00
50% State		\$667,686.00
4. Participant Expenses:		
a. Transportation/Other		460,000.00
50% Federal		230,000.00
50% State		230,000.00
b. Dependent Care		97,500.00
50% Federal		48,750.00
50% State		48,750.00
5. Total E&T Program Costs		\$4,031,514.00
6. 100% State Agency Cost for Dependent Care		-----
7. Total Planned Fiscal Year Costs (Must agree with Table 4—Operating Budget)		\$4,031,514.00

