



MITT ROMNEY  
Governor

KERRY HEALEY  
Lieutenant Governor

**Commonwealth of Massachusetts**  
*Executive Office of Health and Human Services*  
**Department of Transitional Assistance**  
600 Washington Street • Boston, MA 02111

TIMOTHY R. MURPHY  
Secretary

JOHN A. WAGNER  
Commissioner

August 12, 2005

Mary Ann Ferris, Director  
Food Stamp Program  
Northeast Region  
U.S. Department of Agriculture  
10 Causeway Street  
Boston, MA 02222

Dear Ms. Ferris:

*RE: Massachusetts Food Stamp Employment and Training Program Plan*

Enclosed please find the Massachusetts Department of Transitional Assistance's revised Food Stamp Employment and Training Plan for Federal Fiscal Year 2006.

Massachusetts will continue to operate an FS/E&T program that serves ABAWDS and other eligible participants throughout the state in partnership with other Massachusetts Departments and the Workforce Development System. The FS/E&T program providers will conduct employability assessments and provide a menu of services to eligible participants, including providing information on local One-Stop Career Centers for job search and career exploration services.

This is part of DTA's continued initiative to partner with agencies at the state and local level. These agencies will provide Food Stamp individuals with Job Search, Education and Skills Training Services. In this way, Massachusetts will be able to reach a substantial portion of individuals eligible for Food Stamps. As part of a larger effort by Massachusetts, DTA continues to work with agencies responsible for workforce development programs and the Workforce Development System to identify opportunities to more closely coordinate and integrate service delivery with other workforce programs in their community.

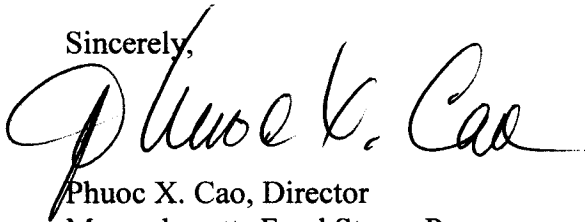
This coming year, Massachusetts plans to expand its utilization of the 15% ABAWD exemption allowance to exempt all new applicants for 6 months during the 36 month eligibility period. The Food Stamp Work Program Participants will receive food stamps for an initial 6 months of benefits before they must fulfill the Work Requirements. We also intend to implement an

education and training program for ABAWDs at-risk of losing their benefits. This program will provide skill development and education to those individuals that lack job skills to obtain and maintain unsubsidized employment.

Please note that Massachusetts is requesting to be included in the Pledge states committing to serve at-risk ABAWDs in the last month of their three month period of eligibility for Food Stamps.

We look forward to hearing from you as quickly as possible regarding the approval of this plan. If you have any questions, please contact Maria Pimentel, Assistant Director, Food Stamp Program Development & Contract Management, at 617-348-5638 or email [maria.pimentel@state.ma.us](mailto:maria.pimentel@state.ma.us).

Sincerely,

A handwritten signature in black ink that reads "Phuoc X. Cao". The signature is written in a cursive style with a large initial 'P'.

Phuoc X. Cao, Director  
Massachusetts Food Stamp Program

Enclosure

**MASSACHUSETTS DEPARTMENT**

**OF**

**TRANSITIONAL ASSISTANCE**

**EMPLOYMENT SERVICE PROGRAM UNIT**

**FOOD STAMP EMPLOYMENT AND TRAINING PROGRAM**

**FISCAL YEAR 2006 PLAN**

**August 15, 2005**

**PART I**  
**SUMMARY OF STATE FOOD STAMP**  
**EMPLOYMENT AND TRAINING (E&T) PROGRAM**  
**FFY 2006**

**A. Abstract of the State E&T Program**

The Massachusetts Food Stamp Employment and Training (FS/E&T) program provides job search, job search training, independent job search (self-directed), education, skills training, community service placements and other employment opportunities to Food Stamp recipients not participating in the State's Temporary Assistance for Needy Families (TANF) work program. The FS/E&T program offers valuable services to low-income individuals striving for financial independence from public assistance while encouraging personal responsibility and gainful employment.

Massachusetts's FS/E&T program is an important part of the Commonwealth's comprehensive workforce development system serving the needs of low-income individuals, indigent workers, and employers.

Massachusetts will continue to operate an FS/E&T program that serves Able Bodied Adults Without Dependent Children (ABAWDs) and other eligible participants throughout the state in partnership with other Massachusetts Departments of Social Services and the Workforce Development System. The FS/E&T program providers will conduct employability assessments and provide a menu of services to eligible participants, including providing information on their local One-Stop Career Centers for job search and career exploration services. In response to differences in client population, dramatic variations in regional economies, and differing levels of service capacity within different agencies and communities, each state Department or Workforce Development System will retain the flexibility to design and implement an FS/E&T program that best fits the needs of participants and resources available to them.

The Massachusetts Department of Transitional Assistance (DTA) will administer the FS/E&T 100 % funds through contracts with the Workforce Development System and other state partners. Additionally, the FS/E&T program providers will operate various FS/E&T programs, and they will be responsible for providing the full breadth of services including support services with the available resources. Now that restrictions on the expenditure of funds have been lifted with the implementation of the Farm Security and Rural Investment Act of 2002 (Farm Bill), State Departments and Workforce Development organizations will make decisions about the level of expenditures on various services including support services based on the needs of their respective participants. For example, it is anticipated that some programs will spend more per participant depending on the types of services being provided. The Department of Transitional Assistance will continue to monitor each of these programs to ensure that participants are receiving the appropriate services. In addition, Massachusetts will continue to identify state and local resources that can be used to contribute to the services provided to FS/E&T participants whether voluntary or mandatory.

This is part of DTA' initiative to partner with agencies at the state and local level to perform outreach that will assist eligible individuals in being screened, completing their applications, and submitting the supporting documentation for the Department of Transitional Assistance to determine eligibility for food stamps thus reaching the many people eligible for but not receiving food stamps.

As part of a larger effort by Massachusetts, DTA will be working with agencies responsible for workforce development programs and the Workforce Development System to identify opportunities to more closely coordinate and integrate service delivery with other workforce programs in their community.

## 1. Program Changes

Massachusetts continues its commitment to help as many low-income individuals as possible to achieve self-sufficiency through employment. Massachusetts is in the process of making significant changes in its FS/E&T program. The following presents a summary of these changes:

- The Massachusetts Department of Transitional Assistance plans to expand its utilization of the 15% ABAWD exemption allowance to exempt all new applicants for 6 months during the 36 month eligibility period. Under this system Food Stamp Work Program Participants will receive food stamps for an initial 6 months of benefits before they must fulfill the Work Requirements. On month 7, Food Stamp Work Program Participants must meet the Work Requirements by either:
  1. working in paid employment of 20 hours per week; or
  2. volunteering at a community service site for a specified number of hour per month (determined by dividing the monthly food stamp allotment by the minimum wage); or
  3. working in a combination of paid employment of less than 20 hours per week and volunteer at a community service site; or
  4. attending an education or training program for 20 hours per week as specified in the food stamp work program participation requirements of section 6 (o) (2) of the Food Stamp Act of 1977.
- Massachusetts has developed and is currently in the Request for Proposals stage of implementing an education and training program for ABAWDs at-risk of losing their benefits before the third month out of the 36-month period of eligibility expires. The Department seeks to enter into agreements with Qualified Service Providers that offer programs designed to serve recipients of the Food Stamp Program who may have difficulty finding and retaining employment due to a lack of job skills, education and supports to obtain and maintain unsubsidized employment. The Department is seeking providers that are able to provide a comprehensive array of coordinated services with unique activities to serve the specific needs of these individuals. This program is intended to provide skill development, core basic education, English language skills, support services, and similar services.
- Massachusetts has developed an education and training program to assist Homeless Individuals, who are Non-Public Assistance (NPA) Food Stamp recipients in achieving economic self-sufficiency through the receipt of high quality, comprehensive training and

employment services through the Boston Service Delivery Area (SDA). The SDAs are the regions of the state defined by the Workforce Investment Act (WIA) under which employment and training services are planned and implemented. They are uniquely qualified by their experience in delivering employment related educational, vocational skill training and pre-vocational services. The agency resources of the SDAs enhance the Department's ability to maximize the number of homeless individuals, who are NPA Food Stamp Recipients, who will receive program services including, but not limited to: assessment, case management, referral, education (GED), Skills Training, Job Search, Job Development and who will obtain gainful employment and achieve independence.

- The Massachusetts Department of Transitional Assistance will continue its effort as noted above to identify local resources that can be used to contribute to the services provided to FS/E&T participants, both mandatory and voluntary, in order to move more participants to employment. Additionally, it will support interested voluntary working participants to move to higher paying jobs that will enable them to be out of poverty and self-sufficient.
- Massachusetts further plans to outreach to Non-Profit Agencies to identify E&T Services and to increase the enrollment of eligible participants in the food stamp program and expand employment and training services through operating an integrated program to serve food stamp participants. The program will offer education, job search related training and job placement services with the Massachusetts Department of Transitional Assistance, the Workforce Development System, Municipalities and Non-Profit Agencies to provide the public matching funding for an expanded 50/50 funded program.

## 2. ABAWD Population

Massachusetts estimates that there will be approximately 5,860 participants who will meet the criteria for being considered an ABAWD, representing about 3% percent of the total number of mandatory registrants in the state.

DTA will use the 15% exemption allowance to exempt new ABAWDs recipients/applicants for up to 6 months.

## 3. Additional Allocation for "Pledge" States

The state of Massachusetts will comply with the commitment to offer a qualifying community service site or employment activity opportunity to every ABAWD registrant (not exempted through the 15% exemption allowance) in FFY06. This commitment will qualify Massachusetts for a portion of the \$20 million used to reimburse State agencies for costs incurred in serving ABAWDs. The estimated costs for fulfilling this commitment are addressed on page 9.

ABAWDs (not exempted) are provided with an offer of a qualifying community service site or an education or skills training activity in order to ensure that ABAWDs at risk of losing their benefits before the 3<sup>rd</sup> month out of 36-month period expires. As stated above Massachusetts plans to implement comprehensive array of coordinated services with unique activities to serve the specific needs of these individuals. The Department of Transitional Assistance monitors the FS/E&T program to ensure that Massachusetts complies with its commitment.

#### 4. Program Components

The Massachusetts FS/E&T Program offers the following components:

- Job Search;
- Job Readiness Training;
- Community Service;
- Education Training (including vocational educational training);
- Skills Training;
- Subsidized Employment (the private or public sector and on-the-job training);
- Unsubsidized Employment;

All program components are consistent with those available through the TANF and WIA programs.

**Case Management** – The ultimate goal for all work registrants is to progress from dependency on government assistance to self-sufficiency possessing the skills and abilities needed to sustain independence from the welfare system. To reach this goal it is necessary to identify and overcome the barriers for participants to become self-sufficient. Therefore, individuals enrolled in any FS/E&T activity may also receive case management services, including client assessments, assistance with transportation, and financial planning and management. Client assessments may include the screening and diagnosis for the presence of learning disabilities. As a result of these assessments various program services may be offered including work-based education and training and job placement and retention services. The services offered will vary based on individual situations and needs.

**Job Placement Services** – Job placement services such as job referrals to specific employers and monitoring (post referral verification) may also be offered to work registrants enrolled in FS/E&T.

The number of hours and choice of program component for individual participants will vary according to the employment needs of the individual as well as the services available through their local Departments or Workforce Development System.

Assignment of participants to components is based on an individualized need and assessment. Initial assignments are often to job search or job search training. There is, however, no predetermined sequence of assignments since assessment results in the development of an individualized plan.

#### 5. Other Employment Programs

Massachusetts's FS/E&T program is part of the state's comprehensive workforce development system. As the state continues to integrate and streamline its workforce services, the FS/E&T program will become a seamless part of this delivery system. The Department of Transitional Assistance local TAOs and other training providers will be encouraged to inform registrants of the services provided by the One Stop Career Centers.

## 6. Workforce Development System

Massachusetts is continuing to develop a seamless statewide workforce development system. There are currently 16 SDAs and 34 One-Stop Centers operating in 5 regions in Massachusetts. As previously described, FS/E&T participants will receive information on One-Stop Career Centers from the FS/E&T program providers.

## 7. Outcome Data

Statistical data on the types of employment found and wage rates have not previously been captured. The Department of Transitional Assistance will be working with all FS/E&T program providers to capture this data in the future.

### **B. Component Summaries**

The following component summaries describe the activities in the FS/E&T program.

#### 1. Job Search

##### Description of Component

Registrants are required to contact employers either via face-to-face interviews or by submission of applications or resumes. One contact must be to register with the Workforce Development System's One Stop Career Centers. Mandatory participants must make at least 18 job contacts, or five job contacts and other job search activities with a combined total of 24 hours of effort within 2 months.

##### Type of Component

Non-work component

##### Geographic Service Areas covered

This component will be offered Statewide

##### Anticipated number of mandatory participants

It is estimated that 1568 non-ABAWD registrants will enter this component.

##### Anticipated number of volunteer participants

It is estimated that 232 volunteers will enter this component as a result of the new partnership initiatives.



### Number of job contacts that will be required over what period of time

Registrants will, on the average, spend eight weeks in job search and make up to 18 employer contacts.

### Targeted population

Non-ABAWDS will be targeted for participation in this component based on employability assessment and labor market conditions.

### Organizational responsibilities

This component will be operated by the Workforce Development System through a contractual agreement with the Department of Transitional Assistance. The Department of Transitional Assistance will assume the responsibility for monitoring the successful operation of the component. It will also be responsible for the imposition of sanctions for non-compliance.

### Method for monitoring job contacts

At the end of the job search assignment, participants will be required to submit a signed Job Search Form attesting to the number of job search contacts made. The Department of Transitional Assistance will assume responsibility for program compliance.

### Per participant cost of participant reimbursement

For transportation, it is estimated that 150 participants will receive \$35 per person per month.

### Cost of the component per placement, excluding reimbursement

The estimated cost per placement, excluding reimbursement is \$417.

### Total cost of the component, including and excluding reimbursement

It is estimated that \$750,106.00 will be expended on job search, excluding reimbursement and \$760,606.00 will be expended including reimbursement.

## **2. Job Readiness Training**

### Description of component

Job Readiness Training will include support activities that may consist of skill assessments, job finding clubs, training in techniques for employability counseling, information on available jobs, occupational exploration, including information on local emerging and demand occupations, job fairs, life skills, guidance and motivation for development of positive work behaviors necessary for the labor market, or job placement services. The activity will be intensive and will teach participants the discrete behaviors associated with job seeking success, i.e. identification of skills/interests, obtaining interviews, developing resumes and good work habits.

Type of Component

Non-work component

Geographic Service Areas covered

This component will be offered Statewide.

Anticipated number of mandatory participants

It is estimated that 150 mandatory registrants will enter this component.

Anticipated number of volunteer participants

It is estimated that 50 volunteer registrants will enter this component.

Level of participation effort/Duration

At a minimum, activities will be structured to ensure a level of effort comparable to spending 12 hours per month for a two-month period.

Targeted population

Non-ABAWDs who are in need of a more structured approach to job search may be assigned to this component.

Organizational Responsibilities

This component will either be operated by the Workforce Development System through a contractual agreement with the Department of Transitional Assistance. The Department of Transitional Assistance will assume the responsibility for monitoring the successful operation of the component and for imposition of sanctions for non-compliance.

Per participant cost of participant reimbursement

For transportation, it is estimated that 135 participants will receive reimbursement at \$70.00 per person per month.

Cost of the component per placement, excluding reimbursement

The estimated cost per placement, excluding reimbursement is \$1,124.

Total cost of the component, including reimbursement and excluding reimbursement

It is estimated that \$224,807 will be expended on job search training, excluding reimbursement and \$234,257.00 will be expended including reimbursement.

### 3. Community Service

#### Description of component

In this component registrants gain work experience and new job skills through unpaid work in a public or private non-profit agency. The primary focus of Community Service is to help the registrant develop good work habits, additional job skills, positive work attitudes and an understanding of the employee-employer relationship. The number of hours a registrant is required to work in any one month will be determined by dividing the current month's Food Stamp allotment by the Federal minimum wage.

#### Type of component

Work component

#### Geographic Service Areas covered

This component will be offered Statewide.

#### Anticipated number of ABAWDs

It is estimated that 1,116 ABAWDs will enter this component.

#### Anticipated number of volunteers

It is estimated that 0 volunteers will enter this component.

#### Targeted population

ABAWDs who wish to maintain their eligibility by meeting a work requirement will be targeted for this component. Each ABAWD may either: (1) self-arrange a community service site; or (2) accept an assigned community service placement, within 10 days, of the date of assignment, to begin their community service participation. It is anticipated that the Department of Transitional Assistance will have sufficient available slots to offer to the majority of participants that may need a placement.

#### Duration

The number of hours a registrant is required to work in any one month is determined by dividing the current month's Food Stamp allotment by the Federal minimum wage. ABAWDs will continue to receive the opportunity to participate in community service as long as their Food Stamp case remains open.

#### Organizational Responsibilities

The Department of Transitional Assistance will assume responsibility for ensuring that worksite development, participant assignment and monitoring are carried out within the guidelines established by the Department.

#### Per participant cost of participant reimbursement

For transportation, it is estimated that 0 participants will receive reimbursement at \$0.00 per person per month.

#### Cost of the component per placement, excluding reimbursement

The estimated cost per placement, excluding reimbursement is \$246.00.

#### Total cost of the placement, including reimbursement and excluding reimbursement

It is estimated that \$274,547.00 will be expended on Community Service, excluding reimbursement and \$274,547.00 including reimbursement.

### **4. Education**

#### Description of component

FS/E&T participants will be referred to existing educational programs based on individual need and assessment. Non-vocational education training is a non-work component providing remedial and education activities which will increase employability. Included are assessment, literacy training, high school, General Education Development (GED), remedial education, alternative education, English as-a-Second Language, Adult Basic Education and postsecondary programs. The cost of the GED tests and certificates may be paid for with FS/E&T funds.

#### Type of component

Non-work component

#### Type of education activities

Educational programs to which registrants are assigned include, but are not limited to, ABE, GED, Vocational Education, Community College Programs and Post-Secondary Education.

#### Geographic Service Areas covered

This component will be offered Statewide.

#### Anticipated number of ABAWD participants

It is estimated that 150 ABAWDs will enter this component.

#### Anticipated number of other mandatory participants

It is estimated that 200 other mandatory registrants will enter this component.

#### Anticipated number of volunteers

It is estimated that 1,260 volunteers will enter this component.

### Targeted population

FS/E&T registrants will be considered for an educational component if educational deficits seem to be the primary barrier to employment. ABAWDS who wish to maintain their eligibility will be targeted for this component.

### Level of participant effort

Participant effort will vary with the type of educational experience provided.

### Duration

Participation in education programs for non-ABAWDs will be limited to the amount of time generally allowed for the completion of the curriculum. Due to funding limitations, local agencies generally limit the duration to one year or less. For ABAWDS, the program will be a minimum of 20 hours per week unless combined with other components.

### Organizational Responsibilities

This component will be operated by the Workforce Development System through a contractual agreement with the Department of Transitional Assistance. The Department of Transitional Assistance will assume the responsibility for monitoring the successful operation of the component and for imposition of sanctions for non-compliance.

### Link to employment

Assignment to an educational component will be based on an assessment that a lack of education is the primary barrier to employment. At the completion of the component, the registrant may be assigned to an individual job search to facilitate immediate job entry. Participants who do not find employment during the job search period will be reassessed and assigned to another activity that will assist in moving the participant into employment.

### Cost of the component per placement, excluding reimbursement

The estimated cost per placement, excluding reimbursement is \$4,469.00.

### Total cost of the component, including reimbursement and excluding reimbursement

It is estimated that \$7,195,860.00 will be expended on education, excluding reimbursement and \$7,195,860.00 will be expended, including reimbursement.

## **5. Skills Training**

### Description of component

Vocational Training – a non-work component which includes occupational assessment, remedial and entry level job skills training, customized training, institutional skills training, upgrade training, and vocational education.

Type of component

Non-work component

Geographic Service Areas covered

This component will be offered Statewide.

Anticipated number of ABAWD participants

It is estimated that 250 ABAWDs will enter this component.

Anticipated number of other mandatory participants

It is estimated that 200 other mandatory participants will enter this component.

Anticipated number of volunteers

It is estimated that 1,232 volunteers will enter this component.

Level of effort

Participation effort will vary with the type of training provided.

Duration

Participation in training programs for non-ABAWDs will be limited to the amount of time generally allowed for the completion of the training activity. Due to funding limitations, local agencies generally limit the duration to one year or less. Most training will be of three to six months duration. For ABAWDs, programs will be a minimum of 20 hours per week.

Targeted population

FS/E&T registrants will be considered for training if it appears that training is needed in order to improve the registrant's employability. ABAWDs who wish to maintain their eligibility will be targeted for this component.

Organizational responsibilities

This component will be operated by the Workforce Development System through a contractual agreement with the Department of Transitional Assistance. The Department of Transitional Assistance will assume the responsibility for monitoring the successful operation of the component and for imposition of sanctions for non-compliance.

Per participant cost of participant reimbursement

For transportation, it is estimated that 0 participants will receive reimbursement at \$0 per person per month.

Cost of the component per placement, excluding reimbursement

The estimated average cost per placement, excluding reimbursement is \$2,056.00.

Total cost of the component, including reimbursement and excluding reimbursement

It is estimated that \$3,458,791.00 will be expended on training, excluding reimbursement and \$3,458,791.00 will be expended including reimbursement.

**6. Work Experience and Skills Training**

Description of component

A work component designed to improve the employability of participants through actual work performed in regular employment. Our agencies have partnered with community agencies, nonprofits and Massachusetts employers to help persons work in real jobs using individualized and comprehensive approaches in offering employment assistance and supports to Food Stamp recipients. Employment specialist work with recipients to match their interests and skills with the needs of employers.

Type of component

Non-work component

Geographic Service Areas covered

This component will be offered Statewide.

Anticipated number of ABAWD participants

It is estimated that 0 ABAWDs will enter this component.

Anticipated number of other mandatory participants

It is estimated that 0 other mandatory participants will enter this component.

Anticipated number of volunteers

It is estimated that 3,187 volunteers will enter this component.

Level of effort

Participation effort will vary with the type of training provided.

Duration

Participation in training programs for non-ABAWDS will be limited to the amount of time generally allowed for the completion of the training activity. Due to funding limitations, local

agencies generally limit the duration to one year or less. Most training will be of three to six months duration. For ABAWDS, programs will be a minimum of 20 hours per week.

Targeted population

FS/E&T registrants will be considered for training if it appears that training is needed in order to improve the registrant's employability. ABAWDS who wish to maintain their eligibility will be targeted for this component.

Organizational responsibilities

This component will be operated by the Workforce Development System through a contractual agreement with the Department of Transitional Assistance. The Department of Transitional Assistance will assume the responsibility for monitoring the successful operation of the component and for imposition of sanctions for non-compliance.

Per participant cost of participant reimbursement

For transportation, it is estimated that 0 participants will receive reimbursement at \$0 per person per month.

Cost of the component per placement, excluding reimbursement

The estimated average cost per placement, excluding reimbursement is \$5,633.00.

Total cost of the component, including reimbursement and excluding reimbursement

It is estimated that \$17,953,682.00 will be expended on training, excluding reimbursement and \$17,953,682.00 will be expended including reimbursement.

**7. Other Activities**

In order to best meet recipient and social services needs and promote creative program design, FS/E&T program providers are given authority to establish additional activities to those already specified in this plan. Such programs shall be described in contracts and agreements and shall conform with the federal requirement that they be designed to move individuals to self-sufficiency. Contracts specifying such alternative activities will be available for USDA review. Massachusetts will report such activity information as required.

**C. Geographic Service Area Coverage**

All components of the FS/E&T Program will operate Statewide.



**PART II**  
**PROGRAM PARTICIPATION AND EXEMPTIONS**

**A. Work Registrant Population**

1. Number of Work Registrants

Number of work registrants expected to be in the State as of October 31, 2005

168,710

Anticipated number of new work registrants to be added between November 1, 2005 and September 30, 2006

17,647

Total number of work registrants in the State between October 1, 2005 and September 30, 2006

186,357

2. Unduplicated Work Registration Count

The estimated number of work registrants is based on an unduplicated work registrant count provided from data input into the Department of Transitional Assistance's Benefit Eligibility and Control On-Line Network (BEACON) by the AU Manager when the client's mandatory status for FS/E&T is determined. The FS/E&T program providers also keep a manual count of registrants.

3. Characteristics of Work Registrants

Demographic data is not available for Massachusetts's FS/E&T population. FS/E&T is not supported by the Department's BEACON System. The Massachusetts FS/E&T program serves primarily non-public assistance Food Stamp recipients. Local agencies determine the characteristics of the work registrants in their respective localities in order to develop their local plan of operation. We are planning to automate this system.

**B. Exemption Policy**

1. Food Stamp Community Service Program Individual Exemptions

The individuals listed below are exempt. Verification necessary for a particular exemption, if any, is noted under that explanation. ABAWDs that fit the criteria below are exempt.

### Age

Persons under 18 years of age or over 49 years of age are exempt.

### Pregnant Women

A pregnant woman is exempt.

### Caretakers

A parent or other household member who is responsible for the care of a dependent child under eighteen or an incapacitated household member is exempt.

If the child has his or her eighteenth birthday within a certification period, the individual responsible for care of the child and the child must fulfill the Work Requirements at the next scheduled recertification, unless the individual qualifies for another exemption.

### Persons Physically or Mentally Unfit

Persons who are physically or mentally unfit for employment, either permanently or temporarily, are exempt. Appropriate verification includes but is not limited to:

- a) receipt of temporary or permanent disability benefits from a government or private source;
- b) a written, dated and signed statement from a competent medical authority stating that the person is physically or mentally unfit for employment;
- c) participation in a Massachusetts Rehabilitation Commission program or other Massachusetts- approved vocational rehabilitation program.

### Persons Temporarily Unfit Due to Illness

Persons who are physically or mentally unfit for employment due to a temporary illness are exempt. Appropriate verification would include proof that the individual is temporarily ill, the illness is expected to last less than 30 days, and such illness is serious enough to temporarily prevent employment.

Persons claiming temporary unfitness for employment due to illness shall be required to meet work requirements once they become physically or mentally fit.

### TAFDC/EAEDC Work Program Participants

A TAFDC or EAEDC recipient subject to and complying with, the cash assistance program work requirement is exempt.

### Unemployment Compensation Applicants/Recipients

Unemployed Compensation applicants or recipients subject to and participating in a comparable work program are exempt.

### Students

Persons enrolled at least half-time in any recognized school, including High School, training program or institution of higher education who have met the conditions of 106 CMR 362.400 and 362.410 are exempt. Enrollment must be verified at application and recertification.

Persons enrolled less than half-time or who experience a break in their enrollment status due to graduation, expulsion or suspension, who drop out or otherwise do not intend to return to school do not qualify for this exemption.

#### Addicts and Alcoholics

A regular participant, either on a resident or nonresident basis, in a drug addiction or alcoholic treatment and rehabilitation program is exempt. Participation, if questionable, may be verified through the organization or institution operating the program.

#### Employed Persons

Persons employed or self-employed may be exempt if working a minimum of 30 hours weekly or receiving weekly earnings equal to or greater than the federal minimum wage multiplied by 30 hours. The guidelines for determining an applicant's or recipient's eligibility for this exemption are as follows:

- a) Verification of earned income, as required for certification, is sufficient to establish this exemption, provided the amount of income appears to be consistent with a 30 hour work week.
  - 1) If the income of the employed individual does not meet the preceding test but he or she still claims to be employed, the applicant shall be requested to supply documentary evidence of the existence of an employee-employer relationship and that the number of hours worked is equivalent to 30 hours a week.
  - 2) If a self-employed person's income does not meet this test, he or she must establish that the income received from self-employment enterprise is sufficient to be considered gainful employment and that the volume of work claimed justifies a determination that the self-employment enterprise is a full-time job for the purpose of this exemption.
- b) Persons engaged in hobbies or any other activity that cannot, because of the minimal amount of moneys received from such activity, be considered gainful employment are not exempt. ✓

#### 2. Food Stamp Community Service Program Categorical Exemptions

DTA will use the 15% exemption allowance to exempt new ABAWDs recipients/applicants for up to 6 months.

#### 3. Food Stamp E&T Individual Exemptions

The individuals listed below are exempt. Verification necessary for a particular exemption, if any, is noted under that explanation. Non-ABAWDs who fit the criteria below are exempt.

##### Age

A person younger than 16 years of age or older than 60 years of age is exempt.

A child having his or her sixteenth birthday within a certification period shall fulfill the work registration requirement at the next scheduled recertification, unless the child qualifies for another exemption.

Persons Physically or Mentally Unfit

Persons who are physically or mentally unfit for employment, either permanently or temporarily, are exempt. Appropriate verification includes but is not limited to:

- a) receipt of temporary or permanent disability benefits from a government or private source;
- b) a written, dated and signed statement from a competent medical authority stating that the person is physically or mentally unfit for employment;
- c) participation in a Massachusetts Rehabilitation Commission program or other Massachusetts- approved vocational rehabilitation program.

Persons Temporarily Unfit Due to Illness

Persons who are physically or mentally unfit for employment due to a temporary illness are exempt. Appropriate verification would include proof that the individual is temporarily ill, the illness is expected to last less than 30 days and such illness is serious enough to temporarily prevent employment.

Persons claiming temporary unfitness for employment due to illness shall be required to meet work requirements once they become physically or mentally fit.

Food Stamp Work Program Participants

A Food Stamp Program recipient subject to and complying with the FS/Work Program requirements in accordance with 106 CMR 362.320 is exempt.

↳ Federal Exemptions

TAFDC/EAEDC Work Program Participants

A TAFDC or EAEDC recipient subject to and complying with the cash assistance program work requirement is exempt.

Unemployment Compensation Applicants/Recipients

Unemployed Compensation applicants or recipients subject to and participating in a comparable work program are exempt.

Caretakers

A parent or other household member who is responsible for the care of a dependent child under six or an incapacitated household member is exempt.

If the child has his or her sixth birthday within a certification period, the individual responsible for care of the child must fulfill the work requirements at the next scheduled recertification, unless the individual qualifies for another exemption.

### Students

Persons enrolled at least half-time in any recognized school, training program or institution of higher education who have met the conditions of 106 CMR 362.400 and 362.410 are exempt. Enrollment must be verified at application and recertification.

Persons enrolled less than half-time or who experience a break in their enrollment status due to graduation, expulsion or suspension, who drop out or otherwise do not intend to return to school do not qualify for this exemption.

### Addicts and Alcoholics

A regular participant, either on a resident or nonresident basis, in a drug addiction or alcoholic treatment and rehabilitation program is exempt. Participation, if questionable, may be verified through the organization or institution operating the program.

### Employed Persons

Persons employed or self-employed may be exempt if working a minimum of 30 hours weekly or receiving weekly earnings equal to or greater than the federal minimum wage multiplied by 30 hours. The guideline for determining an applicant's or recipient's eligibility for this exemption is as follows:

- a) Verification of earned income, as required for certification, is sufficient to establish this exemption, provided the amount of income appears to be consistent with a 30 hour work week.
  - 1) If the income of the employed individual does not meet the preceding test but he or she still claims to be employed, the applicant shall be requested to supply documentary evidence of the existence of an employee-employer relationship and that the number of hours worked is equivalent to 30 hours a week.
  - 2) If a self-employed person's income does not meet this test, he or she must establish that the income received from self-employment enterprise is sufficient to be considered gainful employment and that the volume of work claimed justifies a determination that the self-employment enterprise is a full-time job for the purpose of this exemption.
- b) Persons engaged in hobbies or any other activity that cannot, because of the minimal amount of monies received from such activity, be considered gainful employment are not exempt.

### Teens Attending School

A person aged 16 or 17 who is not a head of household or who is attending school on at least a half-time basis, or who is enrolled in an employment and training program on at least a half-time basis, is exempt.

### **C. Who will have authority to grant exemptions to individuals**

TAO's Eligibility Assistance Unit Managers will determine which program an applicant/recipient is subject to, the Food Stamp Work Program or the Food Stamp E&T program, therefore, they will have the authority to grant individual exemptions.

- D. How frequently will an individual's exemption status be re-evaluated**  
Exemption status will be reevaluated, at least, at every recertification and as frequently as necessary.
- E. Number of Work Registrants Exempt from the E&T Program**  
DTA anticipates that an estimated 149,252 work registrants will be exempt from the E&T program. See Table 1 for Estimated Participant Levels.
- F. Indicate what percentage and number of the state agency's total number of work registrants are expected to be in the exemption categories 88%**
- G. Planned E & T Program Participation**  
See Table 2 for Estimated E & T Placement Levels
- H. ABAWD Information**  
See Table 1, Estimated Participant Levels and Table 2, Estimated E & T Placement Levels

## **PART III PROGRAM COORDINATION**

### **A. Program Coordination**

The linkage between the Food Stamp eligibility functions and the FS/E&T functions are as follows:

At every application, reapplication and recertification for Food Stamps the head of household will work register and enroll all household members 16-60 in FS/E&T. The Eligibility Assistance Unit Manager (AU Manager) will screen each household member to determine if he/she is subject to the work requirements. Those who are found to be non-exempt will be informed of the applicable requirements and penalties and referred to a FS/E&T component, and those who choose to volunteer will be referred to a FS/E&T component. The AU Managers will monitor each household member's exemption status.

AU Managers also will monitor the household member's compliance with the component requirements. If the household member is non-exempt and does not comply, a Notice of Sanction will be sent to the household member. The Notice of Sanction will:

Contain the particular act of noncompliance committed and request the household member to contact the AU Manager to explain why he/she did not carry out the specific program requirements;

The proposed period of disqualification;

Explain to the household member what he/she needs to do in order to comply with the program requirements and the date by which he/she has to respond;

Provide the phone number and name of the AU Manager to contact; and

Explain the consequence of non-compliance.

The household member will have five working days from the date the Notice of Sanction is mailed to contact the AU Manager. The participant, during this time period, can respond by providing good cause for not complying with the requirements or the participant can actually comply with the component assignment.

Should the household member not respond to the Notice of Sanction within the time period, the AU Manager will send the Notice of Adverse Action (NOAA). The AU Manager will submit the NOAA in compliance with Food Stamp eligibility policy.

In order to comply with the component requirement, the household member will be required to perform a verifiable act of compliance. Verbal commitment will not be sufficient unless the household member is prevented from complying by circumstances beyond the participant's control.

The Workforce Development System will also be required to submit reports which will enable DTA to monitor a participant's compliance with program requirements. The report required will provide the following:

- On a monthly basis, participant's name, social security number and participation status.

### Information Coordination

At both the state and local level, AU Managers and FS/E&T program providers' staff will work together in a number of ways to attempt to improve coordination and information flow.

Examples of these cooperative efforts include:

State level

Joint meetings are held to develop policies and procedures and to resolve issues.

Policies and procedures are exchanged while in draft form to allow comments and revisions.

Forms are jointly designed.

Training is jointly planned and staff from both units will deliver training.

Information releases to locality staff are made jointly when possible.

Local level

Joint meetings are held to familiarize staff with the policies of their counterparts, to resolve specific policy issues, and to facilitate coordination within the agency.

Local staff participates in joint training.

### Coordination Time Frames

The AU Manager will notify the FS/E&T provider of a participant's work registration and referral within five days of approval of an application/reapplication or recertification for Food Stamp benefits.

When the AU Manager identifies that non-compliance has occurred, a Notice of Sanction is sent to the household member. The household member has five working days to contact the AU Manager to provide good cause for not complying or to actually comply. The AU Manager will issue the Notice of Adverse Action within ten days of determining the participant's failure to comply without good cause. ✓

The participant may comply at anytime, including after the NOAA is sent. Compliance occurs when the participant performs a verifiable act of compliance. Verbal commitment will not be sufficient unless the participant is prevented from complying by circumstances beyond the participant's control. If the AU member complies, the FS/E&T provider will notify the AU Manager within five working days of the date of compliance.

### **B. Interagency Coordination**

Interagency coordination primarily occurs at the central level. Central DTA and local offices have linkages with Workforce Development, One-Stop Career Centers, Vocational Rehabilitation and other agencies or programs as appropriate. The method of coordination is



dependent on the needs of the household member and the services available in the locality, including, but not limited to interagency agreements, memorandums of understanding and contracts for provisions of services.

As previously stated, Massachusetts is working to becoming part of the state's coordinated Workforce Development System by providing services for FS/E&T participants statewide through the One-Stop Centers and other State agencies managed by the Massachusetts Department of Transitional Assistance.

See Table 3, Summary of Interagency Coordination

### **C. Contractual Arrangements**

The Massachusetts Department of Transitional Assistance plans to continue its interagency service agreements with other Massachusetts Agencies and the Workforce Development System to serve FS/E&T participants. The Department may enter into other interagency agreements to serve joint clients.

The Department of Transitional Assistance will maintain information on the following:

Name and location of the contractor;

Amount of the contract;

The contract management approach that will be followed;

The basis for charging for contractual services;

Number of persons expected to be placed through the contract;

Whether the contract was competitively awarded or sole source;

Method of monitoring contract and results of monitoring;

**PART IV  
PROGRAM COSTS AND FINANCIAL MANAGEMENT**

Planned Costs of the State E & T Program

Operating Budget

See Table 4, Operating Budget

Sources of E & T Funds

See Table 5, Planned Fiscal Year Costs By Category of Funding

Justification of Education Costs

The Massachusetts Department of Transitional Assistance plans to contract out components of the FS/E&T Program during the period covered by this plan. DTA is committed to placing Food Stamp recipients into jobs.

See Part III. C., Contractual Agreements, for additional information.

The Agreement between DTA and the Workforce Development System, and other agencies will stipulate payment on a cost performance basis. Actual expenditure reports will be submitted to DTA on a monthly/quarterly basis.

Participation Reimbursement

Transportation and other Work related Expenses: DTA arranges with the Workforce Development System to ensure that FS/E&T participants are reimbursed for their work related expenses up to \$35/ month.

Cost Allocation

The Workforce Development System and other agencies will provide DTA with its actual costs of operating the FS/E&T program. The Workforce Development System and the other agencies will do this on a monthly/quarterly basis.

**PART V**  
**PROGRAM REPORTING AND MANAGEMENT INFORMATION**

**A. Method for Obtaining Initial Count of Work Registrants**

An initial count of work registrants will include work registrants on-board as of October 1 and those added through October 31 as required by Federal regulations. An automated report showing the numbers of work registrants on-board as of October 1 is produced. This automated report counts all approved cases that have a non-exempt work registrant code. An automated report is generated to count those added between October 1 and October 31 and each month thereafter.

**B. Method for Ensuring an Unduplicated Work Registrant Count**

DTA counts work registrants only once in a fiscal year, even if they register more than once during the year. DTA conducts a social security number match to ensure non-duplication for Food Stamp recipient work registrants over a period of a year.

**C. Methods for Meeting On-Going Federal Reporting Requirements**

1. Management Information System (MIS) Method

a. Type of MIS

Food Stamp application and eligibility data is maintained in BEACON. FS/E&T program data is not yet a part of the automated system but is maintained manually by each FS/E&T program provider through a locally developed reporting system.

Massachusetts is currently in the planning stages of designing an automated system that will track and maintain FS/E&T program participation data that will enable DTA to report on caseload and its demographics of the Food Stamp recipients. In addition, due to the planned expansion of the FS/E&T program, an automated system will expedite tracking and reporting as we work in coordination with the Workforce Development System by tracking services for FS/E&T participants statewide through the One-Stop Centers and other State agencies managed by the Massachusetts Department of Transitional Assistance.

Non-financial reporting requirements will be met by combining manual and automated data. Financial reporting is automated through BEACON and interfaces with FMCS.

b. Reporting requirements

- (i) Contractors will report to the Department of Transitional Assistance with which they contract.
- (ii) Non-financial reporting

DTA will be responsible for:

FS/E&T participants newly registered.  
Work registrants by exemption category.

FS/E&T participants who volunteer for and commence participation in an approved component, broken out by type of component begun.

FS/E&T mandatory participants who actually commence a component.

The number of persons sent a Notice of Adverse Action for failure to comply with FS/E&T requirements.

The number of ABAWDs entering a component will be distinguished from non-ABAWDs.

(iii) Financial reporting

FS/E&T program providers are required to maintain financial reports on total local expenditures and submit reimbursement requests for total expenditures by category.

Participant reimbursement will be reported for each client with the Federal/State/local share of the costs identified. State office staff will monitor total FS/E&T expenditures on a monthly/quarterly basis.

Cost information for ABAWDs and non-ABAWDs will be distinguished separately as appropriate.

Each FS/E&T program provider must complete a monthly statistical report, which captures the number of participants entering a component. This report is due to our Employment Services Program by the 15<sup>th</sup> calendar day of each month/quarter. The Employment Services Program compiles the information and uses it to complete the FNS-583. The Office of Finance completes the FNS-269 report, utilizing expenditure data submitted by the Employment Services Program unit.

2. Organizational Responsibility for E & T Reporting

(a) Responsibility for Non-Financial FS/E&T Reporting

Maria Pimentel, Assistant Director  
Food Stamp Program Development and Contract Management  
Massachusetts Department of Transitional Assistance  
600 Washington Street, 4<sup>th</sup> Floor  
Boston, MA 02111  
(617) 348-5638

**(b) Responsibility for Financial FS/E&T reporting**  
**Director of Finance**  
**Massachusetts Department of Transitional Assistance**  
**Office of Finance**  
**600 Washington Street**  
**Boston, MA 02111**  
**(617) 348-5128**

# TABLE 1

## ESTIMATED PARTICIPANT LEVELS FISCAL YEAR 2006

<b>A.</b>	Anticipated number of work registrants in the State during the fiscal year.	<u><b>168,710</b></u>
<b>B.</b>	List planned exemption categories and the number of work registrants expected to be included in each during fiscal year.	
	1. Age	13,532
	2. Persons Physically or Mentally Unfit	52,376
	3. Persons Temporarily Unfit due to Illness	2,618
	4. Food Stamp Work Program Participants	5,439
	5. TAFDC/EAEDC Work Program Participants	43,560
	6. Unemployed Compensation Applicants/Recipients	2,540
	7. Caretakers	15,263
	8. Students	365
	9. Addicts and Alcoholics	1,101
	10. Employed Persons	11,810
	11. Teens Attending School	140
	12. Pregnant Women	512
	13. Transportation	0
	<b>TOTAL EXEMPTION</b>	<b>149,256</b>
<b>C.</b>	Percent of all work registrants exempt from E&T (B/A)	<u><b>88%</b></u>
<b>D.</b>	Number of E&T mandatory participants (B-A)	<u><b>19,454</b></u>
<b>E.</b>	Anticipated number of ABAWDs in the State during the fiscal year	<u><b>27,316</b></u>
<b>F.</b>	Anticipated number of ABAWDs in waived areas of the fiscal year	<u><b>N/A</b></u>
<b>G.</b>	Anticipated number of ABAWDs to be exempted under the State's 15 percent ABAWD exemptions allowance during the fiscal year	<u><b>6,000</b></u>
<b>H.</b>	Number of at-risk ABAWDs expected in the State during the fiscal year (E-(F+G))	<u><b>6,000</b></u>

## TABLE 2

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### ESTIMATED E&T PLACEMENTS FISCAL YEAR 2006

1.	Number of ABAWD applicants and recipients expected to begin a qualifying ABAWD component.	<u>4,281</u>
2.	Number of all other applicants and recipients (including ABAWDs involved in non-qualifying activities) expected to begin a component.	<u>6,279</u>
3.	Total number of applicants and recipients the State agency expects to begin a component during the fiscal year.	<u>10,560</u>

### ESTIMATED INDIVIDUAL PARTICIPATION FISCAL YEAR 2006

	Number of individuals expected to participate in the E&T Program during the fiscal year.	<u>7,795</u>
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### ESTIMATED ABAWD ACTIVITY FISCAL YEAR 2006

1.	Number of workfare slots expected to be filled by ABAWDs.	<u>1,116</u>
2.	Number of education and training slots expected to be filled by ABAWDs	<u>400</u>
	Total	<u>1,516</u>

**TABLE 3**

**SUMMARY OF INTERAGENCY COORDINATION FOR THE E&T PROGRAM IN FISCAL YEAR 2006**

Areas of Coordination	Agencies (List all that are involved)	Number of E&T Placements Expected	Methods of Coordination
1. Delivers an E&T component	1. Workforce Development System 2. Service Delivery Area 3. Other State Agencies 4. Non-Profit Agencies	2,300 600 3,779 1,800	- Interagency Service Agreements - Contracts - Contracts & Interagency Service Agreements - Contracts
2. The E&T program delivers a service for another agency or program	N/A	N/A	N/A
3. Joint component of the E&T program and another agency or program	Other State Agencies	99	- Interagency Service Agreements
4. Referral of individuals from the E&T program to another program or agency	Workforce Development System, and One Stop Career Centers Service Delivery Areas and Other State Agencies Non-Profit Agencies	2,300 600 3,680 1,800	- Interagency Service Agreements - Contracts - Interagency Service Agreements - Contracts
5. Other forms of coordination (Specify) <u>Policy Coordination</u>	The Department Coordinates FS/E&T policy both within the agency and the Workforce Development System	N/A	N/A



**TABLE 4**

**OPERATING BUDGET  
FISCAL YEAR 2006**

Components	State Agency Costs		Contractual Costs	Participant Reimbursement (State plus Federal)		State Agency Cost for Dependent Care Services	Total
	Salary & Benefits	Other Costs		Dependent Care	Transportation & Other Costs		
Job Search			760,106.00	None	10,000.00	None	770,106.00
Job Readiness Training			224,807.00	None	10,000.00	None	234,807.00
Community Service	205,839.00	68,708.00	233,907.00	None		None	508,454.00
Education			7,195,860.00	None		None	7,195,860.00
Skills Training			3,458,791.00	None		None	3,458,791.00
Work Experience and Skill Training			17,953,682.00	None		None	17,953,682.00
<b>Total Component Costs</b>							<b>30,121,700.00</b>
<b>Overall State Agency E&amp;T Operational Costs</b>							<b>0.00</b>
<b>Total State E&amp;T Costs</b>							<b>30,121,700.00</b>

TABLE 5

**PLANNED FISCAL YEAR COSTS OF THE STATE E&T PROGRAM BY CATEGORY OF FUNDING  
FISCAL YEAR 2006**

Funding Category	Approved FY 2005 Budget *	Fiscal Year 2006
1. 100 Percent Federal E&T Grant:	\$1,959,292.00	\$2,118,820.00
2. Share of \$20 Million ABAWD Grant (if applicable)	\$919,448.00	\$924,547.00
3. Additional E&T Administrative Expenditures	\$27,283,333.00	\$27,058,333.00
50% Federal	\$13,641,667.00	\$13,529,167.00
50% State	\$13,641,666.00	\$13,529,166.00
4. Participant Expenses:		
a. Transportation/Other	\$20,000.00	\$20,000.00
50% Federal	\$10,000.00	\$10,000.00
50% State	\$10,000.00	\$10,000.00
b. Dependent Care		
50% Federal		
50% State		
5. Total E&T Program Costs (1+2+3a+3b+4a+4b=5)	\$30,182,073.00	\$30,121,700.00
6. 100% State Agency Costs for Dependent Care	\$0.00	\$0.00
7. Total Planned Fiscal Year Costs (Must agree with Table 4—Operating Budget		\$30,121,700.00

\*Include immediately preceding fiscal year's approved budget figures for each spending category