

SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM - EMPLOYMENT AND TRAINING

LOUISIANA DEPARTMENT OF CHILDREN AND
FAMILY SERVICES

PERFORMANCE AUDIT SERVICES

Issued April 5, 2023

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April 5, 2023

The Honorable Patrick Page Cortez,
President of the Senate
The Honorable Clay Schexnayder,
Speaker of the House of Representatives

Dear Senator Cortez and Representative Schexnayder:

This report provides the results of our audit of the Supplemental Nutrition Assistance Program's Employment and Training (SNAP E&T) program. The purpose of this audit was to analyze participation, costs, and the Department of Children and Family Services' (DCFS) administration of the program.

We found that DCFS has increased the number of SNAP E&T providers that offer voluntary services from four in federal fiscal year (FFY) 2018 to 29 in FFY 2022. As a result, the number of parishes with in-person providers of voluntary SNAP E&T services increased from 12 to 42. However, not all SNAP recipients had in-person access to these E&T services. We found that 22 of Louisiana's 64 parishes with 155,698 adult SNAP recipients did not have in-person SNAP E&T services available.

In addition, we found that the number of SNAP E&T participants decreased 93.0% from 19,628 in FFY 2018 to 1,370 in FFY 2022 because the program became voluntary in October 2020. However, the number of voluntary participants increased 181.9% from 486 to 1,370 over the same timeframe. SNAP E&T expenditures also increased from \$1.8 million in FFY 2018 to \$8.3 million in FFY 2022, in part because of an increase in the number of providers and, according to DCFS, because of federal requirements that case management be provided.

As of FFY 2021, SNAP E&T consisted of five components in Louisiana. The most commonly offered and provided component was job search training. While supportive services such as transportation and childcare are important to the success of SNAP E&T participants, we found that more than half of the participants did not receive such services through the program. For example, only five participants received childcare assistance, and only one participant received temporary housing assistance in FFY 2021, despite more than half of SNAP E&T providers indicating these are common challenges to serving participants.

We found as well that federal performance outcome measures reported by DCFS show mixed results during FFYs 2018 through 2021. For example, median

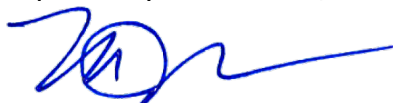
quarterly wages after program completion increased from \$3,225 in FFY 2018 to \$3,614 in FFY 2021, but the percentage of participants completing program components decreased from 70.0% to 40.8% over this same time. In addition, while the purpose of SNAP E&T is to increase SNAP recipient's ability to obtain regular employment with the goal of becoming financially self-sufficient, neither FNS nor DCFS have developed specific targets for what defines "success" in the program.

Additionally, we found that costs to serve participants varied greatly by provider and that some participants exceeded the amount of services they could receive or received duplicative services from multiple providers. Specifically, we found that 25 (33.8%) of 74 participants who received job retention services received them for longer than allowed, which is prohibited by federal law. We also identified 21 instances where nine participants received the same component during the same month from different providers.

The report contains our findings, conclusions, and recommendations. I hope this report will benefit you in your legislative decision-making process.

We would like to express our appreciation to DCFS for its assistance during this audit.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Mike Waguespack", with a stylized flourish extending to the right.

Michael J. "Mike" Waguespack, CPA
Legislative Auditor

MJW/aa

Louisiana Legislative Auditor

Michael J. "Mike" Waguespack, CPA



SNAP Employment and Training Louisiana Department of Children and Family Services

April 2023

Audit Control # 40220017

Introduction

We conducted this audit in response to House Resolution 248 of the 2022 Regular Legislative Session,¹ which requested the Louisiana Legislative Auditor's office to conduct an audit of the Supplemental Nutrition Assistance Program (SNAP), inclusive of the SNAP Employment and Training (SNAP E&T) program. This report focuses on the SNAP E&T program, while two previously-published reports focused on the administration of SNAP in general² and the impact of the COVID-19 pandemic on SNAP.³ The Food and Nutrition Act established SNAP to provide nutrition support for low-income individuals and families and also requires states to provide employment and training services to eligible SNAP recipients. According to the United States Department of Agriculture's Food and Nutrition Services (FNS), effective SNAP E&T programs promote access, remove barriers, and effectively support all participants to ensure they gain the skills and credentials needed to succeed at new and better jobs.

The **purpose** of the SNAP E&T program is to help SNAP recipients gain skills, training, work, or experience to increase their ability to obtain regular employment, with the ultimate **goal** of becoming financially self-sufficient

Administration. SNAP is administered at the federal level by FNS and at the state level by the Department of Children and Family Services (DCFS). States are given flexibility when designing their SNAP E&T program to determine what activities and services to provide, who can provide and receive services, and where services can be provided, as long as certain federal requirements are met. DCFS contracts with community-based organizations and technical colleges to provide SNAP E&T services to voluntary participants. DCFS also contracts with United Way and the Louisiana Community and Technical College System (LCTCS) as intermediaries to support DCFS by helping increase SNAP E&T capacity and support programs. FNS states that some benefits of intermediaries include supporting program expansion by expediting the process of securing SNAP E&T providers and providing access to providers that have limited administrative capacity but

¹ <https://legis.la.gov/legis/ViewDocument.aspx?d=1288158>

² [https://app.la.state.la.us/publicreports.nsf/0/81a8cf9a2ac671bb86258965005b5181/\\$file/00000d26a.pdf?openelement&.7773098](https://app.la.state.la.us/publicreports.nsf/0/81a8cf9a2ac671bb86258965005b5181/$file/00000d26a.pdf?openelement&.7773098)

³ [https://app.la.state.la.us/publicreports.nsf/0/6784aab11b4a18338625897f00658190/\\$file/000010c3a.pdf?openelement&.7773098](https://app.la.state.la.us/publicreports.nsf/0/6784aab11b4a18338625897f00658190/$file/000010c3a.pdf?openelement&.7773098)

connections to SNAP E&T populations and communities. As of October 2020, DCFS only operates a voluntary participation SNAP E&T program and no longer requires mandatory participation for all SNAP recipients with work requirements.⁴

SNAP E&T Funding and Expenditures. FNS provides Louisiana with SNAP E&T funding in two ways: (1) employment and training grants that cover 100% of SNAP E&T administrative and direct program expenses and require no state matching, and (2) reimbursement for 50% of SNAP E&T administrative costs as well as direct program expenses and supportive services costs paid by E&T providers.⁵ SNAP E&T expenditures increased 361.5%, from \$1,796,204 in federal fiscal year (FFY) 2018 to \$8,289,154 in FFY 2022 and totaled \$29,421,261 over these years. Funding increased during this time period because DCFS expanded providers and services. See Exhibit 1 for more detail about how these funds can be spent.

Exhibit 1	
SNAP E&T Program Funding Types and Allowable Costs	
E&T Program Grant (100%) Funds	50% Reimbursement (50-50) Funds
<ul style="list-style-type: none"> • Formula-based grants to states to plan, implement, and operate SNAP E&T services • All states receive 100% funds. Some states do not spend their full allocations; FNS may reallocate remaining dollars to other states 	<ul style="list-style-type: none"> • States may request reimbursement grants (50 cents per dollar allocated) for program costs exceeding those covered by 100% funds or provider and participant expenses • Funds eligible for reimbursement can include state or local funds <u>OR</u> non-federal funds put up by "third-party" providers contracted by states to offer E&T services
What Funds Can Pay For	
<ul style="list-style-type: none"> • Administrative expenses, including state staffing and overall planning, implementation, operations, and partner provider administrative expenses • Direct program expenses (<i>other than participant expenses</i>), including tuition and fees, case management/career navigation, and job development 	<ul style="list-style-type: none"> • Administrative expenses and direct program expenses • Participant expenses that are reasonably necessary and directly related to program participation (supportive services), including: transportation, dependent care, equipment and supplies related to training, books, uniforms, and licensing fees
Source: Prepared by the legislative auditor's staff using information from FNS.	

⁴ In 2016, the Governor issued JBE 2016-12, an executive order that required DCFS to contract with the Louisiana Workforce Commission (LWC) to provide services to Able-bodied Adults without Dependents (ABAWDs). However, in February 2020, the Governor issued another executive order, JBE 2020-5, that rescinded the previous order. In October 2020, LWC's contract with DCFS and requirements for mandatory SNAP E&T participation ended.

⁵ FNS allocates \$20 million annually to distribute between state agencies that pledge to serve all ABAWDs at risk of losing their SNAP benefits for failure to meet a work requirement. However, states like Louisiana with a statewide ABAWD waiver, which limits ABAWDs to receiving benefits for only three months in a 36-month period unless they meet the work requirement, cannot pledge because there are no at-risk ABAWDs.

Participants. As a condition of SNAP eligibility, recipients who are work registrants must comply with the SNAP general work requirement unless they meet federal requirements for exemption.⁶ Work requirements may include registering for work at the time of application and every 12 months after; participating in an E&T program; providing information on employment status; reporting to an employer; accepting employment offers; and not voluntarily quitting a job without good cause. Since October 2020, Louisiana does not require work registrants to participate in SNAP E&T to meet work requirements. However, SNAP recipients may volunteer to participate in SNAP E&T programs.

SNAP E&T offers a way for SNAP recipients to meet work requirements stipulated in federal law through SNAP E&T programs that may assist participants in job searches, job skills training, education, and work experience, and provide supportive services like transportation and childcare to help reduce barriers to employment and training.

Providers. To become a SNAP E&T provider, an entity applies to DCFS. DCFS reviews the application to determine if the entity provides allowable SNAP E&T activities (e.g., case management and supportive services), is currently serving or is able to recruit SNAP recipients for the E&T program, has the organizational capacity to serve participants, and is able to maintain acceptable documentation of SNAP E&T related-costs subject to reimbursement. DCFS also verifies other general business information. The entity then drafts a statement of work, budget and related documents, and completes a non-federal funding form⁷ for DCFS approval.

Services. SNAP E&T is a package of services that includes case management, employment and training activities, and supportive services, such as transportation and childcare. All states are required to implement a SNAP E&T program that consists of at least one employment and training component and case management. However, each state has the flexibility to determine which employment and training components and activities⁸ to offer eligible participants. Louisiana's SNAP E&T programs offer case management services, including a comprehensive assessment and individualized employment plan, and one or more service components. During FFY 2022, DCFS allowed providers to offer the following SNAP E&T components: basic/foundational skills instruction, career/technical education programs or other vocational training, work readiness training, job retention, job search training, internships, on-the-job training, pre-apprenticeship/apprenticeship, and transitional jobs.

⁶ An individual may be exempt from work requirements if they are younger than 16; older than 60; already working at least 30 hours a week; meeting work requirements for the Temporary Assistance for Needy Families (TANF) work program, Strategies to Empower People (STEP); taking care of a child under age six or an incapacitated person; unable to work due to a physical or mental limitation; participating regularly in an alcohol or drug treatment program; or ages 18 to 59 studying in school or training program at least half time.

⁷ The non-federal funding form is used to determine whether the entity has a non-federal funding source(s) to cover costs associated with the SNAP E&T program while waiting for reimbursement.

⁸ An E&T component is a broad category of employment and training activities defined in federal law, while activities are specific types of employment or training offerings that compose a component.

The objective of this audit was:

To analyze participation, costs, and DCFS administration of the SNAP E&T program.

Our results are discussed in detail throughout the remainder of the report. Appendix A contains DCFS' response, and Appendix B contains our scope and methodology. Appendix C contains information about FFY 2022 providers, including the population and parishes served and a description of their SNAP E&T programs. Appendix D shows the number of participants served by provider by component in FFY 2021. Appendix E shows annual performance outcome measures for FFYs 2018 through 2021, and Appendix F shows the cost per participant by provider for FFY 2021.

Objective: To analyze participation, costs, and DCFS administration of the SNAP E&T program.

Overall, we found the following:

- **DCFS has increased the number of SNAP E&T providers of voluntary services from four in FFY 2018 to 29 in FFY 2022, resulting in the number of parishes with in-person providers of voluntary SNAP E&T services increasing from 12 to 42. However, not all SNAP recipients have in-person access to the program, as 22 (34.4%) of 64 parishes with 155,698 adult SNAP recipients do not have in-person SNAP E&T services available to them.⁹ In addition, most SNAP E&T providers specialize in serving certain populations, such as a certain age group, which further limits who can receive SNAP E&T services.**
- **The number of total SNAP E&T participants decreased 93.0%, from 19,628 in FFY 2018 to 1,370 in FFY 2022 because the program became voluntary in October 2020. However, the number of voluntary SNAP E&T participants increased 181.9%, from 486 to 1,370 over the same timeframe. SNAP E&T expenditures increased from \$1.8 million in FFY 2018 to \$8.3 million in FFY 2022, in part due to an increase in the number of providers and, according to DCFS, because of federal requirements that case management services be provided.** The 100% federal funds used to pay for administrative costs¹⁰ related to the planning, implementation, and operation of the program totaled at least \$10.3 million during this five-year timeframe. This funding was used for state agency administration of the program, marketing, computer system upgrades, and administrative costs for third-party providers.
- **As of FFY 2021, SNAP E&T consisted of five components in Louisiana, and the most commonly offered and provided component was job search training. While supportive services such as transportation and childcare are important to the success of SNAP E&T participants, more than half of participants did not receive supportive services through the SNAP E&T program.** For example, only five participants received

⁹ There are three virtual providers which offer services statewide. One provides web-based vocational and apprenticeship training in heating, ventilation, and air conditioning (HVAC), medical coding & billing, and the solar industry, while the second offers a computer software technology program. The third provides referral services in healthcare, manufacturing, automotive, and information technology.

¹⁰ This amount reflects all 100% funding for administrative costs from FFYs 2018 through 2020, including funds received by both DCFS and LWC, while DCFS and SNAP E&T providers received 100% funding for FFYs 2021 and 2022.

childcare assistance, and only one participant received temporary housing assistance in FFY 2021 despite more than half of SNAP E&T providers indicating these are common challenges to serving participants.

- **Federal performance outcome measures reported by DCFS show mixed results during FFYs 2018 through 2021. For example, median quarterly wages after program completion increased from \$3,225 in FFY 2018 to \$3,614 in FFY 2021, but the percentage of participants completing components decreased from 70.0% to 40.8% over this same time. DCFS could better evaluate the effectiveness of components and providers by requiring performance outcome measures and targets in contracts and evaluating whether providers achieve those targets.** While the purpose of SNAP E&T is to increase SNAP recipient's ability to obtain regular employment with the goal of becoming financially self-sufficient, neither FNS nor DCFS have developed specific targets for what defines "success" in the program. In addition, 18 (60.0%) of 30 providers we reviewed for FFYs 2021 and 2022 did not have performance outcome measures even though DCFS policy requires that contracts contain specific, objective, and quantifiable measures.
- **While DCFS performs federally-required monitoring of the SNAP E&T program, it could enhance its oversight and identify potential instances of non-compliance by analyzing service and expenditure data on a routine basis. We found that costs to serve participants varied greatly by provider and that some participants exceeded the amount of services they could receive or received duplicative services from multiple providers.** The average cost per participant for the SNAP E&T program was \$4,559 in FFY 2021, ranging by provider from \$225 to \$35,664. In addition, we found that 25 (33.8%) of 74 participants who received job retention services received them for longer than allowed, which is prohibited by federal law.¹¹ We also identified 21 instances where nine participants received the same component during the same month from different providers.

Our findings and recommendations are discussed in more detail in the sections below.

¹¹ 7 United States Code (U.S.C.) 2015

DCFS has increased the number of SNAP E&T providers of voluntary services from four in FFY 2018 to 29 in FFY 2022, resulting in the number of parishes with in-person providers of voluntary SNAP E&T services increasing from 12 to 42. However, not all SNAP recipients have in-person access to the program, as 22 (34.4%) of 64 parishes with 155,698 adult SNAP recipients do not have in-person SNAP E&T services available to them. In addition, most providers specialize in serving certain populations, which further limits who can receive SNAP E&T services.

According to FNS, effective SNAP E&T programs promote access, remove barriers, and effectively support all SNAP E&T participants to ensure they gain the skills and credentials needed to succeed at new and better jobs. DCFS stated that it is conducting various activities to increase access to SNAP E&T services, including continuing to identify potential providers and expand program availability.

DCFS has increased the number of SNAP E&T providers of voluntary services from four in FFY 2018 to 29 in FFY 2022, resulting in the number of parishes served by in-person SNAP E&T providers with physical locations increasing from 12 to 42. However, not all SNAP recipients have access to the program because 22 (34.4%) of 64 parishes do not have SNAP E&T services available to them,¹² and 155,698¹³ (33.0%) of 471,659 adult SNAP recipients resided in these parishes as of September 2022.

While all SNAP E&T providers have a main location, some providers have satellite offices to better serve participants in rural areas. Although some SNAP E&T providers may also serve surrounding or nearby parishes, most providers are concentrated in Orleans Parish (16 office locations) and East Baton Rouge Parish (4 office locations). While these two parishes have the highest number of adult SNAP recipients in the state, other parishes with large adult SNAP populations such as Caddo (29,681), Lafayette (21,746), and Rapides (15,058) do not have access to in-person SNAP E&T services. This means SNAP recipients in these parishes have to seek out other employment and training programs¹⁴ for these types of services. Exhibit 2 shows the locations of provider offices and parishes SNAP E&T services were available in FFY 2022, while Appendix C shows for each provider the population and parishes served in FFY 2022,¹⁵ as well as a description of the programs each offers.

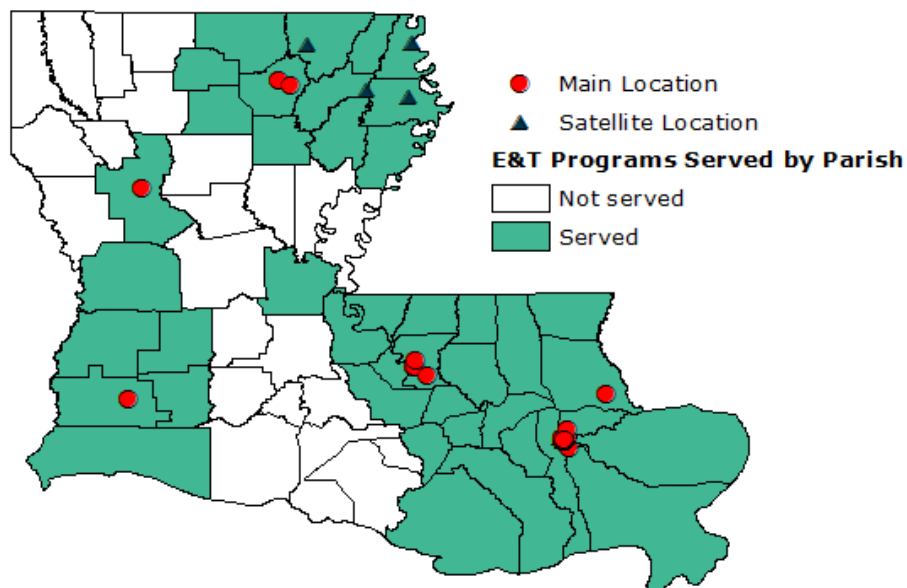
¹² According to DCFS, three providers offer statewide services because they are virtually-based, and participants require internet to access services.

¹³ The number of adult SNAP recipients without access to SNAP E&T services is actually higher, because eight providers limit services to youth, typically between the ages of 16 to 24.

¹⁴ For example, services offered through Local Workforce Development Boards as part of the Workforce Investment and Opportunity Act (WIOA).

¹⁵ The federal fiscal year runs from October through September.

Exhibit 2
SNAP E&T Provider Locations* and Parishes Served
FFY 2022



* This does not include the three providers offering virtual services, which are available statewide to a limited number of participants.

Source: Prepared by the legislative auditor's office using information from DCFS.

In an effort to make SNAP E&T services more accessible statewide, DCFS has started contracting with providers to offer participants virtual training services. For example, in FFY 2022 DCFS contracted with three virtual service providers. This allows SNAP recipients throughout the state, including those parishes where physical providers do not provide services, to access SNAP E&T services. However, receiving these services requires access to internet and certain equipment (e.g., a computer), which may create a barrier for service access. According to DCFS, some of these providers have used funding sources other than SNAP E&T to provide computers to participants.

SNAP E&T providers specialize in serving certain populations, such as youth and homeless individuals, meaning not all SNAP recipients in the parishes where these providers operate have access to services. For example, six (37.5%) of the 16 providers in Orleans Parish only serve youth participants, typically between ages 16 to 24. In the northeastern part of the state, both providers in Ouachita Parish serve individuals ages 18 and older; however, neither provider in this part of the state serves participants ages 16 and 17. According to DCFS, it conducts outreach to increase access for populations and parishes that do not have a SNAP E&T provider. DCFS stated that it is currently holding informational sessions in underserved regions of the state, collaborating with federal partners to develop relationships with recognized Indian Tribal Organizations, and collaborating with LCTCS to increase the number of its colleges

participating as providers. Also, an FNS-commissioned best practices study¹⁶ stated that FNS expects states to collaborate with other programs, such as Workforce Investment and Opportunity Act (WIOA) programs administered by the Louisiana Workforce Commission (LWC), to fully meet the employment and training needs of SNAP recipients. DCFS stated that it is developing a partnership with LWC to accomplish this goal.

Recommendation 1: DCFS should continue to identify additional ways to increase access to SNAP E&T services across the state.

Summary of Management's Response: DCFS agreed with this recommendation and stated that it continuously strives to increase access to various SNAP E&T services across the state and to expand them in underserved areas. See Appendix A for DCFS' full response.

The number of total SNAP E&T participants decreased 93.0%, from 19,628 in FFY 2018 to 1,370 in FFY 2022 because the program became voluntary in October 2020. However, the number of voluntary SNAP E&T participants increased 181.9%, from 486 to 1,370 over the same timeframe. SNAP E&T expenditures increased from \$1.8 million in FFY 2018 to \$8.3 million in FFY 2022, in part due to an increase in the number of providers and, according to DCFS, because of federal requirements that case management services be provided.

SNAP E&T had both mandatory and voluntary programs until October 2020 when mandatory requirements ended. According to a 2018 Government Accountability Office (GAO) report,¹⁷ states that change from a mandatory to a voluntary program generally experience a decline in participation, and voluntary programs are often smaller overall than mandatory programs. FNS suggests that state agencies focusing on voluntary participants instead of mandatory participants may save administrative time because eligibility workers spend less time determining non-compliance, issuing notices, and re-scheduling missed appointments with clients, allowing more time and resources to be dedicated to participants who choose to obtain these services. SNAP E&T services are funded through a combination of federal funding to cover administrative and other services expenses and funding obtained¹⁸ by SNAP E&T providers to pay for costs not reimbursed by federal funding.

¹⁶ <https://www.fns.usda.gov/snap/best-practices-et-program-2016-2020>

¹⁷ <https://www.gao.gov/products/gao-19-56>

¹⁸ For example, through self-generated revenue, private donations, charitable foundations, etc.

The number of SNAP E&T participants decreased 93.0%, from 19,628 participants in FFY 2018 to 1,370 in FFY 2022 because the program changed from mandatory to voluntary. However, the number of voluntary SNAP E&T participants increased 181.9%, from 486 to 1,370 over the same timeframe. In addition, SNAP E&T only provided services to 0.29% of adult SNAP recipients and 1.2% of SNAP work registrants in FFY 2022. According to FNS, some states may have low participation in SNAP E&T, in part, because most SNAP recipients are exempt from work requirements and because SNAP recipients may participate in other activities¹⁹ to comply with work requirements. DCFS stated that the voluntary SNAP E&T program allows it to focus on those participants who choose to participate instead of being forced to participate, so outcomes are typically better. The number of voluntary SNAP E&T participants has increased 181.9%, from 486 in FFY 2019 to 1,370 in FFY 2022. DCFS data shows that only 1,370 (0.29%) of 467,192 adult SNAP recipients were enrolled in SNAP E&T in FFY 2022, which represents only 1.2% of 114,912 work registrants in FFY 2022. An FNS review of DCFS' SNAP E&T program finalized in November 2022 found issues with SNAP recipients not being advised of SNAP E&T opportunities and SNAP E&T providers not knowing what to do if participants are not a good fit for their program. Addressing these issues could help to increase the number of SNAP E&T participants. Exhibit 3 shows the number of adult SNAP recipients and work registrants, as well as SNAP E&T participants by category and overall for FFYs 2018 through 2022.

Exhibit 3					
SNAP Adult Recipients, Work Registrants, and E&T Participants					
FFYs 2018 through 2022					
FFY	Number of Adult* SNAP Recipients**	Number of Work Registrants**	Number of Mandatory E&T Participants	Number of Voluntary E&T Participants	Total Number of E&T Participants
2018	464,512	119,847	19,142	486	19,628
2019	440,372	112,294	20,657	572	21,229
2020	427,083	62,848	5,100	863	5,963
2021	513,620	117,603		1,226	1,226
2022	467,192	114,912		1,370	1,370
*Adult recipients include any individuals age 18 and older receiving SNAP benefits, although some recipients may be eligible for SNAP E&T beginning at age 16.					
**As of October each year.					
Source: Prepared by the legislative auditor's staff using information provided by DCFS.					

During FFYs 2018 through 2022, \$29,421,261 in federal funding was spent by the SNAP E&T program, increasing 361.5%, from \$1,796,204 in FFY 2018 to \$8,289,154 in FFY 2022, in part due to an increase in the number of providers. According to DCFS, federal requirements that case management services be provided also contributed to increased

¹⁹ For example, working at least 30 hours a week or enrolling in another work program.

expenditures. While the total number of SNAP E&T participants decreased, expenditures for SNAP E&T increased due to the increase in the number of voluntary providers. The 100% federal funds used to pay for administrative costs²⁰ related to the planning, implementation, and operation of the program totaled at least \$10.3 million during this five-year timeframe. This funding was used for state agency administration of the program, marketing, computer system upgrades, and administrative costs for third-party providers. For example, DCFS spent approximately \$2.3 million in FFY 2021 for expenses related to the implementation of its SNAP Works system, which is a management information system designed and implemented specifically for the DCFS SNAP E&T program.

SNAP Works allows providers to submit both reimbursement requests and performance measure information through one system and, according to DCFS, is supposed to reduce the manual processing of this information by DCFS staff. In addition, some 100% funds above the \$10.3 million were given to third-party providers for certain direct program expenses as allowed by program rules. The amount of 50% federal funds spent totaled approximately \$19.1 million during FFYs 2018 through 2022. These funds were used to reimburse providers for the cost of services delivered to SNAP E&T participants, including salaries, benefits, administration, and supportive services. SNAP E&T providers used other, non-federal funding sources to pay for the other half of these expenses.

Recommendation 2: DCFS should continue to identify additional ways to conduct outreach to SNAP recipients to increase those receiving SNAP E&T services.

Summary of Management's Response: DCFS agreed with this recommendation and stated that it continuously works to identify additional ways to conduct outreach to SNAP recipients to increase those receiving SNAP E&T services. As of January 2023, DCFS stated that it implemented a new screening and referral process requiring each work registrant to be screened at application and recertification to determine if they can be referred to the SNAP E&T program. See Appendix A for DCFS' full response.

As of FFY 2021, SNAP E&T consisted of five components in Louisiana, and the most commonly offered and provided component was job search training. While supportive services such as transportation and childcare are important to the success of SNAP E&T participants, more than half of participants did not receive supportive services through the SNAP E&T program.

²⁰ This amount reflects all 100% funding for administrative costs from FFYs 2018 through 2020, including funds received by both DCFS and LWC, while DCFS and SNAP E&T providers received 100% funding for FFYs 2021 and 2022.

All states are required to implement a SNAP E&T program that consists of at least one employment and training service component and case management. However, each state has the flexibility to determine which employment and training components and activities to offer eligible participants. According to an FNS-commissioned best-practices study, achieving the right balance or mix of components requires careful consideration, including recognizing that no single service approach is right for all individuals because each individual faces their own unique strengths and barriers to employment. FNS also recommended consideration of local economic contexts when determining which services to provide. For example, what may work well in a rural community may not be ideal for an urban area. Louisiana's SNAP E&T program offers case management services, including a comprehensive assessment and individualized employment plan, and one or more components.

The most commonly offered and provided SNAP E&T component during FFY 2021²¹ was job search training, which was offered by 15 (88.2%) of 17 providers and received by 610 (49.9%) of 1,223 participants. According to FNS, the SNAP E&T program is designed to allow states the flexibility to determine what employment and training services to offer. SNAP E&T best practices²² encourage states to consider service delivery in the geographic context and based on the population served. For example, some rural areas may have less growth in labor industries, and participants in these areas may face additional challenges with access to transportation, internet, and child care. Research has also found that certain services have more impact for specific subgroups of participants such as individuals with lower education levels, less work experience, and justice-system involvement. Specifically, subsidized employment programs and self-employment training noted stronger gains for individuals with more barriers to employment. In addition, certain SNAP E&T programs and providers focus on serving specific groups, like individuals who are English language learners or those who are facing housing insecurity. Exhibit 4 shows a description of each component and activities offered as part of it, the number and percentage of participants served who received each component, and the number and percentage of providers offering that component during FFY 2021, while Appendix D shows the number of participants served by each provider by component during FFY 2021.

²¹ FFY 2021 was the latest available data at the time of our analysis. Starting in FFY 2022, SNAP E&T work experience components in Louisiana were renamed by FNS from work experience to specific components for transitional jobs, internships, on-the-job training, and pre-apprenticeship/apprenticeship.

²² <https://www.fns.usda.gov/snap/best-practices-et-program-2016-2020>

Exhibit 4
SNAP E&T Service Components
Number of Participants and Providers
FFY 2021

Component	Description	Activities	Number Served	% Served	Number of Providers	% of Providers
Job Search Training	Enhance job search skills of participants by providing training in job-seeking techniques, motivation, and self-confidence	Employability assessments, resume writing, job placement services, instruction and support related to seeking employment, workplace etiquette workshops, and career planning	610	49.9%	15	88.2%
Career and Technical Education Programs or Other Vocational Training	Provide individuals with the academic and technical knowledge and skills necessary to prepare for further education and careers in current or emerging employment sectors	Programs that are employer-driven and lead to industry-recognized certificates or credentials	356	29.1%	14	82.4%
Work Experience	Improve the employability of participants through planned, structured learning experiences in a workplace for a limited period of time	Work activities in exchange for SNAP benefits and work-based learning, including: internships, on-the-job training, pre-apprenticeship/apprenticeship, and transitional jobs	127	10.4%	11	64.7%
Basic/Foundational Skills Instruction	Academic instruction and education services below the postsecondary level that increase an individual's ability to perform math, read, write, and speak in English, or other activities needed for the attainment of: a secondary school diploma or recognized equivalent; transition to postsecondary education and training; and employment	Adult Basic Education (ABE), basic literacy, and high school equivalency (GED, HiSET)	181	14.8%	9	52.9%
Job Retention	Assist participants in achieving satisfactory performance, retaining employment, and increasing earnings over time	Case management, job coaching, dependent care assistance, and transportation assistance	74	6.1%	9	52.9%
Total			1,223		17	

*The total of each column does not equal the sum of each respective column because participants may participate in, and providers may offer, more than one component.

Source: Prepared by the legislative auditor's staff using information from DCFS.

Although supportive services such as transportation and childcare are important to the success of SNAP E&T participants, in FFY 2021, more than half of participants did not receive supportive services using E&T funding, and providers only spent \$133,875 (13.0%) of \$1,027,726 budgeted for supportive services. FNS, DCFS, and

stakeholders state that supportive services are a

key element to remove barriers to engagement, retain participants, and achieve successful outcomes. For example, a lack of child care may make it difficult for low-income parents to remain in education and training programs without additional supports. However, more than half of participants did not receive these additional supports through the SNAP E&T program. DCFS stated that participants may instead receive supportive services through other funding mechanisms. Activity reports submitted to DCFS by providers show that only 528 (43.2%) of 1,223²³ participants received supportive services during FFY 2021.²⁴ The most common supportive service was assistance with tuition or program fees, which was provided to 301 (24.6%) participants. While 241 (19.7%) of 1,223 SNAP E&T participants received transportation services, only five (0.4%) received child care, and one (0.1%) received temporary housing assistance. Exhibit 5 shows for FFY 2021 the number and percentage of participants who received each type of supportive service, the number of supportive services provided, and the cost of those services.

The most common challenges to serving SNAP E&T participants, according to the 24 SNAP E&T providers who responded to our survey were:

1. Transportation - 75.0% (18)
2. Housing - 62.5% (15)
3. Child care - 58.3% (14)

Exhibit 5 Unique People Receiving Supportive Services and Number and Cost of Supportive Services FFY 2021				
Category	Number	Percentage of 1,223 Receiving Each Supportive Service	Supportive Services Provided	Cost of Services
Childcare	5	0.4%	5	\$2,706
Temporary Housing Assistance	1	0.1	1	0
Other	38	3.1	40	888
Training	301	24.6	687	117,175
Transportation	241	19.7	500	3,938
Work & Training Tools	223	18.2	470	9,168
Total	528*	43.2%*	1,703	\$133,875
* This is the unique number and unique percentage of participants receiving services. Source: Prepared by legislative auditor's staff using quarterly provider activity reports and individual provider expenditures from DCFS.				

According to DCFS, SNAP E&T providers are required to screen for barriers to participation and offer supportive services to all SNAP E&T participants. However,

²³ While DCFS reports state the unique number of participants for FFY 2021 was 1,226, our analysis of the data removed duplicates and found the number of unique participants was 1,223.

²⁴ We analyzed FFY 2021 instead of FFY 2022 because detailed FFY 2022 participant data was not available at the time of our analysis.

some providers stated that they do not provide supportive services or have a cap on spending. Although DCFS stated that a higher percentage of participants likely received supportive services than those shown on the activity reports, as some providers utilize resources available through other programs or organizations to provide participants supportive services, any services not charged to SNAP E&T were not included in the activity reports. As a result, DCFS cannot use the data available through FFY 2022 to determine how many participants received supportive services overall or by provider. However, according to DCFS, implementation of the SNAP Works system includes new requirements for providers to report supportive services participants received through any funding source beginning in FFY 2023, so DCFS will be able to perform analyses moving forward to ensure that providers are complying with federal requirements for supportive services and determine whether the supportive services provided are sufficient to meet participant needs.

Recommendation 3: DCFS should work with providers to identify SNAP recipients who could benefit from SNAP E&T services and ensure they receive support necessary to receive those services.

Summary of Management's Response: DCFS agreed with this recommendation and stated that it requires all SNAP E&T providers to screen for barriers to participation and offer supportive services to all SNAP E&T participants using a standard comprehensive assessment. In addition, DCFS stated that some SNAP E&T providers utilize other available resources to provide supportive services so the costs are not charged to SNAP E&T. DCFS further stated that it is now requiring providers to track supportive services provided to clients in SNAP Works. See Appendix A for DCFS' full response.

Recommendation 4: DCFS should establish policies to periodically analyze data from the SNAP Works system to assess the sufficiency of supportive services provided to participants.

Summary of Management's Response: DCFS agreed with this recommendation and stated that it will develop policy around analyzing data regarding the sufficiency of supportive services. See Appendix A for DCFS' full response.

Federal performance outcome measures reported by DCFS show mixed results during FFYs 2018 through 2021. For example, median quarterly wages after program completion increased from \$3,225 in FFY 2018 to \$3,614 in FFY 2021, but the percentage of participants completing components decreased from 70.0% to 40.8% over this same time. DCFS could better evaluate the effectiveness of components and providers by requiring performance outcome measures and targets in contracts and evaluating whether providers achieve those targets.

Federal law mandates that states report to FNS on their SNAP E&T programs through the Annual Outcome Report and the quarterly FNS-583 report. FNS guidance recommends that states examine the data in these reports, along with the annual SNAP E&T State Plan, to assess whether outcomes align with one another or signal that program changes should be made for the subsequent fiscal year. Information included in these reports are shown in Exhibit 6.

The **purpose** of SNAP E&T is to increase a participant's ability to obtain regular employment, with the ultimate **goal** of reducing a participant's reliance on SNAP and making them financially self-sufficient.

Exhibit 6	
Measures Reported on Annual Outcome Report and FNS 583 Report	
Annual Outcome Report	Quarterly FNS 583 Report*
<ul style="list-style-type: none"> Participant characteristics (e.g. education, gender, age) Number of participants who received certain components Participants obtaining unsubsidized employment in the 2nd and 4th quarters after completing the SNAP E&T program Participants completing an educational, training, work experience, or on-the-job training component Median quarterly wages in 2nd quarter after completion of participation in E&T 	<ul style="list-style-type: none"> Number of work registrants Number of applicants and recipients participating in qualifying components Number of individuals who participated in each SNAP E&T component
<p>* The number of ABAWD applicants and recipients subject to time limits participating in the program is another measure reported on this report, but this does not currently apply in Louisiana because of the statewide ABAWD waiver in place.</p> <p>Source: Prepared by legislative auditor's staff using information from FNS and DCFS.</p>	

Federal performance outcome measures reported by DCFS show mixed results over our scope. For example, the median quarterly wages after program completion increased, but the percentage of participants completing components²⁵ decreased. During FFYs 2018 through 2021, an

²⁵ This measure only includes participants enrolled in an educational, training, work experience, or on-the-job training component who completed that component. It does not include all participants who received any component, such as those with only job search training.

average of 52.3% of participants completed components, and an average of 44.4% obtained unsubsidized employment.²⁶ In addition, the median quarterly wage two quarters after program completion was lower than the SNAP income eligibility threshold for a single-person household during all years analyzed. The percentage of participants completing SNAP E&T educational, training, work experience, or on-the-job training components decreased from 70.0% in FFY 2018 to 40.8% in FFY 2021. According to DCFS, this is in part due to impacts of the COVID-19 pandemic. However, for those individuals who completed the SNAP E&T program, the percentage obtaining unsubsidized employment²⁷ increased from 45.0% in FFY 2018 to 59.0% in FFY 2021, and median quarterly wages²⁸ earned by these participants two quarters after program completion increased from \$3,225 in FFY 2018 to \$3,614 in FFY 2021. This means that while a lower percentage of participants were completing certain SNAP E&T components, those who did were obtaining employment at a higher rate and were earning higher wages. Appendix E details performance outcome measures for FFYs 2018 through 2021.

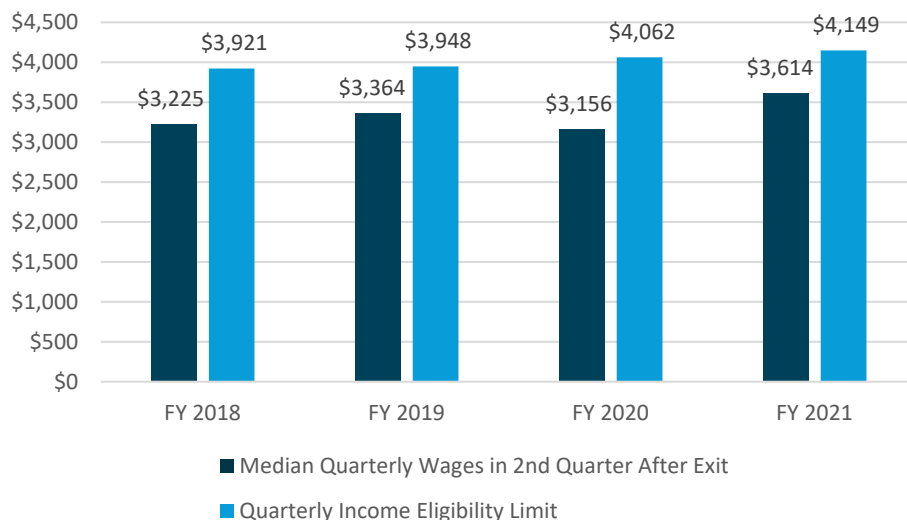
Even though median quarterly wages earned by participants after program completion increased throughout our scope, the wages do not exceed income eligibility limits for SNAP. For example, the annual gross income limit for a single-person household to receive SNAP benefits for FFY 2021 was \$16,596, or \$4,149 per quarter. Based on the FFY 2021 Annual Outcome Report from DCFS to FNS for SNAP E&T participants, the median quarterly wages earned two quarters after program completion were \$3,614, which projects to \$14,456 annually. This means that the SNAP E&T program is meeting part of its purpose by increasing a participant's ability to obtain regular employment; however, since the median quarterly wages earned do not exceed SNAP eligibility thresholds, it does not appear to be meeting its goal of reducing reliance on SNAP and financial self-sufficiency for a majority of participants. See Exhibit 7 for a comparison of median quarterly wages in the second quarter after program completion versus the SNAP income eligibility limit for a single person household during FFYs 2018 through 2021.

²⁶ Unsubsidized employment in the second quarter after completion of participation in SNAP E&T. Unsubsidized employment in the fourth quarter after completion of participation in SNAP E&T was lower at 39.3%.

²⁷ In the second quarter after completion of participation in SNAP E&T.

²⁸ Median quarterly wages are calculated based only on those participants who received wages.

Exhibit 7
Median Quarterly Wages after Program Completion and
SNAP Income Eligibility Limit*
FFYs 2018 through 2021



*Gross income eligibility limit for a single person household.

Source: Prepared by the legislative auditor's staff using information from FNS and DCFS.

DCFS could establish statewide targets to better measure the performance of the SNAP E&T program. The purpose of SNAP E&T is to help SNAP recipients obtain skills, training, work, or experience to increase their ability to obtain regular employment, with the goal of becoming financially self-sufficient. However, DCFS has not established targets for the SNAP E&T program's required federal performance outcome measures to set and track achievement of these goals, such as a certain percentage of participants to complete components, a certain percentage of participants to obtain unsubsidized employment, or a certain median quarterly wage obtained by participants who complete the program. By contrast, LWC works with the United States Department of Labor to establish targets on an annual basis for its WIOA employment and training programs, such as 67.0% of adult participants employed in the second quarter after completion and median wages of \$6,000 for those participants. Although FNS does not require states to set these targets, establishing program expectations would provide a consistent goal for all providers as well as a clear way to measure provider and overall program success.

DCFS does not ensure that SNAP E&T providers have specific performance outcome measures and targets in their contracts, as required by policy. We found that 18 (60.0%) of 30 SNAP E&T providers did not have targets in their contracts during FFYs 2021 and 2022. For those providers that do have them, DCFS does not conduct analyses to determine whether providers achieve those targets. According to DCFS' contract monitoring policy, contracts should contain specific, objective, and quantifiable

performance measures by which the contract can be evaluated and should relate to the desired outcomes for the contracted purpose. Further, DCFS' SNAP E&T Provider Guide states that provider contracts must include goals that are "carefully planned, clear, and trackable" and have a section for performance measures. We found that although some providers do include this information, not all providers have clear performance outcome measures. For example, one provider lists an outcome it will strive to achieve as 70.0% of individuals earning a national certification or other related industry-based certification valued by local employers, while a second provider states that 66.0% of enrolled participants will increase their job earning potential by attaining at least one industry-based credential. For the 18 providers that did not have performance outcome measures and targets like these, they typically include in the statement of work included in their contract that they will track certain information such as the names of participants and when they start or complete the program and provide it to DCFS upon request. Since providers set their own performance outcome measures, DCFS cannot use the measures to compare the performance of different providers, and the level of effort required to achieve the targets may vary.

DCFS policy also states that contracts should be evaluated periodically to determine whether there is a continuing need for these services, or whether a particular contract should be terminated. While DCFS conducts management evaluation reviews²⁹ on an annual basis for all SNAP E&T providers, these reviews do not analyze whether providers have performance outcome measures in their contracts or whether targets are being met. According to DCFS, it does not perform any other analyses of these performance outcome measures or targets to determine if they are met. Working with providers to set targets and periodically analyzing whether they are met would help DCFS to evaluate whether providers are performing as expected and identify best practices and opportunities for improvement.

Recommendation 5: DCFS should establish targets for performance measures it reports for the statewide SNAP E&T program to determine whether the SNAP E&T program is effective at meeting its purpose and goal.

Recommendation 6: DCFS should ensure that each provider contract has performance measures and targets.

Recommendation 7: DCFS should establish a process to evaluate the statewide SNAP E&T program and individual providers to determine whether targets are met.

Summary of Management's Response: DCFS agreed with these recommendations and stated that it will use its recently implemented Performance Outcome Measures Report to determine if contract services

²⁹ According to FNS, management evaluations reviews should (1) assess compliance with Federal law, regulations, and policy; (2) provide technical assistance; (3) determine corrective actions; and (4) identify best practices.

were delivered as projected, if there is a continuing need for partnership with the provider, if budget reduction is warranted, and to establish a baseline for provider service performance. DCFS stated that it will be able to use this report to compare provider performance from year to year. DCFS further stated that it is requiring a section in FFY 2024 provider contracts for uniform performance indicators and clear program targets that are consistent across all providers and has developed a data dashboard where participant data and provider performance can be tracked in real time to determine progress towards identified goals and performance targets. See Appendix A for DCFS' full response.

While DCFS performs federally-required monitoring of the SNAP E&T program, it could enhance its oversight and identify potential instances of non-compliance by analyzing service and expenditure data on a routine basis. We found that costs to serve participants varied greatly by provider and that some participants exceeded the amount of services they could receive or received duplicative services from multiple providers.

DCFS has several responsibilities related to developing and managing the SNAP E&T program, including (1) ensuring providers are providing high-quality services and fulfilling all applicable requirements for the program and services, and (2) conducting management evaluations of providers to ensure they are complying with program requirements and using funds appropriately. Providers track services provided to participants in monthly and quarterly tracking spreadsheets and submit them to DCFS. In FFY 2021, DCFS began the implementation of a new data collection and tracking system for the SNAP E&T program known as SNAP Works. As of FFY 2023, DCFS required all SNAP E&T providers to use SNAP Works for items such as case management, tracking participation, and reimbursement requests. According to DCFS, SNAP Works allows it to better track the efficacy of providers, including budgeting and participation in specific program components.

While DCFS conducted all federally-required annual management evaluation reviews of SNAP E&T service providers in FFY 2022, it could enhance its oversight of the SNAP E&T program by analyzing service and expenditure data on a routine basis. For example, the average cost per participant for providers was \$4,559 overall but ranged by provider from \$225 to \$35,664 during FFY 2021.³⁰ Management evaluation reviews are required by FNS to assess compliance with federal law, regulations, and policy; provide technical assistance; determine corrective actions; and identify best

³⁰ We analyzed FFY 2021 expenditure and participation data because it was the latest available data at the time of our analysis.

practices. These compliance-based reviews determine such things as whether a physical inventory is taken every year, whether records are stored in a secure area, and whether individual employment plans are done in accordance with guidance. We found that DCFS conducted these reviews on all 29 providers who provided services directly to SNAP E&T participants in FFY 2022.

We analyzed SNAP E&T service and expenditure data and found that the average cost per participant in FFY 2021 was \$4,559 for providers, and it increased to \$6,791 when DCFS administrative costs are included. DCFS stated that it implemented a new policy in FFY 2023 as a result of tracking actual expenditures of providers to provide more uniform guidance to providers and to better ensure costs are reasonable and necessary by requiring providers to justify any estimated costs that exceed \$2,500 per participant for each component in their proposed budget. DCFS based this policy on a similar practice in Washington State. While the cost per participant per provider justification is not a federal requirement, analyzing data in this way should allow DCFS to identify factors contributing to varying costs per participant, such as some providers seeking and being reimbursed for indirect costs (i.e., overhead) that others are not. For example, Café Hope's \$178,319 in expenditures in FFY 2021 included \$15,409 in indirect costs. However, other providers, such as Liberty's Kitchen, did not request reimbursement for indirect cost expenditures in FFY 2021. Appendix F shows the cost per participant for each provider for FFY 2021.

DCFS could also use this data combined with other outcome data to analyze the performance of SNAP E&T providers and whether the goals of the program are being met. For example, Café Hope expended \$178,319 to serve five participants in FFY 2021, which equates to \$35,664 per participant. Four of the five Café Hope participants received a certification in the industry and obtained jobs, with three of them obtaining jobs in the food industry. Each of them obtained employment in the quarter after program completion. However, the combined total earnings of these four participants in the quarters since their program completion was \$72,929, or an average of \$3,039 per person per quarter. This is less than the quarterly SNAP eligibility threshold for a single person household, which was \$4,188 in FFY 2022.

DCFS could use SNAP E&T program data to identify potential instances of non-compliance, as we found that some SNAP E&T services were not provided in accordance with Federal law³¹ during FFY 2021. As part of the monthly and quarterly reports providers submit to DCFS, providers track the months that participants are enrolled in specific components. According to DCFS, it does not use these reports to test for overall compliance with certain program requirements, such as participants who exceed certain time limits or who are enrolled in the same component with multiple providers. Federal reviews of DCFS' SNAP E&T program have found such issues. For example, FNS found that services were offered for longer than allowed in two (6.7%) of 30 participant cases

³¹ 7 U.S.C. 2015

reviewed in FFY 2022. We used the reports submitted by providers to test for certain program requirements during FFY 2021 and found the following:

- Job retention services can be provided for a maximum of 90 days to participants who have received employment and training services under the E&T program and have secured employment. Of the 74 participants who received these services, 25 (33.8%) received more than four consecutive months³² of services, 12 (16.2%) were not reported to have received any other E&T services, meaning they were not eligible to receive job retention services, and months of participation were incomplete for seven (9.5%) of the participants.
- While DCFS stated that participants are not allowed to receive the same component from two providers at the same time, we identified 21 instances where nine participants received the same component, during the same month, from different providers. For instance, two providers delivered job search training services to a participant for seven consecutive months, and another participant received three consecutive months of job search training from two different providers at the same time.

According to DCFS, as of FFY 2023, all E&T providers are required to utilize SNAP Works. Providers now use SNAP Works for many purposes, including reimbursement requests and submitting all required performance and activity reports, which were previously sent using spreadsheets that DCFS staff had to manually compile and analyze for its own reporting to FNS. DCFS stated that SNAP Works also has edit checks designed to enforce program rules and prevent duplication of services.

Recommendation 8: DCFS should establish a policy to use service and expenditure data to routinely monitor the SNAP E&T program and ensure compliance with program requirements.

Summary of Management's Response: DCFS agreed with this recommendation and stated that a module in its SNAP Works system will allow for better monitoring of expenditures and invoices and allow it to effectively track program expenditures, make necessary adjustments to provider budgets to ensure efficiency, and determine future year's budgets. See Appendix A for DCFS' full response.

³² We analyzed monthly reports submitted by providers and used four months to account for any individuals who may have started mid-month, since the specific start and end dates are not included on the reports.

APPENDIX A: MANAGEMENT'S RESPONSE



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John Bel Edwards, Governor
Terri Porche Ricks, Secretary

March 28, 2023

Michael J. "Mike" Waguespack
Louisiana Legislative Auditor
P.O. Box 94397
Baton Rouge, LA 70804

Dear Mr. Waguespack:

The Department of Children and Family Services (DCFS) has reviewed the "Supplemental Nutrition Assistance Program – Employment and Training" Performance Audit Report. We appreciate your work on this project and the opportunity to respond. We have also provided additional information about DCFS and Louisiana's SNAP E&T program and its accomplishments (Appendix A).

Conclusion #1: DCFS has increased the number of SNAP E&T providers of voluntary services from 4 in FFY 2018 to 29 in FFY 2022, resulting in the number of parishes with in-person providers of voluntary SNAP E&T services increasing from 12 to 42. However, not all SNAP participants have in-person access to the program, as 22 (34.4%) of 64 parishes with 155,698 adult SNAP participants do not have in-person SNAP E&T services available to them. In addition, most providers specialize in serving certain populations which further limits who can receive SNAP E&T services.

Recommendation 1: DCFS should continue to identify additional ways to increase access to SNAP E&T services across the state.

DCFS Response: *DCFS continuously strives to increase access to various SNAP E&T services across the state. DCFS is currently holding SNAP E&T Informational Sessions targeting rural areas in the Alexandria, Monroe, and Shreveport Regions where there is a lack of infrastructure, facilities, and training programs to increase in-person access to SNAP E&T programs. We utilize the ALICE (Asset, Limited, Income Constraint, Employed) Reports and Louisiana Star Jobs (high demand, well-paying jobs identified by LWC) to assist in accessing community resources and needs. For example, we have learned from employers and organizations in the Alexandria Region that there is limited public transportation such as Uber/Lyft, bus service, or taxis, there are no child care services available, and there are no actual training programs outside of area colleges, so we are focusing efforts to improve opportunities in that area. DCFS is utilizing the assistance of our contracted intermediaries, United Way and Louisiana Community Technical College System, to assist in building service capacity. With the assistance of Food and Nutrition Services (FNS), we are working with the Louisiana Workforce Commission to expand services to Able Bodied Adults Without Dependents (ABAWDs) and the Inter-Tribal Council of Louisiana to expand E&T services to American Indian people living in Louisiana. In addition, DCFS staff, in conjunction with SNAP E&T providers, share information about E&T programs through word of mouth, search the internet and social media for potential opportunities, visit organizations/employers, and SNAP E&T staff serve as members of Workforce Development Boards.*

As of September 30, 2022, DCFS provided services to 1,370 SNAP E&T participants who span across 49 parishes. While not all parishes have in-person services available, we are constantly working to expand SNAP E&T services in underserved areas. Appendix B shows all parishes with SNAP E&T participants and coincides with Exhibit 2 SNAP E&T Provider Locations and Parishes Served for FFY 2022 in the audit report.

Conclusion #2: The number of total SNAP E&T participants decreased 93.0% from 19,628 in FFY 2018 to 1,370 in FFY 2022 because the program became voluntary in October 2020. However, the number of voluntary SNAP E&T



participants increased 181.9% from 486 to 1,370 over the same timeframe. SNAP E&T expenditures increased from \$1.8 million in FFY 2018 to \$8.3 million in FFY 2022, in part due to an increase in the number of providers and, according to DCFS, because of federal requirements that case management services be provided.

Recommendation 2: DCFS should continue to identify additional ways to conduct outreach to SNAP recipients to increase those receiving SNAP E&T services.

DCFS Response: *DCFS continuously works to identify additional ways to conduct outreach to SNAP recipients to increase those receiving SNAP E&T services. As of January 2023, DCFS implemented a new screening and referral process requiring each work registrant to be screened at application and recertification to determine if they can be referred to the SNAP E&T program. At the time of their SNAP interview, all SNAP applicants are informed of the general and SNAP E&T rights and responsibilities and the services that are offered through the SNAP E&T program. All SNAP applicants are then screened to determine if they meet the criteria of being at least 16 years of age and not in school or are unemployed or underemployed (earning less than 20 hours per week at minimum wage) to participate in the SNAP E&T program. All SNAP recipients who meet the program criteria must be offered the opportunity to volunteer to participate in the SNAP E&T Program. Interested participants are referred directly to the SNAP E&T provider of choice based on their region after the SNAP case is authorized. Online services are available for areas where there is not a physical SNAP E&T provider in a potential participant's geographical region. All SNAP recipients receive an automated notice about the SNAP E&T program after their SNAP case is authorized. In addition, SNAP E&T providers are required to utilize case management services which allows for individuals to be informed of SNAP E&T services and assessed to better identify participants' needs and potential referrals to other entities for services. Case management allows SNAP E&T providers to provide support that looks at the whole person and not just their employment needs.*

Conclusion #3: As of FFY 2021, SNAP E&T consisted of five components in Louisiana, and the most commonly offered and provided component was job search training. While supportive services such as transportation and childcare are important to the success of SNAP E&T participants, more than half of participants did not receive supportive services through the SNAP E&T program.

Recommendation 3: DCFS should work with providers to identify SNAP recipients who could benefit from SNAP E&T services and ensure they receive support necessary to receive those services.

DCFS Response: *In addition to the response to recommendation 2, DCFS continuously works with providers to identify SNAP recipients who could benefit from SNAP E&T services and ensure they receive support necessary to receive those services. DCFS requires all SNAP E&T providers to screen for barriers to participation and offer supportive services to all SNAP E&T participants utilizing a standard comprehensive assessment developed by DCFS and included SNAP Works (management information system). Some SNAP E&T participants decline the support services offered. Also, some SNAP E&T providers utilize other available resources to provide supportive services so the costs are not charged to SNAP E&T, which makes it appear the clients are not receiving support services when they actually are. DCFS is now requiring providers to track support services provided to clients in SNAP Works.*

Recommendation 4: DCFS should establish polices to periodically analyze data from SNAP Works system to assess the sufficiency of supportive services provided to participants.

DCFS Response: *SNAP Works became fully functional in October 2022 for operative use, which allows SNAP E&T providers to track supportive services. SNAP E&T providers are required to report the Payee/Vendor Name, Reason, Submitted/Issued Date, Requested Amount, and Authorized Amount for each supportive service issued on the Reimbursements Detail Screen in SNAP Works (Exhibit 1). Providers are also required to enter a case note when supportive services are offered and the SNAP E&T participant declines. Once the supportive services are received, it is entered into the case management module and exported to the invoice, which allows for several reports to be generated to analyze data. DCFS will develop policy around analyzing data regarding the sufficiency of supportive services.*



Exhibit 1 -- SNAP Works Reimbursement Detail Screen

Reimbursements Details

Reimbursement Request

Payee/Vendor Name
Training R' Us

Reason
Course Registration Fees

Submitted Date
03/05/2021

Issued Date
03/04/2021

Requested Amount
\$ 50.00

Authorized Amount

Upload Forms
Choose Files No file chosen

File Name	Size	Progress	Action
No Rows To Show			

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Conclusion #4: Federal performance measures reported by DCFS show mixed results during FFYs 2018 through 2021. For example, median quarterly wages after program completion increased from \$3,225 in FFY 2018 to \$3,614 in FFY 2021, but percentage of participants completing components decreased from 70.0% to 40.8% over this same time. DCFS could better evaluate the effectiveness of components and providers by requiring meaningful performance outcome measures and targets in contracts and evaluating whether providers achieve those targets.

Recommendation 5: DCFS should establish targets for performance measures it reports for the statewide SNAP E&T program to determine whether the SNAP E&T program is effective at meeting its purpose and goals.

Recommendation 6: DCFS should ensure that each provider contract has performance measure targets.

Recommendation 7: DCFS should establish a formal process to evaluate the statewide SNAP E&T program and individual providers to determine whether targets are met.

DCFS Response: *In FFY 2023, DCFS implemented the Performance Outcome Measures Report in SNAP Works to track and record each provider's projected and actual participant totals in work activities as well as the number of participants who entered employment as a result of participation in the SNAP E&T program. Providers are expected to meet or exceed projected number of participants in work activities as indicated in their statement of work. DCFS will review the report to determine if the contract services were delivered as projected, if there is a continuing need for partnership with the provider, or if a budget reduction is warranted.*

DCFS will also use the Performance Outcome Measures Report to establish a baseline for provider service performance. Over the course of time, DCFS will be able to compare each provider's performance from year to year to determine the provider's progress in increasing the number of participants served and the rate of participant success. For FFY 2024 contracts, DCFS is restructuring the provider's statement of work to require a section for uniform performance indicators and clear program targets that are consistent across all providers. In addition, DCFS has developed a Tableau data dashboard where participant data and provider performance can be tracked in real time to determine progress towards identified goals and performance targets.

Conclusion #5: While DCFS performs federally required monitoring of the SNAP E&T program, it could enhance its oversight and identify potential instances of non-compliance by analyzing service and expenditure data on a routine basis. We found that costs to serve participants varied greatly by provider and that some participants exceeded the amount of services they could receive or received duplicative services from multiple providers.



Recommendation 8: DCFS should establish a policy to use service and expenditure data to routinely monitor the SNAP E&T program and ensure compliance with program requirements.

DCFS Response: *The Financial Management Module in the SNAP Works system was designed to streamline the invoice submission process for SNAP E&T Providers and the invoice review process for DCFS staff and allow for more efficient, real-time tracking of all financial aspects of SNAP E&T expenditures. Some unique features of the application are as follows:*

No.	Feature	Description	Benefits
1	Budget upload automation and implementation	<ul style="list-style-type: none"> ✓ SNAP Works application allows instant upload of budget filled in by Providers and automatically reads all the information, displays calculated totals for each section ✓ System allows maintenance of different updated budgets for the same provider ✓ Electronic approval of budget 	<ul style="list-style-type: none"> ✓ Avoid manual entry errors by automatic calculation and totals ✓ Fast input of information ✓ Information stored for future as per retention policy, no risk of paper record loss, easy audit and maintenance ✓ Emergency override of budget allowed for authorized State users
2	Invoice and Expense Management	<ul style="list-style-type: none"> ✓ SNAP Works supports electronic submission of expenses for Providers along with ease of use with features such as auto-population of budget limits, drop-down selection of allowable expense types, standardized invoice submission and export ✓ Application allows upload of all documents categorized by type for easy reference during review ✓ Appropriate alerts and reminders are displayed to warn the Providers about delay in invoice submission, expense exceeding budget, approval/revision of invoice 	<ul style="list-style-type: none"> ✓ Effort saved in paperwork involved in submission for invoices ✓ Documents and information saved for 10 years ✓ Strict adherence to budget implemented, avoids user errors and over/under utilization of budget, automatically reflects updated budget ✓ End to end invoice management – maintains history and status of invoices ✓ Greatly simplifies audit of expenses, information can be pulled up in a few clicks ✓ Electronic certification and revision allowed for invoices ✓ System allows one-click export of invoices saving time for users ✓ Improves timely submission and approval of expenses
3	Alerts	SNAP Works has periodic (monthly/quarterly) as well as real-time alerts to warn users, an example is monthly reminders to alert the providers of upcoming due dates	<ul style="list-style-type: none"> ✓ Users spend less time in back and forth communication, and are automatically alerted of deadlines
4	Dashboards & Reports	Pre-built real-time dashboards; predictive and analytical reports for insight into the provider activities	<ul style="list-style-type: none"> ✓ Prevent over/under utilization of State funds ✓ Allows State to review the Provider KPIs with a few clicks ✓ State is able to generate various fiscal reports easily for historical and current time periods

Using SNAP Works, DCFS is able to track provider expenditures more closely than in previous years and can monitor provider spending levels to ensure adherence to the budget outlined in the provider's budget/budget narrative. The Financial Management Module also allows DCFS to effectively track program expenditures, make necessary adjustments to provider budgets to ensure efficiency, and determine future year's budgets.

The cost per participant per provider is not a federal requirement and funding does not dictate performance standards per Food and Nutrition Service (FNS). However, effective FFY 2023, DCFS implemented limits on provider budgets in an effort to minimize the amount of unexpended funds and ensure costs associated with program participation is



reasonable and necessary. A provider's cost per participant per component is expected to be under \$2,500. The actual cost per participant is auto generated on the provider's budget, and if it is above \$2,500, the provider is required to submit a justification for the overage. DCFS reviews the justification to determine if the overage is reasonable and necessary and if determined unreasonable, DCFS works with the provider to identify areas that can be allocated more efficiently to bring the budgeted amount within range.

If you have any additional questions about the SNAP E&T program, please contact Deputy Assistant Secretary Lorrie Briggs. You can reach her at (337) 344-9676 or Lorrie.Briggs.DCFS@LA.GOV.

Sincerely,



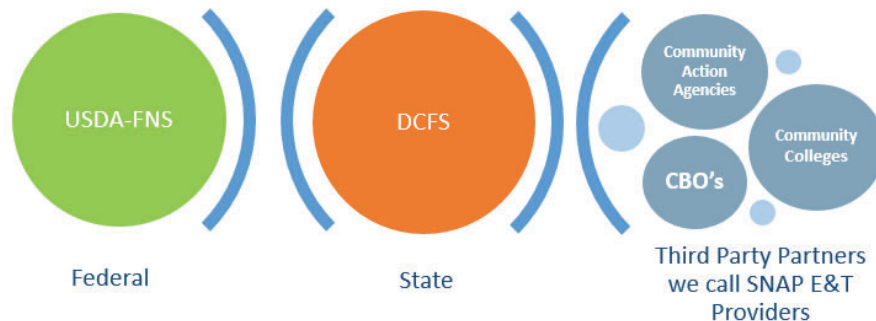
Terri Porche Ricks
Secretary

cc: Ashley Sias, Assistant Secretary, Division of Family Support
Lorrie Briggs, Deputy Assistant Secretary, Workforce Development



Appendix A: Louisiana's SNAP E&T Program

Louisiana's Supplemental Nutrition Assistance Program (SNAP) Employment and Training (E&T) Program has a human centered design that provides an array of employment services to SNAP households such as work skills, resume preparation and job leads, training, education, and supports such as transportation and childcare so that they are successful in participating in the SNAP E&T program. Every state is required to operate a SNAP E&T program. The diagram below shows how the Federal Government, State Agency, and Third Party Partners collaborate to achieve the goal of the SNAP E&T program.



- USDA-FNS: Approves funding and provides guidelines as a result of federal regulations. Funding does not dictate performance standards.
- DCFS: Implements and manages the SNAP E&T program according to federal guidelines and creates partnerships with external entities to provide services to SNAP recipients
- Third Party Partners: Creates capacity for SNAP E&T program requirements and SNAP recipients to get the necessary training and supportive services needed to become self-sufficient.

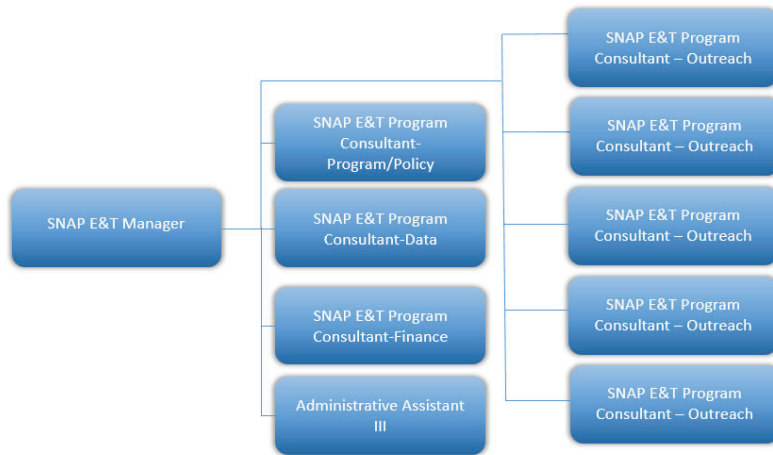
Louisiana has operated a small SNAP E&T program for many years, but began expanding voluntary services in 2016. At that time, Louisiana had a mandatory and a voluntary program. The mandatory program consisted of a partnership with the Louisiana Workforce Commission (LWC) in two ways: the Louisiana Jobs Employment and Training (LaJET) program provided services to Non-ABAWDs (Able Bodied Adults Without Dependents); Governor John Bel Edwards issued an Executive Order (JBE 2016-12) for LWC to provide services to ABAWDs. The mandatory programs affected E&T participation, sanctions, and employment for mandatory E&T participants and therefore, the remainder of the LaJET program dissolved in 2020 and the Governor rescinded the Executive Order for ABAWDs to participate with LWC (JBE 2020-5).

Initially, in August 2016, Louisiana's SNAP E&T program consisted of one staff person working to learn, build, expand, and operate a SNAP E&T program that met federal requirements. In 2016 Louisiana had two SNAP E&T partnerships. Jason Turner, SNAP E&T Program Analyst for the Southwest Regional Office of Food and Nutrition Service (FNS), was instrumental in providing guidance and technical assistance in developing a robust program. In addition, he frequently visited Louisiana to consult with community based organizations and community/technical colleges to assist in building SNAP E&T partnerships.

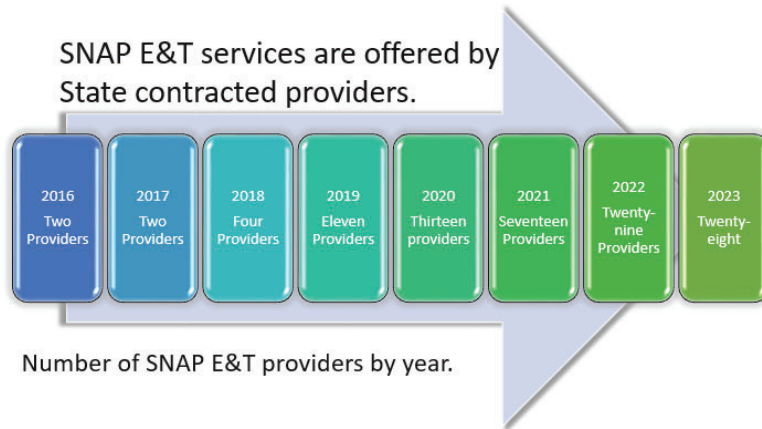
In 2018, an additional staff person worked part time (50%) to support the SNAP E&T program with four SNAP E&T partnerships. In 2020, SNAP E&T partnerships started to increase and the DCFS Division of Family Support was restructured and the Workforce Development Section was created and included the SNAP E&T program. Beginning April 2021, DCFS was able to build capacity to hire additional staff to expand the SNAP E&T program further. Please see the current staff structure below.



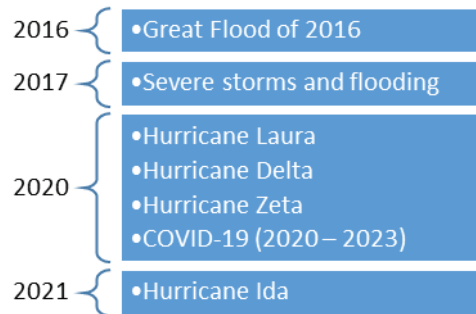
SNAP E&T Staff Structure



The chart below shows the growth in SNAP E&T program providers from 2016 to present.



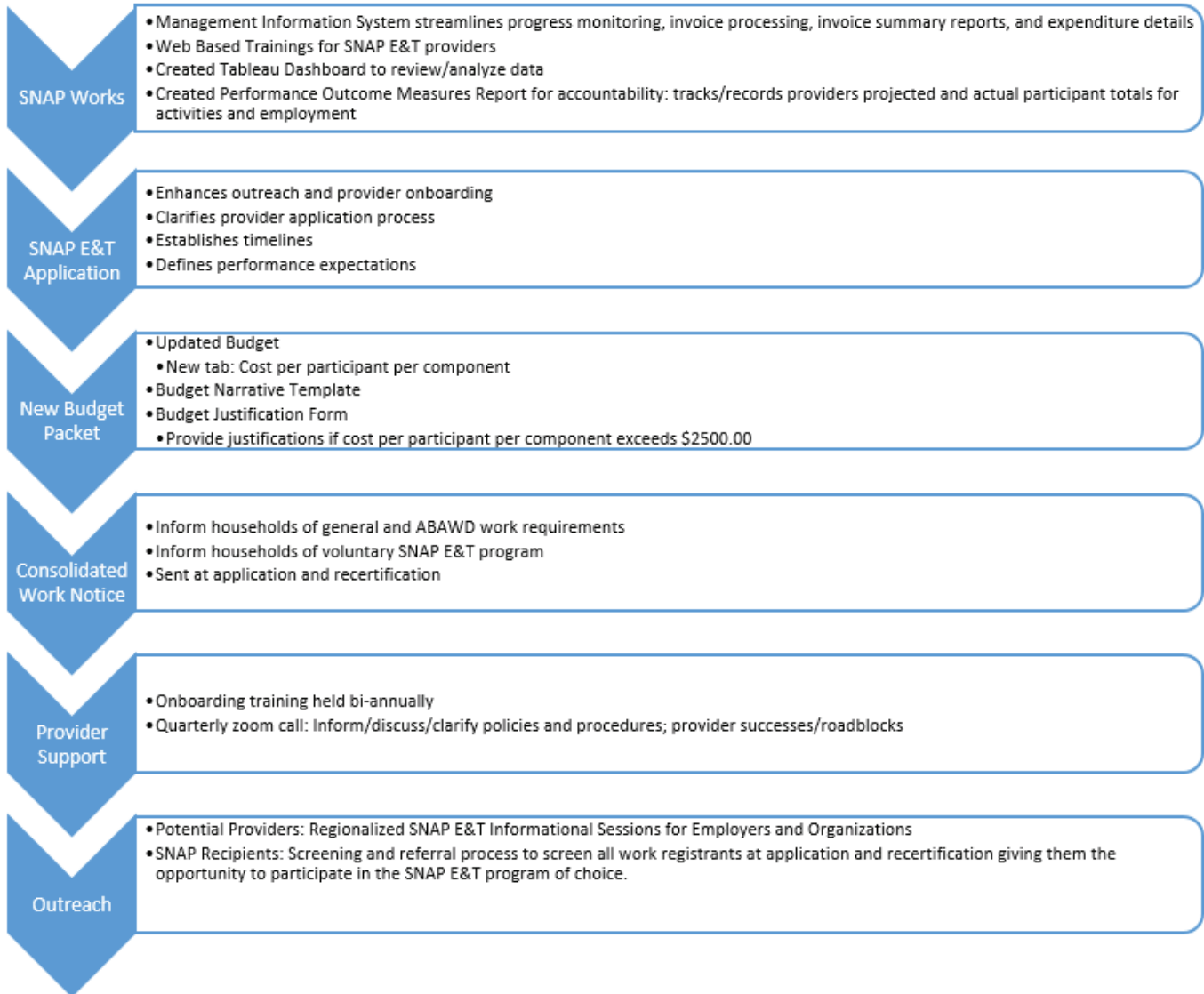
Louisiana has a diverse economy, population, politics, and geography. There is historically high unemployment, and frequent natural disasters, when compared to other states. Natural disasters and the COVID-19 Public Health Emergency adversely affected participation rate, provider capacity, and provider facilities in recent years.



DCFS’ SNAP E&T program has been intentional over the last few years, making remarkable improvements to streamline operational practices to improve program integrity, delivery, efficiency, and effectiveness. As we streamlined processes, one important factor considered was the cost per participant per component. A cost per participant per component worksheet was added to the Provider Budget to assist providers with determining the cost per participant per component. To ensures cost



efficiency, providers are required to provide an explanation if the cost exceeds \$2,500 per participant per component. Other significant improvements to the SNAP E&T program include:



Program Performance Measures

DCFS has established various performance measures for its SNAP E&T Program, including State Performance Measures established in the 2022 DCFS Strategic Plan. DCFS has also developed a Performance Outcome Measures Report for tracking provider performance.

State Performance Measures/DCFS Strategic Plan

DCFS' E&T State Plan and the department's strategic plan include performance measures that are reported annually to FNS, as follows:

- Number of SNAP E&T participants who received E&T services and obtained unsubsidized employment during the second quarter after completion of services through job search training.
- Number of SNAP E&T participants who remain employed in the second quarter after completion of job retention services.



- Number and percentage of SNAP E&T participants who received E&T services and are in unsubsidized employment in the second quarter after completion of work experience.
- Number and percentage of SNAP E&T participants who received E&T services and received a certificate or earned a credential after completion of work experience.
- Number and percentage of SNAP E&T participants who received E&T services and received a certificate or earned a credential after completion of Education – Career Technical Education Programs or Other Vocational Training.
- Number and percentage of SNAP E&T participants who received E&T services and obtained unsubsidized employment during the second quarter after completion of Education – Career Technical Education Programs or Other Vocational Training.
- Number and percentage of SNAP E&T participants who received E&T services and who earned a high school equivalency certificate (Hi/SET/GED) after completion of the basic/foundational skills training.
- Number and percentage of SNAP E&T participants who received E&T services and gained employment in the second quarter after completion of the basic/foundational skills training.
- Number and percentage of SNAP E&T participants who received E&T services and gained employment in the second quarter after completion of the Education – Work Readiness Training.
- Annual cost per SNAP E&T participant per component who will receive E&T services for the Federal Fiscal Year.

Performance Outcomes Measures Report

The Performance Outcomes Measures Report was implemented in SNAP Works in FFY 2023 and is utilized by SNAP E&T Providers to track and record the SNAP E&T provider’s projected and actual participant totals, work activities and who entered employment as a result of SNAP E&T participation. Providers are expected to meet or exceed projected number of participants in work activities and the projected number of participants to gain employment, as indicated in their statement of work. DCFS will review the report to determine if the contract services were delivered as projected, if there is a continuing need for partnership with the provider, or if a budget reduction is warranted.

The SNAP E&T team is currently working to establish and implement attainable level of efforts to the percentage of goals for each measure on the Performance Outcomes Measures Report to at least a 40% completion rate.

A snippet of the report for FFY 2023 Quarters 1 and 2 is below.

SNAP E&T Performance Outcome Measures Report												
Agency Name: All												
Category	Federal Fiscal Year	Q1 Goal	Q1 Actual	Q2 Goal	Q2 Actual	Q3 Goal	Q3 Actual	Q4 Goal	Q4 Actual	Total Goal	Total Actual	Percentage of Goal
# of Unduplicated Participants	Counts	514	351	500	311	17		4		1035	662	63.96%
# Entered Employment	Counts			236		11		1		476		0.00%
Education - Basic/Foundational Skills (GED/HiSET)	Enrollment	82		80	61					162	61	37.65%
Education - Career Technical Education Programs or Other Vocational Training	Enrollment	205	39	220	131	16		4		445	170	38.20%
Education - Work Readiness Training	Enrollment	258	7	233	84					491	91	18.53%
Job Retention	Enrollment	154		128	46					282	46	16.31%
Job Search Training	Enrollment	335	31	291	158					626	189	30.19%
Work Experience (WBL) - Transitional Jobs, Subsidized by E&T	Enrollment	23	41	20	37					43	78	181.40%
Work Experience (WBL) - Apprenticeship	Enrollment	3		2						5		0.00%
Work Experience (WBL) - Internship	Enrollment	20	6	27	4					47	10	21.28%
Work Experience (WBL) - On-the Job Training	Enrollment	69	9	74	14					143	23	16.08%
Work Experience (WBL) - Transitional Jobs	Enrollment	15		15	3					30	3	10.00%

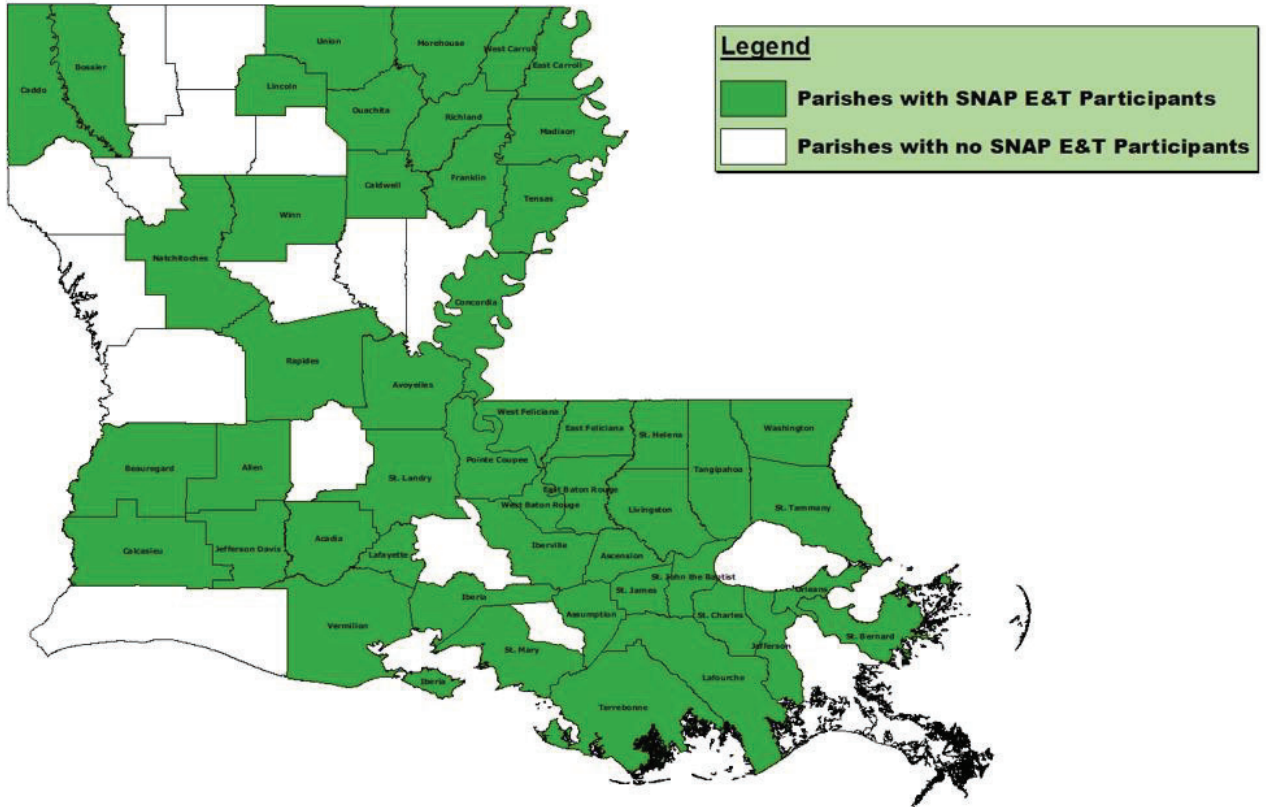


DCFS has made tremendous strides in planning/developing, implementing, and growing an employer-driven robust SNAP E&T program which allows citizens of Louisiana to be educated and trained so they can support their families. Due to the success of Louisiana's program, FNS selected DCFS' SNAP E&T staff to participate in the USDA-FNS SNAP E&T Academy and invited them to present in two different sessions including Developing Partnerships and Onboarding New Providers & College Intermediary at the USDA National SNAP E&T Forum in Virginia. DCFS' SNAP E&T staff also provide technical assistance in other states such as Mississippi and Arizona, and Deloitte nominated DCFS for the 2022 IT Solutions for Human Services Management Recognition Awards for Excellence in Human Services Information Technology for Best Use of Technology for Operations – Internal Focus or Best Use of Technology for Customers – External Focus. DCFS continuously strives to increase citizen participation, identify opportunities for improvement and efficiency, and ensure the SNAP E&T program methodology and strategy affects positive change for the citizens of Louisiana.



APPENDIX B

**Louisiana Department of Children and Family Services
SNAP E&T Participants FFY 2022**



APPENDIX B: SCOPE AND METHODOLOGY

This report provides the results of our performance audit of the Supplemental Nutrition Assistance Program Employment and Training Program (SNAP E&T) administered by the Department of Children and Family Services (DCFS). We conducted this performance audit under the provisions of Title 24 of the Louisiana Revised Statutes of 1950, as amended. This audit covered October 1, 2017, through September 30, 2022. Our audit objective was:

To analyze participation, costs, and DCFS administration of the SNAP E&T program.

We conducted this performance audit in accordance with generally accepted *Government Auditing Standards* issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide reasonable basis for our findings and conclusions based on our audit objective. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

We obtained an understanding of internal control that is significant to the audit objective and assessed the design and implementation of such internal control to the extent necessary to address our audit objective. We also obtained an understanding of legal provisions that are significant within the context of the audit objective, and we assessed the risk that illegal acts, including fraud, and violations of applicable contract, grant agreement, or other legal provisions could occur. Based on that risk assessment, we designed and performed procedures to provide reasonable assurance of detecting instances of noncompliance significant to those provisions.

To answer our objective, we performed the following audit steps:

- Researched relevant federal and state laws, regulations, and policies related to SNAP E&T. We also researched best practices and Government Accountability Office audits of the SNAP E&T program.
- Met with DCFS management and staff to obtain an understanding of SNAP E&T related to program administration and changes over time; services offered, locations where services are offered, and providers of those services; participant eligibility, changes in participation over time, demographics services, and how participants are tracked; program reporting on performance measures; and oversight activities performed.
- Met with United States Department of Agriculture's Food and Nutrition Services (FNS) staff to obtain an understanding of the SNAP E&T program.

- Conducted a survey of SNAP E&T providers to obtain information related to the SNAP E&T program. Sent the survey to 34 individual providers and received responses from 24 providers (70.6%).
- Met with a SNAP E&T provider and toured the facility.
- Obtained and analyzed SNAP E&T provider information for federal fiscal years (FFYs) 2018 through 2022 to identify trends in providers, including the number of providers, populations served, physical office locations, parishes served, and program descriptions.
- Used GIS to plot provider locations and visually show which parishes do and do not have access to SNAP E&T services.
- Analyzed the number of SNAP recipients for FFY 2022 to determine the number of adult recipients by parish and to determine whether those adult recipients had access to SNAP E&T services in the parishes in which they resided.
- Obtained and analyzed provider-reported monthly and quarterly participant activity reports for FFY 2021 to identify the number of participants receiving services from each provider and to determine whether participation in certain service components were in compliance with federal law and program rules.
- Obtained and analyzed FNS management evaluation reviews (MERs) of DCFS' SNAP E&T program for FFYs 2018 through 2022 to identify any potential issues with the administration of the program.
- Obtained and analyzed DCFS SNAP E&T MERs of SNAP E&T providers for FFYs 2021 and 2022 to determine whether they were being conducted and to identify any potential issues with the provider's performance.
- Obtained and analyzed SNAP E&T provider contracts for FFYs 2021 and 2022 to determine contract amounts and to identify performance outcome measures and targets.
- Obtained and analyzed FNS annual allocations for FFYs 2018 through 2022 to determine the annual amount of funding available to the E&T program.
- Obtained and analyzed SNAP E&T program expenditures for FFYs 2018 to 2022 identify 100% administrative expenditures and 50% expenditures, including those for providers to deliver job training, education, and supportive services. We received conflicting overall expenditure information throughout the scope of the audit and thus used overall program expenditure information received from DCFS for 100% and 50% funds.

- Obtained and analyzed individual SNAP E&T provider expenditures for FFY 2021 to determine the amount each provider spent by budget line item, including supportive services.
- Obtained and analyzed annual outcome reports and FNS-583 reports to identify changes in program performance outcomes over the audit scope. Used individual provider expenditure data and provider activity reports to calculate the cost per participant by provider for FFY 2021.
- Obtained and analyzed the SNAP income eligibility threshold limits for FFY 2018 through 2022.
- Obtained wage data from the Louisiana Workforce Commission (LWC) to analyze outcomes for participants who utilized one provider. Obtained performance measure information from LWC for the Workforce Innovation and Opportunity Act.
- Met with DCFS to discuss our conclusions and incorporated its feedback, including efforts to improve implementation of the SNAP E&T program, throughout the report.

APPENDIX C: FFY 2022 PROVIDER POPULATIONS SERVED, PARISHES SERVED, AND PROGRAM DESCRIPTION

Provider	Population Served	Parishes Served	Program Description
AimHigh Education	Individuals ages 18 and older	Statewide	Online educational program that provides web-based vocational and apprenticeship training in HVAC, Medical Coding & Billing, and Solar Industry.
Baton Rouge Community College	Individuals ages 18 and older	East Baton Rouge East Feliciana Pointe Coupee West Baton Rouge West Feliciana	Programs range from short-term credentials such as Industry Based Certification (IBC) or Career Technical Certificate (CTC) through to midlength credentials such as the Certificate of Technical Studies (CTS) and the Technical Diploma (TD) with the longest credential offered being the Associate degree, typically the Associate of Applied Science (AAS) and the Associate of Science in Nursing (ASN).
Ben D. Johnson	Individuals ages 17 to 24	Natchitoches	A 16-week training program in Food Service and Hospitality Certification.
Café Hope	Individuals ages 16 to 24	Jefferson Orleans Plaquemines	A 12-week internship culinary program in a public restaurant and a 4-week internship training in barista skills, management duties, responsibilities; Participants can receive a nationally recognized certification in ServSafe for food handling.
Café Reconcile	Individuals ages 16 to 24	Jefferson Orleans Plaquemines St. Bernard St. Charles	Combines hands-on food service training with classroom instruction, individual case management, job placement services, and follow-up support.
Calcasieu Parish Police Jury	Individuals ages 18 and older	Allen Beauregard Calcasieu Cameron Jefferson Davis Vernon	Services offered include job search training, job readiness training, job retention, and educational programs such as adult basic education (HiSET) and vocational training.
Center for Employment Opportunities	Formerly incarcerated individuals ages 18 and older	Jefferson Orleans St. Bernard St. Tammany	Provides job readiness, training services, such as maintenance and litter abatement services through partnerships with the Louisiana Department of Public Safety & Corrections, and follow-up services.

Provider	Population Served	Parishes Served	Program Description
Covenant House	Homeless, runaway, and at-risk youth ages 16 to 24	Orleans	Job readiness/on-the-job training program for residents of Covenant House which include employment readiness, job search and placement, education referrals for HiSET, and on-site job training in the culinary, maintenance, housekeeping, and landscaping fields.
Family Promise of St. Tammany	Homeless families	St. Tammany Tangipahoa	Provides the following employment and training services: intake and assessment, job search training, case management, transportation assistance, financial assistance, direct service referrals, referrals for training, financial literacy training, and educational and vocational training referrals.
Goodwill	Individuals ages 18 and older	Ascension Assumption East Baton Rouge East Feliciana Jefferson Lafourche Livingston Orleans Plaquemines Pointe Coupee St. Bernard St. Charles St. James St. John the Baptist St. Tammany Terrebonne West Baton Rouge West Feliciana	Provides wrap-around supportive services, intensive case management, job readiness preparation, technical skills training, job placement services and follow-up support. The College offers START (Skills, Tasks, and Results Training), Medical Billing and Coding, and Medical Office Administrative Assistance.
Hope Ministries	Individuals ages 18 to 65 who are disadvantaged	Ascension Assumption Avoyelles East Feliciana East Baton Rouge Iberville Livingston Pointe Coupee West Baton Rouge West Feliciana	Classroom training, one-on-one coaching, referrals to community resources, referrals for education (e.g. GED/HiSET) and national certifications (e.g. HVAC, OSHA 30, Serv Safe) and follow-up support.

Provider	Population Served	Parishes Served	Program Description
Institute for Human Development	Individuals of all ages	East Baton Rouge Livingston	Offers nationally recognized certificate training programs such as Customer Service, Disaster Management (FEMA), Food & Hospitality, Construction, First Aid/CPR, and Property & Casualty Claims Adjuster.
Louisiana Community & Technical College System*	Individuals who are unemployed or underemployed going into the healthcare occupations and construction trades		Programs range from short-term credentials such as an Industry-Based Certification (IBC) or Career and Technical Certificate (CTC) through to midlength such as the Certificate of Technical Studies (CTS) and the Technical Diploma (TD) with the longest credential offered being the Associate degree (typically the Associate of Applied Science (AAS) and the Associate of Science in Nursing (ASN).
Liberty's Kitchen	Individuals ages 16 to 24	Jefferson Orleans St. Bernard	Combines hands-on food service training with classroom instruction, individual case management, job placement services and follow-up support.
Louisiana Delta Community College	Individuals ages 18 and older	Caldwell East Carroll Franklin Jackson Lincoln Madison Morehouse Ouachita Richland Tensas Union West Carroll	Programs range from short-term credentials such as Industry Based Certification (IBC) or Career Technical Certificate (CTC) through to midlength credentials such as the Certificate of Technical Studies (CTS) and the Technical Diploma (TD) with the longest credential offered being the Associate degree, typically the Associate of Applied Science (AAS) and the Associate of Science in Nursing (ASN).
Louisiana Green Corps	Individuals ages of 16 to 50	Jefferson Orleans	Job-training program with a focus on the construction industry for participants to increase their academic skills (e.g. GED/HiSET), learn construction and conservation skills, become certified with industry credentials, and earn on-the-job training.

Provider	Population Served	Parishes Served	Program Description
Mission Rebirth	Individuals ages 16 to 60 who are homeless/displaced or formerly incarcerated/justice-involved	Iberville Jefferson Orleans Plaquemines St. Bernard St. Charles St. James	Provides job search training skills and referrals to partnering agencies for vocational training such as CNA, culinary, HiSET, etc.
New Orleans Career Center	Individuals ages 18 and older who are unemployed, dropped out of high school or college, and/or homeless	Jefferson Orleans St. Bernard St. Charles St. John St. Tammany	Provides vocational training in health care pathways, work readiness training, and job search training.
New Orleans Family Justice Alliance	Individuals ages 17 to 65 who are victims of domestic violence, sexual assault, and human trafficking	Jefferson Orleans Plaquemines St. Bernard	Services include: case management, counseling, emergency shelter, transitional housing, legal services, job search training skills, work readiness training, and education services such as HiSET, Adult Basic Education, and Basic Literacy.
New Orleans Mission	Healthy men ages 18 and older	Jefferson Orleans St. Bernard St. Charles St. James St. John the Baptist St. Tammany Tangipahoa	Paid on-the-job vocational training in carpentry, electrical, and plumbing with a monitored savings plan and personalized case management; workers save 80% of their income, which they will receive when they complete the program.
New Orleans Women & Children's Shelter	Homeless individuals/parents ages 18 and older	Jefferson Orleans Plaquemines St. Bernard	Provides case management services, financial literacy, and referrals to GED/HiSET and vocational training.
NOTEP	Individuals ages 18 and older	Jefferson Orleans St. Bernard St. Tammany	Provides an 8-month Skilled Craft Trade pathway in Electrical, HVAC, and Carpentry that leads to Industry-Based Credentials.

Provider	Population Served	Parishes Served	Program Description
NOVA	Unemployed, underemployed, low-income, etc. individuals ages 18 and older	East Carroll Madison Morehouse Ouachita Richland Tensas West Carroll	Collaborates with local education/training institutions to provide necessary training for demand occupations and offers occupational or customized skills training, case management, work readiness/essential skills training, support services, and transition to employment services.
Operation Restoration	Formerly incarcerated women ages 18 to 65	East Baton Rouge Jefferson Madison Orleans Plaquemines St. Bernard St. Charles St. James St. John West Baton Rouge	Re-entry program that includes HiSET, a 4-week training program in laboratory healthcare as a lab assistant, on-the-job training through placement in hospitals, and job search training skills.
Operation Spark	Individuals ages 18 and older	Statewide	A computer software technology program and includes additional services such as workforce readiness, work experience, job placement, and "life-skills" coaching.
Project Lazarus	Low-income individuals, at risk of homelessness living with HIV	Iberville Jefferson Orleans Plaquemines St. Bernard St. James St. John St. Tammany Tangipahoa Washington	Transitional living facility that provides participants with GED/HiSET or vocational training at Delgado Community College, work readiness, and connects participants to appropriate employment.

Provider	Population Served	Parishes Served	Program Description
Propel	Individuals ages 18 to 24	Ascension East Baton Rouge East Feliciana Iberville Livingston Pointe Coupee St. Helena West Baton Rouge West Feliciana	A program for providing referral services in healthcare, manufacturing, automotive, and information technology with an opportunity to earn industry-standard credentials.
United Way of Southeast Louisiana*			Serves as an intermediary that assists in capacity building, facilitating the Career Ladder Identifier Financial Forecaster (CLIFF), financial literacy, and technical assistance.
Youth Empowerment Project	At-risk, out-of-school, and court involved youth ages 16 to 24	Orleans	Offers opportunities to engage in adult education and work training through YEP's bike shop, thrift store, and graphic design studio.
Youth Force NOLA	Individuals ages 16 to 21	Orleans	Provides services such as job search training skills, work readiness training, and referrals for vocational training programs such as Information Technology, Skill Crafts, Digital Media, Health Sciences, and Acadian Ambulance with the opportunity to earn an industry-recognized credential.
YWCA**	Individuals ages 18 and older	Ascension Assumption East Baton Rouge East Feliciana Iberville Livingston Pointe Coupee St. Helena St. James Tangipahoa West Baton Rouge West Feliciana	Provides services that include job retention, internship opportunities and referrals for HiSET, and vocational training at Baton Rouge Community College.
<p>*Contracts with DCFS for SNAP E&T but does not provide direct services to participants. ** DCFS stated that this provider was contracted by DCFS but did not provide services and was removed from the program. It also did not receive any SNAP E&T funds, according to DCFS. Source: Prepared by the legislative auditor's staff using information from DCFS.</p>			

APPENDIX D: PARTICIPANTS SERVED BY PROVIDER BY COMPONENT FFY 2021

Contractor	Provider	Basic/Foundational Skills	Job Retention	Job Search Training	Vocational Training	Work Experience
Café Reconcile	Café Reconcile			27		27
Center for Employment Opportunities	Center for Employment Opportunities		13	30		51
Covenant House	Covenant House	5	20	92	2	9
Cowen Institute	Cowen Institute		1			2
Calcasieu Parish Police Jury	Calcasieu Parish Police Jury			6		
Goodwill	Goodwill				51	
Hope The Way to Work	Hope The Way to Work		23	103		
Louisiana Green Corps	Louisiana Green Corps				35	
Louisiana Community and Technical College System	Baton Rouge Community College				77	
Louisiana Delta Community College	Louisiana Delta Community College				21	
Liberty's Kitchen	Liberty's Kitchen			18		37
New Orleans Career Center	New Orleans Career Center				86	
New Opportunities Vision and Achievement	New Opportunities Vision and Achievement			123	19	
New Orleans Women and Children's Shelter	New Orleans Women and Children's Shelter		4	34		
United Way	Café Hope			5		
United Way	Family Justice	33		13		
United Way	Family Promise		1	5		
United Way	Operation Restoration	23	12	93		
United Way	Operation Spark			18	47	
United Way	Project Lazarus			34		
United Way	Propel America		1	1	16	
Youth Empowerment Project	Youth Empowerment Project	123		10		4
YouthForce NOLA	YouthForce NOLA			6	6	
Total*		181	74	610	356	127

* Total may not equal sum of columns due to some participants receiving the same component from multiple providers.

Source: Prepared by legislative auditor's staff using information from DCFS.

APPENDIX E: ANNUAL PERFORMANCE OUTCOME MEASURES FFYs 2018 THROUGH 2021

Reporting Measure	FFY 2018			FFY 2019			FFY 2020			FFY 2021*		
	Achieved	Total	%	Achieved	Total	%	Achieved	Total	%	Achieved	Total	%
Unsubsidized employment in 2nd quarter after completion of participation in E&T	4,889	10,864	45.0%	5,021	10,822	46.4%	4,372	10,567	41.4%	206	349	59.0%
Unsubsidized employment in 4th quarter after completion of participation in E&T	5,769	12,652	45.6%	5,391	11,496	46.9%	4,541	10,756	42.2%	146	5,379	2.7%
Completion of an educational, training, work experience, or an on-the-job training component	550	786	70.0%	144	221	65.3%	176	509	34.6%	272	667	40.8%
Reporting Measure	Median Wage			Median Wage			Median Wage			Median Wage		
Median Quarterly Wages in 2nd quarter after completion of participation in E&T**	\$3,225			\$3,364			\$3,156			\$3,614		
<p>* The mandatory SNAP E&T program stopped at the end of FFY 2020, and the program became fully voluntary on the first day of FFY 2021, which is why the number of individuals is lower.</p> <p>** Based only on participants who had wages in this quarter.</p> <p>Source: Prepared by the legislative auditor's staff using information from DCFS.</p>												

APPENDIX F: PROVIDER COST PER PARTICIPANT FFY 2021

Provider	Number of Participants	Expenditures	Average Cost Per Participant
Café Hope*	5	\$178,319	\$35,664
Cowen Institute	2	65,732	32,866
Café Reconcile	27	723,621	26,801
YouthForce Nola	10	202,748	20,275
Propel America*	18	222,503	12,361
Liberty's Kitchen	39	446,578	11,451
Operation Spark*	56	608,632	10,868
Family Promise*	7	66,702	9,529
Center for Employment Opportunities	56	340,999	6,089
Youth Empowerment Project	136	673,890	4,955
Louisiana Green Corps	35	154,221	4,406
Goodwill Industries	51	212,117	4,159
Calcasieu Parish Police Jury	6	24,808	4,135
Louisiana Delta Community College	21	83,201	3,962
Hope Ministries	109	370,059	3,395
Covenant House	140	390,075	2,786
New Orleans Career Center	86	163,452	1,901
Operation Restoration*	115	203,849	1,773
New Orleans Family Justice*	48	69,764	1,453
Project Lazarus*	34	45,512	1,339
Baton Rouge Community College**	77	101,504	1,318
New Opportunities Vision Achievement	136	78,037	574
New Orleans Women & Children's Shelter	46	10,331	225
Total	1,223***	\$5,575,975	\$4,559

* During FFY 2021, these providers were subcontracted through United Way. As of FFY 2022, these providers contract directly with DCFS. United Way had \$101,786 in intermediary costs not included in the cost per participant for its subcontracted providers.

** During FFY 2021, BRCC subcontracted through LCTCS, who contracted directly with DCFS. LCTCS had \$37,536 in intermediary costs not included in the cost per participant for its subcontracted providers.

*** Represents the number of unique participants served by the program. The total does not equal the sum of the column because some participants received services from more than one provider.

Source: Prepared by the legislative auditor's staff using information from DCFS.