

Kentucky 2025

FFY 25 KY 5 ET PLAN  
August 2024 Revised 9/27/2024

Ann Smith

Kentucky 2025

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## A. Cover Page and Authorized Signatures

State: Kentucky

State Agency Name: Cabinet for Health and Family Services

Federal FY: 2025

Date Submitted to FNS (revise to reflect subsequent amendments): 8/01/2024

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

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### Certified By:

DocuSigned by:



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10/2/2024

State Agency Director (or Commissioner)

Date

### Certified By:

DocuSigned by:



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10/2/2024

State Agency Fiscal Reviewer

Date

B. Amendment Log

In accordance with 7 CFR 273.71(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

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## 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
E&T	Employment and Training
FY	Fiscal Year
FNS	Food and Nutrition Service
GA	General Assistance
ITO	Indian Tribal Organization
SNAP	Supplemental Nutrition Assistance Program
TANF	Temporary Assistance for Needy Families
USDA	United States Department of Agriculture
WIOA	Workforce Innovation and Opportunity Act
DAFM	Division of Administration and Financial Management
DCBS	Department for Community Based Services
E&T PAPS	E&T Public Assistance Program Specialists
E&T Providers	Audubon Area Community Services, Inc. Big Sandy Area Development District (BSADD) Central Kentucky Community Action Council (CKCAC) Goodwill Power of Work Northern Kentucky Area Development District (NKADD)
E&T Partners	Brighton Center Catholic Charities Center for Employment Opportunities (CEO) Family Scholar House (FSH) Kentucky Community and Technical College System 16 colleges Goodwill Industries of Kentucky Northern Kentucky Community Action Commission
IEES	Integrated Eligibility and Enrollment System (Worker Portal)
Kynect benefits	Kynect benefits is a self-service portal used by the Commonwealth to provide Kentuckians with assistance from a variety of benefit programs.
Kynect Ability	The E&T case management system used by E&T Providers and Partners as well as DCBS staff to monitor E&T participation.
KWIB	Kentucky Workforce Innovation Board
KWP	Kentucky Works Program
KTAP	Kentucky Transitional Assistance Program
OATS	Office of Administrative and Technology Services
WDB	Workforce Development Board

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## 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**

Check the box to indicate you have read and understand each statement.	Check Box
I. 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))	<input checked="" type="checkbox"/>
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)	<input checked="" type="checkbox"/>
III. State education costs will not be supplanted with Federal E&T funds. (7 CFR 273.7(d)(1)(I)(C))	<input checked="" type="checkbox"/>
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))	<input checked="" type="checkbox"/>
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)	<input checked="" type="checkbox"/>
VI. Contracts are procured through appropriate procedures governed by State procurement regulations. (7 CFR 277.14)	<input checked="" type="checkbox"/>
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)	<input checked="" type="checkbox"/>
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))	<input checked="" type="checkbox"/>
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))	<input checked="" type="checkbox"/>

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**Table D.II. Additional Assurances**

The following assurances are only applicable to State agencies with the situations described below. If the condition applies, check the box to indicate you have read and understand each statement.	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))	<input type="checkbox"/>
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 CFRI 272.2(e)(7))	<input type="checkbox"/>

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## 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.

Kentucky's mission is to provide a cohesive, individualized, and integrated E&T statewide program that engages and empowers voluntary enrollment to deemed appropriate SNAP recipients (including ABAWDS) ages 18 through 59 years old. Individuals who are 16 & 17 years old can participate, if they are head of household and deemed a good fit.)

The E&T program's vision is to increase SNAP recipients' ability to seek and gain regular viable employment statewide through various approved education and training opportunities. By preparing the SNAP E&T participants for employment, both the individual and the employers needs are met.

DFS collaborates with community-based organizations across the Commonwealth that are enthusiastic and equipped to support the residents of Kentucky. The E&T Providers are engaged to assist both the Kentucky Works Program (KWP) and E&T populations. Our Partners provide a range of skills and employment training across the state, including hands-on training and classroom opportunities. The E&T coaches are highly skilled and knowledgeable in helping our public assistance recipients overcome barriers and provide support on their journey to viable employment.

Our Providers and Partners are kept up to date on the specific workforce requirements in the regions they serve. According to the Kentucky Bureau of Labor Statistics (June 2024), employment needs are in sectors such as construction, manufacturing, trade, transportation, utilities, information, financial activities, professional & business services, education, health, and government. The state of Kentucky employs 1,934,766 people in 2023, which ranks it 29th out of all 50 US States. Employment in Kentucky has grown at an annualized rate of 1.6% over the five years to 2023, overperforming the national average of 1.2% (Bureau of Labor Statistics).

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

State level

- c) (For county-administered States only) Describe how counties share information with

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the State agency (e.g. county E&T plans), and how the State agency monitors county operations.

n/a

- 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.

Currently, there are 25 E&T Partners who provide E&T services and training.

Listed below are our five providers and their counties and the list of 50/50 partners and their counties which covers statewide.

- **Audubon covers DCBS regions: The Lakes and Two Rivers**

Allen, Ballard, Barren, Butler, Caldwell, Calloway, Carlisle, Christian, Crittenden, Daviess, Edmonson, Fulton, Graves, Hancock, Hart, Henderson, Hickman, Hopkins, Livingston, Logan, Lyon, Marshall, McCracken, McLean, Metcalfe, Monroe, Muhlenberg, Ohio, Simpson, Todd, Trigg, Union, Warren, Webster

Comprehensive Center- Hopkinsville, Owensboro, Paducah

- **Big Sandy Area Development District covers DCBS regions: Cumberland, Eastern Mountain, Northeastern, and Southern Bluegrass**

Adair, Bath, Bell, Boyd, Boyle, Bracken, Breathitt, Carter, Casey, Clark, Clay, Clinton, Cumberland, Elliott, Estill, Fayette, Fleming, Floyd, Garrard, Green, Greenup, Harlan, Jackson, Jessamine, Johnson, Knott, Knox, Laurel, Lawrence, Lee, Leslie, Letcher, Lewis, Lincoln, Madison, Magoffin, Martin, Mason, McCreary, Menifee, Mercer,

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Montgomery, Morgan, Owsley, Perry, Pike, Powell, Pulaski, Robertson, Rockcastle, Rowan, Russell, Taylor, Wayne, Whitley, Wolfe

Comprehensive Center- Prestonsburg, Hazard, Somerset, and Morehead

- **Central Kentucky Community Action Council covers DCBS regions: Salt River Trail**

Anderson, Breckinridge, Bullitt, Franklin, Grayson, Hardin, Henry, Larue, Marion, Meade, Nelson, Oldham, Shelby, Spencer, Trimble, Washington, Woodford

Comprehensive Center-Elizabethtown

- **Goodwill Power of Work covers DCBS region Jefferson**

Jefferson

Comprehensive Center- POW Jefferson and POW Preston

- **Northern Kentucky Area Development District- covers DCBS region: Northern Bluegrass**

Boone, Bourbon, Campbell, Carroll, Gallatin, Grant, Harrison, Kenton, Nicholas, Owen, Pendleton, Scott

Comprehensive Center- Covington, Georgetown

Partners serve the counties based on their current opportunities and contract.

1. Brighton Center- Boone, Campbell, and Kenton
2. Center for Employment Opportunities – Jefferson
3. Family Scholar House – Jefferson
4. Goodwill – Adair, Allen, Anderson, Ballard, Barren, Bath, Bell, Bourbon, Boyle, Bracken, Breathitt, Breckinridge Bullitt, Butler, Calloway, Carlisle, Carroll, Casey, Clark, Clay, Clinton, Cumberland, Edmonson, Elliott, Estill, Fayette, Fleming, Floyd, Franklin, Fulton, Garrard, Grant, Graves, Grayson, Green, Hancock, Hardin, Harlan, Harrison, Hart, Henry, Hickman, Jackson, Jefferson, Jessamine, Johnson, Knott, Knox, Larue, Laurel, Lee, Leslie, Letcher, Lincoln, Livingston, Logan, Lyon, McCracken, McCreary, Madison, Magoffin, Marion, Marshall, Mason, Meade, Menifee, Mercer, Metcalfe, Monroe, Montgomery, Morgan, Muhlenberg, Nelson, Nicholas, Ohio, Oldham, Owsley, Pendleton, Perry, Pike, Powell, Pulaski, Robertson, Rockcastle, Rowan, Russell, Scott, Shelby, Simpson, Spencer, Taylor, Todd, Trigg, Trimble, Warren, Washington, Wayne, Whitley, Wolfe, and Woodford.
5. Kentucky Community and Technical College System – 16 colleges and their campuses- statewide
6. Northern Kentucky Community Action Commission – Boone, Campbell, Carroll, Gallatin, Kenton, Owen, and Pendleton

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Kentucky has an approved ABAWD Waiver through November 2024 for the following counties: *Adair, Allen, Ballard, Barren, Bath, Bell, Bourbon, Boyd, Boyle, Bracken, Breathitt, Breckinridge, Butler, Caldwell, Calloway, Carlisle, Carter, Casey, Christian, Clark, Clay, Clinton, Crittenden, Cumberland, Daviess, Edmonson, Elliott, Estill, Fleming, Floyd, Fulton, Garrard, Grant, Graves, Grayson, Green, Greenup, Hancock, Hardin, Harlan, Harrison, Hart, Henderson, Hickman, Hopkins, Jackson, Johnson, Knott, Knox, Larue, Laurel, Lawrence, Lee, Leslie, Letcher, Lewis, Lincoln, Livingston, Logan, Lyon, Madison, Magoffin, Marshall, Martin, Mason, McCracken, McCreary, McLean, Meade, Menifee, Mercer, Metcalfe, Monroe, Montgomery, Morgan, Muhlenberg, Nicholas, Ohio, Owsley, Pendleton, Perry, Pike, Powell, Pulaski, Robertson, Rockcastle, Rowan, Russell, Simpson, Taylor, Todd, Trigg, Union, Warren, Wayne, Webster, Whitley, and Wolfe*

Kentucky will submit waivers as needed.

- e) Provide a list of the components offered.

Employment Readiness Training, Supervised Job Search, Work Experience – Work Based Learning & Work Activity, Adult Basic Education, Integrated Education Training, Vocational Education, Job Retention Services

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

[SNAP Employment and Training - Cabinet for Health and Family Services \(ky.gov\)](https://chfs.ky.gov/agencies/dcbs/dfs/Documents/OMVOLIIA.pdf)  
<https://chfs.ky.gov/agencies/dcbs/dfs/Documents/OMVOLIIA.pdf>

## 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.

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During the FFY 2025, Kentucky is implementing strategies from collaboration with Seattle Jobs Initiative (SJI), Food and Nutrition Services (FNS), and Technical Assistance (TA). Past research on Human-Centered Design with Deloitte Digital continues to offer valuable insights in pinpointing causes for decreased participation. Causes for decreased participation were due to high staff turnover and misinformation of the program. After identifying the issues, the state agency revised training material for field staff. The E&T Central office staff assisted in implementing the training with the SNAP Policy Panel and Management Evaluation team. The department put together a retention plan including salary increases and system changes for accuracy and a more user-friendly experience.

1. In this federal fiscal year, the focus is on strengthening and expanding partners.
  - a. Brighton Center is expanding to offer additional services including Employment Readiness Training, a pathway geared to the introduction healthcare career exploration.
2. In 2025, Kentucky will seek process changes to better serve E&T participants, add an additional partner(s), and upgrade the case management system to strengthen the current E&T Program and eliminate gaps in the client's progress to self-sufficiency.
  - a. Central Office staff will be requesting several changes to the current case management system. The first change request will be to add a Report a Change feature to the Partners' access. The second change request will be to add on demand reports to help E&T Providers and Partners to monitor referrals and completion of tasks.
  - b. Kentucky is adding Supervised Job Search to our approved component list. This component will be used in conjunction with or immediately following another component like ERT, IET, Adult Basic Education, Vocational Education, or in limited cases where the individual is ready for work as a stand-alone component. More information on this new component is in the Component's description.
3. One of Kentucky's priorities is to build bridges between the departments that handle different portions of the E&T program including Division of Service Region, Nutrition Assistance Branch and Division of Administration and Financial Management to align processes that maximize efficiency and increase participation with measurable outcomes.
  - a. SNAP E&T Central office staff will have strategic planning meetings at minimum quarterly with DFS branches NAB and PDB, DCBS Commissioner's office, and DSR to align and streamline E&T processes to increase successful referrals to the SNAP E&T program for federal fiscal year 2025 and ongoing.

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- b) Highlight any changes from above that the State agency is making to the E&T program based on the prior year's performance, for instance changes made as a result of E&T outcome and participation data.

Change requests to the case management system are a direct request from our providers and partners so they can better case manage the participants as well as their staff.

### 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).

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The 39-member Kentucky Workforce Innovation Board (KWIB) serves as an advisory board to the Governor on workforce training and development issues. The KWIB is charged with creating a statewide vision for workforce development and adopt a plan to move Kentucky forward through workforce training and development.

To inform design of the SNAP E&T program, DCBS participates in the quarterly meetings of the Kentucky Workforce Participation Committee led by the Committee chair (formerly Amy Luttrell, CEO/President of Goodwill Industries of Kentucky) and Alisher Burikhanov, Executive Director, KWIB. The committee is currently between chairs and will get quarterly meetings back on the calendar once the new chair is in place.

In FFY 2024 committee meetings were held on October 12, 2023 and December 11, 2023 12:00-1:30 pm.

During the October meeting the following topics were discussed:

### 2024 WIOA State Plan Overview and Discussion

#### Questions for Discussion:

- What are practices that transition your programs service population to better employment outcomes?
- What are the key metrics your organization uses to measure outcomes?
- What are the policy opportunities that would allow for mutually reinforcing employment outcomes?

During the December meeting the following topics were discussed:

- Benefit Cliff Recommendations - "Benefit Cliffs Affecting Kentucky Families and Related Policy Related Recommendations: Final Findings". The National Center for Children in Poverty (NCCP) was commissioned by the Kentucky Workforce Innovation Board (KWIB) to complete this study.
- Benefit Cliffs Recommendations - The findings related to SNAP were Kentucky's adoption of BBCE and increasing the income limit for many households to 200% FPL are two of the most effective things to be done regarding SNAP policy and the cliff effect.
- Workforce Pipeline – Discussed DCBS providing contact with the Division of Protection and Permanency to include Foster Youth aging out of care in future workforce pipeline discussions to ensure timely engagement.

Kentucky ensures the SNAP E&T plan aligns with the goals of the WIOA state plan through participation in the quarterly meetings of the Kentucky Workforce Participation Committee. The DFS Director has participated in the meetings held so far in federal fiscal year 2024 and discussed the E&T state plan as well as other relevant SNAP policy with the committee.

In addition to participation in and input from the KWIB Workforce Participation Board Committee Meeting, Kentucky ensures the SNAP E&T plan aligns with the goals of the WIOA state plan through participation in the monthly meetings with our E&T Providers and local KWIB partners.

In FFY 2025, DCBS will be participating in the meetings with the E&T Providers and in their local KWIB partners to help focus on what local employers use in the deciding factors in the hiring process as well as gauge the in-demand jobs with the current E&T offerings and services. These meetings will be held quarterly throughout the year beginning in November 2024.

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Kentucky has a wide range of in-demand and available jobs. Jobs include manufacturing, general and operations managers, customer service representatives, Laborers and Freight, Stock, and Material Movers, secretaries and administrative assistants, maintenance/repair workers, construction, healthcare and more.

The starting wage for most of these are \$14.58 or more. The schedules are flexible primarily day shift with some 2nd and 3rd shifts. The required minimum education is high school with some short-term trainings and others require post-secondary education.

- 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.

n/a

## 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.

Kentucky continues to move forward in building a 21<sup>st</sup>-century DCBS, decreasing barriers and increasing access, centered on the staff and client voice, input, and lived experiences. This knowledge and awareness compliment the Human Centered Design approach and result in having more empathy toward our SNAP applicants. This initiative will also impact decisions on procedures and policies in our service regions. This effort will allow DFS to better recognize equity issues in access and delivery of services and make program improvements to address those issues as identified for public assistance programs including the SNAP E&T program.

- 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).

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DCBS coordinates with Workforce Board and meets quarterly to discuss services provided by both agencies. Offices are strategically located throughout the Commonwealth. One of the five E&T/KWP Providers are part of the Kentucky Career Centers offices, which are part of the 10 local workforce development areas (LWDAs). All the E&T Providers collaborate with the LWDA's to assist individuals, to provide information about available WIOA programs, and eligibility requirements. Individuals are assessed and referred to WIOA services, if appropriate. WIOA provides worker training, on-the-job training, work experience, apprenticeships, and individual training accounts. Our E&T Providers will send appropriate referrals for WIOA programs. Most of E&T Providers and some Partners are involved in collaborative meetings throughout the year.

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.

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The State agency coordinates with TANF programs, services, partners, and activities through the E&T program. Kentucky has five providers who operate the E&T and Kentucky Works Program (KWP) of the Kentucky Transitional Assistance Program (KTAP, the TANF program) in one contract. The E&T and KWP programs are administered through separate case management systems: Online Tracking Information System (OTIS) for KTAP/TANF and kynect ability (KA) for the E&T program. However, it is the same contractor staff who work with E&T and KWP participants. The E&T/KWP staff coordinate with participants to transition from one program to another. They assist KWP participants who lose KTAP (such as reaching the TANF time limit) but are still eligible for SNAP transition to the SNAP E&T program. This allows the individual to complete their certification/activity and continue to receive case management from E&T. One of five E&T Providers are on the workforce boards providing a collaborative effort to the mission of helping people find their potential and placing them in sustainable and viable employment. The other four E&T Providers have community partnerships with local employers, and other Community Based Organizations (CBO) to assist the client in finding employment.

At the end of federal fiscal year 2023, Kentucky added E&T services to the KCTCS (16 colleges and their campuses) contract for the Ready to Work/TANF program. The coordinators will portion out their time and salary for the services program. The invoices are submitted together but have their own funding lines to ensure proper funds are used for each program.

- 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).

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The E&T program participation counts toward the work requirement for our state's childcare assistance. In policy, Volume VIII, Childcare Assistance Program Manual Section (MS) 1001 states Kentucky's Childcare Assistance Program (CCAP) assists families to access and obtain childcare for the following categories: CCAP assists low-income families that meet any of the below eligibility requirements: employment, fulltime education in a certified trade school or accredited college, or participation in SNAP Employment & Training Program. MS 1002 states the goals of the program parallel those of the federal laws that provide funding for Kentucky's childcare program. The primary funding sources for childcare subsidies are the TANF and CCDF block grants.

#### 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?

- ☐ 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.

n/a

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).

n/a

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- 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

*State agencies have the flexibility to implement policy options to adapt and meet the unique needs of State populations. Check which options the State agency will implement.*

- a) The State agency operates the following type of E&T program (*select only one*):

☐ Mandatory per 7 CFR 273.7(e)

☒ Voluntary per 7 CFR 273.7(e)(5)(i)

☐ 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)).

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- 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 program 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.)

Kentucky operates an all-voluntary E&T program exempting all work registrants.

- b) How frequently will the State plan to re-evaluate these exemptions from mandatory E&T?

Each year the Central Office staff re-evaluates 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: All appropriate SNAP recipients ages 16 & 17 head of households through 59 including ABAWDS who are deemed appropriate and want to participate in the program to gain skills and knowledge to achieve self-sufficiency.

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## VII. Organizational Relationships

*State agencies are required to include information on the organizational relationship between the units responsible for certification and the unit's 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 Division of Family Support is composed of five branches, two of which takes part in the administration of E&T. Policy Development Branch (PDB) is responsible for administering the E&T program which includes policy, contracts for E&T services, and monitoring of providers. PDB works closely with the E&T Providers and Partners regarding SNAP rules and regulations. The Nutrition Assistance Branch (NAB) is responsible for SNAP certification and eligibility policy and procedures.

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

The two branches, PDB and NAB, work together to ensure SNAP and SNAP E&T policy and procedures are up to date and correct. They conduct meetings throughout the year to discuss new items and make decisions on policy as well as system changes. When PDB receives any new information from FNS related to SNAP E&T, PDB ensures communication with all stakeholders including NAB to keep operations running accurately and up to date.

PDB's E&T Staff works closely with E&T Providers and Partners to relay any new SNAP policy as well as E&T policy.

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Integrated Eligibility Enrollment System (IEES) and Kynect Ability (E&T case management portal) interface with each other. IEES sends eligibility status, screening, and ABAWD status of an E&T participant. IEES also shares demographic information for the participant. Kynect Ability shares E&T participation with IEES such as hours participated and the component. This crosswalk of information allows IEES to track participation and noncompliant (BA) months for ABAWDs. The eligibility worker can see the E&T information on each participant.

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.

E&T Providers and Partners use Kynect Ability, the E&T case management system, to monitor participation and communicate information regarding the E&T participant. The state agency uses the Integrated Eligibility and Enrollment System (IEES, also called Worker Portal) to determine eligibility and capture participant demographic information. The state agency refers the individual to the Providers through an interface between the two systems. Once eligibility has been established by DCBS and the individual has been assessed as a suitable match for the program, a referral is sent to Kynect Ability. The E&T Providers and Partners use Kynect Ability to enter the assessment, make referrals, and place in components as well as enter notes/comments about the participant, their progress in the program, and request transportation assistance. The E&T Providers and Partners also use Kynect Ability to report participant changes such as address and employment to the state agency. Information entered on Kynect Ability is sent to Worker Portal via an interface, where it creates a task that is added to the DCBS SNAP queue. A worker who has been assigned to the queue will review the task and take any necessary action, which may include calling or sending appointment letters to the participant. Other modes of communication are through emails and calls which are documented in case record in Kynect Ability.

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.

Kynect Ability is the MIS system that retains the E&T data including participation, enrolled components, compliance/monthly activity, and case

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notes. Information on Kynect Ability that is shared with IEES/Worker Portal include when an assessment is completed and monthly participation hours in the E&T component.

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

Policy and procedure communications are emailed to Providers and Partners. The state agency also schedules meetings and trainings when needed to discuss new policy and procedures. The E&T staff meet with both groups every other month.

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 State agency's process for monitoring E&T partners' program and fiscal operations agency include the following:

**Direct Monitoring:**

The E&T program specialists (2) conducts monthly monitoring reviews via TEAMs call with the exception of at least one site visit annually. During the scheduled review, the state shares federal and/or state policy changes. The review monitoring is conducted with E&T partners including the director, supervisor(s), and other designated staff. The monitoring review includes four SNAP E&T cases from the prior months to review in the case management system (kynect ability) to ensure program compliance. On the monitoring tool (report) of each case, the Provider or Partner is reviewed on elements such as steps taken once the referral is received, assessment, referrals and placements to components and opportunities, transportation issuances, and monthly tracking. Program compliance including allowable costs and meeting federal and state requirements are discussed with all E&T Providers and Partners. Case comments are reviewed for next steps and accuracy. Corrective action items are listed on the monitoring tool. The agency is given two weeks to update any action items. The monitoring tool and corrections are emailed between the agencies and the state staff and are kept on file.

The DCBS Contract Performance Section conducts interim Performance Evaluations as required by Department for Procurement and Grant Oversight as a record of vendor's performance regarding deliverables and invoicing during the contract year. The procurement team writes the monitor tool which is written based on regulations/guidelines set for in the contract. Program staff reviews and approves the monitoring tool. All contractors are provided copies of the Contract Monitoring Tools in advance of the appointment. Contract monitoring is conducted by desk review (document review) or on-

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site. The monitoring process will be uploaded to the accounting program E-Mars.

**Indirect Monitoring:**

DFS requires the E&T Providers and Partners to submit a monthly report on their participants. Central Office E&T staff review reports to ensure participants are eligible for E&T program and to monitor participant progress.

For a fiscal review, the agency including the E&T program specialists along with the DAFM staff analyzes the invoices and supporting financial documents that are submitted monthly to ensure accurate and allowable billing.

The Contract Performance Section within DAFM, monitors DCBS contracts, performs a detailed review of each contract and the contract's incorporated material that the Section will monitor. The Contract Monitoring Tool establishes criteria based on their contractual E&T services to ensure objectivity, uniformity, and fairness in the monitoring process. The E&T Central Office staff will review, comment, and finalize the monitoring tool for use.

The DCBS Contract Liaison ensures that program specialists within the DCBS Division are given the opportunity to review Contract Monitoring Tools prior to finalization and provide input. Program staff is encouraged to relay issues with contractors to better inform contract monitoring and scheduling. Upon review of the contracts, the Contract Monitoring Tool, the Contract Monitoring Reports, and the Corrective Action Plans, program staff can determine if the program area's contractors have followed the contracts or require any level of intervention or contract renegotiation.

Contract language modification may be necessary.

Contract Performance Evaluation is another monitoring tool sent out via DocuSign twice per year (interim and year end). This is a 3-page document completed by the E&T Central office staff assigned to the specific contract that has the knowledge of the vendor's performance throughout the year. This is a requirement included in all contracts, supported by the Finance and Administrative Cabinet and Division of Procurement and Grant Oversight.

The state works with the Providers and Partners to address any issues or concerns about allowable costs and meet either in person or virtually for these discussions. When programmatic and fiscal issues arise, DCBS leadership are part of the monitoring meetings. The SNAP E&T specialist also meet virtually bi-monthly with each agency to discuss all E&T related items as well as conduct a review of participation in the case management system. Twice a year it is in person.

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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).

The state agency evaluates the performance of E&T partners through three different monitoring reviews.

The E&T team conducts monthly scheduled monitoring reviews. On the developed monitoring tool (report) of each case, the Provider or Partner is reviewed on elements such as steps taken once the referral is received, assessment, referrals and placements to components and opportunities, transportation issuances, and monthly tracking. Case comments are reviewed for next steps and accuracy. With these measures, the state is ensuring that the contracted agencies are assisting SNAP E&T Participants in gaining skills, training, or placement into work. Currently, the state measures performance through meeting the criteria in the contract which includes submitting monthly reports, timely invoices as well as utilizing the case management system. During our monitor reviews, participation and outcomes are always discussed to brainstorm ways to increase serving more SNAP recipients to complete the program and find sustainable employment.

The second review is through The Department of Procurement and Grant Oversight. This office conducts annual evaluations to ensure Providers and Partners are meeting their contract requirements. At the conclusion of the evaluation, the Provider/Partner receives a report which includes a corrective action plan as needed.

The last monitoring is conducted through Management Evaluation (ME) that reviews the SNAP case which may include E&T participant. This review determines if the DCBS field staff referred a SNAP individual appropriately to the program.

## 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.

Kentucky created the Integrated Eligibility and Enrollment System (IEES), for state workers to use, with work registration policy programmed into it. During the application interview process, the eligibility worker will screen for exemptions from work registration by asking questions such as age, children in the home, pregnancy, veteran status, homelessness, foster care youth under the age of 24, and drug treatment program and enter the answers in IEES. If the applicant has no exemptions and is required to work register, the eligibility worker will explain the work registration requirements by reading the approved script and enter the client's response into the system.

- b) How does the State agency work register non-exempt individuals? For example,

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does the State agency make a notation in the file, do individuals sign a form, etc.?

By them signing the application for SNAP, the recipient agrees to work register, if applicable.

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

During the interview, the eligibility worker explains the SNAP work requirements to the SNAP applicant using the Eligibility Worker Oral Script. Afterwards, the Consolidated Work Notice is mailed to the household member with the work requirements. The consolidated notice (FSET 101) is mailed directly after the full interview is completed with the SNAP household through a nightly batch process.

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## 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.)

During the application, recertification, or case change, the DCBS worker will ask the applicant/recipient the screening criteria questions which is in the Non-Financial Section in the current eligibility system. The questions are 1. Are you looking for a job/employment or a better job? 2. Are you willing to take classes or learn more skills to get a job or better job? 3. Are you available during the day hours of the week (Monday-Friday)? At least one of these questions must be answered Yes. The last question, "Do you want to volunteer in the SNAP E&T program?" would then be available for the applicant to respond Yes or No.

- 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.

During the application, the eligibility worker will ask the screening questions to determine if the client is appropriate for E&T. If it is determined the client is appropriate, the eligibility worker will ask if they wish to volunteer for E&T. If yes, a referral is sent to E&T Provider for the E&T assessment and component placement. The process is the same for recertification.

- 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.

The E&T Provider will receive a referral to schedule an appointment with the E&T participant to complete the assessment, discuss goals, and create an employability plan which will include participation in an E&T component. The E&T assessment is stored in Kynect Ability system and the date that the individual was assessed is interfaced back to the eligibility system. The assessment tool is a skilled and barrier-based assessment tool. For the reverse referral process, the E&T Provider will direct the client to DCBS to be screened for E&T by an eligibility worker and they also submit a change request through the system. After the client has been screened by an eligibility worker and is determined to be appropriate for E&T, a referral is forwarded back to the E&T Provider to complete the E&T assessment and place the client in an appropriate component. Transportation payment is issued upon

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completion of the assessment and if the individual wants to continue in the E&T program. The transportation reimbursement is mailed as a check.

- 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?

During the interview process, after the client is deemed an appropriate candidate to participate, the eligibility worker explains the participant is eligible for up to \$25 transportation reimbursement which is mailed as a paper check to the participant. The E&T Provider staff will request on the case management system the transportation payment when the SNAP E&T participant completes the E&T Assessment and agrees to continue in the program. The transportation reimbursement is a paper check and mailed to the SNAP E&T participant. After the first month and ongoing participation, the client will request the transportation reimbursement and enter the amount up to \$25 with their monthly participation hours using the E&T participation form. Providers and Partners will also explain about the participant reimbursement their agencies provide. The Provider/Partner staff monitors each E&T participants hours and reminds them to submit their form to the agency timely. DAFM monitors and submits quarterly expenditures to DFS Central Office E&T staff and alerts of any fiscal issues. If any fiscal issues arise, DFS and DAFM collaborate on funding stream solutions.

## 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 DCBS eligibility worker will verbally explain the referral process during the interview to the SNAP recipient. The individual will receive an appointment letter within 5 business days of the interview to meet with an E&T Provider career coach who will assist them through the process. On the appointment letter, details are given about the appointment and the name, location, and phone number of the E&T Provider. Both DCBS workers and E&T Providers and Partners also make the individual aware of kynect benefits, a self-service portal individuals use to access benefit information and appointments. Kentucky has a voluntary E&T program and does not sanction SNAP recipient for not participating in the E&T Program.

- 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.?

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The E&T Providers refer the individual(s) (reverse referral) to DCBS when they are not active on SNAP or the E&T screening questions have not been completed. The E&T Provider will explain to the individual that SNAP benefits must be active to be referred to the E&T program. The E&T Provider explains their services and their participant reimbursements as well as transportation assistance the state provides to the individual. It is also explained that each month of participation the individual must complete the participation form to receive the transportation assistance. When the individual contacts DCBS, staff verbally explain during the SNAP interview the SNAP recipient will receive an appointment letter/phone call/text and/or email (based on their preferred mode of contact) within five business days of the interview. They will meet a coach/employment specialist with one of the E&T providers, determined based on the SNAP recipient's physical address/county, who will assist them through the E&T enrollment process. DCBS staff will also explain about their right to receive participant reimbursement (monthly transportation assistance) as well as childcare assistance, if appropriate. Childcare is another public assistance program offered by the state. The appointment letter contains details such name, location, and phone number of the E&T provider. The participant will also have access to appointments and other information about benefits on the kynect benefits platform. They will return to the Provider who submitted the reverse referral unless the participant has moved out of the Provider's area.

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- 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.

DCBS worker will explain to the participant that the Provider will contact them via email, phone, or letter to complete the initial E&T assessment. During the orientation and initial appointment between the E&T Provider and the E&T participant (face to face, video, or call), goals and barriers will be discussed to determine the appropriate next step as well as case management details and supportive services that are available.

- 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?

The information is entered into the Management Information System (MIS) by the eligibility worker. This information is sent in a batch cycle to kynect ability where the E&T provider will get the task to set up an appointment for the participant.

- 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?

The information is sent to kynect ability where the E&T provider will get the task to set up an appointment for the participant.

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## 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?

☒ Yes (*Complete the remainder of this section.*)

☐ 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)

E&T Providers conduct the E&T assessment via the MIS system (kynect ability) and the assessment is stored in the system and can be reviewed by those staff who have the access. Assessment tool is an online tool which consists of work history, strengths, and barriers. In addition to the state assessment, most providers also use their own employment assessments. Participants are assessed during their orientation and initial appointments with the E&T Provider. Partners are also able to conduct assessments, if the participant has been screened appropriate for the E&T program.

## XII. 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?  
*Check all that apply.*

☒ Comprehensive intake assessments

☒ Individualized Service Plans

☒ Progress monitoring

☒ Coordination with service providers

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☒ 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 case management services.

Case management is provided by the E&T Providers (intermediaries) and Partners, contracted agencies who administer SNAP E&T services to participants. The E&T Providers and Partners complete the E&T assessment as well as their agencies' assessment tools. The E&T Providers and Partners assess the participants' strengths, weaknesses, and interests and with the participants' collaboration, find a placement to an appropriate E&T component. They also assess for barriers and help connect participants to resources to resolve these barriers. The Providers and Partners monitor participants' progress in their E&T component on a weekly basis. They can encourage participants who are doing well and lend additional support if issues or concerns arise. The E&T Providers and Partners meet participants when needed and will refer them to other agencies for resources and barrier removal.

- 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.

Communication/Coordination with:

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SNAP eligibility staff:	The E&T Providers and Partners use kynect ability (KA) (case management system created for SNAP E&T) to report changes for a participant as well as request transportation assistance. DCBS eligibility staff receive a task on IEES to conduct case changes such as new employment, household composition updates and SNAP recipient's responses regarding participating in the E&T program and choose to volunteer, if deemed appropriate.
State E&T staff:	<p>DCBS SNAP E&amp;T case managers:</p> <p>The E&amp;T Providers and Partners use kynect ability (KA) (case management system created for SNAP E&amp;T) to enter participation hours, request transportation, report changes, and request good cause. They also enter comments in KA regarding the E&amp;T participant. All this information is sent to IEES (eligibility system) to notify DCBS staff of the E&amp;T participants status as well as any reported changes and requests for good cause. Providers and Partners also correspond via email and phone with DCBS staff. DCBS case managers receive tasks to complete reported changes and issue transportation when necessary. They also update any changes to ABAWD status and update the bad (noncompliance) and bonus months.</p> <p>Central Office: The E&amp;T Providers and Partners use kynect Ability to enter information on E&amp;T participants as well as create opportunities for placement. State E&amp;T Staff has access to KA and can see action taken by the Providers &amp; Partners. They also communicate via email and phone and can request meetings to have a more in-depth discussion on participants, E&amp;T policy, contract questions, or any KA issues. The E&amp;T Providers and Partners have the SNAP E&amp;T email address – <a href="mailto:SNAPET@ky.gov">SNAPET@ky.gov</a> – to request technical assistance with the system and submit reports and invoices.</p> <p>The E&amp;T Providers and Partners also coordinate with State E&amp;T Staff regarding provider determinations. The current process includes the Providers and Partners contact State E&amp;T Staff of the participant and the situation. State E&amp;T Staff then works with local DCBS staff to contact the participant, discuss the determination, and either determine good cause, check if eligible for an exemption, or find another placement if the participant is subject to the time limit and needs other ways to meet work requirements.</p>
Other E&T providers:	The E&T Providers and Partners use kynect Ability (KA) to enter information on E&T participants. The Providers and Partners can review the comments and history of E&T participation information for the participant. They can also use KA to make referrals to another Provider/Partner if they do not have the services or trainings another Provider/Partner has available. They correspond via email and phone with one another. They also attend meetings with State E&T Central Office Staff to update each other with their programs.
Community resources:	Each of the E&T Providers and Partners case managers work through kynect resources and with their local community agencies to make referrals and connect participants for additional resources.

- 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).

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Per contractual agreement, E&T Providers and Partners are to provide case management services to E&T participants. All SNAP recipients who are deemed appropriate and agree to participate in E&T automatically receive case management. Kentucky monitors to ensure E&T participants receive targeted case management services at least monthly via provider/partner meetings, analyzing monthly and yearly reports, and emailing between the state and contracted providers and partners.

### 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.

n/a

c) What is the length of the conciliation period?

n/a

### XIV. Disqualification Policy for General Work Requirements

***This section applies to the General Work Requirements, not just to E&T, and should be completed by all States, regardless of whether they operate a mandatory or voluntary E&T program.***

*All work registrants are subject to SNAP work requirements at 7 CFR 273.7(a). A nonexempt individual who refuses or fails to comply without good cause, as defined at 7 CFR 273.7(i)(2), (i)(3), and (i)(4), with SNAP work requirements will be disqualified and subject to State disqualification periods. Noncompliance with SNAP work requirements include voluntarily quitting a job or reducing work hours below 30 hours a month and failing to comply with SNAP E&T (if assigned by the State agency).*

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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: A participant will be disqualified from receiving SNAP benefits when the participant does not comply with work registration, or when it has been determined that the participant has quit or reduced hours in employment voluntarily or without good cause as established in 921 KAR 3:025. When the participant is determined ineligible for SNAP per 921 KAR 3:025, they are ineligible for SNAP benefits until the participant complies with the program or the following time periods have been served; 2 months for the 1<sup>st</sup> violation 4 months for the 2<sup>nd</sup> violation 6 months for the 3<sup>rd</sup> and any following violations Ineligibility for the participant shall continue until such time the participant becomes; Exempt from work registration or; Serves the ineligibility period listed above and complies with the work registration requirements

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:

☒ 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:

☒ Six months or until the individual complies, as determined by the State agency.

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☐ 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.*

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.

At time of application interview, eligibility workers provide information on SNAP work requirements. DCBS Eligibility Staff inform applicants SNAP requirements who are Work Registrants and ABAWDs with a work requirement. They also inform applicants of good cause reason and advise them to contact the office if the applicant thinks they have good cause reason for not following the work requirements. The DCBS eligibility worker will determine if the SNAP recipients have good cause and apply a good cause exemption to prevent loss of benefits. This is part of the work requirement oral script. The work requirements information is also a part of form FSET-101, Kentucky's Consolidated Work Notice, that is sent to every SNAP household that applies. SNAP households are requested to provide verification for good cause in the initial correspondence of "Requested for Information", that provides examples of Good Cause. During SNAP reapplication, recertification, or case change, the worker will review the case. If the recipient has not complied with SNAP work requirements, the state agency requests verification to be returned within 10 days of discovery, to determine if good cause can be applied. Outside of the interview process, a manual notice requesting for additional information will be mailed to the individual. This is the state agency's attempt of obtaining additional information. The household is notified of good cause immediately through our eligibility system's nightly batch once the verification of good cause is accepted. When the State agency accepts the individual's good cause reasoning, they are notified via correspondence on the Notice of Eligibility. This process occurs at every case action, including reapplication, recertification, and case change. A participant will be disqualified from receiving SNAP benefits when the participant does not comply with work registration, or when it has been determined that the participant has quit or reduced hours in employment voluntarily or without good cause. When the participant is determined ineligible for SNAP, they are ineligible for SNAP benefits until the participant complies with the program or the following time periods have been served; 2 months for the 1st violation, 4 months for the 2nd violation, 6 months for the 3rd and any following violations. Ineligibility for the participant shall continue until such time the participant becomes exempt from work registration or complies with the work registration requirements.

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

Any SNAP recipient can request good cause circumstances include, but are not limited to the following: 1. Illness or incapacity of the member; 2. Illness of another household member, requiring the presence of the member; 3. A household emergency; 4. Unavailability of transportation, with no other readily accessible alternative means of transportation; 5. Lack of adequate child care for children ages 6-12; 6. Inclement weather which prevents the participant from traveling; or 7. Temporary incarceration or court appearance. Good cause requests are reviewed by select DCBS eligibility staff for approval or denial. Kentucky has a voluntary E&T program and does not sanction SNAP recipient for not participating in the E&T Program, but if a participant has a work requirement and did not meet, good cause is available for them to request.

b) 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.

Our E&T Program is voluntary. The SNAP recipient can choose another way to meet their hours for their work requirement (Subject To the Limit-STL) is in effect. If the household chooses or does not participate in E&T that helps them meet their ABAWD requirements, SNAP recipients are informed of other options to fulfill work requirements through oral script and in correspondence. The options include working, in-kind or if they meet good cause criteria or exemptions.

## 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.*

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

When the E&T Provider/Partner determines they cannot work with a client, the E&T Provider will send the person's name to the state's E&T inbox within 7 business days. The E&T Staff will review and forward to the regional program specialist to assign the determination to that county's E&T case manager (CM). The E&T CM will review the client's situation, contact them to discuss options, and determine good cause or find another activity. Good cause will last until time of recertification or client placed in another activity. The timeframe for notifying the participant of a provider determination is 7 days and a copy of the letter is scanned into the participant's record on the case management system-kynect ability, and a case note in the comment section will be made in the Worker Porter/IEES system as well. An ABAWD who has received a provider determination will not accrue countable months during the month during which the State agency notifies the ABAWD of the provider determination.

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

The DCBS worker will contact the client to discuss and explain the provider determination within 3 days. This can be a scheduled in person appointment or a phone call. The state agency will refer the client to another program if applicable. If the individual is an ABAWD, good cause will be given for the first month. Due to statewide processing, the client can call toll free and select SNAP E&T que for assistance. "An ABAWD who has received a provider determination will not accrue countable months during the month during which the State agency notifies the ABAWD of the provider determination."

## 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**

I.	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.  <i>State agencies should take into consideration the number of mandatory E&amp;T participants projected in Table H – Estimated Participant Levels in the Excel Workbook, and the number of mandatory E&amp;T participants likely to be exempted, if the State agency cannot provide sufficient participant reimbursements.</i>	650
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.	240
III.	Estimated budget for E&T participant reimbursements in upcoming FY.	\$530,434
IV.	Estimated budget for E&T participant reimbursements per month in upcoming FY. (Row III/12)	\$44,203
V.	Estimated amount of participant reimbursements per E&T participant per month. (Row IV/Row II)	\$184

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## 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 childcare 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*.

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**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.*

<b>Allowable Participant Reimbursements</b>	<b>Participant Reimbursement Caps (optional)</b>	<b>Who provides the participant reimbursement?</b>	<b>Method of disbursement</b>
Transportation Assistance	Up to \$25 per month per person	State	Mailed check to client as reimbursement for verified participation (actual amount)
Books, fees, uniforms		Brighton Center- CET,	the client receives the books, uniforms, and the fee is paid by the agency in advance reimbursement for the actual amount.
Transportations & uniforms		CEO	The client receives free transportation, and the clients receives the uniforms Agency owned bus/van for transport; uniforms are given the day before the first day of the job in person (in advance reimbursement and actual)
Childcare & transportation		FSH	Childcare is paid by the agency for the client and gives a monthly bus pass (in advance reimbursement and actual)
Transportation- bus passes & credentials, uniforms, books, supplies		Goodwill	Van/bus transport; also bus passes are handed to client as well as uniforms, books, and supplies; items are purchased by Goodwill in advance reimbursement for the actual amount.
Fees, supplies		Brighton, FSH	The fees are paid for on behalf of the client, supplies are distributed in person in advance

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			reimbursement for the actual amount.
--	--	--	--------------------------------------

- a) If providing dependent care, specify payment rates for childcare reimbursements, established in accordance with the Childcare 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.

The child-care reimbursement is only paid over the subsidized allotment and does not pay co pays or late fees. At this point, childcare has not been provided due to limited childcare or closed facilities. To qualify for the Childcare Assistance Program, families must have a gross countable income of less than or equal to 85% of the State Median Income (SMI).

DCBS determines eligibility for childcare. DCBS staff can take childcare applications during SNAP application or after SNAP is approved and client decides to participate in E&T. The same system is used for both applications. An E&T participant with no income would pay \$0 for their co-pay. Childcare is provided by some of our E&T partners as part of their supportive services.

- b) 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?

Due to low participation, this is not a current issue. Several grants were established like Community Partnership Grant, Intergenerational Grant Opportunity, and Family Childcare Providers Start Up grants to further incentivize the establishment of family childcare. These initiatives collectively demonstrate the commitment of the Cabinet for Health and Family Services, Division of Childcare, and the American Rescue Plan Act funds in enhancing the childcare landscape of Kentucky. The sustained efforts aim to not only bridge gaps in accessibility but also ensure the long-term viability and quality of childcare services across the state.

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## 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.

An unduplicated statewide count of all work registrants is taken on October 1 (as of 9/30) of each year and a master file of the social security numbers (SSNs) is created. Each month the SSNs of all new work registrants are matched against the master file. If a match is found, the individual is not counted again for that month. If no match is found, the individual is added to that monthly work registrant count and that individual's SSN is added to the annual master file of work registrants. This procedure is used each month to ensure an unduplicated count is obtained for the annual total number of work registrants. If a SNAP recipient does not have an SSN, a pseudo number is assigned. The participant will be counted when the SSN is provided and replaces the assigned pseudo number.

- b) Describe measures taken to prevent duplicate counting.

Our system has system logic in place to prevent duplication. If a match is found, the individual is not counted again for that month. If no match is found, the individual is added to that monthly work registrant count and that individual's SSN is added to the annual master file of work registrants. This procedure is used each month to ensure an unduplicated count is obtained for the annual total number of work registrants.

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## XIX. Outcome Reporting Measures

### National Reporting Measures

**Table E.III. National Reporting Measures**

Source <i>[Check the data source used for the national reporting measures. Check all that apply]</i>	Employment & Earnings Measures	Completion of Education of Training
Quarterly Wage Records (QWR)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No
National Directory of New Hires (NDNH)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No
State Information Management System (MIS). <i>Indicate below what MIS system is used.</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Manual Follow-up with SNAP E&T Participants. <i>Answer follow-up question below.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Follow-up Surveys. <i>State agencies must complete the Random Sampling Plan section below, if follow-up surveys is used.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
kynectability (kA) case management system	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

- a) If a State MIS is used, please indicate the system (e.g., SNAP eligibility system, State's Department of Labor MIS).

The State MIS system used is a partnership between Kentucky Center for Statistics (KYSTATS) and the Office of Administrative and Technology Services (OATS). MIS system is used to match individuals to those in KYSTATS's database by determining counts and calculates based on unsubsidized employment and provide percentage and number for the following six participant characteristics: Voluntary and Mandatory; Education, ABAWD, ESL, Gender and Age of all E&T participants served in the reporting fiscal year.

The state agency gathers and reports participant data by utilizing state eligibility system (IEES -Worker Portal) extract data and reports monthly or quarterly. The data sources are state's eligibility system (IEES Worker Portal) and the state's E&T case management system (kynect ability).

- 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).

n/a

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- c) 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.

n/a

## State Component Reporting Measures

- d) Check all data sources used for the State-specific component measures.

- ☒ Quarterly Wage Records (QWR)
- ☒ National Directory of New Hires (NDNH)
- ☒ State Management Information System. *Indicate the MIS used below.*
- ☐ Manual follow-up with SNAP E&T Participants. *Answer follow-up question below.*
- ☐ Follow-up Surveys. *Answer follow-up question below.*

- e) If a State MIS is used, please indicate the system (e.g., SNAP eligibility system, State's Department of Labor MIS).

State SNAP eligibility system (Worker Portal salesforce platform), Department of Labor MIS, KYSTATS

- 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).

n/a

- 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.

n/a

- h) If follow-up surveys are used, please describe the sample selection. This description must include the method of sample selection, procedures for estimating

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caseload size, computation of sampling intervals and random starts, as appropriate, and a time schedule for each step in the sampling procedure.

n/a

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

Component	Outcome Measure	Methodology including the timeframes being reported (e.g. denominator and numerator).
Work Readiness Training (EPWRT)	<i>“The number and percentage of individuals that participated in the (EPWRT) and obtained employment.”</i>	<b>Numerator will include those participants who obtained employment after completing (EPWRT) component during the period of 10/1/2024 to 9/30/2025.</b>  <b>Denominator will include the number of participants that participated in EPWRT during the 10/1/2024 to 9/30/2025.</b>
Career/Technical Education Programs or other Vocational Training (EPC)	<i>“The number and percentage of individuals that participated in the (EPC) Component and obtained employment.”</i>	<b>Numerator will include those participants who obtained employment after completing (EPC) component during the period of 10/1/2024 to 9/30/2025.</b>  <b>Denominator will include the number of participants that participated in (EPC) during the 10/1/2024 to 9/30/2025.</b>

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## 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.	<input type="checkbox"/>
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.	<input type="checkbox"/>
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.	<input type="checkbox"/>
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.	<input type="checkbox"/>
The State agency will be ready on October 1 <sup>st</sup> 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.	<input type="checkbox"/>

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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 program, programs under Section 236 of the Trade Act of 1974, Veterans employment and training*

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*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 agreements or other arrangements with providers?

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

Question	Number
I. How many ABAWDs did you serve in E&T in the previous FY?	
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.)	

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

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

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## 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.

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- **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

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

Details	Supervised Job Search (SJS)
Summary of the State guidelines implementing SJS	<p>Supervised Job Search is conducted by SNAP E&amp;T Providers and Partners and requires the participant to complete their activity while being monitored on their progress. Supervised job search (SJS) may be conducted independently or within a group setting, and may also be conducted remotely, in-person, or a combination of both, based on the needs of the participant. SJS may take place at SNAP E&amp;T Providers' or Partners' facilities, in a computer lab/resource room, or virtually through Zoom and other conferencing platforms or systems. E&amp;T Providers in the Loaner Laptop program can utilize the E&amp;T laptops for participation in SJS, if needed. Participants who are work-ready (as determined by an assessment), recently unemployed, or demonstrate a ready to work pathway can enroll. This is to ensure that supervised job search activities have a direct link to increasing the employment opportunities of individuals engaged in supervised job search. Individuals who have completed another E&amp;T component can also enroll in the Supervised Job Search. The time limit for this component is 12 weeks within 12 months, at 20 hours per week. If a participant reaches the maximum number of hours, their provider is directed to refer the participant to a different component. The typical and average enrollment period for SJS should not exceed 60 days.</p> <p>Able-bodied Adult Without Dependents (ABAWD) can participate in this component, but not as a stand-alone component. The rule is that only half of the month can be counted in this component. If the ABAWD is still participating and not gained employment after two weeks, the participant must be placed in another component for the other half of the month. This can be repeated for a second month.</p> <p>Each participant must use Job Search Form to track and upload to the file on kA. Job searches must be no less than 10 a week. The form is submitted monthly.</p> <p>Participants in Supervised Job Search must have at least one meeting a week (remotely or in-person) with a E&amp;T Provider/Partner staff member to review job search activities, get feedback, troubleshoot issues, and discuss next steps. Interactive software or other types of</p>

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	<p>automated processes on a computer does not meet the requirement for this meeting with the E&amp;T Provider/Partner staff. All interactions will be noted in the case management system.</p> <p>State staff approve provider locations for Supervised Job Search based on (1) skilled staff able to identify labor market needs, (2) access to computers and internet, and (3) the ability to track hours. These three criteria markers are tailored to meet the needs of participants for the purpose of interacting with a provider that has the necessary knowledge and skills to guide and support participants through a successful job search. E&amp;T Provider/Partner Staff must ensure that participants have access to all materials needed when identifying the location and mode of supervision for SJS. The E&amp;T staff will provide at least monthly feedback to the participant regarding current job search actions, suggestions to increase the likelihood of being hired, and discussing the next steps. The meetings will occur remotely or in-person and will be documented in case notes.</p>
Direct link	To employment and workforce needs
Target population	SNAP recipients with employment history, training and or skills, ready for the workforce
Criteria for participation	Ready for employment
Geographic area	statewide
E&T providers	E&T Providers (Audubon, Big Sandy Area Development District, Central Kentucky Community Action Council, Goodwill Power of Work, and Northern Kentucky Area Development District),
Projected annual participation	60
Estimated annual component costs	\$9,000

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

Details	Job Retention (JR)
Description of the component	<p>Job Retention Services will be provided for a minimum of 30 days up to 90 days. E&amp;T Participants who become employed and SNAP case is discontinued due to employment income. The client will also receive a transportation assistance \$25 check each month for the 90-day period. The Provider or Partner will submit reimbursement for providing case management to the client on their monthly invoice with documentation.</p> <p>The logic was added to the system to allow payments to those who received the E&amp;T services and whose employment put the household over the income limits for SNAP.</p> <p>The state will revisit the Job Retention Service component this fiscal year and update to provide accommodations for individuals who were enrolled in E&amp;T, found employment, and continued to be eligible for SNAP benefits. These individuals will get the 30-to 90-day JRS from their Provider/Partner, along with a state transportation check.</p>
Target population	Any SNAP E&T participant who have secured employment are eligible to receive job retention services. If they received SNAP benefits in the month of or the month before they start job retention, they 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.
Criteria for participation	Criteria may vary by provider. Common criteria include individuals who have secured employment while in the SNAP E&T program
Geographic area	Statewide
E&T providers	E&T Providers (Audubon, Big Sandy Area Development District, Central Kentucky Community Action Council, Goodwill Power of Work, and Northern Kentucky Area Development District), CEO, Goodwill
Projected annual participation	40
Estimated annual component costs	\$ 9,800

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

Details	Workfare (W)
Description of the component	Workfare provides individuals with an opportunity to gain work experience and useful workplace skills at a supervised worksite, private or public non-profit unpaid. In lieu of wages, workfare participants receive compensation in the form of their household's monthly SNAP allotment divided by the state's minimum wage. Workfare may be combined with job search, job search training, or other components. Workfare participants complete an initial thirty (30) day period of job search and make at least twelve (12) contacts with potential employers. After that, the monthly number of hours an individual is allowed to participate in workfare is determined using the "Workfare Table." The hours of participation are based on the number of E&T participants in a household and each participant's share of the monthly SNAP allotment.
Target population	Any active SNAP recipient that participates in E&T. This component is used as a last resort for ABAWD's as it based on their SNAP allotment so they may have to participate more hours. In some cases, participant lack work experience or has never held a job. This experience could give them a starting point in their journey to employment. The E&T providers place them in the local community organizations that can vary across the state. Examples are animal shelters and food pantries.
Criteria for participation	Hard-to-place individuals or in areas where there are no other placements.
Geographic area	Statewide
E&T providers	E&T Providers (Audubon, Big Sandy Area Development District, Central Kentucky Community Action Council, Goodwill Power of Work eff 7/1/2024 and ongoing, and Northern Kentucky Area Development District) will place them in Community Based Organization that have volunteers' hours available such as a church or animal shelter. The placement varies upon the county of the participant and the opportunities in that county.
Projected annual participation	4
Estimated annual component costs	\$2,280- case management and well as insurance coverage per participant

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## 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).

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

<b>Details</b>	<b>Basic/Foundational Skills Instruction (includes High School Equivalency Programs) (EPB)</b>
Description of the component	Based on the intake assessment and individual goals, clients may be referred to basic education activities that include adult basic, and/or foundational skills instruction. This component will increase the participant's ability to perform math or other activities necessary for the attainment of a secondary school diploma or equivalent, transition to post-secondary education and training, and obtain employment. In Kentucky, KCTCS RTW contract can case manage and monitor SNAP recipients placed in this component during completion of essential skills to be enrolled in a KCTCS college program. Also, our E&T Providers will provide case management to those placed into this component upon referral and completion of assessment, if appropriate.
Target population	Any SNAP recipient aged 18-59 years old who lack a High School diploma or GED will be targeted.
Criteria for participation	Any SNAP individuals who meet the basic requirement for GED/academic levels and not already possess a high school or equivalency program certificate.
Geographic area	Statewide
E&T providers	All E&T Providers (Audubon, Big Sandy Area Development District, Central Kentucky Community Action Council, Goodwill Power of Work, Northern Kentucky Area Development District) KCTCS Ashland KCTCS Big Sandy KCTCS Bluegrass KCTCS Elizabethtown KCTCS Gateway KCTCS Hazard KCTCS Henderson KCTCS Jefferson KCTCS Madisonville KCTCS Maysville KCTCS Owensboro KCTCS Somerset KCTCS Southcentral KCTCS Southeast KCTCS West Kentucky
Projected annual participation	20
Estimated annual component costs	\$7,200

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Not supplanting	During the contracting process, E&T team meets with the agency to discuss all aspects of funding sources to verify sources of all funds and that cost attributed to the E&T program are not supplanting funds. The verification is a budget breakdown for their program as well as the E&T portion along with the names and amounts of the funding sources.
Cost parity	During the contracting process, E&T team meets with the agency to discuss all aspects of funding sources to verify sources of all funds and that the costs charged to E&T do not exceed the costs charged for non-E&T participants. The verification is a budget breakdown for their overall program with an E&T budget to reflect costs of services and supplies. E&T staff along with Finance Staff verify monthly invoices for costs submitted before payment is approved.

**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	Component that improves the employability of participants by providing organized educational activities with academic and technical knowledge and skills to prepare for employment in current high growth occupations including medical, human resources, construction/building trades
Target population	Any active SNAP recipient 16 through 59 years old who wants to pursue a short- term credential or 2-year non-transferrable degree in high demand jobs.
Criteria for participation	Must have completed high school or GED equivalent or be dually enrolled in basic/adult education.
Geographic area	Available throughout the state at all KCTCS 16 colleges and 70+ campuses; Boone, Kenton, and Campbell for CET at Brighton;
E&T providers	KCTCS Ashland KCTCS Big Sandy KCTCS Bluegrass KCTCS Elizabethtown KCTCS Gateway KCTCS Hazard KCTCS Henderson KCTCS Jefferson KCTCS Madisonville KCTCS Maysville

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	<p>KCTCS Owensboro KCTCS Somerset KCTCS Southcentral KCTCS Southeast KCTCS West Kentucky</p> <p>Brighton Center CET provides 3 choices in labor market area jobs for the region.</p>
Projected annual participation	105
Estimated annual component costs	\$337,470
Not supplanting	During the contracting process, E&T team meets with the agency to discuss all aspects of funding sources to verify sources of all funds and that cost attributed to the E&T program are not supplanting funds. The verification is a budget breakdown for their program as well as the E&T portion along with the names and amounts of the funding sources.
Cost parity	During the contracting process, E&T team meets with the agency to discuss all aspects of funding sources to verify sources of all funds and that the costs charged to E&T do not exceed the costs charged for non-E&T participants. The verification is a budget breakdown for their overall program with an E&T budget to reflect costs of services and supplies. E&T staff along with Finance Staff verify monthly invoices for costs submitted before payment is approved. The projected amount has changed to reflect a 20% in inflation due to higher prices. Recalculated the number of participants based on last year's participation data. The colleges will have the same salary rate for all the RTW coordinators, Brighton Center charges based on the course per participant. With the update, the FFY 2025 cost per participant is \$3,215. The cost is reasonable and necessary to provide SNAP E&T individuals with case management services.

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

Details	Integrated Education and Training/Bridge Programs (EPIE)
Description of the component	Integrated Education and Training shall provide adult education and literacy activities alongside and relevant to the E&T Providers or Business Partners preparation activities and training for a specific occupation or occupations for the purpose of obtaining and maintaining self-sufficiency via education and career advancement. KCTCS RTW staff can place appropriate SNAP recipients into this component who are co-enrolled at Adult Education and KCTCS in one of the 109 vocational curriculums and provide case management service as well as our E&T Providers.
Target population	Any active SNAP recipient 16 through 59 years old who wants to be dually enrolled in vocational education and basic education.
Criteria for participation	Individuals can be either skill deficient or have been identified as needing contextualized education by their current education literacy and skill levels.
Geographic area	Statewide
E&T providers	<p>All E&amp;T Providers (Audubon, Big Sandy Area Development District, Central Kentucky Community Action Council, Goodwill Power of Work, and Northern Kentucky Area Development District) and</p> <p>KCTCS Ashland  KCTCS Big Sandy  KCTCS Bluegrass  KCTCS Elizabethtown  KCTCS Gateway  KCTCS Hazard  KCTCS Henderson  KCTCS Jefferson  KCTCS Madisonville  KCTCS Maysville  KCTCS Owensboro  KCTCS Somerset  KCTCS Southcentral  KCTCS Southeast  KCTCS West Kentucky</p>

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Projected annual participation	15
Estimated annual component costs	\$6,150
Not supplanting	During the contracting process, E&T team meets with the agency to discuss all aspects of funding sources to verify sources of all funds and that cost attributed to the E&T program are not supplanting funds. The verification is a budget breakdown for their program as well as the E&T portion along with the names and amounts of the funding sources.
Cost parity	During the contracting process, E&T team meets with the agency to discuss all aspects of funding sources to verify sources of all funds and that the costs charged to E&T do not exceed the costs charged for non-E&T participants. The verification is a budget breakdown for their overall program with an E&T budget to reflect costs of services and supplies. E&T staff along with Finance Staff verify monthly invoices for costs submitted before payment is approved.

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

Details	Work Readiness Training (EPWRT)
Description of the component	<p>Intensive programs that include skill assessment and educational remediation services that prepare individuals for the workforce and employment. The skills may include both foundational cognitive skills such as reading for information, applied mathematics, locating information, problem solving, and critical thinking and non – cognitive skills or soft skills which are defined as personal characteristics and behavioral skills that enhance an individual's interactions, job performance and career prospects such as adaptability, integrity, cooperation, and workplace discipline.</p> <p>Kentucky's SNAP recipients have many options for this component as it is offered by most partners and is an important training to gain the information and the skills needed to prepare and acquire employment.</p>
Target population	Any active SNAP recipient 16 through 59 years old who needs services in reading for information, applied mathematics, locating information, problem solving, and critical thinking and non – cognitive skills or soft skills like personal characteristics and behavioral skills that enhance an individual's interactions, job performance and career

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	prospects such as adaptability, integrity, cooperation, and workplace discipline help the individual to be successful in securing full-time sustainable employment.
Criteria for participation	Individuals who possess reading for information, location information, and academic skills but who need communication, interpersonal, self-management skills or refresher in being employable.
Geographic area	Statewide
E&T providers	E&T Providers (Audubon, Big Sandy Area Development District, Central Kentucky Community Action Council, KentuckianaWorks, Goodwill Power of Work, and Northern Kentucky Area Development District), Brighton, FSH, NKCAC, Goodwill
Projected annual participation	165
Estimated annual component costs	\$144,375
Not supplanting	During the contracting process, E&T team meets with the agency to discuss all aspects of funding sources to verify sources of all funds and that cost attributed to the E&T program are not supplanting funds. The verification is a budget breakdown for their program as well as the E&T portion along with the names and amounts of the funding sources.
Cost parity	During the contracting process, E&T team meets with the agency to discuss all aspects of funding sources to verify sources of all funds and that the costs charged to E&T do not exceed the costs charged for non-E&T participants. The verification is a budget breakdown for their overall program with an E&T budget to reflect costs of services and supplies. E&T staff along with Finance Staff verify monthly invoices for costs submitted before payment is approved.

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.

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**Table G.XII. Work Experience: Work Activity**

Details	Work Activity (WA)
Description of the component	Work Activities are in various locations throughout the state. Individuals are placed based on their assessment and discussion with their E&T Provider. Work experience placements include general work skills can include learning attendance procedures and basic work ethics. Individuals will learn general workplace skills; for example: learning accountability, time management, coping skills, and task responsibilities. The individual can be placed in a Work Activity placement for up to 6 months. At the 6 months review, the individual continues with E&T program, a new site placement should be offered if available for the individual to obtain new skills sets. The maximum amount of participation is 20 hours; however, the hours will vary depending on the allotment & minimum wage calculation. Kentucky SNAP recipients have more opportunities to gain general skills through the local E&T Provider. Goodwill has expanded their services to more counties and will be offering this component this federal fiscal year.
Target population	Any active SNAP recipient 16 through 59 years old who wants to gain on the job experience
Criteria for participation	Individuals are placed based on their assessment and discussion with their E&T Provider. Individuals need minimum academic skills, minimum interpersonal skills, and basic communication skills.
Geographic area	Statewide
E&T providers	E&T Providers (Audubon, Big Sandy Area Development District, Central Kentucky Community Action Council, Goodwill Power of Work, and Northern Kentucky Area Development District), & Goodwill
Projected annual participation	55
Estimated annual component costs	\$38,400 The cost is the same in the approved plan due to Goodwill adding Work Activity Component (Retail Customer Service position within Goodwill retail stores). Goodwill will provide case management along with Customer Service training. The projected amount is reasonable and necessary to provide individuals the training and case management needed to be successful throughout the opportunity.

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**Table G.XVII. Work Experience: Transitional Jobs**

Details	Transitional Jobs (WBLTJ)
Description of the component	<p>Transitional jobs are time-limited un-subsidized work experiences that help individuals who have barriers to employment establish a work history and develop skills to access unsubsidized employment and progress in the workplace. By having real-world work experiences, SNAP E&amp;T participants will have an opportunity to develop not only work skills, but also an understanding of the workplace which will provide additional employment options. These WBL opportunities can be done in conjunction with private, for-profit, public, or nonprofit businesses in the community and/or through web-based resources. A transitional job contract will be <u>limited</u> up to 6 months required for a participant to become proficient in the occupation for which the training is being provided.</p> <p>The State will ensure the focus of this component is training and to establish guidelines for the delivery of work-based learning components and only contracting with agencies who will provide the services in this capacity. Currently in Kentucky, SNAP recipients in Jefferson County if deemed appropriate can take advantage of CEO's opportunity and be placed to learn skills that will transition them into a permanent job. CEO's opportunity is a 3- month program.</p>
Target population	Clients who can gain the skills necessary to match to an in- demand career in the local labor market. Target populations are ABAWDS, returning citizens, individuals experiencing homelessness, etc.
Criteria for participation	<p>Clients who exhibit work readiness during the assessment. Work readiness can be exhibited by demonstration or attestation of the following skills:</p> <ul style="list-style-type: none"> <li>● Communication skills</li> <li>● Interpersonal skills</li> <li>● Self-Management skills</li> <li>● Academic skills</li> <li>● Critical thinking skills</li> <li>● Reading for information</li> <li>● Locating information</li> <li>● Problem solving</li> <li>● Other soft skills necessary for employment</li> </ul>
Geographic area	Statewide

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E&T providers	E&T Providers (Audubon, Big Sandy, Central KY Community Action Council, Northern KY Area Development District), CEO
Projected annual participation	60
Estimated annual component costs	\$140,832. The projected amount has changed to reflect a 20% in inflation due to higher prices. Recalculated the number of participants based on last year's participation data.

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## 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.*

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.	<input type="checkbox"/>
Operates in compliance with all applicable labor laws.	<input type="checkbox"/>
Will not displace or replace existing employment of individuals not participating in E&T.	<input type="checkbox"/>
Provides the same benefits and working conditions as non-E&T participants doing comparable work for comparable hours.	<input type="checkbox"/>

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.

## 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:	Center for Employment Opportunities (CEO)
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<p><b>Service Overview:</b></p>	<p>Center for Employment Opportunities (CEO) is a nonprofit social enterprise that provides ton the jobs, advanced leadership training, and tailored vocational services to individuals recently released from incarceration who need employment support. CEO’s program helps participants build the workplace skills and confidence needed for a successful transition to a stable, productive life for themselves, their families, and their communities. Their program is client-centered and designed to develop and promote self-sufficiency through training, employment experience, vocational skills, assistance with all aspects of the employment application process, and retention support once an individual obtains an unsubsidized job in the community. CEO partners with the region’s workforce development board, KentuckianaWorks and Goodwill Industries (Power of Work) to provide additional transitional job and training opportunities to more individuals returning home from incarceration.</p> <p>CEO offers the following components: Work Experience:</p> <p>Work-Based Learning-Unsubsidized Employment-Transitional Jobs – includes orientation, durable and hard skills training with employer partners Dare to Care Foodbank, Block by Block, and Kentucky Department of Transportation. During this component, participants meet with job coaches and developers who assist with barrier removal and interview readiness. Participants also have access to advance leadership training, such as commercial driver license credentialing, to augment work-based learning with additional skills that will lead to a higher wage paying job.</p> <p>Job Retention:</p>
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Contract or Partner Name:	<b>Center for Employment Opportunities (CEO)</b>
	<p>CEO provides retention services post-placement into a job following work experience. During this time CEO distributes support services as needed, coaches on career advancement, conducts financial planning, and intervenes during workplace conflict should it arise. General training objectives include soft skills like project management as it relates to time, completing multiple tasks, and job expectations from the employer or transitional job partner, professional presentation, risk management and safety, equipment operation, customer service, effective communication, digital literacy, weighing costs, and benefits (and other cognitive behavioral trainings)</p> <p>Listed below are specific training objectives for the two tracks:</p> <p style="padding-left: 40px;">Track#1: Transportation and Material Moving</p> <p>(Employer Partners: KYTC and Block by Block Crews):</p> <ul style="list-style-type: none"> <li>○ OSHA Construction 10: Provided in-house through CEO's Network for Employment Services and Training (NEST) platform, participants learn about health hazards in construction; materials handling, use and disposal; and operating hand tools.</li> <li>○ Flagger: Participants also have access to flagger training through CEO's NEST, which teaches participants how to safely and effectively direct traffic, use hand signals and flagging devices, and identify hazards and respond during emergencies</li> <li>○ CDL Permit Course: Because many programs lack comprehensive permit preparation as part of their Commercial Driver's License (CDL) training, CEO has partnered with FreeWorld to offer participants CDL permit courses. FreeWorld's innovative permit prep services offer a flexible format that accommodates justice-impacted learners, allowing them to progress at their own pace, with the ability</li> </ul>

Contract or Partner Name:	<b>Center for Employment Opportunities (CEO)</b>
	<p>to revisit courses as needed alongside fellow justice-impacted individuals.</p> <ul style="list-style-type: none"> <li>○ Commercial Driver's License: CEO connects participants with local vetted training providers Driver's Resource Center and 160 Driving Academy to obtain their CDL, also providing financial and coaching support during training.</li> <li>○ CEO Registered Apprenticeship: CEO now has a DOL-approved registered apprenticeship as of this federal fiscal year - First-Line Supervisors of Material-Moving Machine and Vehicle Operators (ONET Code 53-1043.00). This is CEO's apprenticeship for supervisors in our own social enterprise and is one of the primary internal hiring pipelines at CEO, as well as a pathway to placements with other industry partners.</li> </ul> <p>Track 2: Warehouse Logistics (Employer Partner: Dare to Care Crew):</p> <ul style="list-style-type: none"> <li>○ OSHA General Industry 10: Provided in-house through CEO's Network for Employment Services and Training, participants learn best practices for identifying and mitigating workplace hazards, including how to reduce accidents and injuries and proper use of personal protective equipment.</li> <li>○ CEO Registered Apprenticeship: CEO now has a DOL-approved registered apprenticeship as of this federal fiscal year - First-Line Supervisors of Material-Moving Machine and Vehicle Operators (ONET Code 53-1043.00). This is CEO's apprenticeship for supervisors in our own social enterprise and is one of the primary internal hiring pipelines at CEO, as well as a pathway to placements with other industry partners.</li> </ul> <p>The underlying training and curriculum is delivered through a "crew-based" approach. This approach places each participant in real work environments, so they can learn how to interact with coworkers in a</p>

<b>Contract or Partner Name:</b>	<b>Center for Employment Opportunities (CEO)</b>
	constructive, cooperative manner, discuss and address workplace disagreements in a positive way, and learn how to take feedback and take direction from supervisors. Each participant can receive support services offered: Transportation, Boots, and Safety equipment.
<b>Intermediary:</b>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>Components Offered:</b>	Case management, job retention services, and work experience- Work Based Learning Transitional Job
<b>Credentials Offered:</b>	n/a
<b>Participant Reimbursements Offered:</b>	Transportation, Uniforms/Clothing, CDL Training, Forklift Training
<b>Location:</b>	Jefferson
<b>Target Population:</b>	Active SNAP recipient deemed appropriate-re-entry
<b>Monitoring of contractor:</b>	Division of Family Support E&T Program Specialists along with DAFM Contract Specialist review the monthly invoices the agency submits, to ensure expenses are allowable and the agency keeps within the budget. DFS also works with DAFM on a yearly contract monitoring for programmatic compliance and ensuring contract deliverables are met. The partner provides participation reports monthly to DFS, showing data that includes component placement, component completion, gaining employment, etc.
<b>Ongoing communication with contractor:</b>	DFS uses email as the primary communication method weekly and as needed. Communication can include questions on the case management system, kynect Ability, invoices, and policy. DFS also schedules group as well as one-on-one meetings to discuss new policy and procedures and to hear concerns from the agency. The E&T team will conduct site visits and facilitate meetings either in person or virtual on a more consistent schedule such as every other month.

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<b>Contract or Partner Name:</b>	<b>Center for Employment Opportunities (CEO)</b>
<b>Total Cost of Agreement:</b>	\$341,000; match is paid by partner
<b>Eligible for 75 percent reimbursement for E&amp;T Services for ITOs:</b>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>New Partner:</b>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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**

<b>Salary/Wages:</b> List staff positions in FTE and time spent on the project. Example: E&T Program Manager - \$60,000 x .50 FTE = \$30,000 5 E&T Counselors - \$25,000 x 1.00 FTEs x 5 = \$125,000	2 Public Assistance Program Specialist \$67,050 x 1.00 FTE x 2=\$134,100  Field Staff 213 Case Management Specialist \$65,900 X .0264 FTE X 213=\$371,300  <b>Total \$505,400</b>
<b>Fringe Benefits:</b> If charging fringe and benefits to the E&T program, provide the approved fringe rate.	78.395% \$396,208

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<p><b>Contractual Costs:</b> All contracts and partnerships should be included in the “contracts and partnerships” matrix of the E&amp;T State Plan Operating Budget Workbook. Briefly summarize the type of services contractors/partners will provide, such as direct E&amp;T program services, IT services, consulting, etc.</p>	<p>All providers/partners will provide case management to participants. Participants will be placed in an approved component based on assessment and conversation with Career Coach. Providers offer E&amp;T components approved by the State E&amp;T Team such as: ERT, WA, WBL, IET, VOC, Basic Education, Workfare. All providers/partners have a goal of employment and use the components to help reach this goal for the SNAP participants. Ongoing IT services provide ongoing maintenance, operations, and licensing for users. The budget is aligned proportionately to the projected number of participants and the percentage of people in poverty throughout the state. Part of the costs in the budget is comprised of participant reimbursements. The budget is also comprised of administrative costs</p>
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	<p>from our providers and partners who are the E&amp;T staff that conducts the assessments, referral placements, and provides the case management. Administrative costs of the 2 E&amp;T Program Specialist and all DCBS eligibility staff who have contact with the individuals are part of administrative costs. In our Workfare component, the required insurance cost is included in the budget. Another large portion of the budget is to maintain our case management system with IT support and licensures. To operate the state's E&amp;T program, the funding is needed to be compliant with FNS' rules and to provide a robust and growing program.</p> <p>\$3,448,934</p>
<b>Non-capital Equipment and Supplies:</b> Describe non-capital equipment and supplies to be purchased with E&T funds.	None
<b>Materials:</b> Describe materials to be purchased with E&T funds.	E&T brochures/digital information/ surveys \$8,000
<b>Travel &amp; Staff Training:</b> 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.	Yearly \$5,000 for staff to gain additional knowledge and best practices of E&T (Economic Mobility and Well Being) registration fee \$850 X 2; airfare, meals, taxi, parking and hotel \$1650 x 2)
<b>Building/Space:</b> If charging building space to the E&T program, describe the method used to calculate space value.	None
<b>Equipment &amp; Other Capital Expenditures:</b> 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.)	Workfare Insurance provided for each participant in the workfare component.

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- a) **Indirect Costs.** Indirect costs (also called overhead costs) are allowable activities that support the E&T program but 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.

Brighton	\$9,783.00
CEO	\$58,279.00
Goodwill	\$16,342.00
KCTCS RTW contract includes 16 Colleges + campuses Statewide-	\$14,233.00
NKCAC-	\$2,984.00
Audubon	\$15,866.00
BSADD	\$62,298.00
CKCAC-	\$9,873.00
NKADD-	\$12,771.00
Total: \$202,429	

- 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.

Transportation, books, fees, Childcare, bus passes, supplies Total **\$ 530,434**  
 (includes State Participant Reimbursement of \$353,149 and the Partners amount of \$177,285 Tab A)