

**BASIC FOOD EMPLOYMENT & TRAINING (BF E&T)
PROGRAM**

PARTNER MANUAL

October 1, 2011

TOPIC INDEX

Introduction and Program Contacts	1
Participant Flow	2
Basic Responsibilities & Reporting Requirements.....	3
Participant Files	4
Potential BF E&T Participants <u>not</u> on Assistance	5
eJAS Referrals & Component Codes.....	6
Partner Case Management	7
Support Services – Child Care.....	9
Support Services – Transportation & Clothing.....	11
Other Support Services	12
Support Services for Participants with Other Sources of Funding	13
Retention Support Services.....	13
Basic Food Zero Benefit Eligibility.....	13
Clarification Appendix I – Voluntary Participation Option	14
Clarification Appendix II – On-Line Education, SSI, Stipends, & Youth Services.....	15

INTRODUCTION & PROGRAM CONTACTS

The purpose of Basic Food Employment and Training (BF E&T), formerly known as the Food Stamp Employment and Training program, is to help people receiving Basic Food benefits get jobs through voluntary participation in job search, training, education, or workfare activities that promote self-sufficiency. The program delivers services through a third party match model, which consists of contractual partnerships between DSHS and the Washington State Board for Community and Technical Colleges (SBCTC) and several community-based organizations (CBO). The 19 colleges represented by SBCTC and the CBOs provide direct services to participants.

This handbook provides a standard set of procedures and guidelines to deliver services under the BF E&T program. This handbook does not cover every situation or scenario a contractor may encounter in their day to day case management activities. Contractors are provided face-to-face training that provides more detailed instructions and examples of common and some rare case actions. Questions regarding program operations should be sent to Tim Fultz at Timothy.Fultz@dshs.wa.gov. Inquiries about college specific issues should be sent to Teri Echterling at techterling@sbctc.edu. Policy questions about Washington's BF E&T program should be sent to Bob Thibodeau at Robert.Thibodeau@dshs.wa.gov.

<p>Program Contacts</p> <p>John Camp, Food Programs Administrator, CSD / DSHS. (360) 725-4616, campjx@dshs.wa.gov</p> <p>Bob Thibodeau, Basic Food Program Manager, , CSD/DSHS (360) 725-4634, Robert.Thibodeau@dshs.wa.gov</p> <p>Nancy Lucas, Contracts Manager, ESA / DSHS (425) 339-4049, lucasna@dshs.wa.gov</p> <p>Kathy Payne, Funding Policy Coordinator, ESA / DSHS (360) 725-4502, Kathryn.Payne@dshs.wa.gov</p> <p>State Partners</p> <p>State Board for Community and Technical Colleges Teri Echterling, Program Administrator, BF E&T program (360) 704- 4341, techterling@sbctc.edu</p>	<p>Program Coordinator:</p> <p>Tim Fultz, BF E&T Coordinator, White Center CSO (206) 716-2334, fultztd@dshs.wa.gov</p> <p>DSHS Office Locator: http://www.dshs.wa.gov/onlinecso/findservice.shtml</p> <p>DSHS/CSD Call Centers: 1 (877) 501-2233 Monday - Friday 8am - 2pm</p>
---	---

BF E&T Contractor Procedures Manual 10/01/11

PARTICIPANT FLOW

Basic Food Assistance Verification for New Participants

Partners in all Regions and counties please send eligibility lists and questions to the BF E&T coordinator via the Tumbleweed secure e-mail system at bfethelp@dshs.wa.gov

Roster process:

- All eligibility lists are worked in the order received with priority given for impending quarter start dates;
- Lists are to be submitted 20 days prior to start of quarter ;
- Late registration lists may be sent in on a weekly basis;
- Lists turned in on a weekly basis will be completed within 10 business days under normal circumstances; and
- Completed lists will be returned via the Tumbleweed system.

All clients submitted for BFET eligibility must indicate the following:

- The component activity code;
- Components start date and end date (the component start date will be the start date indicated on the eligibility list. (If there is no start date on the eligibility list, the start date will be the date the eligibility roster was sent);
- The hours of participation (components and hours need to be separated, for example: JS 15 hrs, BE 10 hrs, etc.);
- For job search, the system allows 84 days in length for the component with optional extensions; and
- Indicate if there is another BFET provider working with the participant.

Basic Food Assistance Verification for Ongoing Participants

**** Partners are encouraged to use the Benefit Verification System (BVS) prior to sending in eligibility lists to determine if the potential participant would be eligible or needs to apply for Basic Food benefits. Although it is known that BVS is not 100% accurate, it can be useful in providing eligibility information about new clients.**

The contractor caseload screen is the prime source of verification of ongoing BF E&T eligibility. The demographic screen provides information on:

- Basic Food program status;
- If TANF has opened (DCA (Diversion Cash Assistance) is not considered TANF);
- The effective date of closed cases; and
- Reason for closed or terminated cases.

The contractor caseload screen should also be reviewed prior to submitting participant names for monthly billing to ensure that the client was eligible for BFET funded services during the month being billed.

BF E&T Contractor Procedures Manual 10/01/11

BASIC RESPONSIBILITIES & REPORTING REQUIREMENTS

- Contractors must develop a written Individual Employment Plan (IEP) with each participant that is specific to his/her identified interests and needs. The IEP shall be developed after assessing each individual's career goals, skills, abilities, family obligations and any other job-related assets and barriers, and include incremental steps that will help participants overcome all identified career barriers while supporting the participant's strengths and goals.
- Update and revise the IEP as the participant's circumstances change.
- Enter participation progress notes in eJAS a minimum of once a month. New notes must be entered any time circumstances change.
- The Contractor shall submit a quarterly summary report within 15 days of the completion of each fiscal quarter. The report will summarize the status of all contracted performance achievements in both chart and narrative formats using a mutually agreeable template. For contracted Community Based Organizations, the report will be submitted via e-mail to Bob Thibodeau, DSHS/CSD HQ at Robert.Thibodeau@dshs.wa.gov. Colleges should submit the report via e-mail to Teri Echterling at techterling@sbctc.edu.

General Responsibilities:

- All contractors doing business with the state are mandatory reporters. Contractors and their staff are required to report any suspected abuse and neglect on an individual or child by calling 1-866-END HARM
- All contractors are required to report knowledge of welfare fraud to 1-800-562-6906, <http://www.dshs.wa.gov/Fraud/> or Bob Thibodeau at Robert.Thibodeau@dshs.wa.gov
- All contractors are responsible for the secure transfer, storage and disposal of client data. Contractors and their staff must familiarize themselves with the data security provision contained in Exhibit A and the Special Terms / Confidentiality section of the BF E&T contract.

BF E&T Contractor Procedures Manual 10/01/11

PARTICIPANT FILES

Files must be kept for all BF E&T clients. The files may be kept in paper or electronic formats and are reviewed as part of the annual BF E&T program & fiscal monitoring. Files should be organized according to the contractor agency's standards but must contain the following information:

Intake & Assessment: This section must have copies of all intake documentation provided and completed by the participant. It must show evidence that an assessment process was completed with the client to determine the most appropriate service and it must contain a copy of the IEP (Individual Employment Plan).

Eligibility verification: The file must contain evidence that the client's eligibility was checked through DSHS and confirmed prior to the start of BF E&T billable services. Eligibility verification is required each time the service component is extended or a new program activity is added.

Participant progress: The file must contain participant progress information which includes, the activity the client is engaged in, the dates of participation in that activity and regular program progress notes. eJAS notes may be substituted for notes in the file.

Support services tracking: All support services must be tracked. This section will contain copies of ticket and bus pass issuance or logs, copies of receipts for all other support services issued, such as: books and supplies, clothing, tools, etc. and the justifications for each issuance.

BF E&T Contractor Procedures Manual 10/01/11

POTENTIAL BF E&T PARTICIPANTS NOT ON ASSISTANCE

<p>Potential BFET Participants NOT Currently Receiving Basic Food Assistance</p>	<p>Low income residents who are not receiving Basic Food assistance should be encouraged to apply. Applicants or agencies can use the self-screen tool by accessing the Eligibility Calculator located at http://www1.dshs.wa.gov/ESA/TEC. Applicants can be encouraged to apply on line at: https://www.washingtonconnection.org/home/</p> <p>DSHS cannot expedite Basic Food applications for participants other than those who meet specific criteria. Contractors should be aware that Basic Food applications might take several days before a determination of eligibility is made. Clients are <u>not</u> eligible for BF E&T services until they have been approved to receive Basic Food benefits.</p>
<p>Verification of Assistance for Potential BFET Participants Making an Application for Basic Food</p>	<p>DSHS is not able to re-check the eligibility of applicants previously submitted and determined ineligible, <u>UNLESS</u> the agency submits the name and identifying information again.</p> <p>As always, verification submittals should be made via e-mail using the Tumbleweed Secure e-mail system or Faxed.</p>

BF E&T Contractor Procedures Manual 10/01/11

eJAS REFERRALS & COMPONENT CODES

eJAS Referrals from DSHS	<p>The CSO worker will refer Basic Food recipients through the eJAS system to the contractor. A follow-up e-mail will be sent to the Contractor by DSHS.</p> <p>The DSHS worker will open the "FI" component indicator code in eJAS (with zero hours) and open any additional components as appropriate.</p>
Maintaining eJAS Component Codes for Active BFET Participants	<p>DSHS requires the use of eJAS component codes to track client participation and progress in various BF E&T activities.</p> <p>Contractors are responsible for advising the CSO BF E&T Specialist of component changes unless they choose to update components in eJAS using the instructions below. Otherwise:</p> <ul style="list-style-type: none">• Activity updates are to be made by submitting an eligibility list with the changes.• Contractors must report the actual hours that a participant is expected to be active in each component per week.• eJAS messages should be checked several times per week. Please reply to eJAS messages promptly.• Components overdue more than 30 days will be closed without notice.• Component changes will not be made if case notes are not current. <p>Contractors that choose to update components in eJAS need to follow the instructions below:</p> <ul style="list-style-type: none">• Initial eligibility determinations will continue to be the responsibility of the CSO Staff. Clients should be added to an eligibility list and sent to the CSO staff contact. CSO staff will determine eligibility and open the FI component and any initial components as requested if the client is determined eligible.• The Contractor will verify the client's continued BFET eligibility by reviewing their Basic Food and TANF status through the eJAS BFET caseload screen or the demographics screen prior to updating components in EJAS. The contractor will place a separate note confirming that the "client is eligible for continued BFET services per the caseload screen" in the eJAS notes using the note type Eligibility Determination.• For any eligibility concerns, the contractor should either submit the client on an eligibility list or contact their DSHS staff for an eligibility determination.• Contractor can update/add JS, JT, BE, VE, and BR (<i>new code - post-employment job retention</i>) components in eJAS. The actual hours of participation need to be used. An EJAS note reflecting the component change/update needs to be left in EJAS after each change. This note can be combined with eligibility-check note described above if eligibility check and component actions are being done at the same time.• Contractors will close components once client has stopped participating in the BFET program. Components should be closed within 30 days of participation stoppage. DSHS staff will close overdue components after 30 days of expiring.

BF E&T Contractor Procedures Manual 10/01/11

PARTNER CASE MANAGEMENT

Monthly Case Management Notes

Each contractor must use eJAS to create and submit case management notes.

- Progress and participation need to be reported at least once per month in eJAS along with a corresponding case note.
- Notes should be entered in the correct note type to ensure proper confidentiality. Remember that any entry made may become public record; notes must be both accurate and be able to withstand public scrutiny.

If a note has been entered incorrectly, contact Tim Fultz (Region 2) at Timothy.Fultz@dshs.wa.gov to submit a deletion request. Deleting notes is restricted to DSHS personnel and require a written request and business reason to do so.

Reporting Changes of Circumstance and Participation

A change of circumstances and participation may affect a participant's eligibility for Basic Food benefits. For this reason, any relevant changes must be reported timely. The following changes must be reported within 10 calendar days:

- Changes in component participation,
- non-participation,
- increase / decrease in participation hours,
- address change, and
- employment (Employment screens in eJAS must also be updated within 10 calendar days of the participant reporting a job to the contractor).

These changes must be reported via eJAS messaging to the CSO BF E&T Specialist and updated if circumstances change.

BF E&T Contractor Procedures Manual 10/01/11

PARTNER CASE MANAGEMENT

Caseload Management Report (CLMR)	<p>The Caseload Management Report (CLMR) in eJAS is designed to help Contractors better manage their BF E&T caseload. Contractors are required to review their CLMR frequently and utilize it to update notes and participation. The CLMR also allows Contractors to view lists of clients that have overdue components and those that will be coming overdue. Please utilize a new eligibility list to send any component updates to the BF E&T coordinator assigned to your area.</p> <p>Expired components that have not been updated will be closed after 30 days without notice.</p>
Termination of Services	<p>Contractors must report within three working days of discovery, any changes that may result in the termination of services, such as:</p> <ul style="list-style-type: none">• Alert the CSO BF E&T Specialist via eJAS messaging when a participant has left contracted services.• Report any employment or changes in employment, such as hours or wages.• Indicate the reason that the participant has left services. <p>The CSO BF E&T Specialist will close the relevant partner components in eJAS. Contractors also have access to clients with closed components in eJAS for 90 days after all components have been closed to submit final notes or reports.</p>
Participants Served by Multiple BFET Contractors	<p>DSHS will make an eJAS referral to the partner who first identifies a potential participant based upon the enrollment roster fax date and time.</p> <p>In situations where a participant will be served by Contractors which provide nearly identical services, the Contractors will have to come to an agreement on which agency will provide that specific service.</p> <p>In some situations, some Contractors will share clients (e.g., the client receives training from one Contractor and case management / job readiness from another Contractor). These clients will be referred to both Contractors but not for the same component.</p> <p>It is the responsibility of the Contractor to coordinate services to participants that are co-enrolled with other Contractors.</p>

BF E&T Contractor Procedures Manual 10/01/11

SUPPORT SERVICES – CHILD CARE

Child Care Subsidy for BF E&T Participants

The Basic Food Employment and Training (BF E&T) program may allow **non-TANF** Basic Food recipients to access child care through Working Connections Child Care (WCCC) in support of their participation in specific employment and training programs if they have income at or below 175% of the [Federal Poverty](#) Guideline. Participants must submit an application for WCCC subsidy through DSHS to get on the WCCC non-priority waiting list. The application process is initiated and completed by phone. The WCCC phone number is reached by contacting the general phone number for the CSO which serves the ZIP code that the BF E&T participant lives in. Please see the attached CSO and ZIP code list in Appendix IV. Remember that the subsidy is not payable until the date that the parent, child care provider and hours are approved.

Beginning October 1, 2011, BF E&T partner agencies (contractors) that have the needed match can provide child care support services and get reimbursed for 50% of the costs up to the lesser amount of the following:

- The child care provider's private pay rate for that child; or
- The maximum childcare daily rate as listed in the WCCC Policy Manual, pages 51-55 (http://www.del.wa.gov/publications/subsidy/docs/WCCC_PolicyManual.pdf)

In order to prevent supplanting and to make sure reimbursement is allowable, contractors need to require:

- 1) Proof that the participant applied for and was denied WCCC and put on the wait list; or
- 2) Proof that the participant is ineligible for WCCC due to income limits (over 175% FPG); and
- 3) A copy of the child care bill in the participant's file as proof that the state did not pay more than the WCCC published rate

Child care is only provided while parents are in approved activities.

Child care staff will verify the client's schedule of BF E&T activities through client components, hours and notes in eJAS. Partners are required to document specific activity information, (i.e. activity types, days, times, start and end dates). **Child care will not be authorized if activity verification is not available or unclear.** Partners must add a case note if childcare is being covered. Include the amount and time period to ensure there is no duplication of services in case the client does come off the WCCC waiting list and starts receiving assistance from WCCC.

Recipients can participate in the following activities:

- **Job Search (JS)** - This activity can be stand alone or combined with education, training or employment.
- **English as a Second Language** - This activity can be standalone or combined with education, training, or employment.
- **Adult Basic Education (BE)** - This activity can be stand alone or combined with education, training, or employment.
- **GED**- This activity can be stand alone or combined with education, training or employment.
- **Vocational Training (VE)** - Includes occupational assessment, remedial and entry level job skills training, customized and institutional skill training, and upgrade training.

- | | |
|--|---|
| | <ul style="list-style-type: none">• Unsubsidized Employment- Can be combined with education or training activities. Child care will only be provided to cover the BF E&T activity unless the participant also qualifies for WCCC under employment guidelines.• (Effective 10/01/2011) Post-Employment Job Retention Services (BR) – Job retention services are a time-limited training and support process that assist the individual in assessing job needs and provides assistance and resources as needed. Retention services can be provided for a maximum of 90 days post employment for individuals who have received other BF E&T employment/training services. Job retention services may extend to households leaving Basic Food up to the 90 day limit. Use BFET component code BR to open these services in eJAS. |
|--|---|

BF E&T Contractor Procedures Manual 10/01/11

SUPPORT SERVICES – TRANSPORTATION & CLOTHING

<p>Transportation</p>	<p>Transportation costs are paid by the Basic Food Employment & Training program.</p> <p>USDA / FNS allow the BF E&T project to provide transportation support services which are reasonably needed to participate in the program or job retention. These support services can be issued by the Contractor directly to the participant and are 50% reimbursable up to the prescribed limits for each category.</p> <p>Transportation assistance may include:</p> <ul style="list-style-type: none">• Transit tickets,• Passes; and• Fuel for participant-owned vehicles. <p>Transportation support services are approved for job retention, training, job search or other approved non-employment BF E&T activity. This support service may be issued as long as it is reasonably needed by the participant to meet the requirements of an approved Basic Food Employment & Training program. The current maximum support service limit for transportation is \$150.00 per participant per month (including the match).</p> <p>Participants need to verify participation in an approved BF E&T program to receive a transportation support services.</p>
<p>Clothing</p>	<p>General clothing support service costs are paid by the Basic Food Employment & Training program.</p> <p>USDA / FNS allows the BF E&T project to provide general clothing support services which are reasonably needed for job retention or to participate in the program. These support services can be issued by the contractor directly to the participant and are reimbursable up to the prescribed limits for the category.</p> <p>General clothing support services may be issued when appropriate clothing is needed for a job interview, to gain employment, for job retention, or to participate in an approved BF E&T activity. The program limit for general clothing is \$300.00 per participant per program year (October – September).</p> <p>In order to be issued a clothing support service voucher or payment, participants must provide a receipt or estimate of the cost of the clothing including tax to the contractor. A voucher will be issued to the participant payable to the vendor in the amount of the receipt.</p> <p>Contractors may also provide the clothing directly to the participant and submit the cost for reimbursement in their billing. Contractors must provide verification of the cost of the clothing and a justification explaining the need for the clothing.</p>

BF E&T Contractor Procedures Manual 10/01/11

OTHER SUPPORT SERVICES

Housing	After all other resources have been exhausted; housing assistance may include rental assistance when housing stability is reasonable and directly related to helping BF E&T participants prepare for self-sufficiency through training or other approved BF E&T activity. <i>*FNS recommends that housing assistance should not be on-going but be limited to a one time or two time maximum per program year (October to September). *</i>
Utility Shut Off	After all other resources have been exhausted; housing assistance may also cover awards to prevent the shut off of essential utilities such as electricity, water and heating/ cooling. <i>*FNS recommends that shut off awards should not be an on-going assistance but be limited to a one time or two time maximum per program year (October to September). *</i>
Personal hygiene and grooming aids	Participants may receive assistance with personal hygiene products and services (including haircuts) necessary to meet a Contractor or potential employer's appearance standards.
Medical related costs	Participants may receive assistance with the cost of training or employer-required inoculations, eye examinations, and the purchase of eyeglasses. Costs associated with emergency dental work and treatment is also allowed.
Work and training permits and fees	Participants may receive assistance with the cost of testing and/or securing permits needed for training, or to support job search activities.
Reasonable Accommodation supplies	Participants with disabilities may receive assistance with reasonable and necessary purchases of goods or services (including testing) that accommodate the individual's disability.
Work and Training Tools	Participants may receive assistance with tools, uniforms, and/or protective clothing required for training. The need for these tools is determined on a case-by-case basis and costs are not allowed for every participant.
School supplies and educational costs	Participants may receive assistance with textbooks, training materials and other reasonable and necessary school supplies for training. Participants may receive assistance with tuition, lab fees and other education related costs necessary for training connected to a BF E&T activity.
Payment of participant mortgage, loans and/or debts.	BF E&T funds cannot be used to help program participants pay for outstanding indebtedness, mortgages or other repayment of loans, including previous student loans, past due fees, penalties or fines.
Weapons	Support service funds may not be used to purchase guns or ammunition, or any other goods that are intended to suppress and/or inflict bodily harm on others.

BF E&T Contractor Procedures Manual 10/01/11

SUPPORT SERVICES FOR PARTICIPANTS WITH OTHER SOURCES OF FUNDING

BF E&T funding cannot be used to pay for support services if the participant is receiving other funds identified to cover those costs. Examples of other sources of funding include but are not limited to: Federal Financial aid, grants, scholarships, loans, private payments etc. BF E&T participants receiving other sources of funding must first fully expend resources on qualified expenditures before being issued BF E&T support service funding.

RETENTION SUPPORT SERVICES

The enacted Food, Conservation and Energy Act of 2008 allows states to issue post employment support services, also known as job retention services. Effective October 1, 2011, Washington State will make this support service available and allow reimbursement to those partners that wish to implement the job retention services option. Although the language in the Act does not provide specific rules for implementing this option, the recently published FNS 2011 E&T Toolkit gives some guidance and allows a state the discretion to choose the job retention services it wishes to offer. Job retention services can be provided to individuals who have secured employment to help them achieve satisfactory performance, keep the job, and to increase earnings over time. Job retention services:

- Can be provided for a maximum of 90 days post employment;
- May extend to households leaving Basic Food up to the 90 day limit; and
- Are only for individuals who have received other employment/training services under BFET.

Job retention reimbursements must be reasonable and necessary and can include support services described in this handbook like clothing required for the job, equipment or tools required for a job, relocation expenses, transportation and child care. Job retention services can also include post employment counseling, coaching and other case management activities.

BASIC FOOD ZERO BENEFIT ELIGIBILITY

Washington State increased the gross income eligibility threshold for the Basic Food program from 130% to 200% FPL effective October 1, 2008. This increase allowed more individuals and families to qualify for Basic Food benefits. It is possible that due to other eligibility factors, some will qualify for a very low issuance or may even receive a zero actual monetary benefit.

Persons eligible for Basic Food but who do not receive a monetary benefit **are eligible** for BF E&T services. There are no special requirements or procedures for serving these individuals. Please be aware that besides being eligible for BF E&T services. All Basic Food eligible individuals and families are also eligible for:

- Enrollment in free school meals for school-aged children;
- Qualification for low-cost local phone service; and
- Shows the family meets the Women, Infants and Children (WIC) income test.

Contractors should encourage people to apply for Basic Food benefits on line through this link: <https://fortress.wa.gov/dshs/f2esaapps/esaosa/intro.aspx> . An eligibility calculator is available online to help contractors and individuals determine if they may qualify for Basic Food. Please go to: http://www.foodhelp.wa.gov/bf_benefit_estimator.htm for more information and help with applying for Basic Food.

BF E&T Contractor Procedures Manual 10/01/11

VOLUNTARY PARTICIPATION OPTION – APPENDIX I

Beginning with the FFY 2011 Basic Food Employment and Training Plan, Washington State implemented an all volunteer E&T program in which individual Basic Food recipients elect to participate in E&T activities. Although contractors are still required to report participation hours and non-participation occurrences, individuals will not be disqualified from receipt of Basic Food assistance for non-participation in BF E&T. As BF E&T volunteers, participants are not limited to a maximum number of participation hours in any given month.

Relevant CFR Citations Definition of Work Activities - 7 CFR 273.7 (e) (1)

(iii) *A workfare program as described in paragraph (m) of this section.*

(A) *The participation requirements of section 20(b) of the Food Stamp (Food and Nutrition) Act (of 2008) and paragraphs (m)(5)(i)(A) and (m)(5)(i)(B) of this section for individuals exempt from Basic Food Program work requirements under paragraphs (b)(1)(iii) and (b)(1)(v) of this section, are not applicable to E&T workfare components.*

(B) *In accordance with section 20(e) of the Food Stamp (Food and Nutrition) Act and paragraph (m)(6)(ii) of this section, the State agency may establish a job search period of up to 30 days following certification prior to making a workfare assignment. This job search activity is part of the workfare assignment, and not a job search “program.” Participants are considered to be participating in and complying with the requirements of workfare, thereby meeting the participation requirement for ABAWDs.*

(C) *The sharing of workfare savings authorized under section 20(g) of the Food Stamp (Food and Nutrition) Act and paragraph (m)(7)(iv) of this section are not available for E&T workfare components.*

(iv) *A program designed to improve the employability of household members through actual work experience or training, or both, and to enable individuals employed or trained under such programs to move promptly into regular public or private employment. Such an employment or training experience must:*

(A) *Not provide any work that has the effect of replacing the employment of an individual not participating in the employment or training experience program; and*

(B) *Provide the same benefits and working conditions that are provided at the job site to employees performing comparable work for comparable hours.*

Definition of Voluntary Participation - 7 CFR 273.7 (e):

(4) *Voluntary participation.*

(i) *A State agency may operate program components in which individuals elect to participate.*

(ii) *A State agency must not disqualify voluntary participants in an E&T component for failure to comply with E&T requirements.*

(iii) *The hours of participation or work of a volunteer may not exceed the hours required of E&T mandatory participants, as specified in paragraph (e)(3) of this section.*

**Voluntary Participation
Option – No Maximum
Hours**

BF E&T Contractor Procedures Manual 10/01/11

CLARIFICATION – APPENDIX II

On-line Education	Educational institutions may offer programs that include courses which are provided on-line. Educational institutions must provide accommodations to program participants who wish to take a program of study which includes on-line classes and who do not have access to technology.
Participation by SSI Recipients	People who are on SSI and also receiving Basic Food benefits can volunteer to participate in BF E&T activities. This includes persons on SSI who are part of a TANF household as long as they are not receiving a TANF grant for themselves
Stipends	Stipends given to participants as an incentive to continue to participate in the program may be issued, as long as they are not issued with federal funds. Stipends are not eligible for match.
Youth Services	<p>Youth ages 16 to 18 may participate in BF E&T programs even if they receive Basic Food benefits through their parent's case. They may also participate in BF E&T programs if they receive Basic Food benefits on their own.</p> <p>The participation expectation for young participants is secondary education or GED classes. State law provides free educational services for children to age 21, therefore secondary education and GED classes for this population are not reimbursable by the 50/50 match program. Services designed to engage youth in secondary education or GED classes are also not reimbursable. However, support services designed to help the child remain in school by eliminating barriers, counseling or tutoring can be provided and reimbursed by the 50/50 match program as long as they are not otherwise provided for free or at reduced cost through another source.</p> <p>Youth may participate in vocational training programs. These programs are eligible for match. GED costs for adults over the age of 21 are also allowed for match.</p>