

WISCONSIN DEPARTMENT OF HEALTH SERVICES
Division of Health Care Access and Accountability
1 W. Wilson St.
Madison WI 53703

To: FoodShare Wisconsin Employment and Training (FSET) Handbook Users

From: Rick Albertoni, Bureau Director
Bureau of Enrollment Policy and Systems

Re: **FSET Handbook Release 10-02**

Release Date: 06/11/10
Effective Date: 06/11/10

EFFECTIVE DATE

The following policy additions or changes are effective 06/11/10, unless otherwise noted. **Bold text denotes new text. Text with a strike through it in the old policy section denotes deleted text.**

POLICY UPDATES

1 FSET Program Introduction > 1.3 Eligible FSET Participants

Old Text:

Eligibility for FSET services include:

1. ~~Adult~~ FS recipients who have been determined reasonably able to obtain competitive employment may volunteer for FSET.

New Text:

Eligibility for FSET services include:

1. **FS recipients*** who have been determined reasonably able to obtain competitive employment may volunteer for FSET.
2. Adult FS recipients who may already be employed, but wish to volunteer to increase their earning potential or those who wish to receive services to enhance or advance career opportunities. Section 4108 of the 2008 Farm Bill indicates that FSET volunteers are not subject to the 120 hour-a-month participation limit or the requirement that the number of hours of participation can not exceed the household's FS allotment divided by the minimum wage.
3. Current FSET volunteers who need job retention services. Only persons who have obtained employment as a result of FSET services are eligible for job retention services. As permissible by Section 4108 of the 2008 Farm Bill, agencies may use a portion of FSET funds to administer job retention services up to 90 days after individuals obtain employment through the FSET program.
4. FS recipients who receive an actual cash TANF **W-2** payment are eligible for FSET services. FS recipients who only receive W-2 case management are not eligible. FSET may serve Transitional FS recipients as long they are not receiving **W-2** case management. Failure to complete FSET activities must not result in a FS sanction.

*** A 16 or 17 year old FS recipient may participate in FSET activities such as after school job search or part-time vocational training if these services are not already available through the school or another agency at no cost to the participant. Please see 8.15 Education for additional details.**

2 FSET Funding > 2.1 Federal 100 Percent Allocation

Old Text:

~~The welfare changes enacted in 1996 imposed strict new requirements on Able-Bodied Adults Without Dependents, known as ABAWDs. The intent underlying these changes is to provide work opportunities for ABAWDs who would otherwise lose FoodShare assistance because of the time limits imposed under PRWORA which requires an ABAWD who is not working at least 80 hours per month to participate in workfare or 80 hours a month of FSET activities in order to receive FoodShare benefits. ABAWDs can receive only three months of FoodShare benefits in a 36-month period if they are neither working nor fulfilling the FSET requirement.~~

~~**Note:** The State of Wisconsin has received a waiver from FNS of federal regulations requiring time-limited FS benefit eligibility for ABAWDs who fail to meet minimum FS work participation requirements (6-3).~~

Funding is allocated to the FSET agency on an annual basis. Current and future allocations are contingent upon receipt of funds from the Department and from the USDA/FNS.

New Text:

Supplemental or 100% Federal funding is designated for administrative costs of the FSET program. This is an annual allocation from the Food and Nutrition Service; 90% is based on the number of work registrants reported by the State each FFY, and 10% is based on the number of reported ABAWDS.

Current and future allocations are contingent upon receipt of funds from the Department and from the USDA/FNS.

Funds are to be used by the FSET Agency for the purpose of providing employment and training services which have been designed to assist FSET participants obtain unsubsidized employment. **Supplemental funding** may be used for expenses related to the development, administration and/or contracting for allowable **services**. **Supplemental funding cannot be used to reimburse participant expenses.**

A provision of the 2008 USDA Farm Bill allows funds to be used to reimburse the costs of services or expenses relating to job retention up to 90 days after starting a job that was obtained as a result of FSET services. **Supplemental funds are allowable for administrative costs associated with providing job retention, while 50/50 match funding must be used for participant expenses.** (See 1.3 for details regarding TANF eligible FSET participants.)

2 FSET Funding > 2.2 50/50 Match Funding

Old Text:

The entire section was deleted and replaced.

New Text:

2.2.1 Introduction

For every dollar the FSET agency or tribe incurs as an allowable expense, fifty cents will be reimbursed. County and tribal governments may choose to subcontract funds from 50/50 match to their Employment and Training contract agency or may elect to operate the entire FSET Program. 50/50 match funding refers to two separate sources of funding.

- 1. Base or 50/50 GPR/Federal is an annual allocation of State General Purpose Revenue (GPR) matched with Federal FSET funds. These funds may be used to cover administrative costs that exceed the 100% Federal allocation, as well as participant reimbursement costs and job retention.**
- 2. 50/50 Local/Federal Match consists of local funding (typically tax levy) matched with Federal dollars, used to fund new or enhanced services**

to expand the FSET program. Local/Federal match must meet certain criteria prior to receiving State and Federal approval.

Note: FSET cannot fund services that are available to the public at no cost. If there is a cost, FSET participants cannot be charged more than what is charged to the public for the same service.

2.2.2 Local/Federal (50/50) Match Criteria

1. Services funded by Local/Federal match must clearly go above and beyond what is currently offered or available to the public at no cost.
2. Funding cannot be matched if the intent is to expand existing employment and training services, available at no cost, to now include FSET participants. Match is not allowed to cover budget shortfalls, or to expand services that are under utilized. Match is not allowed to facilitate program growth unless services go above and beyond existing services and are approved by FNS as part of the state E&T plan.
3. To claim any expenditures under FSET, participants must be eligible and receiving FS benefits;
4. Funds cannot be federal, with the exception of Community Block Grants and some types of federal tribal funding;
5. Funds must be "cash", i.e. actual costs, they cannot be "in-kind" match;
6. Funds cannot be state or local funds which are already designated as match for another program;
7. Funds must not supplant any existing funds. The funds must be used to provide new and enhanced services to participants.
8. All cash contributions must:
 - Be verifiable;
 - Not contributed for another federally assisted program;
 - Necessary and reasonable for accomplishment of FSET project objectives;
 - Not paid by the federal government under another assistance agreement;
 - Are in a budget as approved in the FSET State Plan

8 FSET Component Definitions > FSET 8.15 Education

Old Text:

~~Notice in the table below that all activities related to education are not sanctionable but FSET funds will be used to cover costs for the activities.~~

New Text:

FSET funds may be used to cover costs for educational activities under certain circumstances.

Although some youth (age 16-17) may be eligible to participate in FSET, educational activity as part of FSET must directly improve employability, therefore the participant must be old enough to work upon completion of the activity.

FSET funding cannot be used to support any services that are already available to the participant at no cost. Most services appropriate to high school aged children are likely to be available through the school system or other public programs, and therefore cannot be funded through FSET.

High school attendance does not count as an FSET component, therefore agencies cannot reimburse individuals aged 16 and 17 for the costs associated with attending high school.

**8 FSET Component
Definitions > FSET 8.16 Post
Secondary Education (PSE)
Less Than 2 Years (A1)**

Old Text:

~~This component has been federally approved and will be counted for FSET reports.
FSET funds can be used to pay for this activity.~~

New Text:

This component has been federally approved. FSET funds can be used to pay for this activity under certain circumstances.

The following points are critical in determining whether FSET funding may be used to fund an educational component:

1. Educational enrollment by the agency or self initiated while enrolled in FSET. A participant must be assigned to or placed in an approved education component by the FSET agency as part of the participant's EP. A self initiated placement while the participant is enrolled in FSET is acceptable provided that the education is suitable, and approved by the FSET agency.
2. FSET cannot be used to supplant funds for existing services or charge more to FSET individuals. Federal funds whether 100% or 50% reimbursement must not be used to supplant funds being used for existing services and activities. The FSET agency may use Federal funds to operate an approved education component to the extent that costs exceed the normal cost of services provided to non-FSET students.
3. Existing students* - A FS recipient who is an eligible student already attending the institution (without benefit of FSET participation) is exempt from FS work requirements, including FSET participation. While the student may volunteer to participate in another FSET activity, his or her education costs are already being met and it is not appropriate to use Federal funds to subsidize those expenses.

*FS Students enrolled in pre-college, adult basic education or not succeeding in a regular degree or certificate program must be enrolled in FSET prior to receiving enhanced student services or engaging in closed courses designed exclusively for FSET participants. In addition, non-FS students who self initiate educational enrollment prior to becoming FS eligible and voluntarily participating in FSET cannot receive FSET participant reimbursement for those self initiated educational activities. This includes students who are living in poverty or who have limited resources. These students may voluntarily enroll in FSET for enhanced services, job search, work experience or self employment, if eligible for FS.

Note: Matching student & FS Household rosters is not allowable. For instance, a community college seeking access to Federal money may not run computer matches of student rosters against FS participant rolls; and then consider matched students as FSET "volunteers" to claim 50% reimbursement of administrative costs for all students receiving FS. Such a procedure does not comply with the participant confidentiality requirements of the Food and Nutrition Act of 2008 (the Act) and conflicts with the provisions of the Act and Federal SNAP regulations on the proper use of E&T funding.

**8 FSET Component
Definitions > FSET 8.20
Regular School (RS)**

Old Text:

~~This component has been federally approved and will be counted for FSET reports.
FSET funds can be used to pay for this activity.~~

New Text:

This component is not federally approved and will not be counted for FSET reports. FSET funds cannot be used to pay for this activity as these services

are already available through the Department of Public Instruction or another agency at no cost to the participant.

**8 FSET Component
Definitions > FSET 8.45
Work Experience (NON
ABAWDs)/Workfare
(ABAWDs) (WX)**

Old Text:

This component has been federally approved and will be counted for FSET reports. ~~FSET funds can be used to pay for this activity.~~

New Text:

This component has been federally approved and will be counted for FSET reports. **FSET funds can be used to pay for administrative expenses and participant reimbursement for expenses incurred as a result of this activity. Subsidizing wages of the participant is not an allowable expense.**