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A. Cover Page and Authorized Signatures

State: Oklahoma

State Agency Name: Oklahoma Human Services

Federal FY: 2025

Certified By:

Date Submitted to FNS (revise to reflect subsequent amendments): 08/15/2024

List State agency personnel who should be contacted with questions about the E&T State plan.

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Sondra Shalby State Agency Division Director or Authorized Designee Certified By: Susan Baker 10/01/2024 Program Administrator Date

B. Amendment Log

In accordance with 7 CFR 273.7(c)(8), State agencies must submit plan revisions to the appropriate FNS Regional office for approval if it plans to make a significant change. For a complete list of situations requiring an amendment to the E&T State plan, see Plan Modifications in the E&T State Plan Handbook. The State agency must submit the proposed changes for approval at least 30 days prior to the planned implementation.

Please use the log below to document the submission of an amended plan. A single line in the log should capture each time a plan is amended and resubmitted, not each individual amendment throughout the plan.

To expedite the review process for amendment changes, please highlight areas where text has been added or changed. After FNS approval of amendment changes, highlighting must be removed and a clean, updated plan submitted to FNS.

Table B.I. Amendment Log

Amendment Number	Brief description of changes or purpose for amendment (If amendment includes budget changes, include in description)	Sections of Plan Changed (Highlight areas of plan with changes)	Date submitted to FNS	Date approved by FNS

C. Acronyms

State agencies may consider including acronyms for the SNAP State agency, SNAP E&T program name, State's management information system, and SNAP E&T providers or contractors.

Below is a list of common acronyms utilized within this plan. Please delete acronyms that do not apply and add additional acronyms in alphabetical order.

Table C.I. Acronyms

Acronym Acronym Definition			
ABAWD	Able-Bodied Adult without Dependents		
AFS	Adult & Family Services		
CKTC	Caddo Kiowa Technology Center		
CEO	Center for Employment Opportunity		
E&T	Employment & Training		
FCS	Family & Children's Services		
FNS	Food & Nutrition Service		
FSS	Family Service Specialist		
FFY	Federal Fiscal Year		
GA	General Assistance		
GCWED	Governor's Council for Workforce and Economic Development		
GICO	Goodwill Industries of Central Oklahoma		
GWA	Goodwill Employment Services Center-Ada		
GWT	Goodwill Industries of Tulsa		
HA	Homeless Alliance		
ITO	Indian Tribal Organization		
MSG	Madison Strategies Group		
NWTC			
OESC	Oklahoma Employment and Security Commission		
OKDHS	Oklahoma Department of Human Services		
OK SNAP	Oklahoma's Supplemental Nutrition Assistance Program		
Works	Employment & Training program		
PS	Public Strategies, Inc.		
SXS	Side X Side Inc		
SNAP	Supplemental Nutrition Assistance Program		
TANF	Temporary Assistance for Needy Families		
TEEM	The Education & Employment Ministry		
TCTC	Tri-County Technology Center		
USDA	United States Department of Agriculture		
WIOA	Workforce Innovation & Opportunity Act		
L			

D. Assurances

By signing on the cover page of this document and checking the boxes below, the State agency Director (or Commissioner) and financial representative certify that the below assurances are met.

Table D.I. Assurances

Chec	Check Box	
1.	The State agency is accountable for the content of the E&T State plan and will provide oversight of any sub-grantees. (7 CFR 273.7(c)(4) and 7 CFR 273.7(c)(6))	
II.	The State agency is fiscally responsible for E&T activities funded under the plan and is liable for repayment of unallowable costs. (7 CFR 271.4, 7 CFR 276.2, and 7 CFR 277.16)	\boxtimes
III.	State education costs will not be supplanted with Federal E&T funds. (7 CFR 273.7(d)(1)(ii)(C))	×
IV.	Cash or in-kind donations from other non-Federal sources have not been claimed or used as a match or reimbursement under any other Federal program. (7 CFR 277.4(d)(2))	×
V.	Documentation of State agency costs, payments, and donations for approved E&T activities are maintained by the State agency and available for USDA review and audit. (7 CFR 277.17)	×
VI.	Contracts are procured through appropriate procedures governed by State procurement regulations. (7 CFR 277.14)	×
VII.	Program activities are conducted in compliance with all applicable Federal laws, rules, and regulations including Civil Rights and OMB regulations governing cost issues. (7 CFR parts 271, 272, 273, 274, 275, 276, 277, 281, and 282)	×
VIII.	E&T education activities directly enhance the employability of the participants; there is a direct link between the education activities and job-readiness. (7 CFR 273.7(e)(2)(vi))	×
IX.	Program activities and expenses are reasonable and necessary to accomplish the goals and objectives of SNAP E&T. (7 CFR 277.4(d)(3))	×

Table D.II. Additional Assurances

The with check	Check Box	
I.	If in-kind goods and services are part of the budget, only public in-kind services are included. No private in-kind goods or services are claimed. (7 CFR 277.4(d) and (e))	
II.	The E&T Program is implemented in a manner that is responsive to the special needs of Indian Tribal members on Reservations. The State agency shall consult on an ongoing basis about portions of the E&T State Plan which affect them; submit for comment all portions of the E&T State Plan that affect the Indian Tribal Organization (ITO); if appropriate and to the extent practicable, include ITO suggestions in the E&T State plan. (For States with Indian Reservations only.) (7 CFR 272.2(b)(2) and 7 CFR 272.2(e)(7))	

E. State E&T Program, Operations, and Policy

I. Summary of E&T Program

a) Provide the vision and mission of the State E&T program. In addition, describe how your State agency's E&T program meets the purpose of E&T which is to: 1) increase the ability of SNAP participants to obtain regular employment; and 2) meet State or local workforce needs.

OK SNAP Works is Oklahoma's SNAP Employment & Training (SNAP E&T) program. Our mission is to provide SNAP participants opportunities to gain skills, training, education, work, or experience that will increase their ability to obtain sustainable and living-waged employment, as well as to meet the ABAWD work requirements. OK SNAP Works is a voluntary program that runs at no cost to the participant. Through our contracted partners, OK SNAP Works participants will have access to a variety of resources and additional case management. It also provides several supportive services to assist the participant with potential barriers, such as transportation, given they are reasonable and necessary for the participant to be successful in the program.

OK SNAP Works is focused on fulfilling the State's workforce requirements by equipping participants with comprehensive skills and knowledge necessary for success in their chosen career paths. Participants undergo an initial assessment that evaluates their interests, strengths, weaknesses, and areas for development. This

ongoing case management ensures that participants receive all the necessary resources to foster a strong work ethic and respect for their jobs. Through personalized one-on-one support, the program partners work to ensure participants are well-prepared and supported in their professional endeavors.

b) Is the State's E&T program administered at the State or county level?

Oklahoma's E&T program is administered at the State level. The SNAP E&T Team consists of the Deputy Director of Family and Work, the Program Administrator of SNAP E&T, and six Programs Field Representatives.

C)	(For county-administered States only) Describe how counties share information with
	the State agency (e.g. county E&T plans), and how the State agency monitors
	county operations.

d) Provide the geographic areas of the State where the E&T program operates, and describe the rationale for this selection. Designate which areas, if any, operate mandatory E&T programs.

OK SNAP Works serves Able-Bodied Adults Without Dependents (ABAWDs) and volunteers in the following areas: Oklahoma, Pottawatomie, Tulsa, Osage, Washington, Okmulgee, Wagoner, Creek, Rogers, Pawnee, Pontotoc, McIntosh, Muskogee, Pittsburg, and surrounding areas, provided it does not cause hardship for the participant or the provider.

The rationale for these selections is that Tulsa and Oklahoma counties are the most populated areas in Oklahoma, ensuring a higher concentration of potential participants. Additionally, Oklahoma is working to expand services to more rural areas to reach a broader audience. It's important to note that participation in OK SNAP Works is voluntary.

e) Provide a list of the components offered.

SNAP E&T components offered in Oklahoma include Supervised Job Search (SJS), Job Search Training (JST), Job Retention (JR), Basic/Foundational Skills Instruction (including High School Equivalency programs) (EPB), Career/Technical Education programs or other Vocational Training (EPC), Work Readiness Training (EPWRT), On-the-Job Training (WBLOJT), Work Based Learning-Other (WBLO), Transitional Jobs – Subsidized (WBLJT-SUB), and Work Based Learning – Subsidized (WBLI-

SUB). These components aim to help participants gain the skills and experience necessary to obtain and retain employment.

f) Provide the web addresses (URLs) of State E&T policy resources such as handbooks and State administrative code, if available.

OK SNAP Works (oklahoma.gov)

106. Oklahoma Supplemental Nutrition Assistance Program Works (OK SNAP WORKS)

II. Program Changes

Please complete this section if applicable, and only include changes to the program for the upcoming Federal fiscal year (FY).

a) Summarize changes for the upcoming Federal fiscal year (FY) from the prior FY. Significant changes may include new initiatives, changes in funding or funding sources, policy changes, or significant changes to the number of partners or participants. Significant changes could include those made as a result of management evaluation findings or participation in program improvement initiatives, such as SNAP to Skills. It is not necessary to include changes made as a result of new Federal rulemaking.

OK SNAP Works is excited about our expansion planned for FY 2025. We are thrilled to welcome two new partners, including our second technology center and another partner focused on workforce development. This expansion demonstrates our commitment to providing diverse and inclusive opportunities.

Northwest Tech Center is one of our new partners, committed to creating opportunities through high-quality educational experiences. Their mission is to foster success in education, the workplace, and life. Initially, they will offer case management and Educational Program, Career and/or Technical Education Programs or Other Vocational Training (EPC). This will be specifically within NW Tech's practical nursing program, which prepares 12 students to become licensed practical nurses over a 45-week course. Upon completion, graduates are prepared to take the NCLEX examination and can expect to enter the workforce with an average starting salary of \$54,620 per year. We are particularly excited about this partnership as it introduces our first nursing program, which could lead to employment in one of Oklahoma's top job sectors.

Side X Side, another new partner, aims to bridge the gap between underemployed talent and local employers. This partnership is rooted in collaboration, serving participants by launching them into long-term career pathways and aiding employers in expanding their local labor forces. Participants in the Side X Side program, referred by local nonprofit agencies and supported financially to ensure access, undergo nine weeks of intensive training in essential workplace skills from more than ten local and national curriculum partners. During this period, each participant gains practical experience by working with local employers in a curated 'earn and learn' setting. This dynamic allows participants to apply their new skills in real-world environments while giving employers a chance to evaluate their potential for long-term employment. Side X Side plans to serve 64 participants, targeting individuals facing barriers such as addiction, justice involvement, and generational poverty. They will offer components such as Supervised Job Search, Job Retention, EPB, EPWRT, and SWBL.

Furthermore, OK SNAP Works is revising its screening and referral processes for Family Service Specialists (FSSs). Previously, all Able-Bodied Adults Without Dependents (ABAWDs) were mandatorily screened for OK SNAP Works during certification and referred if applicable. The updated process will now include:

- 1. **Expanded Screening**: All adults aged 18 and older will be screened for OK SNAP Works eligibility.
- Referral Process: Eligible adults will automatically be screened to the program.
- Client Declines Participation: If an eligible adult opts not to be referred, a
 case note will be made to document that the client was screened and found
 suitable but declined to participate.
- 4. **Reverse Referrals**: These case notes will also serve for reverse referrals, showing that a Family Service Specialist has identified the client as suitable for the E&T program, thus eliminating the need for FSSs to contact participants following a reverse referral.

These modifications are designed to streamline the referral process and enhance the efficiency of client screenings and follow-ups, ensuring smoother operations and better service delivery.

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III. Consultation and Coordination with the Workforce Development System

State agencies must design the E&T program in consultation with the State workforce development board and operate the E&T program through the Statewide workforce development system (7 CFR 273.7(c)(5)). The goal of this section is to explain the relationship between the State agency and other organizations it plans to consult and coordinate with for the provision of services, including organizations in the statewide workforce development system. The statewide workforce development system refers to a network of providers, which may include government and the public sector; community-based organizations and non-profits; employers and industry; occupational training providers; and post-secondary institutions, such as community colleges. Please note the State workforce development board is an entity that establishes regional strategic plans and sets funding priorities for their area. They are distinct from State workforce agencies.

Consultation

Consultation with the workforce development system generally includes discussions to learn about services provided in the community and how each organization functions and coordinates with others in the community. State agencies can demonstrate they consulted with their State workforce development board by noting the dates of conversations, who they spoke with, what they spoke about, and how they incorporated this information into the design of their E&T program.

a) Consultation with State workforce development board: Describe how the State agency consulted with the State workforce development board in designing its SNAP E&T program. This description should include with whom the State agency consulted and the outcomes of the consultation. If the State agency consulted with private employers or employer organizations in lieu of the State workforce development board, skip to question (b).

OK SNAP Works continues efforts to collaborate with Oklahoma Works (umbrella term for all things state workforce) through the Workforce Innovation and Opportunity Act (WIOA) regional boards and state board and will continue to seek guidance and support on areas to improve our SNAP E&T program. They are the Central Oklahoma Workforce Innovation Board (COWIB), one of six local boards in the state. A meeting on 05/15/2024 with WIOA and OK SNAP Works staff determined short term coordination goals. WIOA staff attending: Ashely Sellers (CEO), Kim Chapman (Policy and Compliance Manager), Dana Campbell (Business Services and Communications Program Manager). Initial short-term coordination discussed:

 Sending WIOA our State Plan for review and comment. This will go to all regional boards, as well as the Governor's Council for Workforce and Economic Development. Planned delivery date: 07/15/24.

- WIOA requested referrals from Oklahoma Human Services workers when appropriate. Possibility of policy changes are being reviewed, but a quick update is to get WIOA information on referrals to new OHS workers at the Academy. OK SNAP Works coordinated with Academy staff to get a WIOA informational video, test questions, and guidance on referrals to new OHS staff. Process completed 06/14/2024.
- Identified Work Ready as not properly capturing referrals to OK SNAP Works from WIOA staff. WIOA is embedded in some WR locations and does a handoff to WR for their referrals to OK SNAP Works. At that point, WR staff were incorrectly sending the referral as from just WR, not WR and WIOA. OK SNAP Works had in-person training 06/18 to train WR staff.
- WIOA noted that SNAP E&T is only in certain counties, WIOA is all 77 counties. We are looking into a way to recommend sending a referral to WIOA for ABAWD SNAP denials and participants that are outside of E&T counties. Potentially difficult due to several different Workforce Development Board's rather than one central location for DHS workers/referrals to go to.
- WIOA requested OHS present in American Job Centers (public-facing WIOA locations) on OK SNAP Works, so their frontline staff understands what we offer and who might need a referral sent to us. Coordinated with Bradly Wilkerson, Area Manager, Oklahoma Employment Security Commission, for an in-person presentation to WIOA staff on 07/12/24.
- OK SNAP Works planned to attend Governor's Council for Workforce and Economic Development quarterly board meeting on 07/26/24. The meeting was cancelled and not rescheduled, so we will attend the next quarterly meeting scheduled on 10/25/24. This meeting does not allow public comments, but we will network after for future coordination. OK SNAP Works will stress the requirement to consult with the State Workforce Board and request a meeting seeking their advice on the local job market and how to structure our E&T program to meet employer and job-seeker needs.
- WIOA noted referral process between programs is inefficient. OK SNAP Works is looking into updates through new Ergo system to shorten referral process.
- OK SNAP Works shared our new public-facing webpage with WIOA on 05/15/24.

OKDHS has a memorandum of understanding (MOU) in place with WIOA, which covers all DHS programs, including SNAP E&T. OK SNAP Works wants to note that even though WIOA is a partner of the Workforce board, the coordination between OK SNAP Works and WIOA is in guidance with the Governor's Council for Workforce and Economic Development Strategic Plan.

b) Consultation with employers: If the State agency consulted with private employers or employer organizations in lieu of the State workforce development board, document this consultation and explain the determination that doing so was more effective or efficient. Include with whom the State agency consulted and the results of the consultation.

OK SNAP Works used "Oklahoma's 100 Critical Occupations" list from WIOA to identify high-paying careers available in the state for the least amount of education required. OK SNAP Works then identified the 10 largest employers in the state using data from the OK Dept of Commerce. Those employers (excluding #10 OKDHS) in order: Department of Defense, Wal-Mart Associates Inc., Integris Health, Inc., Chickasaw Nation, Oklahoma State University, U.S. Postal Service, OU Health Sciences Center, Hobby Lobby Store Inc, University of Oklahoma, and Mercy Health. OK SNAP Works plans to reach out to appropriate (non-federal) employers to inquire about setting up a training pipeline through our partners for the employers with highpaying jobs. In June 2024, OK SNAP Works attempted to connect with employers such as Wal-Mart, Integris, Hobby Lobby, and Mercy Health through cold emails and LinkedIn messages. However, as of July 1, there were no responses, suggesting that this approach may not be the most effective. Utilizing the local boards' Business Services team and the Oklahoma Employment Security Commission (OESC) could provide a more effective means of connecting with employer partners. OK SNAP Works plans to reach out to employers in person at future career fairs as part of this improved strategy. After reviewing our State Plan, WIOA suggested "that leveraging the local boards' Business Services team and OESC could be a more effective approach to connecting with employer. We plan to bring this up at our next meeting with WIOA.

Coordination

Coordination with the workforce development system consists of efforts to partner with workforce providers to directly serve SNAP E&T participants or to align the flow or types of services offered across programs.

c) **Special State Initiatives:** Describe any special State initiatives (i.e. Governor-initiated or through State legislation) that include SNAP E&T. Describe any efforts taken by the State agency to coordinate these programs, services, partners, and/or activities with the State's E&T program.

OK SNAP Works' strategic priorities are in alignment with the Governor's Council for Workforce and Economic Development strategic plan Impact Goals. GCWED Impact Goal 1 aims to increase the Oklahoma labor force participation rate. OK SNAP Works assists GCWED's plan with partner's scalable career pathways, increased internship and apprenticeship opportunities, and marketing materials that promote our joint efforts. GCWED Impact Goal 2 is to create new private sector jobs with an average salary of \$55,000 per year or higher. OK SNAP Works assists by increasing the percent of Oklahomans with post-high school skills credentials. Impact Goal 3 is to achieve top ten status (currently 29th) in national unemployment rate. OK SNAP Works partners increase internship and apprenticeship opportunities, increase data sharing among partners, and focus career pathways on state and regional business and skills requirements. Impact Goal 4 is increased effectiveness in serving employers. OK SNAP Works contributes by establishing partnerships in each planning region, partners engage businesses in program design, tailor curricula to

accommodate changing business needs, and diversify funding sources. The link to the strategic plan is below.

https://oklahoma.gov/content/dam/ok/en/workforce/documents/gcwed/GCWED-Strategic-Plan.pdf

d) **Coordination with title I of WIOA**: Describe the extent to which the State agency is carrying out SNAP E&T programs in coordination with title I programs under the Workforce Innovation and Opportunity Act (WIOA).

An American Job Center (AJC) is typically the initial contact for individuals seeking employment. To increase access to employment and training programs, including job searches, OK SNAP Works accepts referrals from our Green County Workforce (Tulsa County locations) and Central OK Workforce (OK County region). In collaboration with the Workforce, OK SNAP Works accepts referrals for programs designed to fill gaps in adult education. AJCs will refer individuals on SNAP who need soft skills and adult basic education. These programs are completed with our SNAP E&T providers before the individuals enter more skilled programs offered through Workforce. OK SNAP Works will continue to seek guidance from One Stop AJC locations.

e)	WIOA Combined Plan: Is SNAP E&T included as a partner in the State's WIOA Combined Plan?
	□ Yes
	⊠ No

f) **TANF/GA Coordination:** Describe how the State agency is coordinating with TANF/GA programs, services, partners, and/or activities. Describe any TANF/GA special initiatives targeting specific populations and any actions taken to coordinate with these efforts.

Both TANF and OK SNAP Works are under the same Deputy Director. This allows our State agency to actively coordinate with TANF through a structured approach that emphasizes collaboration and communication. We ensure alignment of services, resources, and activities to maximize support for our community's most vulnerable populations.

Actions taken to coordinate these efforts include regular meetings with TANF program administrators to share best practices, identify areas for improvement, and address challenges faced by program participants. We also leverage data-sharing agreements to facilitate seamless referrals and ensure that individuals who may not qualify for one program are promptly connected to alternative support services.

Overall, our agency's commitment to coordination with the TANF program underscores our dedication to enhancing the effectiveness and efficiency of social assistance delivery, ultimately improving outcomes for our participants.

g) **Other Employment Programs:** Describe how the State agency is coordinating its SNAP E&T program with any other Federal or State employment program (e.g. HUD, child support, re-entry, refugee services).

OK SNAP Works partners with the OKDHS Refugee Assistance Team, which is housed within OKDHS. The Refugee Assistance Team helps determine SNAP eligibility for any refugee, special Immigrant Visa, Amerasian, Foreign-born 18+ Human trafficking victims, asylees, Cuban or Haitian Entrant, Afghan Humanitarian Parolee, or Ukrainian Humanitarian Parolee. This team also refers these refugees to RSS Employment Services. If for some reason, RSS is not a good fit for the refugee, a referral to OK SNAP Works can be made.

IV. Consultation with Indian Tribal Organizations (ITOs)

State agencies are required to consult with Tribes about the SNAP State Plan of Operations, which includes the E&T State Plan, per 7 CFR 272.2(b) and 272.2(e)(7). The consultations must pertain to the unique needs of Tribal members. State agencies are required to document the availability of E&T programs for Tribal members living on reservations in accordance with 7 CFR 273.7(c)(6)(xiii). The goal of this section is to describe how the State agency consulted with Indian Tribal Organizations (ITOs), describe the results of the consultation, and document the availability of E&T programs for Tribal members living on reservations.

a)	Did the State agency consult with ITOs in the State?
	\square Yes, ITOs in the State were consulted. (Complete the rest of this section.)
	⋈ No, ITOs are located in the State but were not consulted. (Skip the rest of this section.)
	☐ Not applicable because there are no ITOs located in the State. (Skip the rest of this section.)

b) Name the ITOs consulted.

Agency Wide Consultation:

For Oklahoma Human Services, our Native Nations' Liaison, Summer Wesley commenced the

agency's consultation, on March 1, 2024, with a letter that was sent to all 38 Nations, via standard mail and email, inviting the Nations to engage in discussions specific to AFS programs, community needs, and the FY 2025 state plans.

The Nations comment period was open from March 1, 2024, to May 1, 2024. During this period, the comprehensive plans for the Federal Fiscal Year 2024 were made available for review to provide necessary context. Comments could be submitted via a designated web form accessible through the provided link or QR code, through email, or by engaging with the AFS's liaison to the Nations, Summer Wesley, either by phone or in person.

The letters were sent by both mail and email, to the following officials:

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			2025	
			South	
			Gordon	
			Cooper Dr,	
Absentee	John		Shawnee,	
Shawnee	Johnson	Governor	Ok 74801	jjohnson@astribe.com
	*Chief			"
	(Subject to			
	Tribal			
	Leadership			
	Dispute): *			
	Wilson		101 East	
Alabama			_	
Quassarte	Yargee / Sam		Broadway,	
		Chief	Wetumka,	info@alabama ayaaaatta ara
Tribal Town	Marshall	Chiei	OK 74883	info@alabama-quassarte.org
			P.O. Box	
Apache			1330,	
Tribe of	Durrell		Anadarko,	
Oklahoma	Cooper	Chairperson	Ok 73005	durrell.cooper@apachetribe.org
			P.O. Box	
			487,	
Caddo	Bobby		Binger, Ok	
Nation	Gonzalez	Chairperson	73009	bgonzalez@mycaddonation.com
			P.O. Box	
			948,	
Cherokee	Chuck	Principal	Tahlequah,	
Nation	Hoskins	Chief	Ok 74465	chuck-hoskin@cherokee.org
			100 Red	
			Moon	
Cheyenne &			Circle,	
Arapaho	Reggie		Concho,	
Tribes	Wassana	Governor	Ok 73022	rwassana@c-a-tribes.org
111003	vvassaria	COVCITIO	P.O. Box	i wasanawo-a-mbes.org
Chickasaw	Bill			
Nation		Governor	1548 Ada, Ok 74820	tommy grov@shiskosow not
เงสแบบ	Anoatubby	GOVERNO	UK 1402U	tammy.gray@chickasaw.net
Choctaw				
Nation of	Randy	Executive	P.O. Box	
Oklahoma	Hammons	Director	1210,	rhammons@choctawnation.com
Orianoma	i iaiiiiiioiis	חופכוטו	1210,	mammons@cnoctawnation.com

			Durant, Ok 74702	
Citizen Potawatomi Nation	John A. "Rocky" Barrett	Chairperson	1601 South Gordon Cooper Drive, Shawnee, Ok74801	jbarrett@potawatomi.org
Comanche Nation	Sandra Mithlo	Director of Social Services	P.O. Box 908, Lawton, Ok 73502	Sandra.Mithlo@comanchenation.com
Delaware Nation	Deborah Dotson	President	P.O. Box 825, Anadarko, Ok 73005	ddotson@delawarenation-nsn.gov
Delaware Tribe of Indians	Brad KillsCrow	Chief	5100 Tuxedo Blvd., Bartlesville, Ok 74006	Bkillscrow@delawaretribe.org
Eastern Shawnee Tribe	Glenna J. Wallace	Chief	10200 S. 695 Rd. Wyandotte, Ok 74730	gjwallace@estoo.net
Fort Sill Apache	Lori Gooday Ware	Chairperson	43187 U.S. Hwy 281, Apache, Ok 73006	lori.g.ware@fortsillapache-nsn.gov
Iowa Tribe	Jacob Keyes	Chairperson	335588 E. 750 Rd., Perkins, Ok 74059	jkeyes@iowanation.org
Kaw Nation	Kimberly Jenkins	Chairperson	P.O. Box 50,Kaw City, Ok 74641	kjenkins@kawnation.com
Kialegee Tribal Town	Stephanie Yahola	Mekko	P.O. Box 332, Wetumka, Ok 74883	stephanie.yahola@kialegeetribe.net
Kickapoo Tribe	Darwin Kaskaske	Chairperson	P.O. Box 70, McLoud, Ok 74851	darwin.kaskaske@okkt.net
Kiowa Tribe	Lawrence SpottedBird	Executive Director	P.O. Box 369,	LSpottedBird@kiowatribe.org

			Carnegie, OK 73015	
			P.O. Box	
	Douglas		1326,	
Miami Tribe	Douglas Lankford	Chief	Miami, Ok 74355	dlankford@miamination.com
Miailii Ilibe		Cillei	74333	dianklord@ifflarfilliation.com
Modoc Tribe	*Chief (Subject to Tribal Leadership Dispute): *Robert Burkybile III / Kirk Miller	Chief	22 N. Eight Tribes Trail Miami, Ok 74354	modoctribe@modocnation.com
			P.O. Box	
Muscogee			580,	
(Creek)	D 2 - 1 1 1 1 1 1	Principal	Okmulgee,	JL:110
Nation	David Hill	Chief	Ok 74447	dhill@mcn-nsn.gov
	Cooffroy		627	
Osage	Geoffrey Standing	Principal	Grandview, Pawhuska,	
Nation	Bear	Chief	Ok 74056	gstandingbear@osagenationnsn.gov
	Boar	0	8151	gotanianigotal@oodgenationiigot
Otoe- Missouria Tribe	John R. Shotton	Chairperson	Highway 177 Red Rock, Ok 74651	jshotton@omtribe.org
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			110,	
Ottawa	Kalisha	0	Miami, Ok	
Tribe	Dixon	Chief	74355	kalisha.oto@gmail.com
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Pawnee			470, Pawnee,	
Nation	Misty Nuttle	President	Ok 74058	jk1106@pawneenation.org
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			Eight	
			Tribes Trail	
Peoria Tribe	Craig		Miami, Ok	
of Indians	Harper	Chief	74354	chiefharper@peoriatribe.com
			20 White	
			Eagle	
Ponca	Oliver Little		Drive	
Nation	Cook	Chairperson	Ponca City, Ok 74601	oliver.littlecook@ponca-nsn.gov
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			630 rd.	
Quapaw	Wena		Quapaw,	
Tribe	Supernaw	Chairperson	Ok 74363	wena.supernaw@quapawnation.com

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			920963 S.	
			Hwy 99	
Sac & Fox		Principal	Stroud, Ok	secondchief@sacandfoxnation-
Nation	Don Abney	Chief	74079	nsn.gov
			36645 US -	3
			270.	
Seminole	Lewis J.	Principal	Wewoka,	
Nation	Johnson	Chief	,	shief@ana nan gay
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			23701	
			South 655	
Seneca-			Road,	
Cayuga	Charlie		Grove, Ok	
Tribe	Diebold	Chief	74344	cdiebold@sctribe.com
			29 S. Hwy	
Shawnee	Benjamin		69A Miami,	
Tribe	Barnes	Chief	Ok 74354	chief@shawnee-tribe.com
			P.O. Box	
			188	
			Okemah,	
Thlopthlocco	Ryan		Okeman, Ok 74859-	
Tribal Town	Morrow	Town King	0188	rmorrow@tttown.org
TIDAL TOWIT	IVIOITOW	Town King		inionow@illown.org
			1 Rush	
			Buffalo	
			Road,	
Tonkawa	Russell		Tonkawa,	
Tribe	Martin	President	Ok 74653	rmartin@tonkawatribe.com
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United			746,	
Keetoowah			Tahlequah,	
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Wichita &			729,	
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144			60,	
Wyandotte	D E	01: 6	Wyandotte,	
Nation	Billy Friend	Chief	Ok 74370	bfriend@wyandotte-nation.org

A subsequent correspondence was dispatched using the same methodologies to the prior dignitaries on April 1, 2024. This letter sought their participation and input on addressing the community needs of the citizens in their respective Nation, with a specific focus on the Federal Fiscal Year 2025 State Plan of Operations.

The deadline for written comments was May 1, 2024. However, AFS conducted a virtual summit during the drafting period for the FY 2025 plans to engage Nations in discussions concerning community needs and program operations. On May 3, 2024, save the date letters were issued to the listed recipients via both mail and email.

Registration notifications for the virtual summit were dispatched to the officials via postal mail and email on May 31, 2024. Additionally, reminder emails were issued to the same recipients on June 11, 2024.

The AFS Native Nations Virtual Summit took place on June 14, 2024, from 1:00 to 3:00 pm. The summit provided an opportunity for in-depth discussions regarding the drafting of the plan. Matthew Conley, Programs Administrator with SNAP, and Joni Jackson, Program Field Representative with OK SNAP Works, were in attendance to present their programs for the Nations. This allowed for interactive sessions featuring live commentary and facilitated the opportunity for attendees to pose questions to the program experts.

Any documentation such as the letters or information from the Nation Nations Summit can be provided, if requested.

c) **Outcomes:** Describe the outcomes of the consultation. Provide specific examples of how the State agency incorporated feedback from ITOs into the design of the E&T program (e.g., unique supportive service, new component, in-demand occupation).

Consultation Outcomes from AFS Native Nations Liaison Summer Wesley *High level overview

<u>Native Nations Comment Period:</u> Unfortunately, Oklahoma did not receive any comments during the open period from any of the 38 Nations. Oklahoma will continue to reach out to the Nations Leadership in hopes of building relationships and partnerships with the Native Nations.

Wichita & Affiliated Tribes

President Parton requested Liaison Wesley to attend the Wichita and Affiliated Tribes' Food Sovereignty Initiative Strategic Planning session. During the event, they discussed the Nation's community garden and teaching program, as well as the possibility of creating a new program to provide small, raised beds for citizens to have at their home. Ms. Wesley also discussed the possibility of a raised bed project with President Parton and let her know that seeds and food-producing plants can be purchased with SNAP benefits. Representatives from the Indigenous Food and Agriculture Initiative stated they can help locate grant money to develop food sovereignty plans and programs. President Parton looks forward to the ongoing relationship and expressed gratitude for the engagement. OK SNAP Works also set up as a vender with a table representing the OK SNAP Works program.

Comanche Nation

On April 23, 2024, AFS's Liaison, Summer Wesley, met with Chairman Woommavovah of the Comanche Nation along with the Tribal Administrator and FDPIR Director. They

discussed community needs and the Summer EBT program. The Comanche Nation expressed interest in the program, but they are currently not eligible to administer it. AFS will explore possibilities for providing the program in the future. Both Chairman and Administrator appreciated the engagement.

Kiowa

On April 23, 2024, AFS's Liaison, Summer Wesley, met with several officials from a nation to discuss their projects focused on advancing self-determination and meeting community needs. The nation expressed interest in providing TANF & WIC in the future and operating a community garden funded by SNAP Ed. They are considering becoming a training site for SNAP E&T but expressed concerns about restrictions that create barriers for FDPIR participants. The Vice Chairman suggested including this change in their lobbying efforts.

Outreach and Relationship Building specific to OK SNAP Works.

At OK SNAP Works, we are dedicated to fostering meaningful relationships to enable and facilitate effective consultation. We believe in the power of strong connections, positive outcomes, and sparking curiosity. Our engagement involves interactions with various Nations, Native Nation's service entities and Native Nations community engagement.

We are currently creating specific flyers for the Nations and making space for them on the OK SNAP Works website landing page.

FNS and Peer State Support

OK SNAP Works met twice with Arizona for discovery with the creation of our onboarding plans.

We tried to schedule meetings with Washington State, but those have not been successful yet.

We make it a priority to have regular check-ins with our FNS team as well as our tribal liaison for AFS.

Native Nations Events

AFS Native Nations Virtual Summit

The AFS Native Nations Virtual Summit, held on June 14, 2024, from 1:00 to 3:00 pm, provided an invaluable platform for engaging discussions on the development of the plan. The participation of Matthew Conley, Programs Administrator with SNAP, and Joni Jackson, Program Field Representative with OK SNAP Works, brought forth inspiring and interactive sessions, allowing attendees to engage with program experts

and pose their questions.

OK SNAP Works has since sent out a follow-up email to all nations that were invited to the summit to see if they could facilitate a more intimate conversation and build relationships.

988 Tribal Mental Health Lifeline Summit

OK SNAP Works was proud to participate and showcase a vendor booth at the 988 Tribal Mental Health Lifeline Summit on November 14-15, 2023. Our presence allowed us to demonstrate our commitment to supporting the nations and promoting the bridging of gaps between mental health, food insecurity, and self-sufficiency through employment and education programs. The event was graced by the presence of many of the nation's leaders, making it a significant opportunity to recognize and learn about our program.

Native Nations Intermediary

Center for Employment Opportunities CEO has expressed interest in expanding their intermediary and has been in communication with Muskogee Creek Nation. Native Nations Serving Entities

Native Nations Serving Entities

Caddo Kiowa Technology Center

OK SNAP Works has had multiple communications with Caddo Kiowa Technology Center since our Seattle Job Initiative Technical Assistance and webinar on September 6, 2023. Caddo Kiowa Technology Center officially applied on December 11, 2023. Communications also occurring in October and November 2023. On March 4, 2024, we visited with their leadership (Tony Hanncock, Staci Repp and Jennie Nunn), as well as, representatives from Caddo (Kay O'Neal) and Comanche Nations (Angela Rashidi) with our FNS team (Jason Turner and Kathryn McDonald). Correspondence continued after March 2024 with virtual meetings. As of July 2024, Caddo Kiowa Technology Center has withdrawn their application to become a SNAP E&T Provider. They have new administration and a part of a new TANF expansion that assists both TANF and non-TANF populations through Work Ready Oklahoma (Public Strategies). They appreciated our time and effort, but they want to see how this year goes with these substantial internal changes.

Goodwill Industries of Ada, Chickasaw Partnership

Our partner, Goodwill Industries of Ada, has a partnership with the Chickasaw Nation. We have sent emails to arrange a meet and greet but have not been successful at this time.

Redlands Community College

Redlands Community College, represented by Amy Graham and Tori Davis, met with OK SNAP Works in October 2023 as a result of the Seattle Jobs Initiative TA webinar.

After several communications, Redlands Community College expressed a strong desire to concentrate on how they could support student-athletes receiving SNAP benefits with their operational hours, rather than emphasizing employment and training at the present time.

United Urban Indian Council Inc.

We spoke with Tracy Harjo, Executive Director of the United Urban Indian Council in June 2024. During our initial meeting, we learned that they are currently 100% federally funded. However, she mentioned that there will be budget cuts soon, and they will be completing grant applications and seeking other funding sources. We told her to reach out to us once this happens, so that we can review non-federal sources to provide a match.

Native Nations

Caddo Nation

After meeting with Kay O'Neal at Caddo Kiowa Technology Center on March 4, 2024, we have attempted to connect through email and phone calls multiple times but have not succeeded.

Caddo Child Care is hosting a school readiness event on August 3rd, 2024, where we will be present as a vender.

Cheyenne and Arapaho Tribes

Pending meeting on August 7th, 2024, with Erwin Pahmahmie and Marsha Lena.

Comanche Nation

After meeting with Angela Rashidi at Caddo Kiowa Technology Center on March 4, 2024, we have attempted to connect multiple times through email and phone calls but have not succeeded.

Kickapoo Tribe of Oklahoma

On September 17th, 2024, OK SNAP Works has turned in their application to be a vender at their Health Fair.

Muskogee (Creek) Nation

OK SNAP Work has presented twice for MCN Fiber Optics Program. The first presentation took place on March 5, 2024, with Mark Harjo from MCN; Jason Turner, and Kathryn McDonald from FNS; and Susan Baker, Andy Jensen, and Joni Jackson from OK SNAP Works. The second presentation occurred on April 10, 2024, with Mark Harjo's team and the OK SNAP Works team. Contracts were sent for review on April 16, 2024. Despite multiple attempts to follow up and answer questions, no communication has been received since the contracts were sent. It is known that the CEO has been in communication with them to be added under their intermediary services.

Wichita & Affiliated Tribes

President Parton extended a special invitation to Liaison Wesley to participate in the Wichita and Affiliated Tribes' Food Sovereignty Initiative Strategic Planning session. OK SNAP Works had an incredible opportunity to set up as a vendor, showcasing the potential impact of the OK SNAP Works program for their Nation. It was an opportunity for us to demonstrate support and raise awareness of our program within the Nations.

We are committed to building strong connections with the Nations. OK SNAP Works will continue to extend its presence and collaborate closely with our AFS Native Nations Liaison Summer Wesley. Unofficially, we have received positive feedback and interest from various Nations. Pending approval, we plan to feature Nations on our OK SNAP Works Landing page with their own section created for their uniqueness and create tailor-made materials for the Native Nations Liaison and OK SNAP Works to distribute during events.

d)	Enhanced reimbursement: Will the State agency be seeking enhanced reimbursement for E&T services (75%) for ITO members who are residents of reservations, either on or off the reservation?
	□ Yes
	⊠ No
V.	Utilization of State Options
uni	te agencies have the flexibility to implement policy options to adapt and meet the que needs of State populations. Check which options the State agency will element.
a)	The State agency operates the following type of E&T program (select only one):
	□ Mandatory per 7 CFR 273.7(e)
	☐ Combination of mandatory and voluntary
b)	The State agency serves the following populations (check all that apply):
	☐ Applicants per 7 CFR 273.7(e)(2)

	☐ Exempt members of zero benefit households that volunteer for SNAP E&T per 7 CFR 273.10(e)(2)(iii)(B)(7)
	☐ Categorically eligible households per 7 CFR 273.2(j)
c)	Does the State agency enable ABAWDs to regain SNAP eligibility through E&T and verify that the ABAWD will meet the work requirement within 30 days subsequent to application per 7 CFR 273.24(d)(1)(iv)?
	□ Yes
	⊠ No

VI. Characteristics of Individuals Served by E&T

State agencies are required to include information about the categories and types of individuals they plan to exempt from mandatory E&T participation (7 CFR 273.7 (c)(6)(iv)), as well as the characteristics of the population they plan to place in E&T (7 CFR 273.7 (c)(6)(v)).

a) Describe the categories and types of individuals the State will exempt from mandatory E&T participation. In accordance with 7 CFR 273.7(e), State agencies may exempt from mandatory E&T participation, categories of work registrants (e.g. all those in counties X, Y, Z, or those in their first 30 days of receipt of SNAP) and individual work registrants based on certain personal characteristics or circumstances (e.g. lack of transportation or temporary disability). These exemptions are in addition to the federal exemptions from work requirements at 273.7(b) and only applicable to the E&T requirement at 7 CFR 273.7(a)(1)(ii). Exemptions from Mandatory E&T must also be listed in Table H 'Estimated Participant Levels' Sheet of the Excel Workbook.

(Note: States than run all-voluntary E&T programs would note that they exempt all work registrants.)

Oklahoma operates as a voluntary state, meaning that all work registrants are exempt from mandatory participation in SNAP E&T (Supplemental Nutrition Assistance Program Employment and Training). This approach allows individuals to choose whether they wish to participate in E&T programs without mandatory enrollment. By exempting all work registrants from compulsory participation, Oklahoma aims to encourage voluntary engagement. engagement in E&T activities, providing support and resources to those who are motivated to improve their employment prospects and skills.

- b) How frequently will the State plan to re-evaluate these exemptions from mandatory E&T?
- c) What are the characteristics of the population the State agency intends to serve in E&T (e.g. target population)? This question applies to both mandatory and voluntary participants.

⊠ ABAWDs
⊠ Homeless
⊠ Veterans
⊠ Students
⊠ Single parents
⊠ Returning citizens (aka: ex-offenders)
⊠ Underemployed
☑ Those that reside in rural areas
☐ Other: Click or tap here to enter text.

VII. Organizational Relationships

State agencies are required to include information on the organizational relationship between the units responsible for certification and the units operating the E&T components, including units of the statewide workforce development system, if available. For the purposes of the questions below, E&T providers are considered to include units of the Statewide workforce development system. FNS is specifically interested in ensuring that the lines of communication are efficient and that, if applicable, noncompliance with mandatory E&T is reported to the certification unit within 10 working days after the noncompliance occurs, per 7 CFR 273.7(c)(4). State agencies must also include information on the relationship between the State agency and other organizations it plans to coordinate with for the provision of services.

The following questions are about how the E&T program is structured in your State agency.

a) Please indicate who at the State agency directly administers the E&T program (i.e. establishes E&T policy, contracts for E&T services, monitors providers). For example, if the E&T program unit is separate from the SNAP certification unit, and if there are separate E&T units at the county level.

The OK SNAP Works team, operating independently from the SNAP Certification & Policy Units, is comprised of one Programs Administrator and six Program Field Representatives (PFRs). The PFRs have diverse responsibilities, including assisting

in the development and refinement of SNAP E&T policies, creating, and conducting training sessions for Eligibility Workers, and monitoring and managing SNAP E&T contracts. They also ensure the timely and accurate completion of the FNS-583 report, prepare the SNAP E&T annual State Plan with any necessary amendments, and conduct outreach to recruit potential service providers. Additionally, the PFRs manage SNAP E&T email correspondence with internal staff, service providers, and the public, monitor and code 8% exemptions, assist with direct and reverse referrals, and process childcare applications for SNAP E&T participants.

Contracted service providers play a crucial role in the SNAP E&T program by handling participant intake and assessments. They deliver all component services, with each provider offering distinct components tailored to their specific programs. These providers are responsible for tracking participant engagement and regularly updating the OK SNAP Works coordinator on the participation status, outcome performance measures, and any Provider Determinations made for referred individuals.

Family Service Specialists (FSSs) work on the ground and maintain direct contact with SNAP customers. Their key duties include screening applicants for work registration and ABAWD (Able-Bodied Adults Without Dependents) exemptions, assessing all adults and initiating E&T referrals when applicable, documenting case notes to reflect work registration and ABAWD coding accurately, and updating the work registration code in the system. They also mail written requirements to all SNAP recipients at the time of certification, ensuring that participants are informed of their responsibilities and program expectations.

These roles collectively ensure the effective implementation and management of the SNAP E&T program, supporting both participants and staff through comprehensive policy development, training, monitoring, and direct service delivery.

b) How does the E&T unit coordinate and communicate on an ongoing basis with the units responsible for certification policy?

SNAP E&T staff communicates with the SNAP Certification & Policy Unit and the Policy & Legislative Liaison through various channels, including scheduled in-person meetings, open collaboration days in the office, and virtual platforms such as Teams, email, and phone calls. These interactions facilitate collaboration on any policy changes and updates. When the Food and Nutrition Service (FNS) provides new information regarding policy changes, all relevant units convene the following Wednesday to discuss these changes and strategize on how to disseminate the new information to staff and systems personnel. This initial meeting is followed by additional Teams meetings, emails, and phone calls to ensure the new policy is thoroughly updated and implemented.

c) Describe the State's relationships and communication with intermediaries or E&T providers (if applicable):

1. Describe how the State agency, intermediaries, E&T partners, share participant data and information. Include the names of any MIS systems (or other modes of communication) used.

Oklahoma's OK SNAP Works program is transitioning from a manual to a more automated and streamlined process with the development of a new landing portal named ERGO. Funded by SNAP E&T Technical Assistance, this portal is designed to enhance the efficiency and management of the program. Here are the key features and functions of ERGO:

- 1. **Participant Management**: ERGO tracks the history of each OK SNAP Works participant from the time they join the program until they become employed or leave for other reasons.
- 2. Partner Access and Functionality: Partners can use ERGO to:
 - Enter monthly participation sheets (PAS)
 - Submit monthly invoices
 - Request Technical Assistance (TA)
 - Ask guestions to OK SNAP Works team members
- 3. **Budget and Invoice Tracking**: The portal helps monitor invoices and budgets, ensuring that all partners adhere to their budget allocations for both regular Employment and Training (E&T) services and participant reimbursements.

The introduction of ERGO aims to simplify the administrative processes, improve tracking, and ensure effective management of resources and participant progress within the OK SNAP Works program.

2. If the State uses an MIS system, describe the E&T related data that is tracked and stored in those systems (e.g. referrals, noncompliance with program requirements, provider determinations, etc.), and whether the system(s) interact with each other.

We do not use a MIS system for OK SNAP Works.

3. Describe how the State agency shares new policies, procedures, or other information with the intermediary or other E&T partners.

Policy and procedural changes are updated in the OK SNAP Works Provider Handbook and communicated to contracted SNAP E&T providers through various channels. These include email, online virtual training sessions, and in-person meetings. Any new information is subsequently reinforced with a conference call or an additional in-person or virtual meeting as needed.

4. Describe the State agency's process for monitoring E&T partners' program and fiscal operations. Include plans for direct monitoring such as visits, as well as indirect monitoring such as reviewing program data, financial invoices, etc.

The Management Evaluations (ME) are a crucial assessment of all E&T contracted providers that leads to a report of best practices, findings, observations, and suggestions. FY 2025 ME's will be conducted on all OK SNAP Works partners who receive 100% funding, partners that operate the SWBL component, and partners that represent more than 10 percent of the E&T budget. The ME includes a review of the provider's policy material, assessment of client services, participant tracking, component activities, case file reviews, prior ME's for any trends, and financial record keeping. An on-site or virtual visit is conducted to review randomly selected capital equipment if applicable, an on-site checklist, and a minimum of ten (10) randomly selected participant case files. OK SNAP Works team members use a checklist to review each case file for required verification and documentation and validate that each participant matches what is reflected on the reported Participant Activity Spreadsheet (PAS). Results of the reviews are compiled with constructive feedback, observations and findings are included in a report sent to providers within 60 days of the on-site visit. Providers are given 30 days to respond with an action plan to correct any findings. OK SNAP Works offers technical assistance in developing an action plan if requested. Fiscal Monitoring included in the ME consists of an annual questionnaire to be reviewed and provided for by mutually agreed upon date and time of the ME.

After a monitoring evaluation, if a partner has identified any findings, a coaching plan will be established once their action plan response has been submitted to ensure the process is working smoothly. This will involve various check-ins and desk audits tailored to the findings.

New providers and experienced community partners will receive comprehensive training covering various topics though out the year. These topics will be identified based on trends observed through OK SNAP Works or related to policy and compliance. All partners will be invited to attend the training, which can be either virtual or in-person.

Partners can always request individual technical assistance from OK SNAP Works if needed. The program has an open-door policy for this purpose.

Fiscal Monitoring and Contract Oversight in SNAP E&T Program SNAP E&T providers follow a structured fiscal operations process, submitting monthly reimbursement requests through invoices to ensure

financial integrity and compliance with federal and state regulations. This offsite process includes meticulous review of invoices to verify allowable costs and examination of detailed monthly reports to track expenses and align with budgetary allocations. Additionally, partners complete an annual offsite questionnaire to ensure compliance and financial transparency. Contract monitoring responsibilities ensure providers fulfill obligations as per the scope and budget, with offsite oversight ensuring timely and budget-compliant deliverables. Two program field representatives conduct an initial thorough review of all submitted invoices and reports to ensure they comply with established guidelines and regulations, scrutinizing each document for accuracy and regulatory compliance. Following this, the program administrator conducts final approval of the fiscal monitoring process, ensuring all financial activities align with federal and state regulations. This multi-layered review process maintains high standards of transparency and accountability within the SNAP E&T program, minimizing the risk of errors or non-compliance.

5. Describe how the State agency evaluates the performance of partners in achieving the purpose of E&T (assisting members of SNAP households in gaining skills, training, work, or experience that will increase their ability to obtain regular employment and meets State or local workforce needs).

SNAP Works assesses the performance of our contracted E&T providers through thorough management evaluations. These evaluations track participants' progress toward important milestones, such as completing a program, achieving vocational training certificates, or securing full-time employment. They also ensure the accuracy of reported information through monthly participation sheets.

Monthly reports from SNAP E&T providers showcase participants' strides in education, training, and employment, highlighting their achievements in earning certificates, completing graduations, and sustaining employment.

Participant outcomes are reported on the closure of each case, and if successful, in the outcomes section of the monthly PAS report.

VIII. Screening for Work Registration

State agency eligibility staff must screen for exemptions from work registration, per 7 CFR 273.7(a).

a) Describe how the State agency screens applicants to determine if they are work registrants.

A customer or their declared authorized representative must undergo an interview with an eligibility worker to qualify for SNAP benefits. During the interview process, the eligibility worker will orally outline Work Registration, ABAWD as well as their rights and responsibilities. This explanation must include the following details:

- Who is subject to the Work Registration and ABAWD work requirement: Clearly identify individuals who need to comply with these requirements.
- What Work Registration and ABAWD exemptions are available and how to request and verify the exemptions: Explain the criteria for exemptions and the process for requesting and providing verification for these exemptions.
- What Work Registration and ABAWD good cause are and how to request and verify good cause: Define what constitutes good cause for not meeting the requirements and outline the procedure for requesting and verifying good cause.
- How to maintain eligibility under Work Registration and ABAWD: Provide guidance on the steps and actions needed to remain eligible under these requirements.
- What dates must the household act by to maintain eligibility: Specify critical deadlines that the household must meet to avoid losing eligibility.
- What happens if a household member does not meet the Work Registration and ABAWD requirement: Describe the consequences of non-compliance with the work requirements.
- How to regain eligibility: Offer information on the process for regaining eligibility if it is lost due to non-compliance.
- b) How does the State agency work register non-exempt individuals? For example, does the State agency make a notation in the file, do individuals sign a form, etc.?

When applying for SNAP benefits, workers must orally explain the work registration statement to applicants and record the work registration status of all household members aged 16 to 59 in the case file. The Responsibilities and Signature for Benefits form (08MP003E) includes a work registration statement that registers all eligible household members upon signature. This information must be documented in the case file.

If a client is not eligible for a work registration exemption but agrees to register for work, the eligibility staff will update the case record and code "R" for registered in block F170 of the case file (FACS). If the customer does not qualify for a work registration exemption and refuses to register, the eligibility staff will contact the State Office SNAP Policy Unit to review exemptions and apply a sanction if necessary. Upon certification, a written comprehensive notice will be sent to the household based on their coded status.

c) At what point in the certification process does the State agency provide the written explanation and oral notification of the applicable work requirements?

Applicable oral notifications occur during initial or recertification interviews, when a new person joins the household, or when a previously exempt household member becomes subject to work requirements. After certification, a comprehensive written notice will be sent to the household based on their coded status.

IX. Screening for Referral to E&T

The State agency must screen each work registrant to determine if it is appropriate, based on State specific criteria, to refer them to the E&T program per 7 CFR 273.7 (c)(2). State agencies may operate program components in which individuals elect to participate, per 7 CFR 273.7(e)(4).

a) List the State-specific criteria eligibility workers use to screen individuals to determine if it is appropriate to refer them to the State's SNAP E&T program. (Note: This question is not asking about criteria that may be unique to each provider.)

The State agency does not use SNAP E&T funds to cover staff time spent on screening and referring individuals to the E&T program. Oklahoma is a voluntary state, but eligibility workers use the following criteria to screen all adults to determine if it is appropriate to refer them to OK SNAP Works program:

- 1. Unemployed or underemployed
- 2. Receiving SNAP
- 3. Not Receiving TANF
- 4. Age: The participant must be 16 years or older.
- 5. Location: The participant must reside in or near a servicing county.
- 6. Willingness to Volunteer: The participant must be willing to volunteer for the program.
- b) Describe the process for screening during the certification and recertification process. Include the staff involved in the screening, how the staff conduct the screening, and when the screening occurs.

The State agency does not use SNAP E&T funds to cover staff time spent on screening and referring individuals to the E&T program. State eligibility staff assess the suitability of OK SNAP Works for SNAP recipients, a process typically undertaken during initial applications or mid-certification renewals. However, referrals can occur at any point within the certification period. During interviews for initial applications and renewals, workers systematically review Work Requirements, beginning with Work Registration, ABAWD status, and opportunities within OK SNAP Works. This screening and referral process is documented using the "SNAP E&T Screening and Referral Tool for SNAP Eligibility Workers" on Microsoft SharePoint. This internal form captures

critical information such as case numbers, individual details, service area, SNAP and ABAWD status, age criteria, and SNAP recipient status.

If any of the specific criteria for OK SNAP Works is not met, the form automatically halts the process, indicating that the individual is ineligible for OK SNAP Works. For example, if the person does not live in or around a servicing area, the screening process stops but captures the customer's name and case number. Similarly, if the individual does not receive SNAP, the tool will stop the screening and prompt the worker to suggest alternative employment opportunities.

The final section of the form confirms the referral and ensures that the worker has discussed the essential aspects of the program with the potential participant. Once the screening and/or referral is completed, it is sent back to the eligibility worker as confirmation of submission. The eligibility worker is then expected to add notes about the screening and/or referral to the individual's case file, ensuring all relevant information is documented.

c) (If applicable) Describe the process for screening upon receipt of a request for referral to E&T from an E&T provider (reverse referral). Include the staff involved in the screening, how the staff conduct the screening, and when the screening occurs.

OK SNAP Works collaborates closely with community partners to identify potential volunteers through reverse referrals. When our partners identify individuals who might be suitable volunteers, they engage with them directly to gauge their interest in participating.

For FFY 2025, pre-referral procedures involve eligibility workers screening all adults during certification or recertification interviews to determine their suitability for OK SNAP Works. During these screenings, eligibility workers confirm individuals' willingness to volunteer. However, they delay making actual referrals until the state agency receives a request from an E&T provider. If a client is eager to start immediately, the eligibility worker initiates a direct referral using the SNAP E&T Screening and Referral Tool (SRT) system. For those interested but not ready to begin, a case note is added to document their screening for future reference.

Upon receiving a referral request from an E&T provider, the eligibility worker reviews the pre-referral information to ascertain if the individual should be referred and then proceeds with the actual referral. If there is no existing case note and once the partner obtains verbal consent from the potential participant, they submit a reverse referral via a survey-style link, similar to our direct referrals. The reverse referral is reviewed by a Family Service Specialist (FSS) who contacts the client by phone to assess their appropriateness for participation in OK SNAP Works.

It is crucial to understand that an individual becomes an E&T participant only after being screened and formally referred by an eligibility worker.

d) How and when are participants informed about participant reimbursements? In the case of mandatory participants, how and when does the State agency ensure individuals are exempted from mandatory E&T if the costs of participant reimbursements exceed any State agency cap or are not available?

OK SNAP Works is a voluntary program available to both ABAWDs (Able-Bodied Adults Without Dependents) and non-ABAWD participants. From the outset of their involvement, participants are informed about potential reimbursement opportunities. Eligibility workers provide this information during initial application interviews and midcertification renewal interviews. Additionally, our community partners discuss these reimbursements during the intake process.

Starting in FFY 2025, OK SNAP Works will introduce a mandatory 'voluntary agreement form.' This form will be an essential part of the participant's intake and/or assessment and must be retained in the participant's case file. It includes a section that informs participants about available support services and provides a space for them to sign and date, acknowledging their understanding and agreement.

Throughout their participation, eligibility workers or community partners will continue to discuss these supports as part of case management services tailored to the participant's needs, ensuring that participants are continually informed and supported throughout their involvement in the program.

X. Referral to E&T

In accordance with 7 CFR 273.7(c)(2), the State agency must refer participants to E&T.

a) What information does the State provide to E&T participants when they are referred and how is the referral communicated (e.g. information about accessing E&T services, case management, dates, contact information)?

The State agency does not use SNAP E&T funds to cover staff time spent on screening and referring individuals to the E&T program. During the SNAP interview, the eligibility worker will orally outline Work Registration, ABAWD as well as their rights and responsibilities. The eligibility staff will explain that participation in OK SNAP Works is voluntary for both ABAWD (Able-Bodied Adults Without Dependents) and non-ABAWD participants. Eligible members can receive reimbursements to assist with employment, training, and job search success. If the customer decides to volunteer, they will be screened and, if deemed appropriate, referred to one of our community partners. The eligibility worker will provide information about various partners located in or around the participant's county of residence.

The eligibility worker will inform referred individuals that they will be contacted by the partner via phone call, text, or email using the information provided on the referral form. Additionally, participants will receive the Oklahoma Human Services webpage

OK SNAP Works (oklahoma.gov) that includes more information about the program, contact details for the OK SNAP Works team, and direct links to partners, enabling them to reach out directly.

For ABAWDs who want to volunteer but do not live near an operating county, the eligibility worker may refer them to other resources such as OKJobMatch, Be A Neighbor, Oklahoma Works, or 211. Oklahoma's SNAP certification notice also explains that SNAP participants are eligible for employment services. Participants can follow a link or scan a QR code on the notice, directing them to the OK SNAP Works webpage OK SNAP Works (oklahoma.gov).

b) If a State receives and approves a referral request from an E&T provider (reverse referral), how does the State communicate to the SNAP participant that they are in SNAP E&T and about their rights to receive participant reimbursements, etc.?

The State agency does not use SNAP E&T funds to cover staff time spent on screening and referring individuals to the E&T program.

For FFY 2025, pre-referral procedures involve eligibility workers screening all adults during certification or recertification interviews to determine their suitability for OK SNAP Works. During these screenings, a direct link to <u>OK SNAP Works</u> is provided, and eligibility workers discuss the program, available participant supports, and confirm individuals' willingness to volunteer. However, they delay making actual referrals until the state agency receives a request from an E&T provider. If a client is eager to start immediately, the eligibility worker initiates a direct referral using the SNAP E&T Screening and Referral Tool (SRT) system. For those interested but not ready to begin, a case note is added to document their screening for future reference.

When a customer contacts or visits a SNAP E&T provider, the provider asks questions to determine if the customer is receiving SNAP and if they are appropriate for participation in SNAP E&T. The provider explains that the client could be eligible for participant reimbursements through SNAP E&T if they choose to participate voluntarily. If the client agrees to participate, the provider submits a reverse referral request.

Upon receiving a referral request from an E&T provider, the eligibility worker reviews the pre-referral to quickly determine if the individual should be referred and then makes the actual referral. The partner then notifies the individual about their participation status, informs them of their right to supports, and discusses any other opportunities available through OK SNAP Works.

The individual will also sign a voluntary agreement form, which confirms their understanding that they are now an OK SNAP Works participant and informs them of their right to participant supports. This ensures that the participant is fully aware of the available resources and their status in the program.

c) After referral, describe what the E&T participant must do next. For instance, if the participant must report for an orientation describe who conducts the orientation, where the orientation occurs (e.g. in-person at a provider, log-in to a computer program, telephone interview with a case manager), and what happens during the orientation. If the next step varies throughout the State, describe the most common next step.

After a participant has been deemed appropriate for OK SNAP Works, the respective partner will contact them directly via phone call, text, or email to discuss the next steps. This process typically involves scheduling an intake and/or orientation session, which can be conducted either virtually or in person.

During the intake or orientation session, the participant will undergo thorough assessments. These assessments will examine various aspects of the participant's background and needs, and may include, but are not limited to, the following, which may vary by partner:

- 1. Employment and Education History: Reviewing the participant's previous job experiences and educational background to identify skills and qualifications.
- 2. Potential Obstacles to Employment: Identifying any barriers that might hinder the participant's ability to find and maintain employment, such as transportation issues, childcare needs, or health concerns.
- 3. Career Aspirations: Discussing the participant's career goals and aspirations to align the program's support with their long-term objectives.
- 4. Necessary Participant Support: Determining any reasonable and necessary supports that the participant may require to successfully complete the program. This may include assistance with job search, training opportunities, or other resources to address identified obstacles.

By conducting these comprehensive assessments, OK SNAP Works ensures that each participant receives tailored support to maximize their chances of successful employment and program completion.

d) How is information about the referral communicated within the State agency? For instance, is the information entered into an MIS by the eligibility worker and reviewed by an E&T specialist?

OK SNAP Works and eligibility workers communicate information about referrals through our case note system, which is directly added to the participant's case file. Eligibility workers document discussions about OK SNAP Works, typically held during interviews, and any screenings or referrals resulting from those conversations.

Similarly, OK SNAP Works documents the referral confirmation, including details such as the specific partner to whom the referral was sent. This ensures that all relevant information about the participant's involvement in the program is accurately recorded and easily accessible for ongoing case management.

e) How is information about the referral communicated to E&T providers, as applicable? If the State works with E&T providers outside the State agency, how does the E&T provider know a SNAP participant has been referred to them?

Our community partners receive an email from the OK SNAP Works team when a participant is referred and/or confirmed for OK SNAP Works. This notification includes the participant's name, SNAP and ABAWD status, and current contact information. This ensures that partners have all the necessary information to follow up with the participant promptly and provide the appropriate support and resources.

XI. Assessment

As a best practice, SNAP participants should be assessed after referral to ensure they receive targeted E&T services.

a)	Does the State require or provide an assessment?
	□ No (Skip to the next section.)
b)	If yes, describe the processes in the State, if any, to provide E&T participants with

an assessment (e.g. who conducts the assessment, when are participants assessed, what tools *are* used, and how are the results shared with State agency staff, providers, and/or participants)

Participants in the SNAP E&T program who agree to participate in the OK SNAP Works program will undergo a comprehensive assessment and collaborate with their provider to create an Individualized Employment Plan. These assessments may include, but are not limited to, the PAIRIN, Job Start Ready Employability Assessment, and Education & History Intake Form, and may vary by partner. These tools aim to identify the participant's education and employment needs, as well as any barriers they may face, to prepare them for the workforce.

The comprehensive intake assessment involves a one-on-one interview where various aspects of the participant's background are discussed. This includes their education, work history, interests, hobbies, strengths, weaknesses, skills, certifications, licenses, and test scores like HiSET (if applicable). The assessment also addresses barriers, recommended activities, participant reimbursements, and follow-up plans.

During the assessment process and throughout their participation in the program, E&T providers share pertinent information with participants. OK SNAP Works staff

may review assessments of randomly selected participants during case file reviews as part of the annual management evaluation.

Starting in FFY 2025, OK SNAP Works will introduce a mandatory "voluntary agreement form." This form will be a crucial part of the participant's intake and/or assessment and must be retained in the participant's case file. The agreement form includes a section that informs participants about available support services and provides a space for them to sign and date, acknowledging their understanding and agreement.

XII. Case Management Services

case management services.

The State E&T program must provide case management services to all E&T participants. In accordance with 7 CFR 273.7(c)(6)(ii), State agencies are required to include specific information about the provision of case management services in the E&T State plan.

a) What types of E&T case management services will the State agency provide?

	Спеск ан тпат арргу.
	⊠ Comprehensive intake assessments
	⊠ Individualized Service Plans
	☐ Coordination with service providers
	□ Reassessment
	☐ Other. Please briefly describe: Click or tap here to enter text.
b)	Describe how case management services are delivered in your State. For instance, in one model case management is provided by E&T specialists who provide assessments and other services after participants are referred to E&T. In other instances, case management is integrated into the component. If your State uses more than one model, describe the one or two most common ways of delivering

SNAP E&T providers are required to provide case management services to all participants, customized to meet their specific needs, and conducted at least monthly. Providers may employ various methods for case management, typically involving assessments to identify and address barriers, developing personalized Education/Employment Plans to monitor progress, offering ongoing support services, and assisting with job placements.

c) Using the table below, describe how E&T case managers coordinate with other staff and services. Coordination can involve tracking E&T participation, sharing information that may be relevant to participation in E&T (e.g. information related to good cause or a work exemption), and referral to additional services.

SNAP eligibility staff:	Communication between E&T Providers and front-line eligibility staff typically occurs indirectly, with all SNAP E&T concerns directed to the OK SNAP Works Team. When providers become aware of specific criteria, such as good cause exceptions, meeting ABAWD work rule requirements, or changes in ABAWD work exemptions, they are required to notify E&T staff within ten days.
	Upon notification, the OK SNAP Works unit initiates an internal form that is uploaded to OnBase. This action triggers a task in CURRENT to alert the eligibility worker, prompting them to review the case and take necessary actions within designated processing timeframes. The form specifies whether the SNAP E&T participant complies with program participation, meets ABAWD work requirements, or includes a provider determination.
	If applicable, the OK SNAP Works unit provides comments on the form, outlining steps for the eligibility worker to follow in completing the required actions. The eligibility worker then makes necessary updates to the case and adds detailed case notes to document their actions.
	The State E&T Unit continues to maintain and update case notes in the participant's file for referrals and ongoing participation as outlined in their respective protocols.
State E&T staff:	E&T Providers maintain regular communication with State E&T staff to report on participation and outcomes within the E&T program. They also share important information related to program operations.
Other E&T providers:	Providers often collaborate with each other to support participants in achieving their employment, education, and training goals. When a participant's needs suggest a better fit with another provider, a cross-referral can be initiated. The current provider uses the 'Reverse Referral' tool to select and refer the participant to the new partner. This process ensures seamless transition and notifies the new provider of the participant's transfer.

Community resources:	Case managers from the provider's team assist participants
	in connecting with community service providers and
	resources beyond the scope of SNAP E&T. This
	comprehensive support may include accessing mental
	health services, housing assistance, substance abuse
	treatment, and other essential resources for holistic support.

Communication/Coordination with:

d) Describe how the State agency will ensure E&T participants receive targeted case management services through an efficient administrative process, per 7 CFR 273.7(c)(6)(ii).

Case management is a continuous process designed to enhance participants' engagement and success in their assigned E&T components. Our contracted E&T providers employ dedicated case managers who conduct personalized case management sessions with SNAP E&T participants. These sessions occur either inperson or via telephone on a regular basis. The primary objectives of these meetings are to complete assessments, develop and maintain individualized employment plans, monitor progress, and discuss available participant reimbursements.

All case management interactions are meticulously documented in participants' electronic and/or paper files to ensure comprehensive tracking and continuity of care. In addition to managing E&T program requirements, participants are also referred to community resources aimed at addressing various barriers to employment stability. These resources may include legal aid for resolving issues, housing support, and access to physical and mental health services, as well as assistance with substance abuse concerns.

When providers refer participants to external resources beyond the E&T program, details of these referrals, including the type and recipient of the referral, are documented in case notes or the participant's file. E&T staff are available to assist with verifying benefits if required by the referral destination, ensuring seamless access to necessary support services for participants.

XIII. Conciliation Process (if applicable)

In accordance with 7 CFR 273.7(c)(3), State agencies have the option to offer a conciliation period to noncompliant E&T participants. The conciliation period provides mandatory E&T participants with an opportunity to comply before the State agency sends a notice of adverse action. The conciliation process is not a substitute for the determination of good cause when a client fails to comply.

a) Does the State agency offer a conciliation process?

	☐ Yes (Complete the remainder of this section.)
	⋈ No (Skip to the next section.)
b)	Describe the conciliation process and include a reference to State agency policy or directives.
c)	What is the length of the conciliation period?
X۱۷	V. Disqualification Policy for General Work Requirements
Thi sho	is section applies to the General Work Requirements, not just to E&T, and build be completed by all States, regardless of whether they operate a ndatory or voluntary E&T program.
nor CFI sub incl	work registrants are subject to SNAP work requirements at 7 CFR 273.7(a). A nexempt individual who refuses or fails to comply without good cause, as defined at 7 R 273.7(i)(2), (i)(3), and (i)(4), with SNAP work requirements will be disqualified and object to State disqualification periods. Noncompliance with SNAP work requirements ludes voluntarily quitting a job or reducing work hours below 30 hours a month, and ing to comply with SNAP E&T (if assigned by the State agency).
a)	What period before application does the State agency use to determine voluntary quit and/or reduction in work effort without good cause per 7 CFR 273.7(j)(1)?
	□ 30 days
	⊠ 60 days
	□ Other: Click or tap here to enter text.
b)	For all occurrences of non-compliance discussed below, must the individual also comply to receive benefits again?
	⊠ Yes
	□ No
c)	For the first occurrence of non-compliance per 7 CFR 273.7(f)(2)(i), the individual will be disqualified until the later of:

	oxtimes One month or until the individual complies, as determined by the State agency
	□ Up to 3 months
d)	For the second occurrence of non-compliance per 7 CFR 273.7(f)(2)(ii), the individual will be disqualified until the later of:
	⊠ Three months or until the individual complies, as determined by the State agency
	□ Up to 6 months
e)	For the third or subsequent occurrence per 7 CFR 273.7(f)(2)(iii), the individual will be disqualified until the later of:
	oxtimes Six months or until the individual complies, as determined by the State agency
	☐ Time period greater than 6 months
	□ Permanently
f)	The State agency will disqualify the:
	⊠ Ineligible individual only
	☐ Entire household (if head of household is an ineligible individual) per 7 CFR 273.7(f)(5)(i)

XV. Good Cause

In accordance with 7 CFR 273.7(i), the State agency is responsible for determining good cause when a SNAP recipient fails or refuses to comply with SNAP work requirements. Since it is not possible for FNS to enumerate each individual situation that should or should not be considered good cause, the State agency must take into account the facts and circumstances, including information submitted by the employer and by the household member involved, in determining whether or not good cause exists.

a) Describe the State agency process to determine if a non-exempt individual has good cause for refusal or failure to comply with a SNAP work requirement. Include how the State agency reaches out to the SNAP participant, employers, and E&T providers (as applicable), as well as how many attempts are made to reach out to the SNAP participant for additional information. During certification and recertification interviews, eligibility workers engage in discussions about SNAP work requirements. If a household member refuses or fails to comply with these requirements, the worker investigates the reasons to determine if there is a valid justification, known as "good cause."

Throughout the certification period, if it becomes evident that a household member has declined or failed to meet SNAP work requirements, the worker employs every available means to contact the household. This includes calling listed phone numbers, leaving voicemails where possible, and utilizing texts or emails if provided. Upon establishing contact, the worker explores the circumstances surrounding non-compliance to assess whether the household member qualifies for good cause exemption. In cases where further verification is necessary, the worker may seek collateral contacts, such as employers or service providers.

The goal of these efforts is to ensure that households receive fair consideration regarding their eligibility for SNAP benefits, particularly in cases where compliance with work requirements may be challenging due to valid reasons.

b) What is the State agency's criteria for good cause?

When an ABAWD would have fulfilled the work requirement, but missed some hours for good cause, the ABAWD meets the work requirement if the absence is temporary. Per 7 C.F.R. § 273.24(b)(2), good cause includes circumstances beyond the person's control, such as, but not limited to:

- (1) illness;
- (2) illness of another household member requiring the presence of the ABAWD:
- (3) unavailability of transportation; or
- (4) a household emergency.

When the worker determines a non-exempt adult household member voluntarily quit his or her employment or reduced his or her work effort, the worker must determine if he or she had good cause for doing so. The worker uses information provided by the household member and the employer to determine if the voluntary quit or reduction in work effort is with good cause. Per Section 273.7(i) of Title 7 of the Code of Federal Regulations (7 C.F.R. § 273.7(i)), good cause for leaving employment or reducing work effort includes: (1) discrimination by an employer based on age, race, sex, color, disability, religious creed, national origin, political beliefs, or reprisal or retaliation for prior civil rights activity; (2)work demands or conditions that render continued employment unreasonable, such as working without being paid on schedule; (3) acceptance by an adult household member of other employment or enrollment at least half-time in any recognized school, training program, or institution of higher education, requiring the household member to leave employment; (4) acceptance by an adult household member of other employment or enrollment at least half-time in any recognized school, training program, or institution of higher education in another county or area requiring the household to move and thereby requiring another adult household member to leave employment; (5) resignations by

persons under 60 years of age that are recognized by the employer as retirement; (6) employment that becomes unsuitable after the acceptance of such employment because it no longer meets the criteria of suitable employment per 7 C.F.R. § 273.7(h) and Oklahoma Administrative Code 340:50-5-85(c); (7) leaving employment after accepting a bona fide offer of employment of more than 30 hours a week or in which the weekly earnings are equivalent to the federal minimum wage multiplied by 30 hours because the agreed upon work hours or weekly earnings do not materialize; (8) leaving a job in connection with patterns of employment in which workers frequently move from one employer to another, such as migrant farm labor or construction work. There may be some circumstances where households apply for food benefits between jobs, particularly in cases where work may not yet be available at the new job site. When employment at the new job site has not started, the voluntary guit is considered with good cause when it is part of the pattern of that type of employment; or (9) circumstances beyond the person's control, such as, but not limited to: (a) illness; (b)illness of another household member sufficiently serious to require the presence of the registrant; (c)unavailability of transportation; (d)lack of adequate child care for children who are between 6 and 12 years of age; or (e) an unanticipated emergency.

c) Please describe the State agency's process to determine good cause if there is not an appropriate and available opening for an E&T participant.

OK is a voluntary state.

XVI. Provider Determinations

In accordance with 7 CFR 273.7(c)(18) a State agency must ensure that E&T providers are informed of their authority and responsibility to determine if an individual is ill-suited for a particular E&T component.

a) Describe the process used by E&T providers to communicate provider determinations to the State agency.

When an E&T provider determines that an individual is ill-suited for an E&T component, they promptly notify the State agency through email at oksnapworks@okdhs.org. This notification must occur immediately and no later than 10 days after the determination is made. The email includes:

- 1. Participant Information: The provider specifies the participant's name and case number to ensure accurate identification.
- 2. Detailed Explanation: The provider provides a thorough explanation detailing why the determination was made, citing specific reasons or criteria that led to the decision.

 Steps Following Determination: Additionally, the provider outlines the steps or actions that will be initiated following the determination. This may involve recommendations for alternative E&T components, referrals to workforce partnerships, reassessment procedures, or coordination with other support programs.

This process ensures timely and comprehensive communication between E&T providers and the State agency regarding participant eligibility and program engagement.

b) Describe how the State agency notifies clients of a provider determination. Please include the timeframe for contacting clients after receiving a provider determination.

Immediately, within 1 business day of receiving a provider determination, OK SNAP Works staff review the reasons provided by the E&T provider and notify the appropriate eligibility worker. Within 10 days from receipt of the provider determination, the eligibility worker contacts the participant to discuss the following:

- 1. Discussion of Provider Determination: The eligibility worker explains the reasons behind the provider's determination regarding the participant's suitability for the E&T program.
- 2. Exploration of Options: The eligibility worker discusses alternative E&T programs that may better meet the participant's needs, or evaluates the participant's work requirement status to determine if exemptions apply. If the client's provider determination is due to behavioral issues, the eligibility worker clarifies that referral to another partner will not be pursued due to the nature of the determination.
- Sanctions and Countable Months: The participant is informed that they will not face sanctions as a result of the provider determination. For ABAWDs, it is clarified that they will not accrue a countable month in the month of the provider determination unless specific work requirements are fulfilled or exemptions apply.
- 4. Contact Attempts: The eligibility worker makes two attempts to contact the participant by phone using the contact number on record. If necessary, a voicemail is left, and details of the attempts are documented in the case notes. The case notes also indicate the reason for the contact attempt.
- 5. Follow-up Communication: If the participant returns the call, the eligibility worker updates the case notes with the outcome of the conversation and provides a callback number for further communication.
- 6. Notification Process: No formal notice is mailed to the participant's address, but all relevant information and actions are clearly documented in the case notes.
- 7. Actions Before Recertification: Before the participant's next recertification date, the eligibility worker takes one of two actions based on the discussion:
 - Refers the participant to an appropriate E&T component that aligns with their needs.

 Re-assesses the participant's mental and physical fitness for potential exemptions from general work requirements and makes necessary adjustments to the case.

This comprehensive process ensures effective communication and appropriate actions following provider determinations, taking into account the specific circumstances of each participant.

XVII. Participant Reimbursements

In accordance with 7 CFR 273.7(d)(4), State agencies are required to pay for or reimburse participants for expenses that are reasonable, necessary, and directly related to participation in E&T. State agencies may impose a maximum limit for reimbursement payments. If a State agency serves mandatory E&T participants, it must meet all costs associated with mandatory participation. If an individual's expenses exceed those reimbursements available by the State agency, the individual must be placed into a suitable component or must be exempted from mandatory E&T.

Table E.I. Estimates of Participant Reimbursements

l.	Estimated number of E&T participants to receive participant reimbursements. This is an unduplicated count. If an individual participates in more than one month, they would only be counted once.	3454
num Tabl Worl parti	ber of mandatory E&T participants projected in ber of mandatory E&T participants projected in e H – Estimated Participant Levels in the Excel kbook, and the number of mandatory E&T cipants likely to be exempted, if the State agency not provide sufficient participant reimbursements.	
II.	Estimated number of E&T participants to receive participant reimbursements per month. This is a duplicated count. This calculation can include the same individual who participates in more than one month.	288
III.	Estimated budget for E&T participant reimbursements in upcoming FY.	\$1,329,824
IV.	Estimated budget for E&T participant reimbursements per month in upcoming FY. (Row III/12)	\$110,818.66
V.	Estimated amount of participant reimbursements per E&T participant per month. (Row IV/Row II)	\$384.79

Participant Reimbursement Details

Complete the table below with information on each participant reimbursement offered/permitted by the State agency (do not indicate information for each provider). A description of each category is included below.

- Allowable Participant Reimbursements. Every State agency must include child
 care and transportation in this table, as well as other major categories of
 reimbursements (examples of categories include, but are not limited to: tools, test
 fees, books, uniforms, license fees, electronic devices, etc.). Mandatory States
 must meet all costs associated with participating in an E&T program, or else they
 must exempt individuals from E&T.
- Participant Reimbursement Caps (optional). States have the option to establish maximum levels (caps) for reimbursements available to individuals.
 Indicate any caps on the amount the State agency will provide for the participant reimbursement.
- Who provides the participant reimbursements? Indicate if the participant reimbursement is provided by the State agency, a provider, an intermediary, or some other entity. The State agency remains ultimately responsible for ensuring individuals receive participant reimbursements, even if it has contracted with another entity to provide them.
- **Method of disbursement.** Indicate if the participant receives the participant reimbursement *in advance* or as *a reimbursement*. Also indicate if the amount of the participant reimbursement is an *estimated amount* or the *actual amount*.

Table E.II. Participant Reimbursement Details

The following table should be completed with details that reflect the State agency's policies on allowable reimbursements. If the response varies by E&T provider, include examples to illustrate this variation. Expenses must be listed in the State plan and approved by FNS to be allowable.

Allowable Participant Reimbursements	Participant Reimbursement Caps (optional)	Who provides the participant reimbursement?	Method of disbursement
Transportation (Gas cards, bus passes, repairs, etc.,)	Must include signed statement in participants case file with the to/from destinations & reason for gas card, buss pass, rideshare.	Provider	In advance/Actual amount

Allowable Participant Reimbursements	Participant Reimbursement Caps (optional)	Who provides the participant reimbursement?	Method of disbursement
	Repairs are a case- to-case basis and must have prior approval. Must be reasonable, necessary, and directly related to SNAP E&T (orientation, training, employment opportunity, etc.). NOT to be incentivized.		
Alcohol, Tobacco, & Firearm (ATF) restricted Gift cards for work attire, interview clothing.	Must include signed statement by the participant(s) in case file acknowledging the gift card is for work or interview attire only (receipts preferred). Must be reasonable, necessary, and directly related to SNAP E&T. NOT to be incentivized.	Provider	In advance/actual amount
Clothing for interviews	Must be reasonable, necessary, and directly related to SNAP E&T.	Provider	In advance/actual amount
Uniforms	Must be reasonable, necessary, and directly related to SNAP E&T.	Provider	In advance/actual amount
Work and Training Tools	Must be reasonable, necessary, and directly related to SNAP E&T.	Provider	In advance/actual amount
Tuition and Books	Must be reasonable, necessary, and	Provider	In advance/actual amount

Allowable Participant Reimbursements	Participant Reimbursement Caps (optional)	Who provides the participant reimbursement?	Method of disbursement
	directly related to SNAP E&T.		
Dental and Vision Care	Case-to-case basis. Limited to basic cleaning, eye exam and glasses. Must be reasonable, necessary, and directly related to SNAP E&T.	Provider	In advance/actual amount
Certifications	Must be reasonable, necessary, and directly related to SNAP E&T.	Provider	In advance/actual amount
Permanent Documents (ID, birth certificates, etc.)	Must be reasonable, necessary, and directly related to SNAP E&T.	Provider	In advance/actual amount
Personal Hygiene	E&T won't cover ongoing personal costs, only those that are reasonably essential and directly linked to the client's involvement in E&T. Participants may receive support for personal hygiene items and services needed to adhere to the appearance standards of the E&T provider and potential employer.	Provider	In advance/actual amount
Permits and Fees	Must be reasonable, necessary, and directly related to SNAP E&T.	Provider	In advance/actual amount
Background Checks	Must be reasonable, necessary, and directly related to SNAP E&T, directly	Provider	In advance/actual amount

Allowable Participant Reimbursements	Participant Reimbursement Caps (optional)	Who provides the participant reimbursement?	Method of disbursement
	related to SNAP E&T.		
Fingerprinting	Must be reasonable, necessary, and directly related to SNAP E&T.	Provider	In advance/actual amount
Drug test	Only allowed if necessary for a job.	Provider	In advance/actual amount
Training Materials	Must be reasonable, necessary, and directly related to SNAP E&T.	Provider	In advance/actual amount
Course Registration and/or testing fees.	Must be reasonable, necessary, and directly related to SNAP E&T.	Provider	In advance/actual amount
Wi-Fi (prepaid internet card, startup fees)	Case-to-case basis. Only allowed if mandatory for employment, job has been secured and is not provided by employer. Must provide verification of employment (letter, check stub, etc.).	Provider	In advance/actual amount
Remote Work Equipment: Laptops, monitors, keyboards, etc.)	Case-to-case basis. Only allowed if Mandatory for employment, job has been secured and is not provided by employer. Must provide verification of employment (letter, check stub, etc.).	Provider	In advance/actual amount

Allowable Participant Reimbursements	Participant Reimbursement Caps (optional)	Who provides the participant reimbursement?	Method of disbursement
Vaccinations/immuniz ations required for training or employment	Only allowed if necessary for a job. Must be reasonable, necessary, and directly related to SNAP E&T.	Provider	In advance/actual amount
Legal Fees	Legal fees that result from a failure to follow Federal, State, or Local Laws cannot be paid from Federal E&T funds. If certain conditions are met, the Federal government may allow some legal fees in accordance with 2 CFR 200.435.	Provider	In advance/actual amount

If providing dependent care, specify payment rates for child care reimbursements, established in accordance with the Child Care and Development Block Grant (CCDBG) and based on local market rate surveys. If alternative dependent care is provided by the State agency in lieu of reimbursement, describe these arrangements.

DHS Policy 340:40-7-8 (d) 1 outlines the process for providing subsidized childcare benefits for SNAP E&T program-related assigned activities. Here's a more detailed description:

DHS Policy 340:40-7-8 (d) 1 Overview:

Subsidized childcare benefits may be provided for activities assigned under the SNAP E&T program. Before approving these benefits, the SNAP E&T coordinator follows specific steps to confirm the eligibility of the activity:

1. Activity Confirmation:

 The SNAP E&T coordinator verifies that the activity is an approved part of the SNAP E&T program. This ensures that only activities directly related to enhancing employment skills and opportunities are eligible for childcare benefits.

2. Assigned Start Date:

 The coordinator confirms the start date assigned to the participant for the approved activity. This information ensures that childcare benefits are aligned with the participant's actual engagement in program-related activities.

3. Scheduled Days and Hours:

The coordinator also verifies the scheduled days and hours of the activity. This includes understanding the regularity and duration of the participant's engagement, which is crucial for determining the appropriate level of childcare support needed.

Process for Approval:

- Once these details (activity confirmation, start date, scheduled days and hours) are confirmed with the contracted service provider, the SNAP E&T coordinator proceeds with the approval of subsidized childcare benefits.
- This process ensures that childcare benefits are allocated appropriately, supporting participants in their engagement with SNAP E&T program activities while addressing their childcare needs effectively.

c)	If dependent care agencies have a waiting list or otherwise cap the number of
	enrolled dependents, how will the State agency ensure E&T participants with
	dependent care needs receive dependent care?

XVIII. Work Registrant Data

The SNAP general work requirements are described at 7 CFR 273.7(a). Individuals who do not meet an exemption from the general work requirements, as listed in 7 CFR 273.7(b)(1), are subject to the general work requirement and must register for work. In accordance with 7 CFR 273.7(c)(10), the State agency must submit to FNS the number of work registrants in the State as of October 1st. This information is submitted on the first quarter E&T Program Activity Report.

a) Describe the process the State agency uses to count all work registrants in the State as of the first day of the new fiscal year (October 1). Please provide information about how data is pulled from the eligibility system. For instance, how work registrants are identified and how counting is conducted.

DHS has built a specific mainframe that stores all data for our cases (CA221). This mainframe holds identifiable information, race, benefits being received, application date, certification date, closure and denial dates, income coded on the case, and work registration codes and dates. We use a report that pulls information from this mainframe. For identifying work registrants, we use the R code in block F170, which is updated during case processing. Staff select R for registered or choose an

exemption. OMES, another state agency, completes the report using WebFocus, which counts the R's in this block but does not count others.

The data is carefully selected and counted by month, year, and case number. This process is automated to avoid human error. The database includes client information, such as SSN and DOB. With this criteria, the system can easily determine who is a work registrant and who is not (e.g., a participant with a DOB of 01/02/2018 is not a work registrant). The software scans all active (issuing) cases and totals and displays the number of work registrants. Potential duplicates are automatically removed by matching SSNs. October 1 reports are pulled by January 15th.

b) Describe measures taken to prevent duplicate counting.

Since each case number is unique in the CA221 mainframe, there is no duplicate counting. Clients are identified by Social Security number, date of birth, name, and case number. Once a client is reported in the Federal Fiscal Year (FFY), they are not counted a second time if there is a match of these data elements. All SNAP data is extracted from CA221 and loaded into the Data Warehouse weekly. The FNS 583 report is built using the Data Warehouse relational tables, following the specifications in the FNS 583 instructions (11-11).

Month-to-month duplicate participants are automatically not recorded in the software by checking for duplicate SSNs. If an SSN is marked as a participant for a given month but was recorded in the previous month, it is flagged and not displayed, similar to how duplicated entries are handled in Excel columns.

XIX. Outcome Reporting Measures

National Reporting Measures

Table E.III. National Reporting Measures

Source	Employment	Completion
[Check the data source used for the national	& Earnings	of Education
reporting measures. Check all that apply]	Measures	of Training
Quarterly Wage Records (QWR)	⊠ Yes □ No	□ Yes ⊠
		No
National Directory of New Hires (NDNH)	⊠ Yes □ No	□ Yes ⊠
		No
State Information Management System (MIS). Indicate	☐ Yes ⊠ No	□ Yes ⊠
below what MIS system is used.		No
Manual Follow-up with SNAP E&T Participants. Answer	☐ Yes ⊠ No	□ Yes ⊠
follow-up question below.		No

Source [Check the data source used for the national reporting measures. Check all that apply]	Employment & Earnings Measures	Completion of Education of Training		
Follow-up Surveys. State agencies must complete the Random Sampling Plan section below, if follow-up surveys is used.	☐ Yes ⊠ No	□ Yes ⊠ No		
Other - Describe source: PAS Report	⊠ Yes □ No	□ Yes ⊠ No		
a) If a State MIS is used, please indicate the system (e.g. State's Department of Labor MIS).	 a) If a State MIS is used, please indicate the system (e.g., SNAP eligibility system, State's Department of Labor MIS). 			
b) If a manual follow-up with SNAP E&T participants is conducted, describe the process for follow-up, including the contact method (e.g., verbal contact, email, or mail).				
e) If a State agency is not using Quarterly Wage Records (QWR) as the source for the national measures, describe the State agency's plan to move toward using QWR including a timeline for completion.				
State Component Reporting Measures				
d) Check all data sources used for the State-specific cor	nponent measure	S.		
⊠ Quarterly Wage Records (QWR)				
☑ National Directory of New Hires (NDNH)				
☐ State Management Information System. <i>Indicate to</i>	he MIS used belo	W.		
	nswer follow-up qu	uestion		
☐ Follow-up Surveys. Answer follow-up question bel	low.			

e)	If a State MIS is used, please indicate the system (e.g., SNAP eligibility system, State's Department of Labor MIS).
f)	If a manual follow-up with SNAP E&T participants is conducted, describe the process for follow-up, including the contact method (e.g., verbal contact, email, or mail).
g)	If follow-up surveys are used, please describe the sample frame. This description must include source, availability, accuracy, completeness, components, location, form, frequency of updates and structure.
h)	If follow-up surveys are used, please describe the sample selection. This description must include the method of sample selection, procedures for estimating caseload size, computation of sampling intervals and random starts, as appropriate, and a time schedule for each step in the sampling procedure.

Using the table below, indicate the outcome measure that will be used for each component that the State agency will offer that is intended to serve at least 100 participants in the FY. Explain in detail the methodology for acquiring the component data. Please ensure the component names listed here match the component names in the FNS-583 report and Section G: Component Detail.

Table E.IV. Component Outcome Measures

		Methodology including the timeframes being reported (e.g.
Component	Outcome Measure	denominator and numerator).
Supervised Job Search (SJS)	The number and percentage of SNAP E&T participants who participated SJS and entered unsubsidized employment.	Numerator will include total number of participants who completed SJS and are in unsubsidized employment during the time frame of 10-01-2024 to 09-30-2025.

		Methodology including the
Component	Outcome Measure	timeframes being reported (e.g. denominator and numerator).
-		Denominator will include total number of participants that participated in SJS during the time frame of 10-01-2024 to 09-30-2025.
Job Search Training (JST)	The number and percentage of SNAP E&T participants who participated in JST and entered unsubsidized employment.	Numerator will include total number of participants who were employed during or upon completion of JST and are in unsubsidized employment during the time frame of 10-01-2024 to 09-30-2025.
		Denominator will include total number of participants who participated in JST during the time frame of 10-01-2024 to 09-30-2025.
Job Retention (JR)	The number and percentage of SNAP E&T participants who entered unsubsidized employment through SNAP E&T services and then participated in JR.	Numerator will include those participants who were in unsubsidized employment based on the participants needs at a minimum of 30 days to a maximum of 90 days of JR during time frame of 10-01-2024 to 09-30-2025. Denominator will include those
		participants who are currently participating in JR during the time frame of 10-01-2024 to 09-30-2025.
Basic/Foundation al Skills Instruction (includes High School Equivalency	The percentage and number of program participants who obtained a high school diploma equivalent credential	Numerator will include total number of participants who earned a high school equivalency certificate after completing EPB during the time frame of 10-01-2024 to 09-30-2025.
Programs) (EPB)	(GED, HiSET, etc.) or increased skill measured by a test or assessment.	Denominator will include total number of participants who participated in EPB during the time frame of 10-01-2024 to 09-30-2025.
Career/Technical Education	The number and percentage that earned certification/credential	Numerator will include total number of participants who received EPWRT and are in unsubsidized

Component	Outcome Measure	Methodology including the timeframes being reported (e.g. denominator and numerator).
Programs and other Vocational	during or after completion of this component. For	employment during the time frame of 10-01-2024 to 09-30-2025.
Training (EPC)	example: Business computer user certificate, computer support certifications, State CLEET certifications, Forklift training certifications, welding.	Denominator will include total number of participants who participated in EPWRT during the time frame of 10-01-2024 to 09-30-2025.
Work Readiness Training (EPWRT)	The number and percentage of program participants who received EPWRT and are in unsubsidized employment.	Numerator will include total number of participants who received EPWRT and are in unsubsidized employment during the time frame of 10-01-2024 to 09-30-2025.
		Denominator will include total number of participants who participated in EPWRT during the time frame of 10-01-2024 to 09-30-2025.
On-the-Job- Training (WBLOJT)	The number and percentage of program participants who retained unsubsidized employment subsequent to the receipt	Numerator will include total number of participants who completed WBLOJT and are in unsubsidized employment during the time frame of 10-01-2024 to 09-30-2025.
	of WBLOJT.	Denominator will include total number of participants who participated in WBLOJT during the time frame of 10-01-2024 to 09-30-2025.
Internship –SUB (WBLI-SUB	The number and percentage of program participants who participated in WBLI-SBU and are in unsubsidized employment.	Numerator will include total number of participants who participated in WBLI-SUB and are in unsubsidized employment during the time frame of 10-01-2024 to 09-30-2025. Denominator will include total
		number of participants in WBLI-

Component	Outcome Measure	Methodology including the timeframes being reported (e.g. denominator and numerator).
		SUB during the time frame of 10- 01-2024 to 09-30-2025.
Transitional Jobs - Subsidized (WBLTJ- SUB)	The number and percentage of program participants who participated in WBLTJ-SUB and are in unsubsidized employment.	Numerator will include total number of participants who participated in WBLTJ-SUB and are in unsubsidized employment during the time frame of 10-01-2024 to 09-30-2025.
		Denominator will include total number of participants in WBLTJ- SUB during the time frame of 10- 01-2024 to 09-30-2025.

F. Pledge to Serve All At-Risk ABAWDs (if applicable)

The Act authorizes FNS to allocate \$20 million annually to State agencies that commit, or pledge, to ensuring the availability of education, training, or workfare opportunities that permit able-bodied adults without dependents (ABAWDs) to remain eligible beyond the 3-month time limit.

To be eligible for these additional funds (pledge funds), State agencies must pledge to offer and provide an opportunity in a work program that meets the participation requirements of 7 CFR 273.24 to every applicant and recipient who is in the last month of the 3—month time limit and not otherwise exempt. Individuals are exempt from the time limit if they meet an exception under 7 CFR 273.24(c), reside in an area covered by a waiver in accordance with 7 CFR 273.24(f), or who are exempted by the State under 7 CFR 273.24(g). ABAWDs who meet the criteria outlined in 7 CFR 273.7(d)(3)(i) are referred to as "at-risk" ABAWDs.

a)	Is the State agency pledging to offer qualifying activities to all at-risk ABAWDs?
	☐ Yes (Complete the rest of this section.)
	⊠ No (Skip to Section G: Component Detail.)

Table F.I. Pledge Assurances

Check the box to indicate that the State agency understands and agrees to comply with the following provisions, per 7 CFR 273.7(d)(3).	Check Box
The State agency will use the pledge funds to defray the costs of offering every at-risk ABAWD a slot in a qualifying component.	
The cost of serving at-risk ABAWDs is not an acceptable reason for failing to live up to the pledge. The State agency will make a slot available and the ABAWD must be served even if the State agency exhausts all of its 100 percent Federal funds and must use State funds.	
While a participating State agency may use a portion of the additional funding to provide E&T services to ABAWDs who are not at-risk, the State agency guarantees that at-risk ABAWDs are provided with opportunities by the State agency <u>each month</u> to remain eligible beyond the 3-month time limit.	
The State agency will notify FNS immediately if it realizes that it cannot obligate or expend its entire share of the ABAWD allocated funds, so that FNS may make those funds available to other participating pledge States within the fiscal year.	
The State agency will be ready on October 1 st to offer and provide qualifying activities and services each month an ABAWD is at-risk of losing their benefits beyond the 3-month time limit.	

b)	Where will the State agency offer qualifying activities?
	□ Statewide
	☐ Limited areas of the State (Complete questions c and d below.)
c)	Explain why the State agency will offer qualifying activities in limited areas of the State.
	□ ABAWD waiver for parts of the State
	☐ Will use discretionary exemptions
	□ Other: Click or tap here to enter text.
d)	If the State agency will be offering qualifying activities only in limited areas of the State, please list those localities/areas.
e)	How does the State agency identify ABAWDs in the State eligibility system?
f)	How does the State agency identify ABAWDs that are at-risk?
g)	When and how is the offer of qualifying activities made? Include the process the State agency uses to ensure that at-risk ABAWDs receive an offer of a qualifying component for every month they are at risk, including how the offer is made.

The next set of questions is intended to establish the State agency's overall capacity and ability to serve all at-risk ABAWDs during the fiscal year through the services available in SNAP E&T as well as through other qualifying activities available through other Federal or State employment and training programs. In addition to SNAP E&T components, qualifying activities for ABAWDs include programs that operate outside of SNAP E&T. Such as Optional Workfare programs, WIOA title I programs, programs under Section 236 of the Trade Act of 1974, Veterans employment and training

programs offered by the Department of Veterans Affairs or the Department of Labor, and Workforce Partnerships in accordance with 7 CFR 273.7(n).

h)	What services and activities will be provided through SNAP E&T? (List the components and participant reimbursements.) This should be consistent with the components detailed in Section G, as well as Section E-XIV regarding participant reimbursements.
i)	What services and activities will be provided outside of SNAP E&T? (List the operating program, such as title 1 of WIOA, services and activities.)
j)	To pledge, State agencies must have capacity to offer a qualifying activity to every at-risk ABAWD for every month they are at-risk. What is the State agency's plan if more ABAWDs than expected choose to take advantage of the offer of a qualifying activity? For instance, how will the State agency ensure the availability of more slots? What steps has the State agency taken to guarantee a slot through

Table F.II. Information about the size of the ABAWD population

agreements or other arrangements with providers?

_		
1.	Question How many ABAWDs did you serve in E&T in the previous FY?	Number
II.	How many SNAP recipients are expected to be ABAWDs this fiscal year? This should be an unduplicated count. If an individual is an ABAWD at any time during the fiscal year, they would be counted only once. Note: This should be consistent with the projected number of ABAWDs shown on Table H row 11 in the Excel Workbook.)	
III.	How many ABAWDs will meet the criteria of an at-risk ABAWD? This should be an unduplicated count. If an individual is an at-risk ABAWD at any time during the fiscal year, they would be counted only once. (Note: This should be consistent with the projected number of at-risk ABAWDs shown on Table H row 14 in the Excel Workbook.)	

Question	Number
IV. Number of at-risk ABAWDs averaged monthl be annual total from line (III) divided by 12.	y? This should

Table F.III. Available Qualifying Activities

When considering all the qualifying activities that the pledging State agency intends to offer to at-risk ABAWDs, provide a projected estimate for each category below.

	Expected average monthly slots available to at-risk ABAWDs	Expected average monthly slots offered to at-risk ABAWDs	Expected monthly at-risk ABAWD participation for plan year
SNAP E&T			-
All other programs outside of SNAP E&T			
Total slots across all qualifying activities			

Table F.IV. Estimated cost to fulfill the pledge

		Value
I.	What is the projected total cost to serve all at-risk ABAWDs in your State?	
II.	Of the total in (I), what is the total projected administrative costs of E&T?	
III.	Of the total in (I), what is the total projected costs for participant reimbursements in E&T?	

k)	k) Explain the methodology used to determine the total cost to fulfill the pledge.		

G. Component Detail

The goal of this section is to provide a comprehensive description of E&T program components and activities that the State agency will offer. A State agency's E&T program must include one or more of the following components: supervised job search; job search training; workfare; work experience or training; educational programs; self-employment activities; or job retention services. The State agency should ensure that the participation levels indicated in this section align with other sections of the State Plan, such as the projected participant levels in Section H – Estimated Participant Levels.

Complete the following questions for each component that the State agency intends to offer during the fiscal year.

I. Non-Education, Non-Work Components

Complete the tables below with information on each non-education, non-work component that the State agency intends to offer during the fiscal year. *If the State does not plan to offer one of the components in the table, please leave the cells blank.* For each component that is offered, the State should include the following information:

- Summary of the State guidelines implementing supervised job search (applies to SJS only). This summary of the State guidelines, at a minimum, must describe: The criteria used by the State agency to approve locations for supervised job search, an explanation of why those criteria were chosen, and how the supervised job search component meets the requirements to directly supervise the activities of participants and track the timing and activities of participants.
- Direct link (applies to SJS only). Explain how the State agency will ensure that supervised job search activities will have a direct link to increasing the employment opportunities of individuals engaged in the activity (i.e. how the State agency will screen to ensure individuals referred to SJS are job ready and how the SJS program is tailored to employment opportunities in the community).
- Description of the component (applies to JST, SET, and Workfare). Provide a brief description of the activities and services.
 - For JR Only: Provide a summary of the activities and services. Include a
 description of how the State will ensure services are provided for no less
 30 days and no more than 90 days.

- **Target population**. Identify the population that will be targeted. Include special populations such as ABAWDs, Returning Citizens, Homeless, Older Disconnected Youth, etc.
- **Criteria for participation.** What skills, knowledge, or experience is necessary for participation in the component? For example, literacy or numeracy levels, recent labor market attachment, computer literacy etc.
- **Geographic area**. Where will the component be available (statewide, regional, counties, localities not covered by ABAWD waivers, areas covered by American Job Centers, etc.).
- **E&T providers**. Identify all entities that will provide the service.
- Projected annual participation. Project the number of unduplicated individuals.
- Estimated annual component costs. Project only administrative costs

Table G.I. Non-Education, Non-Work Component Details: Supervised Job Search

Table G.I. Non-Education, Non-Work Component Details: Supervised Job Search			
Details	Supervised Job Search (SJS)		
guidelines implementing SJS	Supervised Job Search (SJS) is a non-work component offered by State-approved E&T providers. Supervised Job Search activities helps participants obtain suitable employment through effective job search techniques, resume building, practicing interviewing questions, completing employment applications, and more. State-approved guidelines for any OK SNAP Works SJS component include: a qualified staff member present and available for participants, and the participant's completed activities be tracked and reported monthly. Participant activities will be logged daily (either electronically or manually), and participants must have the provider overseeing the component validate its accuracy by entry of case notes or other mediums. SJS tracking information must include the following: name of participant, the time spent in the component, and the activities completed by each participant during the component. When offered virtually, a trained staff member will be present to monitor, guide, and track participant activities. Our locations are based, and approved, on the location of our contractual partners that meet the SJS guidelines. The level of effort required for this component varies by provider. ABAWD's can only participate in SJS for less than half their 20 hour/week, 80 hour per month, requirement. ABAWDs' will be informed that to be in compliance with their work requirement, they will need to		

	participate in another component, work for wages, or do unpaid work.
	Supervised job search activities must have a direct link to increasing the employment opportunities of individuals engaged in the activity. If a reasonable period of supervised job search does not result in employment, placing the individual in a training or education component to improve job skills will likely be more productive.
	Supervised Job Search is not intended to be a long-term activity. The duration of Supervised Job Search is set at a maximum of 16 weeks.
Direct link	Each organization facilitating SJS activities offers support services to aid participants in pursuing and securing appropriate employment opportunities. These services encompass, but are not restricted to, a) practicing interview questions, b) conducting mock interviews, c) assisting with job applications, d) imparting effective job search strategies, and e) updating resumes. Prior to commencing any component, providers conduct assessments to gauge participants' skills and identify potential barriers to success. Furthermore, they furnish supportive, community-oriented services and make referrals to enhance participant achievement. OK SNAP Works providers have forged partnerships with local companies, collaborating to fulfill employment needs and support workforce development.
Target population	Volunteer
Criteria for participation	Participation eligibility for this component is decided by the contractor. Each contractor assesses the suitability of participants for this program.
	Commitment to Supervised Job Search: Individuals must be willing to participate in a supervised job search program, which typically involves actively seeking employment with the guidance and support of program staff.
	Compliance with Program Requirements: Participants are expected to adhere to the requirements and guidelines set forth by the SNAP E&T program, including attending

	scheduled appointments, completing assigned tasks, and actively engaging in job search activities. Ability to Benefit: Participants should demonstrate a readiness and ability to benefit from the supervised job search program, including a willingness to learn job search
	techniques, improve employment skills, and actively pursue suitable job opportunities.
	Availability for Supervision: Participants must be available for regular supervision and support from program staff, which may include attending meetings, workshops, or training sessions designed to enhance job search skills and employability.
	Overall, the criteria for participation in supervised job search within the SNAP E&T program aim to support SNAP recipients in gaining employment and achieving self-sufficiency by providing structured guidance and resources for job search and career development.
Geographic area	Oklahoma, Pottawatomie, Tulsa, Osage, Washington, Okmulgee, Wagoner, Creek, Rogers, Pawnee, Pontotoc, McIntosh, Muskogee, Pittsburg, and surrounding areas.
E&T providers	CEO, FC&S (WIR, WJT), GICO (Goodwill Ada), GWT, HA (Curbside Chronicle, Curbside Flowers, Sasquatch Shaved Ice, Curbside apparel), MSG (Work Advance), PS (Work Ready), RM, TEEM, TCTC, SXS
Projected annual participation	545
Estimated annual component costs	\$2,912,552

Table G.II. Non-Education, Non-Work Component Details: Job Search Training

Details	Job Search Training (JST)
Description of the component	Job Search Training is a component that enhances a participant's job readiness by teaching and/or enhancing job seeking techniques, increasing job search motivation, and self-confidence to ensure job readiness and employment. Job Search activities may include, but are not limited to:
	Assessments of employability

	 Crafting resumes Access to job placement services Guidance and assistance in job pursuit Workshops focusing on workplace etiquette Strategic career planning The level of effort required for this component varies by provider. ABAWD's can only participate in JST for less than half their 20 hour/week, 80 hour per month, requirement (once the ABAWD time limit is reimplemented). ABAWDs' will be informed that to be in compliance with their work requirement, they will need to participate in another component, work for wages, or do unpaid work. Participation in Job Search Training is capped at 120 hours per month unless participants willingly opt for additional hours. Job Search Training is not intended to be
Target population	a long-term activity. The duration of Job Search Training is set at a maximum of 16 weeks. Volunteers
Target population	VOIGITICOIS
Criteria for participation	Participation eligibility for this component is decided by the contractor. Each contractor assesses the suitability of participants for this program.
Geographic area	Oklahoma, Pottawatomie, Tulsa, Osage, Washington, Okmulgee, Wagoner, Creek, Rogers, Pawnee, Pontotoc, McIntosh, Muskogee, Pittsburg, and surrounding areas.
E&T providers	CEO, FC&S (WIR, WJT), GICO (Goodwill Ada), GWT, HA (Curbside Chronicle, Curbside Flowers, Sasquatch Shaved Ice, Curbside apparel), MSG (WorkAdvance), PS (Work Ready), RM, TEEM, TCTC
Projected annual participation	435
Estimated annual component costs	\$1,141,087

Table G.III. Non-Education, Non-Work Component Details: Job Retention

Details	Job Retention (JR)
Description of the component	This component is designed to support SNAP E&T participants who secure employment or enhance their job status through participation in SNAP E&T activities or services. Job retention services encompass: • Case management • Assistance in acquiring or reimbursing costs for essential items such as uniforms, work attire, equipment, supplies, or tools needed for the job • Coverage for test fees • Transportation support • Provision of other necessities essential for maintaining employment and achieving satisfactory performance in their new roles. The job retention component is meant to provide support services for at least 30 days and up to 90 days to individuals who have secured employment. Individuals are eligible to receive job retention services if they received SNAP benefits in the month of or the month before they start job retention and may receive job retention services after leaving SNAP unless the individual is leaving SNAP due to a failure to comply with the general work requirement or an intentional program violation. The participant must have secured employment after or while receiving other E&T services. There is no limit to the number of times an individual may receive job retention services, as long as the individual has re-engaged with E&T prior to obtaining new employment.
Target population	Volunteers
Criteria for participation	Participation eligibility for this component is decided by the contractor. Each contractor assesses the suitability of participants for this program. There is no limit to the number of times an individual may receive job retention services, as long as the individual has re-engaged with E&T prior to obtaining new employment. The participant must have secured employment after or while receiving other E&T services.

Geographic area	Oklahoma, Pottawatomie, Tulsa, Osage, Washington, Okmulgee, Wagoner, Creek, Rogers, Pawnee, Pontotoc, McIntosh, Muskogee, Pittsburg, and surrounding areas.
E&T providers	CEO, FC&S (WIR, WJT), GICO (Goodwill Ada), GWT, HA (Curbside Chronicle, Curbside Flowers, Sasquatch Shaved Ice, Curbside apparel), MSG (WorkAdvance), PS (Work Ready), RM, TEEM, TCTC, SXS
Projected annual participation	422
Estimated annual component costs	\$1,345,630

Table G.IV. Non-Education, Non-Work Component Details: Self-Employment Training

Details	Self-Employment Training (SET)
Description of the component	
Target population	
Criteria for participation	
Geographic area	
E&T providers	
Projected annual participation	
Estimated annual component costs	

Table G.V. Non-Education, Non-Work Component Details: Workfare

Details	Workfare (W)
Description of the	
component	
Target population	
Criteria for participation	
Geographic area	
E&T providers	
Projected annual	
participation	
Estimated annual	
component costs	

II. Educational Programs

Complete the tables below with information on each educational program component that the State agency intends to offer during the fiscal year. *If the State does not plan to offer one of the components in the table, please leave the cells blank.* For each component that is offered, the State should include the following information:

- Description of the component. Provide a summary of the activities and services.
- Target population. Identify the population that will be targeted. Include special populations such as ABAWDs, Returning Citizens, Homeless, Older Disconnected Youth, etc.
- **Criteria for participation.** What skills, knowledge, or experience is necessary for participation in the component? For example, literacy or numeracy levels, recent labor market attachment, computer literacy etc.
- **Geographic area**. Where will the component be available (statewide, regional, counties, localities not covered by ABAWD waivers, areas covered by American Job Centers, etc.).
- **E&T providers**. Identify all entities that will provide the service.
- Projected annual participation. Project the number of unduplicated individuals.
- Estimated annual component costs. Project only administrative costs.

- Not supplanting: Federal E&T funds used for activities within the education component must not supplant non-Federal funds for existing educational services and activities. For any education activities, provide evidence that costs attributed to the E&T program are not supplanting funds used for other existing education programs.
- Cost parity: If any of the educational services or activities are available to
 persons other than E&T participants, provide evidence that the costs charged to
 E&T do not exceed the costs charged for non-E&T participants (e.g. comparable
 tuition).

Table G.VI. Educational Program Details: Basic/Foundational Skills Instruction

Details	Basic/Foundational Skills Instruction (includes High School Equivalency Programs) (EPB)
Description of the component	An educational component that provides a wide variety of activities designed to improve the fundamental skills and job prospects of SNAP participants. These activities focus on enhancing reading, writing, and English language abilities, as well as proficiency in mathematics and other essential tasks needed to earn a secondary school diploma or its equivalent. Our programs cover Adult Basic Education (ABE), basic literacy classes, English as a Second Language (ESL) courses, and preparation for high school equivalency exams like HiSET or GED. Additionally, participants have access to other post-secondary education opportunities to further their learning and career goals. Participants can engage in Basic/Foundational Skills training for up to 120 hours per month, with the option for volunteers to extend their hours if desired.
Target population	Volunteers
Criteria for participation	Participation eligibility for this component is decided by the contractor. Each contractor assesses the suitability of participants for this program. SNAP recipients are placed in EPB, which is a non-work component, when determined to have education or training needs such as they have not obtained a high school diploma or GED.
Geographic area	Oklahoma, Pottawatomie, Tulsa, Osage, Washington, Okmulgee, Wagoner, Creek, Rogers, Pawnee, McIntosh, Muskogee, Pittsburg, and surrounding areas.

E&T providers	CEO, FC&S (WIR, WJT), GWT, HA (Curbside Chronicle, Curbside Flowers, Sasquatch Shaved Ice, Curbside apparel), MSG (WorkAdvance), PS (Work Ready), RM, TEEM, SXS
Projected annual participation	240
Estimated annual component costs	\$1,085,861
Not supplanting	To adhere to Federal cost principles, the State refrains from using funding for State/local general costs, including public education. OK SNAP Works has established controls to ensure non-supplanting, including: • Communication of rules during provider onboarding regarding the use of SNAP E&T funds, both in
	 written and verbal form. Providing providers with the FNS Employment and Training Toolkit, which outlines specific rules regarding charges for the E&T education component. The OK SNAP Works Provider Handbook states that Federal E&T funds allocated for activities within the education component must not replace non-Federal funds for existing educational services and activities. OK SNAP Works also requests a list of non-Federal funding sources from potential providers and conducts reviews during provider Management Evaluations (MEs) to verify that costs attributed to OK SNAP Works do not result in supplanting. The State ensures that costs attributed to the E&T program do not supplant funds used for other existing education programs.
Cost parity	SNAP E&T providers are required to ensure that fees charged to SNAP E&T clients are identical to those charged to individuals not participating in SNAP E&T. This includes documenting in the client's case file that the amount billed to E&T clients matches the amount charged to non-SNAP E&T clients. Controls implemented by OK SNAP Works to guarantee cost parity involve comprehensive communication during provider onboarding

regarding the utilization of SNAP E&T funds. Providers receive an FNS Employment and Training Toolkit containing specific guidelines for the E&T education component. During annual provider Management Evaluations (MEs), OK SNAP Works staff review tuition receipts to verify the amounts charged to SNAP E&T clients. They also examine provider course catalogs to confirm that tuition charged to non-E&T participants is equivalent to that charged to SNAP E&T clients. OK SNAP Works protocol ensures that E&T clients are not charged more than the general public for the same service. The OK SNAP Works Provider Handbook specifies, "If any of the educational services or activities are available to persons other than E&T participants, the costs charged to E&T must not exceed the costs charged for non-E&T participants." Providers furnish funding proof for participants through billing statements for both SNAP E&T participants and non-participants, which are then compared to the costs invoiced by the provider.

Table G.VII. Educational Program Details: Career/Technical Education Programs or other Vocational Training

Details	Career/Technical Education Programs or other Vocational Training (EPC)
Description of the component	Organized activities at the post-secondary level provide individuals with the academic and technical knowledge and skills needed to prepare for further education and careers in current or emerging employment sectors. These programs primarily target individuals beyond the age of compulsory high school attendance. Ideally, such programs should be driven by employer needs and result in industry-recognized certificates or credentials. The duration of these programs varies significantly based on the specific credential being pursued. Available certificates include forklift operation, Microsoft applications (Excel, PowerPoint, and Word), CompTIA ITF+ and CompTIA A+ Certification, Construction Technology, EMT certification, Healthcare Administration, CompTIA Network + Certification, CompTIA Security + Certification, Paramedic license, Certified Nurse Aide License, Phlebotomists, paint and refinish technician, automotive technician, cosmetologist, facialist, manicurist, practical nursing, and machinist.

	The hours for these programs will vary significantly depending on the specific credential being pursued.
Target population	Volunteers
Criteria for participation	Participation eligibility for this component is decided by the contractor. Each contractor assesses the suitability of participants for this program.
	EPC will be offered to SNAP recipients to upgrade their work skills and experience in order to obtain stable employment with a living wage. Before enrolling in the EPC, a thorough evaluation of clients' skills is conducted to ensure their success in the program. This assessment encompasses various areas such as English comprehension, speaking, reading, and writing abilities, workplace communication, fundamental math, and basic computer skills. Clients expressing interest in acquiring new skills and certifications in specific trades will have access to technical training tailored to their preferences. Participation requires a foundation in basic technical skills and a dedication to completing the program.
Geographic area	Oklahoma, Pottawatomie, Tulsa, Osage, Washington, Okmulgee, Wagoner, Creek, Rogers, Pawnee, Pontotoc, McIntosh, Muskogee, Pittsburg, and surrounding areas.
E&T providers	CEO, GICO (Goodwill Ada), GWT, HA (Curbside Chronicle, Curbside Flowers, Sasquatch Shaved Ice, Curbside apparel), MSG (WorkAdvance), PS, RM, TCTC, NWTC
Projected annual participation	376
Estimated annual component costs	\$1,460,777
Not supplanting	To adhere to Federal cost principles, the State refrains from using funding for State/local general costs, including public education.
	OK SNAP Works has established controls to ensure non-supplanting, including:

•	Communication of rules during provider onboarding
	regarding the use of SNAP E&T funds, both in
	written and verbal form.

- Providing providers with the FNS Employment and Training Toolkit, which outlines specific rules regarding charges for the E&T education component.
- education component must not replace non-Federal funds for existing educational services and activities.
- OK SNAP Works also requests a list of non-Federal funding sources from potential providers and conducts reviews during provider Management Evaluations (MEs) to verify that costs attributed to OK SNAP Works do not result in supplanting.
- The State ensures that costs attributed to the E&T program do not supplant funds used for other existing education programs.

Cost parity

SNAP E&T providers are required to ensure that fees charged to SNAP E&T clients are identical to those charged to individuals not participating in SNAP E&T. This includes documenting in the client's case file that the amount billed to E&T clients matches the amount charged to non-SNAP E&T clients. Controls implemented by OK SNAP Works to guarantee cost parity involve comprehensive communication during provider onboarding regarding the utilization of SNAP E&T funds. Providers receive an FNS Employment and Training Toolkit containing specific guidelines for the E&T education component. During annual provider Management Evaluations (MEs), OK SNAP Works staff review tuition receipts to verify the amounts charged to SNAP E&T clients. They also examine provider course catalogs to confirm that tuition charged to non-E&T participants is equivalent to that charged to SNAP E&T clients. OK SNAP Works protocol ensures that E&T clients are not charged more than the general public for the same service. The OK SNAP Works Provider Handbook specifies, "If any of the educational services or activities are available to persons other than E&T participants, the costs charged to E&T must not exceed the costs charged for non-E&T participants." Providers furnish funding proof for participants through billing statements for both SNAP E&T

	participants and non-participants, which are then compared to the costs invoiced by the provider.

Table G.VIII. Educational Program Details: English Language Acquisition

Deteile	Finalish Language Association (FDFL)
Details	English Language Acquisition (EPEL)
Description of the	
component	
Target population	
Criteria for participation	
Geographic area	
E&T providers	
Projected annual	
participation	
Estimated annual	
component costs	
Not supplanting	
Cost parity	

Table G.IX. Educational Program Details: Integrated Education and Training/Bridge Programs

Details	Integrated Education and Training/Bridge Programs (EPIE)
Description of the component	
Target population	
Criteria for participation	
Geographic area	
E&T providers	
Projected annual participation	
Estimated annual component costs	

Not supplanting	
Cost parity	

Table G.X. Educational Program Details: Work Readiness Training

Details	Work Readiness Training (EPWRT)
Description of the component	This component is a comprehensive program offering skill assessment and educational support to prepare individuals for the workforce. Participants receive training in essential topics such as anger management, workplace wellness, seeking safety, relapse prevention, and employment readiness. These activities are designed to enhance executive functioning and life skills, which are critical for successful employment and personal development. The program covers foundational cognitive skills like reading comprehension, applied mathematics, information retrieval, problem-solving, and critical thinking. In addition, it focuses on developing non-cognitive or soft skills, which are characterized by personal attributes and behavioral competencies that enhance interactions, job performance, and career prospects. Examples of these soft skills include adaptability, integrity, cooperation, effective communication, time management, conflict resolution, teamwork, and workplace discipline. By concentrating on both cognitive and non-cognitive skills, the program ensures that participants are well-equipped to navigate the workplace environment, maintain steady employment, and achieve self-sufficiency. The training provides consistent support and engagement, allowing individuals to steadily build the skills necessary for long-term success in both their personal and professional lives. This structured approach fosters a sense of community and continuous personal growth, directly correlating to improved employment outcomes. The level of commitment to this component may vary among providers, ensuring flexibility to meet the diverse needs of participants.
Target population	Volunteers
Criteria for participation	Participation eligibility for this component is decided by the contractor. Each contractor assesses the suitability of participants for this program.

	Prospective participants should either be unemployed or seeking improved employment opportunities, or they should be out of school and at least 16 years old with a keen interest in gaining employment and training skills. To fully benefit from the program, individuals must demonstrate both the ability to comprehend information and a willingness to learn, be prepared for employment opportunities, and be adaptable to changes in a work environment.
Geographic area	Oklahoma, Pottawatomie, Tulsa, Osage, Washington, Okmulgee, Wagoner, Creek, Rogers, Pawnee, Pontotoc, McIntosh, Muskogee, Pittsburg, and surrounding areas.
E&T providers	FC&S (WIR, WJT), GICO (Goodwill Ada), MSG (WorkAdvance), PS (Work Ready), RM, TEEM, SXS
Projected annual participation	375
Estimated annual component costs	\$1,265,354
Not supplanting	 OK SNAP Works has established controls to ensure non-supplanting, including: Communication of rules during provider onboarding regarding the use of SNAP E&T funds, both in written and verbal form. Providing providers with the FNS Employment and Training Toolkit, which outlines specific rules regarding charges for the E&T education component. The OK SNAP Works Provider Handbook states that Federal E&T funds allocated for activities within the education component must not replace non-Federal funds for existing educational services and activities. OK SNAP Works also requests a list of non-Federal funding sources from potential providers and conducts reviews during provider Management Evaluations (MEs) to verify that costs attributed to OK SNAP Works do not result in supplanting. The State ensures that costs attributed to the E&T program do not supplant funds used for other existing education programs.
Cost parity	SNAP E&T providers are required to ensure that fees charged to SNAP E&T clients are identical to those charged to individuals not participating in SNAP E&T. This

includes documenting in the client's case file that the amount billed to E&T clients matches the amount charged to non-SNAP E&T clients. Controls implemented by OK SNAP Works to guarantee cost parity involve comprehensive communication during provider onboarding regarding the utilization of SNAP E&T funds. Providers receive an FNS Employment and Training Toolkit containing specific guidelines for the E&T education component. During annual provider Management Evaluations (MEs), OK SNAP Works staff review tuition receipts to verify the amounts charged to SNAP E&T clients. They also examine provider course catalogs to confirm that tuition charged to non-E&T participants is equivalent to that charged to SNAP E&T clients. OK SNAP Works protocol ensures that E&T clients are not charged more than the general public for the same service. The OK SNAP Works Provider Handbook specifies, "If any of the educational services or activities are available to persons other than E&T participants, the costs charged to E&T must not exceed the costs charged for non-E&T participants." Providers furnish funding proof for participants through billing statements for both SNAP E&T participants and non-participants, which are then compared to the costs invoiced by the provider.

Table G.XI. Educational Program Details: Other

Details	Other (EPO): State agency must provide description
Description of the component	
Target population	
Criteria for participation	
Geographic area	
E&T providers	
Projected annual participation	
Estimated annual component costs	
Not supplanting	
Cost parity	

III. Work Experience (WE)

Work experience is divided into two subcomponents per 7 CFR 273.7(e)(2)(iv): Work activity (WA) and Work-based learning (WBL). WBL activities like internships, apprenticeships, and on-the-job training, among others, may provide wages subsidized by the E&T program. In order to capture information about WBL activities that may be subsidized or unsubsidized by E&T, there are two sets of tables below for each kind of WBL activity – the first group of tables are for activities not subsidized by E&T (e.g. Work-based learning – Internships) and the second group of tables are for activities subsidized by E&T (e.g. Work-based learning – Internships - Subsidized by E&T). Note that subsidized means programs where E&T funding is used to subsidize wages of participants. Subsidized in this context does not mean programs where participants receive a subsidized wage from another source.

Work Activity and Unsubsidized WBL Components

Complete the tables below with information on Work Activity and each unsubsidized WBL component that the State agency intends to offer during the fiscal year. *If the State does not plan to offer one of the components in the table, please leave the cells blank.* For each component that is offered, the State should include the following information:

- Description of the component. Provide a summary of the activities and services
- **Target population.** Identify the population that will be targeted. Include special populations such as ABAWDs, Returning Citizens, Homeless, Older Disconnected Youth, etc.
- **Criteria for participation.** What skills, knowledge, or experience is necessary for participation in the component? For example, literacy or numeracy levels, recent labor market attachment, computer literacy etc.
- Geographic area. Where will the component be available (statewide, regional, counties, localities not covered by ABAWD waivers, areas covered by the American Job Centers, etc.).
- **E&T providers.** Identify all entities that will provide the service.
- Projected annual participation. Project the number of unduplicated individuals.
- Estimated annual component costs. Project only administrative costs.

Table G.XII. Work Experience: Work Activity

Details	Work Activity (WA)
Description of the	
component	
Target population	
Criteria for participation	
Geographic area	
E&T providers	
Projected annual	
participation	
Estimated annual	
component costs	

Table G.XIII. Work Experience: Internship

Details	Internship (WBLI)
Description of the	
component	
Target population	
Criteria for participation	
Geographic area	
E&T providers	
Projected annual	
participation	
Estimated annual	
component costs	

Table G.XIV. Work Experience: Pre-Apprenticeship

Details	Pre-Apprenticeship (WBLPA)
Description of the	
component	
Target population	
Criteria for participation	
Geographic area	
E&T providers	

Projected annual participation
ted annual
mponent costs

Table G.XV. Work Experience: Apprenticeship

Detaile	Apprenticeship (WBLA)
Details	
Description of the	
component	
Target population	
Criteria for participation	
Geographic area	
E&T providers	
Projected annual	
participation	
Estimated annual	
component costs	

Table G.XVI. Work Experience: On-the-Job Training

Details	On-the-Job-Training (WBLOJT)
Description of the component	On-the-job training as defined under WIOA (20 CFR 680.700), is designed to facilitate meaningful interactions with industry and community professionals. Whenever possible, participants will engage with these professionals in real-world settings, providing them with firsthand exposure to tasks relevant to their chosen fields. Where direct engagement is not feasible, simulated environments will be utilized to offer a similar level of practical experience. This approach ensures that participants gain valuable insights and hands-on skills that are directly aligned with their curriculum and instruction. The program covers a wide range of fields, including healthcare, retail, culinary arts, construction, landscaping, computer coding, and IT. In each of these areas, participants will have the opportunity to work on tasks that are integral to their future careers. For example, in the healthcare sector, participants may assist in laboratory settings, learning the intricacies of medical testing and diagnostics. In culinary arts, they might work in professional kitchens, honing their cooking techniques and

	understanding kitchen management. Construction and landscaping participants will gain experience with hands- on projects, from building structures to designing and maintaining outdoor spaces. In the fields of computer coding and IT, participants will tackle real-world problems, developing software solutions or managing IT systems. To support their educational goals, participants will receive in-person or virtual tutoring tailored to their individual needs. This tutoring will cover both academic subjects and practical skills, ensuring that participants are well-prepared for their future careers. The comprehensive support system is designed to help participants achieve educational milestones while simultaneously training for their chosen professions. Incorporating on-the-job training as defined under WIOA (20 CFR 680.700), upon successful completion of the training, it is anticipated that the employers involved in the program will retain the participants as employees. This expectation is based on the practical experience and industry-specific skills that participants will have acquired during the training. The goal is to create a seamless transition from training to employment, with participants being fully prepared to meet the demands of their new roles. This approach not only benefits the participants but also provides employers with well-trained, ready-to-work individuals who are familiar with the industry standards and expectations.
Target population	Volunteers
Coographic area	Participation eligibility for this component is decided by the contractor. Each contractor assesses the suitability of participants for this program. Prospective participants should either be unemployed or seeking improved employment opportunities, or they should be out of school and at least 16 years old with a keen interest in gaining employment and training skills. To fully benefit from the program, individuals must demonstrate both the ability to comprehend information and a willingness to learn, be prepared for employment opportunities, and be adaptable to changes in a work environment.
Geographic area	Oklahoma and Tulsa counties and surrounding areas
E&T providers	HA, MSG

Projected annual	130
participation	
Estimated annual	\$609,076
component costs	

Table G.XVII. Work Experience: Transitional Jobs

	Transitional Jobs (WBLTJ)
Details	
Description of the	
component	
Target population	
Criteria for participation	
Geographic area	
E&T providers	
Projected annual	
participation	
Estimated annual	
component costs	

Table G.XVIII. Work Experience: Work-based learning - Other

Details	Work-based learning - Other (WBLO): State agency must provide description
Description of the component	Creating supportive employment opportunities is crucial for reducing and preventing homelessness in Oklahoma City. The Homeless Alliance offers individuals transitioning out of homelessness, who face significant employment barriers, the opportunity to gain immediate, practical work experience as magazine vendors for the Curbside Chronicle, Oklahoma City's street paper. This program provides hands-on training in essential job skills such as time management, customer service, effective communication, and prioritization.
	The initiative focuses on swiftly integrating participants into the workforce, providing access to employment that might otherwise be unattainable. New vendor orientations are conducted twice weekly at the Homeless Alliance, allowing individuals to start working soon after completing their training. Initially, each new vendor receives 15 magazines and uniform attire at no cost. Subsequently, vendors buy magazines at 75 cents each and sell them for \$2, retaining all profits and tips. On average, vendors earn

	approximately \$4 per magazine, receiving direct payment from customers.
	Vendors operate as independent contractors, essentially managing their small businesses through magazine sales. The Homeless Alliance supports them via vendor coordinators who assist in identifying optimal sales locations, enhancing sales techniques, and resolving any arising issues. These coordinators also facilitate connections to additional resources and referrals, aiding vendors in transitioning from magazine sales to more conventional employment opportunities.
	Similar street paper programs exist globally, with Nashville, TN hosting a SNAP E&T partner program akin to Oklahoma City's. Employment training within the program is delivered both in group settings and individually. Each participant collaborates with the Homeless Alliance to create a tailored individualized service plan (ISP), aiming to achieve residential stability, enhance self-determination, and increase skills and income. Vendor coordinators play a pivotal role in helping participants navigate personal employment barriers, providing support with obtaining identification, budgeting, and interpersonal skill development.
Target population	Volunteers
Criteria for participation	Anyone is eligible to participate in this component and must meet with our staff at least twice a month. If a client lacks the literacy needed to engage with services, we will help them connect with literacy resources to increase their skills.
Geographic area	Oklahoma County
E&T providers	HA
Projected annual participation	40
Estimated annual component costs	\$237,521

For all of the included subsidized components, the State agency attests to the following:	Check Box
Will pay the individual a wage at least equal to the State or Federal minimum wage, whichever is higher.	\boxtimes
Operates in compliance with all applicable labor laws.	\boxtimes
Will not displace or replace existing employment of individuals not participating in E&T.	\boxtimes
Provides the same benefits and working conditions as non-E&T participants doing comparable work for comparable hours.	\boxtimes

Subsidized WBL Components

For assistance with developing the State's E&T SWBL budget, please refer to the optional SWBL tool on the Operating Budget Excel Workbook.

Complete the tables below with information on each subsidized WBL component that the State agency intends to offer during the fiscal year. *If the State does not plan to offer one of the components in the table, please leave the cells blank*. For each component that is offered, the State should include the following information:

- Description of the component. Provide a summary of the activities and services.
- Target population. Identify the population that will be targeted. Include special
 populations such as ABAWDs, Returning Citizens, Homeless, Older Disconnected
 Youth. etc.
- Criteria for participation. What skills, knowledge, or experience is necessary for participation in the component? For example, literacy or numeracy levels, recent labor market attachment, computer literacy etc.
- Geographic area. Where will the component be available (statewide, regional, counties, localities not covered by ABAWD waivers, areas covered by the American Job Centers, etc.).
- **E&T providers.** Identify all entities that will provide the service.
- Projected annual participation. Project the number of unduplicated individuals.
- Estimated annual component costs. Project only administrative costs.
- Length of time the SWBL will run. Indicate the maximum number of hour participants can receive SWBL (e.g. 300 hours). Indicated if there is variation in how many hours will be offered to participants.
- What other administrative costs, if any, will be associated with the SWBL. Examples include workers compensation, payroll taxes paid by the employer, and costs, direct or indirect costs associated with training and administering the SWBL.

Table G.XIX. Subsidized Work Experience: Internship – Subsidized by E&T

Details	Internship – Subsidized by E&T (WBLI - SUB)
Description of the component	Internship – Subsidized by E&T (WBLI - SUB) The training objectives of the Catalyst Cookies job training program include earning a ServSafe Food Handler certification upon completion. Participants who complete the Grow with Google curriculum receive an IT certificate from Coursera. Participants will interact with industry professionals in real-world settings. Industry professionals will visit ReMerge to provide insights about their professions and the necessary trainings and credentials for success. Participants who earn an IT certification through the Grow with Google program use donated laptops to participate in simulations and interactive training via Coursera. Additionally, participants will engage in job shadowing experiences, including on-site visits to affiliated businesses for tours and a behind-the-scenes look at daily operations and equipment. For the simulated work environment, the Catalyst Cookies program operates within the ReMerge program, paying participants \$10.78 per hour to develop bakery food-handling skills by preparing, baking, and managing inventory. ReMerge offers training in various industry fields based on individual participant goals. Participants pursuing the IT certification focus on IT, while those in the Catalyst Cookies program receive on-the-job training in bakery food service. Participants in the Catalyst Cookies program and the IT certification are on the ReMerge payroll for 8-12 weeks at \$10.78 per hour and 12 weeks at \$15.16 per hour, respectively, with varying part-time hours. After completing these programs, ReMerge does not establish direct placements to a specific worksite. Instead, the Education & Employment staff actively build community connections and use those relationships to match individual program participants with employers that align with their interests and strengths. The IT certification program involves 13 weeks of handson training and classroom instruction, followed by optional internship placements. Participants in this program earn \$15.16 per hour,
	developed with input from industry leaders, employers,

local industry associations, and workforce data from the Chamber of Commerce and the Office of Workforce Development. The primary curriculum used is the Grow with Google curriculum. ReMerge ensures training opportunities align with local labor and employer demands.

Employers and industry sector representatives were consulted in the design of the SWBL component and training curriculum. The IT support fundamentals and computer skills course is taught by an instructor specializing in these areas, supplemented with classroom instruction. The Catalyst Cookies program and its curriculum are led by a ReMerge employee with restaurant industry management experience.

The SWBL component provides a structured learning experience aligned with a curriculum. ReMerge follows curriculum specific to each participant's career goals, including the Grow with Google curriculum for IT training and various community college or online programs for other fields. Education & Employment staff ensure participants enroll in formally accredited curriculums to further their career goals.

Participants are expected to learn and apply career-related training objectives by completing the program. For the Grow with Google IT Support certification, students learn about operating systems, computer networking, and customer support. Catalyst Cookies participants gain basic career entry/reentry skills through an Introduction to Career Skills course, covering interviewing, workplace communication, etiquette, and timekeeping.

Employers and industry professionals are involved in developing and executing the training element of the SWBL component. Area professionals teach the classroom training portion of the IT certification, while local professionals and recruiter volunteers help identify external employment opportunities. Education & Employment staff teach workplace-readiness classes and bring in local professionals to provide real-world insights.

The training objectives are shared with participants during orientation and through regular check-ins with program staff. Participants understand overall and weekly training objectives built into the curriculum. Feedback on progress is gathered through retention calls

	to employers, though a standardized tool for this process can be developed if needed. The program follows an articulated and documented path leading to regular, unsubsidized employment. Stable employment is a requirement for completing the ReMerge program, which is a diversion program. The Education & Employment department coaches' participants on setting employment objectives, discussing goals, troubleshooting workplace issues, applying for jobs, and preparing for interviews. The provider focuses on promptly moving participants into regular employment. Employment is required at a certain phase of recovery, with all participants starting in the Catalyst Cookies program as a first step. After completing a high-school equivalency (HSE), participants are guided through making career decisions, establishing education goals, and securing employment. Education & Employment staff are committed to supporting these functions. Participants are employed with external industry employer partners after their training period. Staff support the job search process and network with area employers to connect clients with suitable opportunities. Participant reimbursements and support services are provided for expenses directly related to participating in the SWBL activity. Participants receive no-cost childcare and free transportation to and from their training and early employment to the extent possible. Limited to a six-month duration, with exceptions considered on a case-by-case basis approved by the OK SNAP Works team.
Target population	Volunteers
Criteria for participation	
Geographic area	Oklahoma county
E&T providers	ReMerge
Projected annual participation	60
Estimated annual component costs	\$316,960.00 RCP - \$116,424.00 (50/50) match = \$58,212 Catalyst - \$22,638 (50/50) match = \$11,319 Total Wages = \$139,062 (50/50) match = \$69,531

Length of time the SWBL	3-months
will run	
Other administrative costs	\$117,898
associated with SWBL	

Table G.XX. Subsidized Work Experience: Pre-Apprenticeship– Subsidized by E&T

Details	Pre-Apprenticeship- Subsidized by E&T (WBLPA-SUB)
Description of the	
component	
Target population	
Criteria for participation	
Geographic area	
E&T providers	
Projected annual	
participation	
Estimated annual	
component costs	
Length of time the SWBL	
will run	
Other administrative costs	
associated with SWBL	

Table G.XXI. Subsidized Work Experience: Apprenticeship – Subsidized by E&T

Details	Apprenticeship – Subsidized by E&T (WBLA-SUB)
Description of the	
component	
Target population	
Criteria for participation	
Geographic area	
E&T providers	
Projected annual	
participation	
Estimated annual	
component costs	
Length of time the SWBL	
will run	

Other administrative costs
associated with SWBL

Table G.XXII. Subsidized Work Experience: Transitional Jobs – Subsidized by E&T

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Details	Transitional Jobs – Subsidized by E&T (WBLTJ - SUB)			
Description of the component	CEO - The CEO program begins with a two-day paid orientation, referred to as Pathways to Employment (P2E), to initiate the process of increasing employability. During orientation, CEO employees assist each participant in assembling all necessary documents for employment and benefits. Initial training topics, such as workplace safety, are covered to prepare participants for transitional jobs. Participants also complete an employability assessment, informing CEO employees of their preparedness to obtain and maintain long-term employment and their interests in sectors aligning with work-based learning. CEO employees also assist each participant in assembling all documents necessary for employment and eligible benefits.			
	After completing P2E, participants move on to paid real-world work-based learning experiences paired with training and feedback. For many participants, this is their first job. The focus of transitional jobs is to develop the soft and hard skills crucial for obtaining and retaining full-time employment. This model is particularly suited for individuals with high barriers. About half of the participants have no prior work experience, and many are returning home after long periods of incarceration, working to gain employment with multiple and/or stigmatized convictions.			
	CEO's Work-Based Learning Transitional Job (WBLTJ-SUB) curriculum was designed in collaboration with employer partners to improve participants' employment outcomes. CEO is the employer of record for this component, and participants work in crews of 5-8, led by a Site Supervisor, earning \$9.50 per hour. Site supervisors provide structure by assigning daily tasks, setting deadlines, and giving feedback. Participants are matched with work crews that best fit their availability, interests, and skill sets. This crew-based training approach places participants in real work environments where they learn to interact constructively with			

coworkers, handle workplace conflicts, practice new skills, and receive feedback from site supervisors.

The specific jobs participants perform vary by employer partner, but the hard skills acquired are aligned with the transportation and construction industries and are transferable across industries. These skills include equipment management, project management, task structuring, and workplace safety. Additional hard skills specific to industries, such as transportation and material-moving equipment use, can be obtained based on work crew assignments. The program also emphasizes soft skills through job coaching, job development, and the transitional jobs participants undertake.

All CEO crews include trained and professional crew leadership, insurance, workers' compensation, administrative and logistical support, and compliance with all applicable labor laws. Site supervisors and directors meet bi-weekly with employer partners to discuss crew management and participant performance. CEO Oklahoma City has seven transitional job crews, and CEO Tulsa has eight, including partners like the Oklahoma Department of Transportation (OKDOT), City of Oklahoma City, City of Edmond, Oklahoma County, City of Tulsa, and Tulsa Community College. These partners help define the specific skills learned on each work crew. Current training focuses on roadside safety, maintenance, and vegetation management, which are essential for related jobs with these employer partners and in the broader industries.

E&T participants do not displace or replace existing employment of non-E&T individuals. To reduce barriers to the program, CEO provides participants with support services such as transportation, work clothing, tools, and training necessary for participating in the SWBL activity. By working on active crews, participants acquire many transferable soft and hard skills that help them become Job Start Ready.

CEO aims to build career pathways into its economic mobility framework, focusing on two core areas: integrating digital skill development into the CEO model and creating a network of strategic training providers with

the necessary supports for participants to access training leading to quality jobs. Each participant must complete three weeks of digital literacy training directly related to their transitional job experience. CEO partnered with Google to curate self-guided training sessions to help participants create resumes, attend video calls, and use Gmail. For advanced training opportunities, CEO tailors programming to each participant's circumstances and needs, offering a variety of options.

Optional advanced training opportunities include:

- Network for Employment Services & Training (NEST): An online hub of training modules to expand remote access to services and improve digital literacy, offering virtual credentialed skills training through trusted community partners.
- Commercial Driver License (CDL) Pathway:
 Participants interested in transportation can obtain a commercial driver's license, enhancing their employment prospects within the industry.

 Eligibility is based on the ability to obtain a CDL license.
- Information Technology (IT) Pathway:
 Participants learn skills to navigate mobile devices, operating systems, hardware, virtualization, and cloud computing to prepare for the CompTIA A+ 1001 and A+ 1002 exams.
- CEO Registered Apprenticeship: A DOLapproved registered apprenticeship for First-Line Supervisors of Material-Moving Machine and Vehicle Operators, serving as an internal hiring pipeline and a pathway to placements with transportation industry partners.

For FY25, CEO Oklahoma plans to enroll 22 individuals in CDL training and 12 in other advanced pathways related to employer partners, including heavy equipment operation, welding, and skilled construction trades. These training opportunities align with career fields listed in Oklahoma's 100 Critical Occupations list. CEO's vocational staff support participants individually, identifying barriers to full-time, stable employment. Internal data shows a correlation between transitional job training and full-time job placements.

In order to ensure participants, move promptly into regular employment, CEO's vocational staff work closely with each participant to enhance their skills and address any obstacles to achieving stable employment. Due to limited unsubsidized placement slots, the component focuses on sustained interactions with industry professionals and a structured curriculum. This approach helps participants obtain employment in the same industry if immediate opportunities with partners are unavailable. More than half of CEO's placements last year were directly related to the industries targeted by the SWBL curriculum.

CEO Intermediary – Subcontractor

Resonance - Resonance offers a six-month training program at Take 2 Cafe where participants are employed to gain hands-on experience in restaurant management, customer service, and sales. This training helps women secure future employment by providing practical skills. Participants work approximately 30 hours per week, receive paid training, and obtain their food handler certification while being coached on maintaining their assigned shifts at the cafe.

Participants interact with industry professionals as Take 2 Cafe Managers, who are previous restaurant owners, provide training and supervision. The cafe operates as a real-world setting, offering a genuine restaurant experience open to the public. The program focuses on the food service and management industry, with Resonance Take 2 Cafe serves as the employer of record for participants, who earn \$13 per hour. The wages are fully subsidized, with SNAP E&T providing 50% reimbursement for those wages.

The program is designed to meet the skilled workforce needs of employers by equipping participants with basic workforce skills applicable in various fields. Some women pursue careers in food service and management, while case management supports job development and education, including GED classes, welding school, manufacturing certificates, Peer Recovery Support Specialist certifications, and CDL licenses.

Take 2 Cafe, a social enterprise established in 2016, was developed with input from local restaurant owners and chefs to create a conducive learning and working environment. The expertise of cafe managers, who have

industry experience, guides the learning process. The structured learning experience includes real-world training and job readiness activities, with participants gaining experience in various roles within the cafe, such as operating the cash register and working the food line. Participants are provided with an onboarding review detailing what to expect and the skills they will develop. Regular feedback is given by cafe managers, and participants are encouraged to help others once they master a skill. Performance reports are shared with case managers to monitor progress.

The program follows an articulated path leading to regular, unsubsidized employment, tailored to each participant's desired career field. The goal is for participants to be employed and self-sufficient by the program's end. Case management focuses on moving participants promptly into regular employment through assessments, goal planning, and weekly reviews. Nearly all participants are hired by industry employer partners after completing the program.

As part of its SWBL component, Resonance provides work clothing to all individuals participating in the Take 2 program and assists them in obtaining their Food Handlers License. The training offered by Take 2 Cafe equips women with essential job skills and education that are transferable to various careers.

Although food service is not listed on Oklahoma's 100 Critical Occupations list, many program graduates have used the skills they acquired to achieve certifications in welding and construction, obtain CDL licenses, or start careers as entry-level social workers through Peer Recovery Support Specialist certifications. The experience and training they receive at the cafe are instrumental in helping them succeed in these diverse career paths.

GWT-

Goodwill's program ensures that participants are paid a wage that meets or exceeds the State or Federal minimum wage. It operates in full compliance with all applicable labor laws and guarantees that no existing employees will be displaced or replaced by E&T participants. Furthermore, it provides the same benefits and working conditions to E&T participants as those

offered to non-E&T employees performing similar work for comparable hours.

The program offers comprehensive training objectives aimed at equipping participants with essential skills and credentials. It begins with a month-long Career Readiness course led by the Reentry Career Navigator, covering job readiness (such as resume building and interview skills), personal development (including life skills and financial literacy), and access to support services like mental health counseling and housing assistance. At the program's conclusion, each participant meets individually with the Career Navigator to assess needs, develop career plans, and establish timelines for employment or transitional work options.

Participants then transition into a 90-day transitional work program at Goodwill, dedicating one day per week to their job search. The Reentry Employment Specialist supports participants in securing employment aligned with their interests. Ongoing career support includes alumni meetings, mentoring for emerging leaders, and a savings match program. Upon completion, participants earn certificates recognizing their achievements in Career Readiness Training, Reentry Work-Based Learning, and optional Forklift and Advanced Order Picker Training.

In addition to structured training, participants engage directly with industry professionals in a real-world setting through the 2nd Chance Outlet, a functioning business under Goodwill Industries of Tulsa. This provides practical experience and exposure to real industry environments. Mock Interviews with area employers and community partners further enhance participants' readiness for the job market.

The SWBL component focuses on training participants for careers in manufacturing, production, and retail customer service sectors. Goodwill Industries of Tulsa, Inc. serves as the employer of record for the program, ensuring compliance with all labor laws and providing equitable benefits and working conditions to participants. The SWBL program duration is designed for a maximum of 4 months, ensuring focused engagement and efficient skill development. Participants earn an hourly wage of \$12.50, with 50% of wages reimbursed by E&T funds. The curriculum is meticulously designed to meet the skilled workforce needs of employers, incorporating input from industry representatives and utilizing nationally

recognized program processes. It integrates content from sources such as the Aspire Program SOPs, ON Reentry Career and Life Skills Readiness Curriculum, toolkits from Goodwill Industries International and other organizations, insights from the Society of Human Resource Managers (SHRM), and collaborations with local entities like the Education and Training Pathways Collective and Center for Employment Opportunities – Tulsa. This ensures that participants receive training aligned with industry standards and tailored to local labor market demands.

Additional Program Features:

- Career-Related Training Objectives: The curriculum includes specific career-related training objectives that participants are expected to achieve by the end of the program.
- Employer Involvement: Employers actively participate in program development and execution by making presentations during Career Readiness Training, conducting Mock Interviews, and offering employment opportunities through referrals and onsite hiring events.
- Participant Communication: Training objectives and program expectations are communicated to participants through a detailed enrollment document outlining objectives, behavior expectations, eligibility requirements, an orientation checklist, termination criteria, and a code of conduct form.
- Progress Feedback: Participants receive weekly feedback on their progress toward meeting training objectives from Employment Specialists or Peer Support Specialists, ensuring accountability and support in their transitional employment and long-term employment goals.
- Path to Unsubsidized Employment: The
 program follows a structured path designed to
 lead participants into regular, unsubsidized
 employment. This includes initial Career
 Readiness Training, practical experience through
 the 2nd Chance Outlet, and the development of
 Individual Plans for Employment with Employment
 Specialists to track progress and ensure
 successful job placement.
- **Employment Placement:** The majority of SWBL graduates are hired by worksite employers or

- other industry partners, facilitated through partnerships with existing employers and community organizations focused on assisting individuals with justice-involved backgrounds.
- Participant Support Services: Reimbursements and support services are provided to participants for expenses that are reasonable, necessary, and directly related to participating in the SWBL activity, ensuring comprehensive support throughout their training and employment journey.

Side X Side

The training objectives of Side X Side are designed to equip participants with multiple certificates upon graduation. These include computer skills (via multiple modules from Northstar Digital Literacy), employability skills (15 hours of class time with MetroTech), mental health (an 8-session curriculum from HALO), financial literacy (an 8-session curriculum from Growing Oaks Association), tenant rights and education (four modules from Shelterwell), and a Side X Side certificate for 360 hours of professional development training. Participants will indeed interact with industry professionals in real-world settings. Side X Side partners with over a dozen speakers, mentors, and education providers who deliver curriculum during the full-time training. Additionally, each participant will spend four weeks embedded with a local employer during their Earn & Learn phase, applying the skills developed during training with the anticipation of receiving long-term career offers post-program.

Side X Side's curriculum focuses on power skills training, addressing the needs of various industries such as healthcare, IT, light manufacturing, hospitality, and customer service. During the Earn & Learn phase, participants are trained specifically for these fields, ensuring they are well-prepared for employment in these sectors.

The education stipend provided to participants during the training portion of the program is paid directly by Side X Side. The complete program lasts nine weeks, with the training portion spanning five weeks. Participants receive an hourly wage of \$12.50, with 50% of these wages reimbursed by E&T funds.

Side X Side collaborates closely with 15 employer partners to ensure the curriculum meets the skilled workforce needs of these employers. The program includes structured learning experiences that align with the curriculum, covering essential skills such as communication, emotional intelligence, financial literacy, and digital literacy. This curriculum is delivered by industry professionals, ensuring participants receive expert guidance.

Employers and industry sector representatives were extensively consulted in the design of the SWBL component and training curriculum. Side X Side hosted listening sessions with 80 individuals from various sectors, including employers, nonprofit agencies, education providers, government representatives, funders, and potential participants. Regular meetings with employer partners further refine the training content to meet industry needs.

Weekly objectives are shared with participants at the beginning of each week during training, and weekly surveys assess retention and engagement with the curriculum. Participants receive feedback on their progress from career navigators through one-on-one meetings at least once a week. This process provides coaching and accountability, ensuring participants meet the program's objectives.

Side X Side follows a structured path leading to regular, unsubsidized employment. The program boasts a 100% placement rate for Earn & Learn employment during the program and a 90% conversion rate to career roles postprogram. The phased approach from training to provisional employment to career employment helps participants transition smoothly into stable jobs. Participants receive support services from local agencies, which handle long-term case management. Side X Side does not bill supports to the SNAP E&T program, as these needs are managed by referring partners. Lastly, the career fields Side X Side focuses on, such as healthcare, IT, light manufacturing, hospitality, and customer service, are all listed on Oklahoma's 100 Critical Occupations list. This ensures that participants are trained for roles that have a career trajectory and are in demand.

	Limited to a six-month duration, with exceptions considered on a case-by-case basis approved by the OK SNAP Works team.
Target population	Volunteers
Criteria for participation	Participation eligibility for this component is decided by the contractor. Each contractor assesses the suitability of participants for this program.
	CEO does not require any specific skills, knowledge, or experience to participate in our program and our transitional jobs. Our model is specifically designed to cater to all ranges of work experience and background. For individuals to begin working on our transitional jobs, they must complete P2E and orientation.
	Goodwill - Applicants must possess all required I-9 documentation for employability. Eligibility includes those who are recently released or under supervision, as well as individuals with past justice involvement. However, crimes of a sexual nature and violent crimes categorized as 85% crimes or those requiring registration as a violent offender are not eligible for this program. The skills, education levels, and job interests of program participants will also be identified. An interview with the Program Coordinator and/or Program Director may be necessary to determine the best fit or referral based on the program criteria and the conviction history of the participant. This session will assess motivation towards employment, suitability for the industry, and efforts towards recovery and reintegration. The aim is to promote fairness, consider rehabilitation and reintegration, and ensure Goodwill maintains the safety and well-being of the academic and employment community.
	SXS - Having experienced some sort of barrier to career employment and being referred by a local partner agency with an established relationship
Geographic area	Oklahoma, Tulsa counties and surrounding areas.
E&T providers	CEO, GWT, SXS

Projected annual participation	831
Estimated annual component costs	Total WBLTJ-Sub = \$4,204,453
·	GWT \$726,423
	Wages \$472,500.00(50/50) match = \$236,250.00
	SXS \$195,000 Wages/Stipends \$195,000.00 (50/50) match = \$97,500
Length of time the SWBL	CEO – 3 Months
will run	CEO Subcontractor – 6 months
	Goodwill – 4 months
	SXS – 3 months
Other administrative costs	CEO \$2,207,176
associated with SWBL	CEO Subcontractor N/A
	GWT \$253,923
	SXS \$97,500

Table G.XXIII. Subsidized Work Experience: Work-based learning - Other - Subsidized by E&T

Details	Work-based learning - Other -Subsidized by E&T (WBLO - SUB): State agency must provide description)
Description of the	description)
component	
Target population	
Criteria for participation	
Geographic area	
E&T providers	
Projected annual	
participation	
Estimated annual	
component costs	
Length of time the SWBL	
will run	
Other administrative costs	
associated with SWBL	

H. Estimated Participant Levels

Complete the Estimated Participant Levels sheet in the Excel Workbook projecting participation in E&T for the upcoming Federal FY. Use the numbers in the Excel Workbook as a reference to answer the question below.

a) If less than 20% of E&T participants are expected to receive participant reimbursements, please provide an explanation.

N/A			

I. Contracts/Partnerships

For each partner/contractor that receives more than 10% of the E&T operating budget, complete the table below. If all partners receive less than 10% of the budget, provide the information in the table for the five providers who receive the largest total amount of E&T funding. Partners are the entities that the State agency has contracted with or has agreements (MOUs or MOUAs) with for the delivery of E&T services. All partner contracts must be available for inspection by FNS as requested. (Note: All E&T partners and contracts will be included in the Contract and Partnership Matrix in the Operating Budget Excel Workbook.)

Table I.I. Contractor/Partner Details

Contract or Partner Name:	CEO
Service Overview:	Center for Employment Opportunities (CEO) offers a structured program to enhance employability for individuals facing significant employment barriers, including those with limited work experience or incarceration histories. The program begins with a two-day paid orientation called Pathways to Employment (P2E), where participants prepare necessary documents, receive initial training on workplace safety, and complete an employability assessment.
	Transitional Jobs: After P2E, participants engage in paid, real-world work-based learning experiences to develop essential soft and hard skills. They work in crews led by Site Supervisors, earning \$9.50 per hour. Tasks are structured to simulate real work

Contract or Partner Name:	CEO
	environments, fostering coworker interactions and skills application.
	Work-Based Learning: The Work-Based Learning Transitional Job (WBLTJ-SUB) curriculum focuses on skills aligned with transportation and construction industries. Participants acquire hard skills like equipment management and project management, and soft skills through job coaching and feedback.
	Support Services: CEO provides transportation, work clothing, tools, and necessary training. Digital literacy training and advanced pathways like Commercial Driver's License (CDL) and IT certifications are available.
	Partnerships and Crew Management: CEO collaborates with partners like the Oklahoma Department of Transportation, tailoring training to industry needs. Participants work on projects such as roadside safety and maintenance.
	Career Pathways: CEO integrates digital skill development and offers advanced training in areas like CDL and IT, aligning with Oklahoma's critical occupations list.
	CEO Intermediary - Subcontractor: Resonance's six-month program at Take 2 Cafe provides hands-on experience in restaurant management and customer service. Participants work 30 hours per week, earning \$13 per hour, and receive food handler certification.
	Outcome Focused: CEO's vocational staff work closely with participants to enhance their skills and address barriers, ensuring they are well-prepared for full-time job placements. The program shows strong

Contract or Partner Name:	CEO
	correlations between transitional job training and successful employment outcomes.
	Overall, CEO equips participants with the necessary skills, support, and training to overcome employment barriers and secure quality jobs, fostering long-term career growth.
Intermediary:	⊠ Yes □ No
Components Offered:	SJS, JST, JR, EPB, EPC, WBLTJ-SUB
Credentials Offered:	Food Handler Certification, CDL, Peer Recovery Support Specialist Certifications
Participant Reimbursements Offered:	Bus passes, gas cards, interview clothing, uniforms, and personal safety items.
Location:	Oklahoma and Tulsa counties and surrounding areas.
Target Population:	Reentry
Monitoring of contractor:	OK SNAP Works staff will complete offsite monitoring of providers for programmatic and contractual compliance, as well as fiscal monitoring of invoices on a monthly basis. Management evaluations (MEs) will be completed onsite annually.
Ongoing communication with contractor:	Communication is primarily via email, telephone calls, bi-monthly virtual meetings, and on-site visits. Policy revisions are shared by email.
Total Cost of Agreement:	\$6,101,412
Eligible for 75 percent reimbursement for E&T Services for ITOs:	☐ Yes ☒ No
New Partner:	☐ Yes ⊠ No

Table I.II. Contractor/Partner Details

Contract or Partner Name:	TEEM
Service Overview:	TEEM (The Education and Employment
	Ministry) in Oklahoma offers a
	comprehensive range of services designed
	to break cycles of incarceration and poverty.
	They provide educational opportunities
	including adult basic education (ABE), high

Contract or Partner Name:	TEEM
	school equivalency (HSE) preparation (GED or HiSET), and specialized vocational training, aimed at improving participants' academic skills and qualifications. TEEM also delivers intensive job readiness training, focusing on resume building, interview preparation, communication skills, and professional etiquette to enhance employability and facilitate successful job placements. They assist participants in securing employment through job fairs, connecting them with job openings, and providing ongoing support for workforce integration. Additionally, TEEM offers support services such as transportation assistance, access to clothing and professional attire, childcare resources, and referrals to community resources, addressing barriers to stability and employment. For individuals transitioning from incarceration, TEEM provides specialized reentry programs that focus on reintegration, reducing recidivism, and supporting successful transitions through education, employment, and personal development initiatives.
Intermediary:	☐ Yes ⊠ No
Components Offered:	SJS, JST, JR, EPB, EPWRT
Credentials Offered: Participant Reimbursements Offered:	High School Equivalency (HSE) Certification (GED or HiSET), Vocational Training Certifications Bus passes, uniforms, books, equipment,
·	IDs, Social Security cards, and Birth Certificates.
Location:	Oklahoma and Pottawatomie Counties
Target Population:	Reentry
Monitoring of contractor:	OK SNAP Works staff will complete offsite monitoring of providers for programmatic and contractual compliance, as well as fiscal monitoring of invoices on a monthly basis. Management evaluations (MEs) will be completed onsite annually.

Contract or Partner Name:	TEEM
Ongoing communication with contractor:	Communication is primarily via email,
contractor:	telephone calls, virtual meetings, and on-site visits. Policy
	revisions are shared by email
Total Cost of Agreement:	\$2,059,818
Eligible for 75 percent reimbursement for E&T Services for ITOs:	☐ Yes ☒ No
New Partner:	☐ Yes ⊠ No
Table I.III. Contractor/Partner Details	
Contract or Partner Name:	
Service Overview:	
Intermediary:	☐ Yes ☐ No
Components Offered:	
Credentials Offered:	
Participant Reimbursements Offered:	
Location:	
Target Population:	
Monitoring of contractor:	
Ongoing communication with	
contractor: Total Cost of Agreement:	
Eligible for 75 percent reimbursement	☐ Yes ☐ No
for E&T Services for ITOs:	
New Partner:	☐ Yes ☐ No
Table I.IV. Contractor/Partner Details	
Contract or Partner Name:	
Service Overview:	
Intermediary:	☐ Yes ☐ No
Components Offered:	
Credentials Offered:	
Participant Reimbursements Offered:	

Contract or Partner Name:	
Location:	
Target Population:	
Monitoring of contractor:	
Ongoing communication with contractor:	
Total Cost of Agreement:	
Eligible for 75 percent reimbursement for E&T Services for ITOs:	☐ Yes ☐ No
New Partner:	☐ Yes ☐ No
Table I.V. Contractor/Partner Details	
Contract or Partner Name:	
Service Overview:	
Intermediary:	☐ Yes ☐ No
Components Offered:	
Credentials Offered:	
Participant Reimbursements Offered:	
Location:	
Target Population:	
Monitoring of contractor:	
Ongoing communication with contractor:	
Total Cost of Agreement:	
Eligible for 75 percent reimbursement for E&T Services for ITOs:	☐ Yes ☐ No
New Partner:	□ Yes □ No

J. Budget Narrative and Justification

Provide a detailed budget narrative that explains and justifies each cost and clearly explains how the amount for each line item in the operating budget was determined. Note that the E&T State plan is a public document and must be made available to the public upon request, so the budget should not identify individual names or salaries that are not subject to public disclosure requirements. State agencies should note that the

direct costs noted below are exclusively those attributed to the State and local SNAP agencies.

Table J.I. Direct Costs

Salary/Wages: List staff positions in FTE and time spent on the project. Example: E&T Program Manager - \$60,000 x .50 FTE = \$30,000	1 E&T Program Administrator= \$80,000 X 1.00 FTE=\$80,000
5 E&T Counselors - \$25,000 x 1.00 FTEs x 5 = \$125,000	6 E&T Program Field Representatives= \$52,700 x 1.00 FTEs x 6=\$316,200
	Total=\$80,000 + \$316,200=\$396,200
	We have budgeted for \$400,000 total on salary/wages for the OK SNAP Works Team. The extra \$3,800 is being budgeted for pay increases throughout the year.
Fringe Benefits: If charging fringe and benefits to the E&T program, provide the approved fringe rate.	50.47%
Contractual Costs: All contracts and partnerships should be included in the "contracts and partnerships" matrix of the E&T State Plan Operating Budget Workbook. Briefly summarize the type of services	Each partner provides direct E&T program services.
contractors/partners will provide, such as direct E&T program services, IT services, consulting, etc.	CEO (Subcontractors - NewLife Training, Just the Beginning, Resonance, 1st Step) administration costs will be funded with \$2,889,954 from nonfederal funds and \$2,889,954 with 50/50 federal reimbursement plus \$100,605 in 100% federal funds for a total of \$5,880,513. \$1,641,515 (50/50) are costs related to WBLTJ-SUB

(Transitional Jobs-Subsidized by E&T) component.

FCS (WIR and WJT) administration costs will be funded with \$497,465 from non-federal funds and \$497,465 with 50/50 federal reimbursement for a total of \$994,930.

GICO administrative costs will be \$219,687.5 funded from non-federal funds and \$219,687.5 with 50/50 federal reimbursement for a total of \$439,375

GWT administration costs will be funded with \$421,400 from nonfederal funds and \$421,400 with 50/50 federal reimbursement for a total of \$842,800. \$363,212 (50/50) are costs related to WBLTJ-SUB (Transitional Jobs-Subsidized by E&T) component.

HA (Curbside Chronicle, Curbside Flowers, Sasquatch Shaved Ice, Curbside Apparel), administration costs will be funded with \$503,780 from nonfederal funds and \$503,780 with 50/50 federal reimbursement for a total of \$1,007,560.

MSG (WorkAdvance) administration costs will

be funded with \$276,197 from nonfederal funds and \$276,197 with 50/50 federal reimbursement for a total of \$552,394.

PS administration costs will be funded with 25,734 from nonfederal funds and 25,734 with 50/50 federal reimbursement for a total of \$51,468 plus \$135,035.00 100% federal funds for a total of \$186,503.

PS is seeking an additional 100% funding amounting to \$944,999 to be allocated for automation and information technology enhancements in ERGO. Specifically, PS proposes the ongoing development of ERGO to streamline the operations of OK SNAP Works. ERGO is designed to facilitate easier tracking of participants and provide providers with quicker access to crucial information. ERGO will enable SNAP E&T staff to efficiently track, monitor, and report participant information. It will also enhance communication and allow for seamless management of various reports, such as monthly participation reports, participant support

tracking, and specific partner information, including budgets and target populations. Additionally, the portal will support the submission of invoices through ERGO, further simplifying administrative processes and improving overall efficiency.

RM administration costs will be funded with \$487,092.5 from nonfederal funds and \$487,092.5 with 50/50 federal reimbursement for a total of \$974,185. \$158,480 (50/50) are costs related to WBLI-SUB (Work-Based Learning-Internship Subsidized by E&T) component.

TEEM administration costs will be funded with \$1,020,309 in non-federal funds and \$1,020,309 in 50/50 funds for a total of \$2,040,618.

Tri County administration costs will be funded with \$286,865 in non- federal funds and \$286,865 in 50/50 funds for a total of \$573,730.

Side X Side administration costs will be funded with \$412,314.5 in non-federal funds and \$412,314.5 in

50/50 funds for a total of \$824,629. NW Tech administration costs will be funded with \$131,017 in non-federal funds and \$131,017 in 50/50 funds for a total of \$262,034 Costs for providers for the SNAP E&T program will be funded with 50/50 funds of \$14,579,271 (\$7,289,635.50 in nonfederal funds and \$7.289.635.50with federal reimbursement) and \$235,640 with 100% federal funds. Non-capital Equipment and Supplies: Describe noncapital equipment and supplies to be purchased with E&T funds. Materials: Describe materials to be purchased with E&T **\$20,000-** The state is funds. requesting \$20,000 for materials essential for outreach, onboarding, training, and participant engagement. These materials will include fliers for mailing to all ABAWDS, educating them on opportunities and partner locations throughout Oklahoma. Additionally, the funds will cover booth and space rentals for training sessions, collaboration events, and outreach activities. Other items will consist of informational fliers, large-format posters for county offices and other locations. banners, and branded

Travel & Staff Training: Describe the purpose and frequency of staff travel charged to the E&T program. This line item should not include E&T participant reimbursements for transportation. Include planned staff training, including registration costs for training that will be charged to the E&T grant.

merchandise such as pens, gear, apparel, mugs, notepads, and tote bags. These materials aim to increase program visibility, foster a sense of community, and engage participants effectively.

\$27,624.84- The state is requesting \$27,624.84 to cover travel expenses for essential activities that include outreach, training eligibility workers, attending conferences, collaborating with training partners, recruiting new partners, conducting peer reviews, and performing Management Evaluations (ME). These travel activities are vital for maintaining program integrity, expanding its reach, and ensuring continuous improvement in service delivery.

Additionally, 1-2 PFRs (Program Field Representatives) may receive training and/or education to meet Generally Accepted Accounting Standards (GAAS) in order to meet compliance with state and federal requirements. This ensures that the financial management of the program aligns with both state and federal guidelines, supporting the program's overall integrity.

Examples of these travel expenses include:

Outreach Initiatives:
 Traveling to different communities to promote the program and engage with potential

participants.

- Training
 Eligibility
 Workers:
 Conducting on-site
 training sessions
 across various
 regions.
- Conferences:
 Attending industry conferences to stay updated on best practices and innovations, including the SNAP Employment & Training National Forum.
- Collaborating with Training Partners: Coordinating and delivering joint training workshops.
- Recruiting New Partners: Visiting potential partner organizations to establish new collaborations.
- Peer Reviews: Observing and

- comparing program operations at peer locations.
- Management
 Evaluation (ME):
 Conducting site
 visits and case
 reviews to assess
 program
 implementation
 and ensure
 compliance.

The State's Tribal Liaison plays a pivotal role in extending the reach and impact of the SNAP **Employment & Training** program. As such, the liaison is actively involved in key events, including the SNAP Employment & Training National Forums, various SNAP E&T conferences, and targeted outreach initiatives. These engagements are crucial for building bridges and fostering relationship opportunities with tribal communities, enhancing collaboration, and sharing best practices across different regions. This involvement not only strengthens ties with tribal entities but also ensures that the program's benefits are extended comprehensively, reflecting a commitment to inclusivity and community engagement.

Building/Space: If charging building space to the E&T program, describe the method used to calculate space value.	
Equipment & Other Capital Expenditures: Describe equipment and other capital expenditures over \$5,000 per item that will be charged to the E&T grant. (In accordance with 2 CFR 200.407, prior written approval from FNS is required.)	

a) **Indirect Costs.** Indirect costs (also called overhead costs) are allowable activities that support the E&T program, but are charged directly to the State agency. If using an indirect cost rate approved by the cognizant agency, include the approval letter as an attachment to the E&T State plan.

We do not operate under an indirect cost percentage agreement. Instead, we utilize a Public Assistance Cost Allocation Plan (PA CAP). \$156,349.00

b) Participant Reimbursements (Non-Federal plus 50 percent Federal reimbursement). Participant reimbursements should include the total participant reimbursement amount from the contracts/partners matrix of the E&T State Plan Operating Budget Excel Workbook, as well as any participant reimbursements the State agency plans to provide.

These services are designed to address barriers to participation and empower individuals to successfully complete their training programs and gain suitable employment for self-sufficiency. The following services are deemed reasonable and necessary for successful participation in the SNAP E&T program:

- 1. **Transportation**: Assistance with transportation costs to ensure participants can access training and employment opportunities.
- 2. **Clothing for Job Interviews**: Support for purchasing appropriate attire for job interviews, enhancing participants' prospects of securing employment.
- 3. **Uniforms**: Provision of necessary uniforms or attire required for participation in training programs and employment.
- 4. **Work and Training Tools**: Assistance with obtaining tools and equipment essential for both training and employment purposes.
- 5. **Tuition and Books**: Financial support for tuition fees and required textbooks/materials for educational and training courses.
- 6. **Dental & Vision**: Basic vision and dental care such as cleanings, eye exams and glasses promotes overall health, well-being, and appearance which can lead more job opportunities, productivity, and performance.
- 7. **Certifications**: Funding for obtaining certifications necessary for specific employment opportunities.

- 8. **Permanent Documents**: Assistance with obtaining permanent documents such as identification cards or driver's licenses, which are essential for employment purposes.
- Personal Hygiene: Provision of personal hygiene products and services directly related to participation in SNAP E&T, ensuring compliance with appearance standards set by E&T providers and potential employers.
- 10. **Permits and Fees**: Financial assistance for permits and related fees required for employment or training activities.
- 11. **Background Checks**: Coverage of expenses associated with background checks, facilitating employment opportunities.
- 12. **Fingerprinting**: Assistance with the costs associated with fingerprinting, where required for employment or training purposes.
- 13. **Drug test**: Coverage of expenses associated with drug tests, where required for employment.
- 14. **Training Materials**: Provision of necessary training materials and resources to support participant learning and skill development.
- 15. **Course Registration Fees**: Financial support for registration fees for educational or training courses.
- 16. **Wi-Fi access or internet connectivity:** This can be particularly valuable for individuals with remote work opportunities: It supports remote work, which is increasingly common, especially in rural areas, allowing individuals to maintain employment even if they can't commute.
- 17. Remote Work Equipment: Laptops, monitors, keyboards, etc. This can be particularly valuable for individuals with remote work opportunities: It supports remote work, which is increasingly common, especially in rural areas, allowing individuals to maintain employment even if they can't commute.
- **18. (ATF restricted) Gift cards for work attire/interview clothing** Providing gift cards offers immediate access to clothing, crucial for those with upcoming interviews or job start dates. This can help individuals present themselves professionally, boosting their confidence and increasing their chances of securing and maintaining employment.
- **19. Vaccinations/immunizations required for employment –** Essential prerequisites for ensuring workplace safety and public health, covering these expenses demonstrates a commitment to participant well-being and supports successful employment outcomes.

These support services are essential components of the SNAP E&T program in Oklahoma, aimed at empowering participants to achieve economic self-sufficiency through education, training, and employment opportunities.

Side X Side, participant reimbursements are provided by other funding and/other referrals to community resources.

Total amount of participant reimbursements is estimated at: \$1,329,824