Expanding Community Colleges as SNAP E&T Providers

Support Services (Participant Reimbursements)

Planning Guide #9



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This planning guide is one of a series of documents produced by ACCT with the following project partners:

APHSA American Public Human Services Association

SJI SEATTLE JOBS INITIATIVE Opening Doors to Living-Wage Careers

skills strategy CONSULTING

USDA Food & Nutrition Service

The United States Department of Agriculture – Food and Nutrition Service funded this project under FRPS Program FY22 SNAP E&T National Partnership federal grant agreement number SNAP-ETNP-22-DC. The contents of this document do not necessarily reflect the views and policies of the U.S.D.A. Food and Nutrition Service, nor does mention of trade names or commercial products constitute endorsement or recommendation for use.

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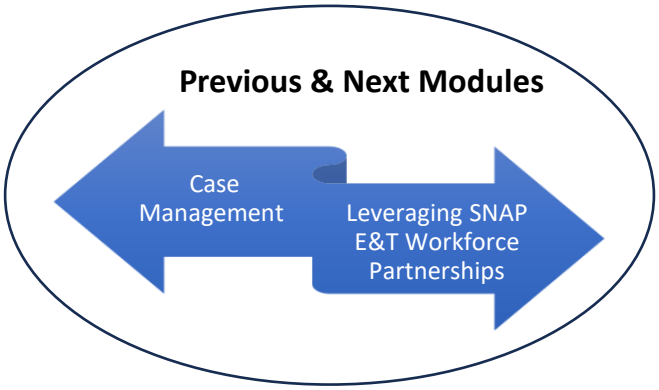
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SNAP E&T Planning Guide #9

Support Services (Participant Reimbursements)

Summary



Community and technical colleges across the country have put forth significant efforts to boost holistic supports to address student basic need insecurity, financial constraints and other challenges today's students face to ensure they can equitably access postsecondary education, gain skills and earn meaningful credentials that lead to jobs with economic stability and mobility.

According to the 2024 State of Higher Education Report published by the Lumina Foundation and Gallup, 85% of unenrolled adults in a certificate, certification, associate or bachelor's degree program cite cost of the program as an important reason why they are not currently enrolled. Similarly, 72% of "stopped out" students and 63% of currently enrolled students in postsecondary education indicated the cost of college as a highly important characteristic in their decision to either enroll or stay enrolled in post-secondary education.[1]

SNAP E&T can complement and enhance college efforts in providing holistic supports for students receiving SNAP benefits. Furthermore, as SNAP E&T third-party providers, community colleges can be reimbursed 50% for support services that are reasonable and necessary and directly related to participation in an approved service or component of an E&T program, and meet all Federal cost principles. These participant reimbursements must be included in the E&T State Plan along with their cost and reviewed and approved by the FNS Regional Office prior.

State agencies have the flexibility to determine which support services, are reasonable and necessary and directly related to participation in an approved service or component in an E&T program, based on their state and local community. Participant reimbursements may include, but are not limited to dependent

Who to Invite to the Table (college internal planning)

- SNAP E&T college lead
- College executive leader sponsor
- Campus food pantry coordinator
- Benefit access/Resource hubs coordinators
- Academic Advisors/Career Coaches/Navigators –*who provide support services*
- Student government leaders addressing student basic needs
- Faculty, staff and admin from following programs available through SNAP E&T:
  - Workforce development /Continuing Education
  - Career Technical Education
  - Adult education
- College liaison with human service agency, CBO's, and workforce partners

Planning Goals

1) Take inventory of existing support services the college provides to students and determine which supports can be offered to SNAP E&T participants based on identified needs and approved by SNAP agency
2) Determine how college will gather documentation needed to receive reimbursements for support services
3) Establish how college will invest resources into SNAP E&T support services at beginning of program

[1] https://www.luminafoundation.org/wp-content/uploads/2024/05/State-of-Higher-Education-2024.pdf

care, transportation, books and supplies, clothing and uniforms, and personal safety. SNAP E&T offers a participant-centered approach that can address student needs in a flexible and personalized way. Tuition and fees can also be covered by SNAP E&T and are a critical resource to address resource gaps and unmet financial need. Colleges should work with their human service agency to determine whether those expenses are considered support services (participant reimbursement), or more generally detailed as part of their program budget but tracked per individual student expenditure.

It is important to note that these support service payments do not count against a student's cost of attendance or expected financial assistance, as they are receiving them because of their enrollment into the SNAP E&T program and not because of their enrollment in the institution of higher education. They are considered a means tested benefit that is part of the SNAP E&T program. It is also important to understand that these support services are considered participant reimbursements according to federal policy and definition, even when the reimbursement of support service is provided prior to cost of posts directly to a student's account or is paid to a third party.

Some SNAP E&T students may only need to access one or two support services such as transportation and/or booksand supplies whereas another student may have more significant unmet needs. Presuming multiple participant reimbursements have been approved in the SNAP plan, another student may access technology (i.e. broadband, laptop), credential testing fees and interview clothing in addition to transportation and books to address these needs.

Additionally, a SNAP E&T participant may be able to access support services from more than one third-party SNAP E&T provider as long as they are not duplicative and are both approved by the SNAP agency. This encourages collaboration in a student or participant-centered approach. Under this scenario, both providers can be reimbursed 50% for these participant support services.

SNAP E&T is a unique program that aligns directly with state and institutional goals focused on equitable access to, and completion of college credentials for students that lead to economic mobility. The SNAP E&T framework is extremely flexible and can easily leverage current faculty and staff work in student success. Colleges do not need to hire new staff or pull existing staff away from their ongoing responsibilities.

Student Basic Needs

23.4%

of community college students have experienced food insecurity within the last 30 days

(Source: 2020 NCES National Postsecondary Student Aid Study)

SNAP E&T Support Services/Participant Reimbursement Examples



This visual illustrates the type of SNAP E&T participant reimbursements that are reasonably necessary and directly related to participation in an approved service or component in an E&T program, and meet all Federal cost principles.

Guiding Questions

1) How has the college gained insights on student basic needs across different programs at the college?
    a. What has been identified as priority needs for students?
    b. Has this assessment included students from adult education, workforce education and quality non-degree credential programs?
    c. If not, how can they be included to ensure all students' basic needs can be met?
2) How is the college currently providing equitable support services to students?
    a. Which programs have addressed students' holistic needs most effectively?
    b. What supports have been most helpful for students?
    c. In what ways have you or could you engage with students to learn more about potential barriers they are facing that impede their progress towards a college credential or even to enroll in college courses?
3) What student needs have been most challenging to address?
    a. How has the college attempted to address them?
    b. How might SNAP E&T address these student unmet needs or enhance existing holistic supports?
    c. Who needs to be involved in mapping these potential supports out?

4) What community partnerships have enhanced wraparound supports for students to address basic needs?
    a. What complementary support services have been provided to students?
    b. What other community organizations (including other SNAP E&T third-party providers) might supplement resources and supports for students not provided by the college?
5) How is the college planning to fund the support services for the SNAP E&T program?
    a. What funds do you anticipate having to cover upfront costs to receive the SNAP E&T 50% reimbursement? (For example, foundation funds, state grants, a portion of the 50% reimbursement, etc…)
    b. If there is not a current non-federal funding source established, how might the college line up these program investment resources?
6) What processes are in place to ensure proper documentation for reimbursement and tracking of SNAP E&T student supports/participant reimbursements?
    a. What needs to be done additionally to establish this documentation?
7) How can the college maintain strong communication with the SNAP agency to convey emerging and priority student needs that SNAP E&T could address in the future?
8) What themes from the college's strategic plan and/or strategic enrollment management (SEM) plan align with this potential opportunity through SNAP E&T to improve student support services?

Meeting Agenda Template

- Check-in regarding prior meeting action items
- Review and discuss responses to guiding questions
- Review and discuss the potential challenges
- Develop written responses for guiding question
- Identify areas that need further research/understanding – develop specific descriptions of information still needed
- Create a detailed list of questions for technical assistance
- Clarify next steps, who is responsible, and a timeframe for reporting back to team

Additional questions for support services (participant reimbursements):

9) What are anticipated concerns from college faculty and staff about offering students support services through SNAP E&T?
    a. What are some strategies to bring them along?
10) What are next steps in SNAP E&T support services/participant reimbursements planning?

Potential Challenges

1) While colleges continue to develop systems to help identify student basic needs, including potential food insecurity, through enhanced intake, orientation and onboarding processes among others, students may not feel comfortable revealing specific needs as some of these realities can be stigmatized along with benefits and resources to address these needs. Some students may also believe other students' realities are more challenging and they may be taking benefits or resources away from others, which is not the case. Colleges can find ways to destigmatize and normalize SNAP, SNAP E&T and other public benefits similar to Pell grants that help address the cost of education.

2) With the multitude of support services that colleges provide to students including SNAP E&T participant reimbursements, fully leveraging these resources can be challenging as many of them may have certain

restrictions or eligibility criteria. In terms of SNAP E&T, students may fluctuate on accessing SNAP benefits depending on income thus impacting SNAP E&T resources available. This requires college staff to have a deep understanding of these various student support service parameters to ensure students can maximize them.

3) Colleges will be required to capture proper documentation for participant reimbursements based on SNAP agency guidelines. This may take some time to map out and develop strong systems with more than one college staff person involved in the SNAP E&T program.

4) If there is more than one SNAP E&T third-party provider beyond the college offering unduplicated participant reimbursements, it is important for all staff involved in SNAP E&T at the college (and partner agencies) to understand clearly which student support services are being provided by which organization to avoid duplication. Strong training, documentation and communication is all required for this to work smoothly to help SNAP E&T students to maximize these resources.

Planning Checklist

- ❒ 1) Take inventory of existing support services available to students on campus and processes for students to access these resources.
- ❒ 2) Identify SNAP E&T students' support service needs through case management processes and other connection points.
- ❒ 3) Gather information from SNAP agency or intermediary about what participant reimbursements/support services are approved for SNAP E&T students.
- ❒ 4) Determine how college will collect proper documentation for reimbursement following SNAP agency guidelines.
- ❒ 5) Identify existing or new non-federal funding source(s) for SNAP E&T support services/participant reimbursements
- ❒ 6) Continue to communicate emerging and priority SNAP E&T student support needs to SNAP agency to offer insights and input on what may be permissible in the future in terms of SNAP E&T support services

Tools/Organizational Aids for this Module

- FNS SNAP E&T Toolkit
- FNS SNAP E&T Operations Handbook
- FNS SNAP E&T website

Resources

- FNS SNAP E&T 2024 National Forum – Community College and Human Service SNAP E&T Partnerships
- FNS Webinar – How Community College Systems and SNAP Agencies Can Take Career Pathways to Scale
- The Hope Center for College, Community and Justice - Connecting Community College Students to SNAP Benefits: Lessons Learned from a pilot intervention in California
- Community College Research Center (CCRC) - Strategies for Improving Postsecondary Credential Attainment Among Black, Hispanic, and Native American Adults
- Community College Research Center (CCRC) Advising and Student Supports at Community Colleges
- CCRC Research Brief - Scaling ASAP: How Expanding a Successful Program Supported Broader Institutional Change at Bronx Community College

FAQ's

1) How can a college determine what support services are permissible through SNAP E&T?

   College third-party SNAP E&T providers should work closely with their SNAP agency to understand what participant reimbursements/support services, that are reasonable and necessary and directly related to participation in an approved service or component in an E&T program, are available to SNAP E&T participants. Colleges should continue to communicate the emerging and priority needs of students to the SNAP agency to shape what may be permissible in the future in terms of SNAP E&T support services

2) Should all SNAP E&T student participants receive the same amount or allocation of support services/participant reimbursements?

   SNAP E&T allows a participant-centered approach to meet the diverse needs of students. It is highly discouraged to follow traditional workforce grants or models where each student receives the same support and amount of resources. Some students may have more significant unmet needs than others and the program is designed in a way to accommodate these distinct needs. As long as the support services are reasonable and necessary and directly related to participation in an approved service or component in an E&T program, third-party providers can determine how best to utilize these resources to address different student needs. In some cases, other grants with support services may be leveraged, or certain students may only have challenges in one particular area such as transportation or technology while other students may have more complex realities that SNAP E&T can address.

3) Can more than one SNAP E&T third-party provider offer support services to students?

   Yes, as long as these are participant reimbursements in an approved service or component in an E&T program by the SNAP agency, and are unduplicated. In other words, two SNAP E&T third-party providers can both support a SNAP E&T student enrolled in a credential program at the college as long as each is providing different SNAP E&T components. In this scenario, both third-party providers can count student outcomes and be reimbursed for the distinct student supports. To ensure there is not duplication, it is critical that these services and SNAP E&T components are documented properly by all providers.

Case Study

ABC Community College is in their third year as a SNAP E&T third-party provider. Based on the case management intake assessment process, the college identified that transportation and technology support were the biggest challenges for SNAP E&T students. In the first year of the program, the SNAP agency had approved transportation as a participant reimbursement with the related E&T components. The college leveraged funding through the college's foundation to pay for these student supports and engaged with a local philanthropic organization to explore additional investments. They also established the best way of tracking and documenting these participant reimbursements.

The college communicated with the SNAP agency about the technology gaps for SNAP E&T students which were also reasonable and necessary and directly related to participation in an approved E&T component. In the second year, the college was approved for this participant reimbursement. Meanwhile, the philanthropic organization put forth $100,000 over two years to help address broadband and technology device gaps for students at the college. The institution also decided to reinvest a portion of their 50% reimbursement from the previous year in support services for transportation costs.

ABC Community College has continued to deepen its understanding of the needs of SNAP E&T students and identified that testing fees for the GED and industry certifications along with work clothing are other priorities. There are a few community-based organization third-party SNAP E&T providers in the region and one in particular that is approved to provide work clothing as a participant reimbursement for their SNAP E&T program. The college has been coordinating with this CBO to leverage these resources for college SNAP E&T students.