

January 16, 2019

Time Limits and Other Challenges Hinder Success of Kentucky's SNAP E&T Program

By Ashley Spalding

Executive Summary

Recent data shows more than 10,000 Kentuckians have lost SNAP (Supplemental Nutrition Assistance Program, formerly known as “food stamps”) as a result of new barriers to participation erected by the state. Lacking economic opportunity to become food secure without SNAP, individuals who have lost or are at risk of losing food assistance are falling through the cracks of the state’s inadequate SNAP Education and Training (E&T) program, which is meant to improve participants’ economic security in the long run — and in the short-term keeps them from losing food assistance. SNAP E&T in Kentucky has been expanded to coincide with the state’s roll-out of these barriers to food assistance – the county-by-county elimination of work requirement waivers for adults without disabilities or dependents. However, the program is inadequate to improve quality of life for the Kentuckians it is meant to serve. In addition to a lack of jobs with adequate wages in many counties that make training an insufficient response, SNAP E&T in Kentucky is difficult to access with few such training opportunities across the state, not targeted to good jobs and career pathways, and missing the support services needed to make the program successful at promoting upward mobility.

In this report, we first provide background information on SNAP E&T and the context for its expansion due to the Bevin administration’s voluntary expiration of time limits for nondisabled adults (ages 18 to 49) without dependents who receive SNAP benefits. The administration’s decision to expire time limit waivers removes nutrition assistance from SNAP participants who struggle to find adequate work, including as a result of living in economically distressed regions of our state, facing racial barriers to economic opportunity, or having a felony record, for instance. As a result of these and other factors, time limits have a long track record of failing to improve employment and economic outcomes.

Second, we show that Kentucky’s SNAP E&T program is an inadequate response to these many barriers facing Kentuckians newly subject to the time limits:

- Employment opportunities are limited in many parts of the state, making training an insufficient response to time limits.
- SNAP E&T training providers are few and there are numerous additional barriers to accessing E&T programs; for instance, many counties do not have a Kentucky Career Center offering E&T services including initial intake assessments for the program.
- There is not enough focus on skills or career pathways to meaningful jobs, too much of a “work first” focus instead.
- There are not enough supports to address the barriers many face to participation in E&T such as adequate transportation assistance. The loss of SNAP benefits due to time limits will make good, steady employment, not to mention overall health and well-being, harder. Removing nutrition assistance from Kentuckians with low incomes — many of whom already work but often in low-wage industries where hours are inconsistent — is antithetical to health, steady employment and productivity.

In total, Kentucky's approach to SNAP runs the risk of driving people further into poverty, and further away from quality employment. The final section of this report makes policy recommendations to address concerns. The state should return to the practice of waiving time limits for SNAP in areas facing economic challenges and increase the quality and availability of E&T services and supports as part of a broader approach to reducing poverty in the state.

Context for SNAP E&T Expansion – Time Limit Waivers Expiring and Kentuckians Losing Food Assistance

SNAP E&T has been expanded in Kentucky to coincide with the expiration of time limit waivers across the state. Unfortunately, in addition to a lack of jobs in many parts of the state — particularly ones that pay adequately — SNAP recipients subject to the time limits (nondisabled adults without dependents) are more likely than others receiving food assistance to face many additional barriers to work. We have already seen more than 10,000 Kentuckians lose SNAP due to the time limits.¹ This context is important for understanding the state's expansion of SNAP E&T, which can help keep those subject to the time limit from losing benefits.

Kentucky's voluntary expiration of time limit waivers

SNAP (formerly known as “food stamps”) is a federal program providing nutrition assistance – roughly \$1.32 per meal per person in Kentucky – to about 580,000 Kentuckians with low incomes.² The program requires that after receiving food assistance for three months, nondisabled adults without dependents must participate in a “work activity” (such as a job, school or training program including through E&T) for at least 20 hours a week. However, for decades, Kentucky has requested waivers of the requirement from the federal government for counties with long- and short-term economic challenges. But in October 2017, the state started phasing out these waivers.³ As a result, after three months of participation in SNAP, nondisabled adults without dependents now have their food assistance contingent upon participation in a “work activity” even in areas of the state where jobs are scarce. Since May 1, 2018 waivers from time limits remain in effect in just Kentucky eight Promise Zone counties in eastern Kentucky (discussed in more detail below).

Many Kentuckians losing food assistance

More than 68 percent of Kentucky's SNAP participants are in families with children, more than 35 percent are in working families, and nearly 38 percent are in families with members who are elderly or have disabilities.⁴ While just about 1 in 10 receiving SNAP in January 2018 were nondisabled adults under the age of 50 without dependents, these approximately 64,000 Kentuckians face many barriers to employment including the state's continued economic challenges that are worse in some areas than in others.⁵

According to national data, those subject to the time limits are extremely poor, tend to have limited education and may face barriers to work such as former involvement in the criminal justice system.⁶ About a quarter nationally have less than a high school education, and half have at most a high school diploma or GED credential. These SNAP participants are more likely than others receiving food assistance to lack basic job skills like reading, writing and basic mathematics.

As mentioned previously, we know that 10,000 Kentuckians so far have lost SNAP benefits for not meeting the “work activity” requirements — that's approximately 1 in 5 people that became subject to the time limit.

Kentucky's expansion of SNAP E&T

Established in 1985, SNAP E&T is a federal program states utilize to provide education and training to SNAP beneficiaries and more generally to support workforce development. Kentucky's SNAP E&T program is set up to be an option for those subject to the time limit who may not be currently working

enough to meet the requirement. Previously the state's E&T program was very minimal as it was mandatory for (and only available to) those subject to the time limit — and, as noted, most areas of the state were exempt. However, the state has expanded E&T to coincide with the waiver expirations; as part of this expansion Kentucky's E&T program is now considered to be “voluntary” for participants as it is an option for those subject to the time limits, and employment is at least theoretically another option to keep from losing benefits.⁷ The state has not committed to train all SNAP participants subject to the time limit, but has said by expanding the program it aims to provide more opportunity to receive these services for those at risk of losing benefits.

In nine counties (Bullitt, Campbell, Fayette, Henry, Jefferson, Oldham, Owen, Shelby and Spencer) the E&T program was also available to other SNAP recipients in 2018 — those not subject to time limits, including adults with dependents. The state is in the process of expanding E&T as an option to anyone in the state receiving SNAP.

To fund the expansion of SNAP E&T, Kentucky has relied in part on federal resources. Federal E&T funding is awarded to states in two different streams, the latter of which is the partial funding source for Kentucky's recent expansion:

- 100 percent funds (historically about \$90 million a year across all states) that come entirely from federal dollars and do not require a state or local contribution. These funds do not stretch very far in providing education and training services to SNAP recipients.⁸
- 50 percent reimbursement with federal dollars for eligible administrative costs and reimbursements for supports needed to help participants engage in services. Increasingly states are using this relatively new 50/50 match opportunity to provide training through partners such as community colleges and community-based organizations. Because the 100 percent funds are so limited, the 50/50 match enables more services to be offered to more SNAP participants.

In Kentucky, the 100 percent funds are utilized primarily by Kentucky Career Centers (KCCs) to provide SNAP participants with E&T assessment, case management and training activities such as job search and workfare (like an unpaid internship); and through the KCCs, SNAP participants can also be connected to a training program through Workforce Innovation and Opportunity Act (WIOA) funding. The 50/50 funds enable SNAP participants in Kentucky to enroll in additional E&T programs, including in a community college credential program.

Among the activities approved for state SNAP E&T programs are:

- Job search.
- Job search training.
- Job retention services.
- Workfare (similar to an unpaid internship, usually at a community organization).
- Work experience.
- Education and occupational training (including at a community college).
- Self-employment training.
- Enrollment in a federally-funded workforce training program.

A different type of SNAP E&T program — called “Paths 2 Promise” — is operating in the eight Promise Zone counties in eastern Kentucky where the time limit waivers are still in place: Bell, Clay, Harlan, Knox, Leslie, Letcher, Perry and Whitley. One of 10 SNAP E&T pilots in the nation funded by grants from the U.S. Department of Agriculture (USDA), Paths 2 Promise is designed to provide — and to test the impact of — expanded services for SNAP recipients such as team-based case management and intensive supportive services alongside education, training and subsidized employment. After the pilot ends in 2019, the work requirements are expected to go into effect in even these severely economically distressed counties.

SNAP E&T Is an Inadequate Response to Barriers Faced by Many Kentuckians Receiving SNAP

Kentucky's SNAP E&T program is an inadequate response to time limits and the many barriers Kentuckians face to economic security. The state has too few jobs with adequate wages, and the E&T program has too few providers among other barriers to participation, is not focused enough on skills and provides inadequate supports for participants.

Too few jobs with adequate wages

While an expansion of SNAP E&T could provide important opportunities to Kentuckians needing food assistance, pairing it with SNAP time limits is counterproductive. SNAP recipients, especially those who face discrimination in the labor market and who live in economically distressed communities, may participate in E&T programs to get training and to keep their food assistance, but may still face a lack of employment options — and also hunger — once trainings are completed.

The economic challenges faced in many Kentucky communities are considerable and longstanding.⁹ For this reason, the time limits have never been in effect for all of Kentucky; in most of the years since 1998 when they were enacted nationally, a large number of Kentucky counties have been under a waiver because of a persistent lack of jobs. For 2018, there were 48 counties and 3 cities in Kentucky deemed Labor Surplus Areas, which made them “readily approvable” for such waivers by the USDA.¹⁰ In other words, while all Kentucky counties could potentially still qualify for waivers if the state made the case for it to the USDA, in 2018 48 counties were so challenged economically they officially had more people to work than they had jobs — and 40 of these counties now have time limits in place due to the state's decision.¹¹

Participants face numerous additional barriers to work

On top of the lack of good jobs, many SNAP E&T participants face additional employment impediments. A national survey of E&T participants by the USDA found 80 percent of participants reported facing at least one barrier to employment — including health issues, transportation issues, lack of education and caring for a family member with health issues.¹² Approximately 28 percent reported 3 or more barriers. And 32 percent reported facing discrimination when they searched for jobs, including age (16.9 percent) race (11.5 percent) and gender (9 percent). Taking food assistance away because people cannot overcome barriers to employment will only worsen food and economic security and make it harder to get ahead.

While SNAP E&T can potentially increase education and skills, no matter how high-quality Kentucky's E&T programs are, they will not create the jobs needed in distressed regions, eliminate race- and gender-based discrimination, or resolve individuals' and families' health issues. In fact, Kentuckians may become less healthy if forced to go without food assistance as a result of time limits.

Few training providers

Nine separate organizations agreed to be SNAP E&T 50/50 partners in Kentucky in 2018, which is a relatively small number given the large number of SNAP participants subject to the time limits and their geographic spread across the state. Participating organizations, listed in the table below, include two community colleges (Jefferson and Gateway), Kentucky Skills U (formerly known as “Kentucky Adult Education”) and five non-profit community-based organizations. However, just a few of these SNAP E&T programs were actually available to participants in 2018.

2018 SNAP E&T 50/50 Partners

Partner	Counties Served	Services Provided	Number of Individuals Participating in E&T
Brighton Center	Boone, Bracken, Campbell, Gallatin, Grant, Kenton, Pendleton and Owen	Training in business and computer technologies, medical assisting and health technology administration.	0
Employment Solutions	Clark, Fayette, Franklin, Jessamine and Woodford	Work experience in manufacturing and food preparation.	0
Goodwill Industries of Kentucky	95 counties (does not include Boone, Kenton, Campbell, Lewis, Greenup, Boyd, Carter, Lawrence, Martin, Daviess, Henderson, McLean, Webster, Union, Hopkins, Caldwell and Crittenden or the 8 Promise Zone counties)	Job readiness training and intensive job search and job placement services. Goodwill Industries of KY attempts to place participants in full-time jobs that pay around \$10 an hour and provide some paid time off and access to an employer-based retirement plan.	41
Kentucky Alliance of Boys and Girls Clubs	Jefferson	Career exploration, financial literacy and work simulation for 16 and 17 year olds leading up to high school graduation.	0
Kentucky Community and Technical College System – Jefferson and Gateway	Bullitt, Campbell, Henry, Jefferson, Oldham, Owen, Shelby and Spencer	Short-term postsecondary credentials such as in five “high-demand” industries (some programs enable those without a high school diploma or GED credential to complete adult education while taking college courses).	80
Kentucky Skills U – Bluegrass Career and Technical Center and Gateway Career and Technical Center	Boone and Fayette	Adult education.	0
Opportunity for Work and Learning	Fayette	Job readiness training, job search, customer service certification, job retention services.	32
Total			153

Source: KCEP communications with SNAP E&T 50/50 partners.

Note: Number of participants is from September 2017 through July 2018.

Kentucky Center for Economic Policy | kypolicy.org

As shown in the table above, only a small number of SNAP recipients actually participated in one of the SNAP E&T programs offered through the 50/50 partners (as of July 2018). According to most of these partners, there have been many challenges with the program that have resulted in several having no

participants at all and others reporting few referrals to their SNAP E&T program. In several cases, organizations have been confused about how to meet program requirements.¹³

Just four of the E&T programs listed in the table above were actually available to SNAP beneficiaries newly subject to the time limits in 2018: Opportunity for Work and Learning, Jefferson Community and Technical College, Gateway Community and Technical College, and Goodwill Industries of Kentucky.¹⁴ The reasons for this limited availability are varied, and E&T partners in some cases cited a lack of guidance and communication from the state. The resulting lack of programming is troublesome considering the important role the 50/50 partners can play in expanding access to training for those subject to the time limits (and therefore in keeping Kentuckians from losing SNAP benefits). While 50/50 partners are not the only providers of E&T training, these programs enable the state to serve more SNAP participants and offer a greater variety of training — and in some cases higher quality training.

Of the 112 counties with time limits currently in place, 14 had no E&T 50/50 partner opportunities in 2018 — and 7 of those are Labor Surplus Areas where jobs (another way to meet the work requirement) are scarce.¹⁵ Eighty counties had Goodwill Industries of Kentucky as the only operating E&T partner, and 34 of these were a Labor Surplus Area — problematic because Goodwill Industries focuses on relatively quickly placing participants in a job and fewer of these are available in Labor Surplus Areas.

KCCs can also provide SNAP E&T “work activities” including job readiness training, workfare and training (for instance, in a vocational program) through WIOA. It is unclear at this point how many E&T participants have received training through the KCCs and, as described below, there are also too few KCCs.¹⁶ At a recent Kentucky Workforce Innovation Board meeting, it was noted that around 1,200 individuals are currently enrolled in some type of WIOA-funded workforce credential program through the KCCs; however it was not indicated how many were SNAP E&T participants.

Notices about time limits and E&T option another barrier

Leading up to the expiration of waivers, SNAP recipients were sent a series of notices about the time limits expiring and the options available to those subject to the work requirements. One of these notices states that the E&T program is an option for meeting the requirements, which it describes as “a work program that includes work experience, skills training, job search and education to help you prepare for and obtain paid employment or a better job.” It also includes phone numbers for contacting a career coach to discuss this option.¹⁷

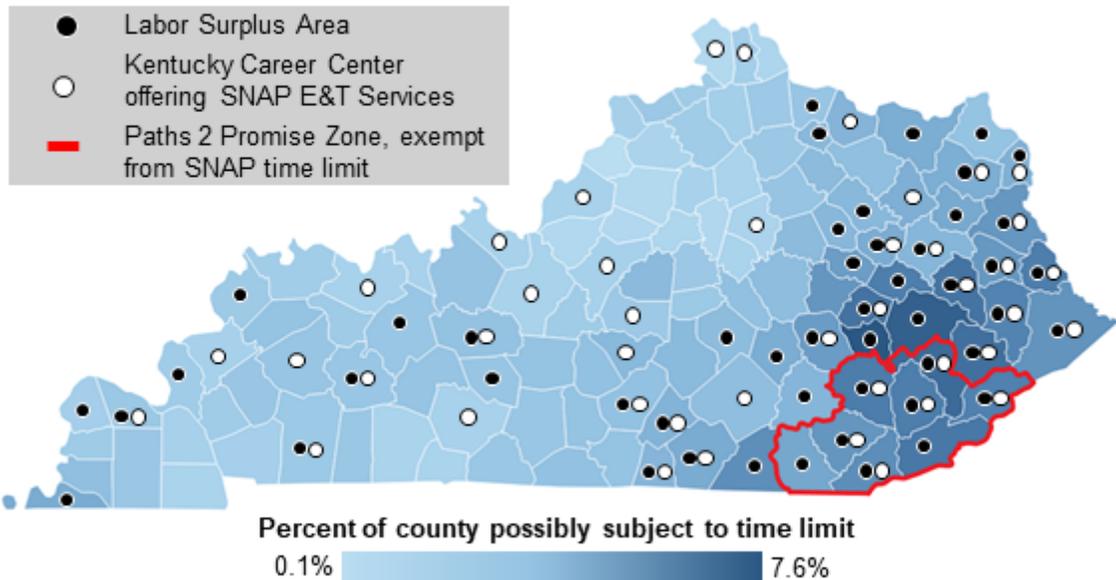
However, in the three other notices, SNAP E&T is either described in much less detail, or in more detail but using inaccessible language — and all three of these notices describe the need to register online before meeting with a career coach, which involves setting up an account with a username and login (see appendix for these notices). In addition to the lack of clarity in the documents themselves, the instructions about registering online (which could give the impression it is a requirement) may be a barrier to participation in SNAP E&T. Census data shows around 25 percent of adults receiving SNAP, who do not have a child in their household or a reported disability, do not have internet access at home.¹⁸

Too few KCC locations

The small number of KCCs providing E&T services — only 37 of the 112 counties subject to time limits have one in their county — is also likely a barrier to participation. While one KCC per county would be ideal — and this is close to what is provided to Paths 2 Promise participants — beginning in January 2017 the state closed many of its KCCs.¹⁹ KCCs provide initial screenings and placement in training programs (including with the 50/50 partners) and/or engagement in other “work activities,” so it is problematic that they are difficult to access for many SNAP beneficiaries. There is little public transportation outside of cities, making it even more difficult to access services for rural Kentuckians already facing economic insecurity and who are eligible for inadequate transportation reimbursements of just \$25 a month.²⁰ This lack of access is demonstrated in the map below.

Kentucky SNAP Participants Need More Opportunities for Employment and Training Programs

75 of 112 counties subject to the SNAP time limit do not have a Kentucky Career Center offering E&T services, 20 of the 75 are Labor Surplus Areas.



Source: KCEP analysis of data from the Kentucky Cabinet for Health and Family Services (January 2018) and Department for Workforce Investment, the U.S. Department of Labor and 2017 Census Population Estimate.

Kentucky Center for Economic Policy | kypolicy.org

In 75 counties (out of 112 counties with time limits currently in place), SNAP participants do not have a KCC in their county that offers E&T services.²¹ A SNAP participant can arrange to meet with a KCC staff member outside of a KCC, but these special arrangements are unlikely to provide the kind of robust assistance needed to address the need for services, especially as created by the time limits. (See appendix for information by county about KCC locations, E&T partner organizations, Labor Surplus Areas, number of adults subject to the time limit and the number of adults disenrolled due to the time limit.)

Not enough focus on skills

Training programs are far from equal. Some programs simply put participants to work doing job searches for low-wage employment or through workfare (unpaid work experience), while other programs provide the opportunity to gain skills and credentials that could lead to long-term employment at a decent job. Unfortunately Kentucky's E&T program takes too much of a "work first" approach by emphasizing moving E&T participants into any type of employment rather than prioritizing education and training that can lead to a job with adequate wages and benefits.

A U.S. Census Bureau study found when former recipients of cash assistance subject to work requirements became employed, their ability “to advance out of entry-level, low wage employment has been quite limited,” even after years in the labor market.²² The only such programs that had some positive outcomes (those in Portland, Oregon and Riverside, California) were those that provided more intensive training and supports than merely requiring them to search for work or find a job; these programs also encouraged participants to hold out for higher quality work rather than simply taking the first position available even if it paid poorly.²³

The design of Kentucky’s SNAP E&T program may frequently steer Kentuckians into low-wage jobs rather than support upward mobility through high-quality, skills-focused training. As noted previously, activities such as job search and workfare don’t typically lead to upward mobility, while educational programs can where jobs are available. In a USDA focus group with E&T participants, most reported being enrolled in independent job search and/or job search training, which they viewed as either ineffective or limited in capacity to help with obtaining the experience, skills, certificates or education needed to find work and achieve financial security: “For instance, focus group participants commonly reported that their E&T providers assisted clients in learning basic computer skills needed to find and apply for work online but generally did not offer software training or typing classes that would help them qualify or compete for administrative work.”²⁴

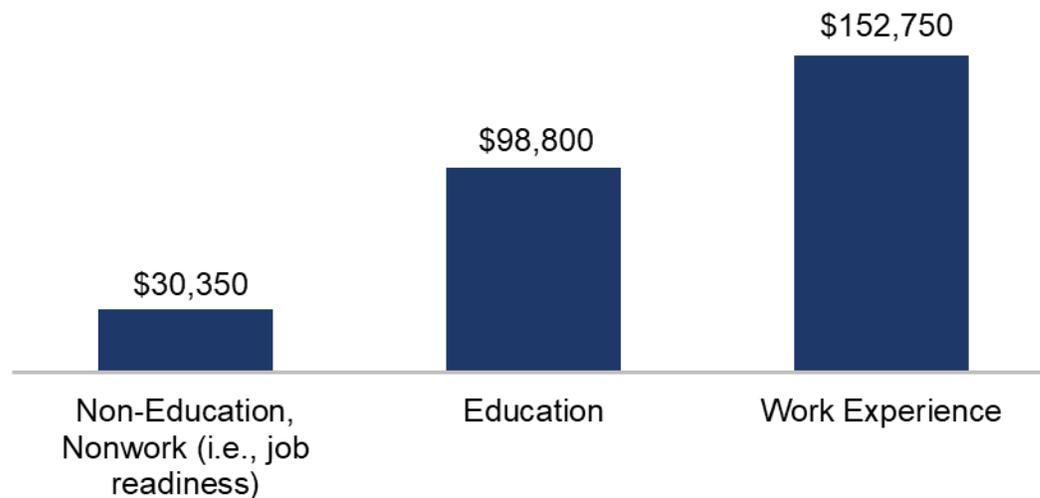
Right now, Kentucky’s SNAP E&T program puts too much emphasis on workfare, which is not a skills-focused option.²⁵ Based on the information in Kentucky’s SNAP E&T plan for 2018, just 35 percent (\$98,800) of total E&T funds each month were anticipated to be spent on education (basic and vocational), while 54 percent (\$152,750) would be spent on workfare and other work experience.²⁶ Another 11 percent (\$30,350) was slated for employment readiness training.

Case in Point – Madison County

A look at Madison County can provide insight into some of these barriers to SNAP E&T participation. Madison County has the 4th largest number of adults with SNAP who are subject to the time limit. Meanwhile, the nearest KCC offering E&T services is Lexington, around 25 miles away from Richmond (the county seat, although some parts of the county are farther from Lexington than Richmond). Kentucky River Foothills has a service, though not well advertised, that will transport a person from Richmond to Lexington and back for a \$20 fee (when given 72 hours’ notice). However, this would only leave \$5 for transportation to and from training the rest of the month given the E&T program’s maximum coverage of \$25 per month for transportation. In addition, the only 50/50 partner providing E&T services in Madison County is Goodwill Industries of Kentucky.

SNAP E&T Plan Prioritizes Funding for Work Experience Over Education

Planned monthly state spending on SNAP E&T by type in Kentucky for federal fiscal year 2018.



Source: Kentucky Department for Community Based Services, "Kentucky SNAP Employment and Training Plan Federal Fiscal Year 2018."

Kentucky Center for Economic Policy | kypolicy.org

Though the training programs vary considerably, few of the E&T partners offer a high-quality credential that will result in much economic mobility:

- Community college programs likely have some of the best employment outcomes, but few subject to the work requirement have access to such programs.
- Goodwill Industries of Kentucky focuses on job readiness and placement, although they do attempt to take job quality into account with placement.²⁷
- And Brighton Center offers three strong career programs — in medical assisting, business and computer technologies, and health technology administration — that provide the opportunity to earn credentials and have good outcomes for participants. However, Brighton Center is still working on raising funds that will qualify for the 50/50 match; no E&T participants have yet participated in these programs.²⁸

Inadequate supports

Participant supports are crucial to success in SNAP E&T programs. In the national USDA survey of E&T participants, 75 percent of respondents indicated that support services were very important to them, but only a small number reported having received those services.²⁹

Kentucky's E&T program provides very few supports. Participants receive a maximum of just \$25 a month through the KCCs for transportation while they are in E&T. Furthermore, 50/50 E&T providers should be able to be reimbursed if they offer certain other supports such as the provision of work uniforms and high school equivalency (i.e., GED diploma) testing fees, but several E&T partners described a lack of clear communication from the state about how to make that happen.³⁰ For SNAP participants with dependents (who are not subject to the time limits), the Child Care Assistance Program is another available support through the state; however, reimbursement rates are so low many providers do not accept the subsidy.³¹

Meanwhile, the supports being piloted in the Paths 2 Promise program in the eight Promise Zone counties have a lot of potential and show what is possible when supports are a significant priority. Coordinated team-based case management is provided by the Department for Community Based Services (DCBS), KCCs, Kentucky Skills U and the Kentucky Community and Technical College System. Supplemental wrap-around support services are also provided, including reimbursements for transportation (including up to \$1,500 in vehicle repairs), child care, and mental health and addiction recovery counseling.³² While the approach being piloted is promising, it will still be difficult for some Kentuckians facing structural barriers to economic mobility to overcome them.

Loss of benefits will make meaningful employment (and overall well-being) harder

Taking away SNAP benefits from Kentuckians who face numerous barriers to jobs providing adequate wages will only make it harder to find good, steady work. Adequate nutrition plays a critical role in productivity, not to mention overall health and well-being.³³

Modest Program Improvements Expected in 2019

Several changes to Kentucky's SNAP E&T program are underway for 2019 that will hopefully lead to some increased participation and better employment outcomes for low-income Kentuckians. However, the proposed changes are not adequate to stem the tide of Kentuckians losing food assistance.

One important aspect of the plan for 2019 is an expansion of the program to SNAP recipients who are not subject to the time limit.³⁴ Ideally this will enable greater participation, and with increased enrollment, additional partners may be recruited, thus also benefitting those subject to the time limit.

A new online case management system called KEE SUITE is expected to facilitate better communication in 2019 among SNAP recipients, DCBS, KCCs and E&T 50/50 partner organizations.³⁵ DCBS hopes that this system will enable SNAP beneficiaries and KCC case managers to better understand which programs are available and for E&T partners to get "reverse referrals."³⁶ Part of the robustness of Washington State's SNAP E&T program — which is consistently cited by Kentucky DCBS as a model program — is due to reverse referrals; these occur when individuals participating, or interested in participating, in an education or training program are determined by a SNAP E&T partner to be a SNAP beneficiary — and therefore eligible for SNAP E&T. Reverse referrals connect the E&T program with SNAP participants who are already taking steps to gain education and skills.

In the long term, DCBS is interested in implementing a team-based management system like what is reportedly working well in the Paths 2 Promise program in eastern Kentucky — and this possibility is noted in the 2019 state SNAP E&T plan.³⁷ The team would include DCBS, KCC staff, Kentucky Skills U and the community college system in order to best serve SNAP E&T participants.

Unfortunately, significant expansion of the number of 50/50 partners is not expected in 2019.³⁸ However, several organizations listed as partners in 2018 that did not actually provide E&T services will be working to do so in 2019 (although one program does not plan to participate at all in 2019). The state E&T plan for 2019 also describes plans to consider proposals from for-profit entities and employers to provide training through E&T, which while providing additional needed partners could be an area for concern in terms of training and job quality.

Additionally, the share of total E&T funds the state anticipates to spend in 2019 on different types of training activities is still heavily weighted toward non-education activities. In fact, funds for education programs make up just 17 percent of anticipated E&T investments in training in 2019 — compared to 35 percent in 2018.³⁹

Kentucky's E&T Program Needs to Be More Skills-Focused with Robust Supports as Part of Broader Approach to Poverty Reduction

While SNAP E&T alone cannot address the many barriers to economic security faced by nondisabled adults without dependents, the program can make important contributions to broader anti-poverty efforts if changes are made. In addition to time limit waivers being reinstated and barriers to training opportunities being addressed, Kentucky's E&T program needs to place more of an emphasis on high-quality training for good jobs across the state (which involves strengthening relationships with partners) and ensuring adequate participant supports are provided.

Reinstate time limit waivers

To fulfill the state E&T program's potential, it is essential that waivers from time limits be reinstated across the commonwealth wherever it is possible. The threat of losing assistance due to time limits, especially given the economic challenges remaining in most Kentucky counties, is harmful and counterproductive.

Ensure access to education and training

The state's SNAP E&T program needs to fully investigate barriers to participation such as the difficulty some face in getting to a KCC that offers these services and the limited number of 50/50 partners available. Expanding 50/50 E&T providers — such as to additional community colleges as described above — could help to increase access. Enabling participant intake for E&T programs to occur at locations outside of KCC may be another option; in Washington State's E&T program, this empowerment of community colleges and community based organizations helps encourage program participation. Kentucky's SNAP E&T program also needs to strengthen communications with current and potential 50/50 partners so that organizations can design training opportunities that meet the requirements of the program.

Focus on high-quality training

Kentucky's SNAP E&T program should do more to provide high-quality training — what the National Skills Coalition considers to be a “skills-focused” program that can help low-income individuals advance beyond low-wage jobs.⁴⁰

The National Skills Coalition has identified best practices for state SNAP E&T programs:⁴¹

- Skill building is an integral part of the program's vision.
- A “third-party partnership model” is used to support skill-building; community colleges, community-based organizations, and others provide training services with non-federal funds, the costs of which are partially reimbursed using federal 50/50 funds.
- Participant reimbursements are used to provide support services like transportation, books and supplies and child care.
- Participation in SNAP E&T is voluntary and not required in order for SNAP participants to maintain eligibility for SNAP benefits.
- Skill-building activities are accessible to SNAP participants in multiple parts of the state.

At the federal level, the National Skills Coalition has also commented against prematurely ‘pushing’ people into the labor market (and by extension, off public assistance) by restricting the use of SNAP time limit waivers.⁴² They recommend instead expanding support to states for policies “that ‘pull’ people into the labor market who are ready to participate.”

As described in a USDA report on best practices for SNAP E&T programs, states that emphasize high-quality training in their SNAP E&T programs, such as participation in postsecondary education programs, have a better likelihood of improving long-term employment and earnings for participants. In contrast, states that require participation in E&T and prioritize less robust training activities such as job search are

less likely to have SNAP participants meaningfully improve their economic situations.⁴³ While Kentucky's E&T program is considered to be "voluntary" and does utilize the third-party partnership model, it has a long way to go to be a skills-focused program.

Washington State is an example of a state that has effectively leveraged SNAP E&T funds to provide high-quality training to a large number of voluntary participants.⁴⁴ The program involves all of the state's community and technical colleges as well as nearly 50 community-based organizations. High-quality vocational education is by far the most common SNAP E&T activity. Employment and wage outcomes for the program are promising; more than 60 percent of former participants are employed 2 and 4 quarters after leaving the program and the average wage continues to rise after completing services.⁴⁵ It is important context that Washington State has continued to waive qualifying areas from SNAP time limits.

In order to increase the quality of training offered through Kentucky's SNAP E&T program, the state needs to follow the example of Washington State by prioritizing high-quality vocational training rather than workfare. Opportunities for postsecondary education need to be expanded to additional community college campuses. Given the low rates of participation at the two Kentucky campuses currently participating, however, this would need to occur alongside other recommendations for the program including addressing barriers to participation. Adult education should also be fully available as an E&T activity; Kentucky Skills U recently completed two pilot adult education-focused E&T programs but does not currently have a contract to be a SNAP E&T provider.⁴⁶

The state should also ensure any training provided by for-profit entities and employers is high-quality and that participating employers meet high-road standards such as no wage and hour violations, low rates of turnover and competitive pay and benefits (including paid sick leave and fair scheduling practices).⁴⁷

Provide more robust supports

Kentucky's SNAP E&T program also needs to make supports more robust and improve utilization by partners. The transportation benefit of \$25 a month is too low. In addition, since some SNAP E&T partner organizations have expressed confusion regarding what qualifies for reimbursement and how to apply for these funds, the state should improve these communications with partners. And community colleges need support to expand student services to address student non-academic needs, especially those institutions participating in the E&T program.⁴⁸

Washington State's E&T program serves as a good model of 50/50 community-based organizations providing wrap-around services. This may be difficult to fully duplicate in Kentucky due to a low number of well-funded community-based organizations that could serve in this capacity; however, we should look to how Washington State's community colleges successfully connect students to supports, including by working with other state or local agencies.

Make broader state policy changes

While access to E&T services and the quality of training provided are critical to improve outcomes for SNAP recipients, it is also important to acknowledge the limits of even high-quality training through SNAP E&T given the state's job quality and labor market challenges.⁴⁹

As Kentucky looks to SNAP E&T as an opportunity to develop our workforce and to equip Kentuckians with the tools they need to succeed, not only does SNAP E&T itself need improvement, but the state must take steps toward improved job quality. Efforts to provide education and training need to be accompanied by policies that increase wages, improve college affordability, support students with low incomes and increase access to felony expungement.⁵⁰

Conclusion

Reinstating SNAP time limit waivers across the state and making improvements to the E&T program would do much to encourage economic security for Kentuckians with low incomes. Reducing barriers to

SNAP means fewer Kentuckians go hungry, which can lead to better health — in addition to the economic benefits to the state from SNAP dollars circulating in local economies. And a SNAP E&T program with improved access, training quality and supports could go a long way toward increasing opportunities for state workforce development and economic mobility for Kentuckians receiving SNAP.

¹ Dustin Pugel and Jason Dunn, “Reinstated SNAP Time Limit Has Led to Thousands Without Food Assistance,” <https://kypolicy.org/reinstated-snap-time-limit-has-led-to-thousands-without-food-assistance/>.

² Pugel and Dunn, “Reinstated SNAP Time Limit Has Led to Thousands Without Food Assistance.”

³ During the Great Recession and subsequent slow recovery, the 3-month time limit was waived across the entire country, including in all 120 counties in Kentucky. The state began to expire waivers in 2016, first in 8 and then a total of 20 counties by the end of 2017.

⁴ Center on Budget and Policy Priorities, “Kentucky Supplemental Nutrition Assistance Program,” Dec. 3, 2018, https://www.cbpp.org/sites/default/files/atoms/files/snap_factsheet_kentucky.pdf.

⁵ Kentucky Center for Economic Policy analysis of Cabinet for Health and Family Services data, January 2018.

⁶ Ed Bolen, “Waivers Add Key State Flexibility to SNAP’s Three-Month Time Limit,” Center on Budget and Policy Priorities, Feb. 6, 2018, https://www.cbpp.org/research/food-assistance/waivers-add-key-state-flexibility-to-snaps-three-month-time-limit#_ftn18.

⁷ Research on best practices for SNAP E&T programs indicates voluntary programs are preferable because participants get more out of training when they are genuinely interested. However, the tension between an officially voluntary program and its potentially compulsory nature in practice is demonstrated in responses to the USDA national survey of SNAP E&T participants. Respondents were asked if they were participating in the program because it was required to keep benefits (considered by the study to be mandatory) or if they volunteered to participate in SNAP E&T (considered by the study to be voluntary). The USDA report indicates there were “substantial differences between how SNAP E&T participants self-identified their participation and how the State defined participation in their program (mandatory or voluntary).” United States Department of Agriculture, “SNAP Employment and Training (E&T) Characteristics Study: Final Report,” October 2017, <https://fns-prod.azureedge.net/sites/default/files/ops/SNAPandTCharacteristics.pdf>.

⁸ United States Department of Agriculture, “SNAP E&T Operations Handbook,” January 2018, <https://fns-prod.azureedge.net/sites/default/files/snap/S2S-Operations-Handbook.pdf>.

⁹ Nathan Joo and Elaine Waxman, “How Kentucky’s Economic Realities Pose a Challenge for Work Requirements,” Urban Institute, Aug. 9, 2018, <https://www.urban.org/urban-wire/how-kentuckys-economic-realities-pose-challenge-work-requirements>.

¹⁰ Employment and Training Administration, “Labor Surplus Area Classification,” Federal Register, Oct. 2, 2017, <https://www.federalregister.gov/documents/2017/10/02/2017-20977/labor-surplus-area-classification>.

¹¹ The criteria to be deemed an Labor Surplus Area is an average annual unemployment rate during the previous two calendar years of 20 percent or more above the average annual civilian unemployment rate for all states during a 24-month period. Federal Register, “Labor Surplus Area Classification,” Oct. 2, 2017, <https://www.federalregister.gov/documents/2017/10/02/2017-20977/labor-surplus-area-classification>. For Fiscal Year 2019, two counties are no longer Labor Surplus Areas (LSAs) but six more are LSAs in 2019, which were not in 2018 – for a net change of four more LSAs. Ashley Spalding, “Growing Number of Kentucky Counties Have More Available Workers Than Jobs,” Kentucky Center for Economic Policy, Oct. 2, 2018, <https://kypolicy.org/growing-number-of-kentucky-counties-have-more-available-workers-than-jobs/>.

¹² United States Department of Agriculture, “SNAP Employment and Training (E&T) Characteristics Study.”

¹³ 50/50 SNAP E&T partners, personal communication.

¹⁴ While Goodwill Industries of Kentucky and the community colleges reported fewer than expected SNAP E&T referrals to their programs, other organizations described barriers that prevented them from serving any participants in 2018. Kentucky Alliance for Boys and Girls Club initially experienced difficulty coming to an agreement with the Department for Community Based Services (DCBS) as to who they would serve, and some other logistics are still being worked out, given the organization serves youth rather than adults. Employment Solutions had problems working out a curriculum with DCBS that would meet the requirements of SNAP E&T. And Brighton Center has three training programs with impressive outcomes for participants, but they don’t currently have funding sources that qualify for a match (although they are in the process of attempting to raise private funds for this purpose). On the other hand, close to the end of the 2018 federal fiscal year Kentucky Skills U was still in the very early stages of its two pilot programs.

¹⁵ Kentucky Center for Economic Policy analysis of data from the Kentucky Cabinet for Health and Family Services, Kentucky SNAP E&T 50/50 partners and the U.S. Department of Labor. In addition to the 14 counties that had no 50/50 partners serving the county, an additional 2 had partners whose programs were not in effect in 2018.

¹⁶ The Office of Employment & Training at the Education and Workforce Development Cabinet was contacted but did not provide this information.

¹⁷ Kentucky Department for Community Based Services, Division of Family Support, “Notice from the Cabinet for Health and Family Services.” See appendix for actual notices.

¹⁸ These are Kentuckians receiving SNAP, ages 18-49, who do not receive Supplemental Security Income (SSI), did not report a disability and reported no “own children” in the household. KCEP analysis of 2017 1-Year Sample, American Community Survey data for Kentucky.

¹⁹ Daniel Desrochers, “State Pulling Workers Out of 31 Unemployment Offices Amid Major Cuts,” Jan. 10, 2017, Lexington Herald-Leader, <https://www.kentucky.com/news/politics-government/article125733614.html>.

²⁰ The most common barrier to accessing an E&T program identified by the USDA survey was transportation. United States Department of Agriculture, “SNAP Employment and Training (E&T) Characteristics Study.”

- ²¹ Kentucky Center for Economic Policy analysis. Kentucky Career Center, "Office Locations," <https://kcc.ky.gov/Pages/Locations.aspx>.
- ²² Fredrik Anderson, Harry Holzer and Julia Lane, "Worker Advancement in the Low-Wage Labor Market: The Importance of Good Jobs." U.S. Census Bureau, July 2003, <ftp://ftp.census.gov/ces/tp/tp-2003-08.pdf>.
- ²³ LaDonna Pavetti, "Work Requirements Don't Cut Poverty, Evidence Shows," Center on Budget and Policy Priorities, June 7, 2016, <https://www.cbpp.org/research/poverty-and-inequality/work-requirements-dont-cut-poverty-evidence-shows>.
- ²⁴ United States Department of Agriculture, "SNAP Employment and Training (E&T) Characteristics Study."
- ²⁵ Seattle Jobs Initiative, "SNAP E&T Advocates Guide," November 2017, <http://www.seattlejobsinitiative.com/wp-content/uploads/SNAP-ET-Advocates-Guide-and-Messaging-Tool.pdf>.
- ²⁶ Kentucky Department for Community Based Services, "Kentucky SNAP Employment and Training Plan Federal Fiscal Year 2018," Aug. 15, 2017.
- ²⁷ Goodwill Industries of Kentucky, personal communication.
- ²⁸ Brighton Center, personal communication.
- ²⁹ United States Department of Agriculture, "SNAP Employment and Training (E&T) Characteristics Study."
- ³⁰ Kentucky SNAP E&T partner organizations, personal communication.
- ³¹ Steve Magre, "Upgrading the Kentucky Child Care Program Would Pay Off for the State," Courier-Journal, Dec. 22, 2017, <https://www.courier-journal.com/story/opinion/contributors/2017/12/22/opinion-upgrading-kentucky-child-care-program-would-pay-off-state/964253001/>.
- ³² Joe Asher, "Paths to Promise: Program Available to Those Who Quality," Harlan Daily Enterprise, June 1, 2018, <https://www.harlandaily.com/2018/06/01/paths-to-promise-program-available-to-those-who-quality/>. United States Department of Agriculture, "Evaluation of SNAP Employment and Training Pilots: Fiscal Year 2017 Annual Report to Congress," <https://fns-prod.azureedge.net/sites/default/files/snap/SNAP-E-and-T-Report-Congress-FY2017.pdf>.
- ³³ Steven Carlson and Brynne Keith-Jennings, "SNAP Is Linked with Improved Nutritional Outcomes and Lower Health Care Costs," Center on Budget and Policy Priorities, Jan. 17, 2018, <https://www.cbpp.org/research/food-assistance/snap-is-linked-with-improved-nutritional-outcomes-and-lower-health-care>.
- ³⁴ Kentucky Department for Community Based Services, personal communication.
- ³⁵ The interface used by KCC case managers, E&T 50/50 partners and other staff is called "Business Connect." The interface SNAP recipients use is called "Citizen Connect."
- ³⁶ Kentucky Department for Community Based Services, "Kentucky SNAP Employment and Training Plan Federal Fiscal Year 2018."
- ³⁷ Department for Community Based Services, personal communication.
- ³⁸ Kentucky Department for Community Based Services, "Kentucky SNAP Employment and Training Plan Federal Fiscal Year 2019."
- ³⁹ Kentucky Center for Economic Policy analysis of Kentucky's 2019 state SNAP E&T plan.
- ⁴⁰ Brooke DeRenzis, "Skills-Based SNAP Employment and Training Policy Toolkit," National Skills Coalition, October 2016, <https://www.nationalskillscoalition.org/resources/publications/file/SNAP-ET-Policy-Toolkit.pdf>.
- ⁴¹ DeRenzis, "Skills-Based SNAP Employment and Training Policy Toolkit."
- ⁴² National Skills Coalition, "Comments on Supplemental Nutrition Assistance Program: Requirements and Services for Able-Bodied Adults Without Dependents," April 2018, <https://www.nationalskillscoalition.org/documents/National-Skills-Coalition-comments-on-RIN-0584-AE57.pdf>.
- ⁴³ United States Department of Agriculture, "SNAP Employment and Training (E&T) Best Practices Study: Final Report," Nov. 22, 2016, <https://www.fns.usda.gov/snap/snap-employment-and-training-et-best-practices-study-final-report>.
- ⁴⁴ Kentucky Department for Community Based Services, "Kentucky SNAP Employment and Training Plan Federal Fiscal Year 2018," Aug. 15, 2017.
- ⁴⁵ Washington State Department of Social and Health Services, "Expansion of the Basic Food Employment and Training Program (BFET)," Report to the Legislature, November 2017, https://app.leg.wa.gov/ReportsToTheLegislature/Home/GetPDF?fileName=Legislature%20Report_2017%20BFET%20Expansion_b2f117b8-f29f-4d25-8ab2-2387d00db455.pdf.
- ⁴⁶ Kentucky Skills U, personal communication.
- ⁴⁷ Ashley Spalding, "Workforce Development in Kentucky Should Encourage High-Road Jobs," Feb. 12, 2018, <https://kypolicy.org/workforce-development-kentucky-encourage-high-road-jobs/>.
- ⁴⁸ Leslie Helmcamp, "Strengthening Student Success with Non-Academic Supports: The Role of State Policy," Working Poor Families Project, Spring 2015, <http://www.workingpoorfamilies.org/wp-content/uploads/2015/06/WPFP-Spring-2015-Brief.pdf>.
- ⁴⁹ Jason Bailey, "State of Working Kentucky 2018," Kentucky Center for Economic Policy, Aug. 28, 2018, <https://kypolicy.org/the-state-of-working-kentucky-2018/>.
- ⁵⁰ Kentucky Center for Economic Policy, "An Economic Agenda for a Thriving Commonwealth," Aug. 22, 2018, <https://kypolicy.org/economic-agenda/>. Helmcamp, "Strengthening Student Success with Non-Academic Supports."



Appendix

This report is a publication of the Kentucky Center for Economic Policy (KCEP), with support from the [Working Poor Families Project](#). KCEP is a non-profit, non-partisan initiative that conducts research, analysis and education on important policy issues facing the Commonwealth. Launched in 2011, the Center is a project of the Mountain Association for Community Economic Development (MACED). For more information, please visit KCEP's website at www.kypolicy.org.

SNAP E&T In Kentucky

County	Labor Surplus Area	Closest Kentucky Career Center location offering E&T services	KCC providing E&T services in county?	SNAP E&T 50/50 provider	Adults subject to time limit	Adults Disenrolled due to time limit
Adair	LSA	Somerset - Pulaski County; Columbia (Affiliate) - Adair County	Yes	Goodwill Industries of KY	330	43
Allen		Bowling Green - Warren County	No	Goodwill Industries of KY	291	114
Anderson		Lexington - Fayette County	No	Goodwill Industries of KY	128	32
Ballard	LSA	Paducah - McCracken County	No	Goodwill Industries of KY	80	29
Barren		Bowling Green - Warren County	No	Goodwill Industries of KY	623	238
Bath	LSA	Morehead - Rowan County	No	Goodwill Industries of KY	267	36
Bell*	LSA	Hazard - Perry County; Pineville (Affiliate) - Bell County	Yes	N/A - Paths 2 Promise	1,198	-
Boone		Covington - Kenton County; Florence (Affiliate) - Boone County	Yes	Brighton Center** and Kentucky Skills U**	496	122
Bourbon		Lexington - Fayette County	No	Goodwill Industries of KY	307	45
Boyd	LSA	Morehead - Rowan County; Ashland (Affiliate) - Boyd County	Yes	None	1,222	95
Boyle		Lexington - Fayette County	No	Goodwill Industries of KY	388	55
Bracken	LSA	Covington - Kenton County; Maysville (Affiliate) - Mason County	No	Goodwill Industries of KY, Brighton Center**	124	18
Breathitt	LSA	Hazard - Perry County	No	Goodwill Industries of KY	924	43
Breckinridge		Elizabethtown - Hardin County	No	Goodwill Industries of KY	319	102
Bullitt		Louisville - Jefferson County	No	Goodwill Industries of KY, KCTCS	370	70
Butler		Bowling Green - Warren County	No	Goodwill Industries of KY	199	83
Caldwell		Hopkinsville - Christian County	No	None	179	31
Calloway		Paducah - McCracken County	No	Goodwill Industries of KY	287	58
Campbell		Covington - Kenton County	No	KCTCS, Brighton Center**	561	107
Carlisle		Paducah - McCracken County	No	Goodwill Industries of KY	58	13
Carroll		Covington - Kenton County	No	Goodwill Industries of KY	143	45

SNAP E&T In Kentucky

County	Labor Surplus Area	Closest Kentucky Career Center location offering E&T services	KCC providing E&T services in county?	SNAP E&T 50/50 provider	Adults subject to time limit	Adults Disenrolled due to time limit
Carter	LSA	Morehead - Rowan County; Grayson (Affiliate) - Carter County	Yes	None	737	66
Casey		Somerset - Pulaski County	No	Goodwill Industries of KY	327	57
Christian	LSA	Hopkinsville - Christian County	Yes	Goodwill Industries of KY	913	261
Clark		Lexington - Fayette County	No	Goodwill Industries of KY, Employment Solutions**	725	109
Clay*	LSA	Hazard - Perry County; Manchester (Satellite) - Clay County	Yes	N/A - Paths 2 Promise	1,099	8
Clinton	LSA	Somerset - Pulaski County; Albany (Sattellite) - Clinton County	Yes	Goodwill Industries of KY	235	44
Crittenden		Hopkinsville - Christian County	No	None	79	16
Cumberland		Somerset - Pulaski County	No	Goodwill Industries of KY	108	16
Daviess		Owensboro - Daviess County	Yes	None	822	141
Edmonson	LSA	Bowling Green - Warren County	No	Goodwill Industries of KY	181	76
Elliott	LSA	Morehead - Rowan County; Sandy Hook (Affiliate) - Elliott County	Yes	Goodwill Industries of KY	226	10
Estill		Lexington - Fayette County	No	Goodwill Industries of KY	571	68
Fayette		Lexington (Hub and Affiliate) - Fayette	Yes	Goodwill Industries of KY, Opportunity for Work and Learning, Employment Solutions, Kentucky Skills U**	2,274	454
Fleming		Morehead - Rowan County; Maysville (Affiliate) - Mason County	No	Goodwill Industries of KY	263	17
Floyd	LSA	Prestonsburg - Floyd County; Allen (Affiliate) - Floyd County	Yes	Goodwill Industries of KY	1,804	139
Franklin		Lexington - Fayette County	No	Goodwill Industries of KY, Employment Solutions**	414	94

SNAP E&T In Kentucky

County	Labor Surplus Area	Closest Kentucky Career Center location offering E&T services	KCC providing E&T services in county?	SNAP E&T 50/50 provider	Adults subject to time limit	Adults Disenrolled due to time limit
Fulton	LSA	Paducah - McCracken County	No	Goodwill Industries of KY	175	65
Gallatin		Covington - Kenton County	No	Goodwill Industries of KY, Brighton Center**	100	22
Garrard		Lexington - Fayette County	No	Goodwill Industries of KY	307	50
Grant		Covington - Kenton County	No	Goodwill Industries of KY, Brighton Center**	242	70
Graves		Paducah - McCracken County	No	Goodwill Industries of KY	511	142
Grayson	LSA	Elizabethtown - Hardin County; Leitchfield (Affiliate) - Grayson County	Yes	Goodwill Industries of KY	437	177
Green		Somerset - Pulaski County	No	Goodwill Industries of KY	186	19
Greenup	LSA	Morehead - Rowan County; Ashland (Affiliate) - Boyd County	No	None	565	66
Hancock		Owensboro - Daviess County	No	Goodwill Industries of KY	72	18
Hardin		Elizabethtown - Hardin County; Fort Knox (Affiliate) - covers parts of Bullitt, Hardin and Meade Counties	Yes	Goodwill Industries of KY	845	179
Harlan*	LSA	Hazard - Perry County	No	N/A - Paths 2 Promise	1,523	6
Harrison		Lexington - Fayette County	No	Goodwill Industries of KY	247	48
Hart		Bowling Green - Warren County	No	Goodwill Industries of KY	298	121
Henderson		Owensboro - Daviess County	No	None	498	85
Henry		Louisville - Jefferson County	No	KCTCS, Goodwill Industries of KY	111	30
Hickman		Paducah - McCracken County	No	Goodwill Industries of KY	82	16
Hopkins		Hopkinsville - Christian County; Madisonville (Affiliate) - Hopkins County	Yes	None	670	178

SNAP E&T In Kentucky

County	Labor Surplus Area	Closest Kentucky Career Center location offering E&T services	KCC providing E&T services in county?	SNAP E&T 50/50 provider	Adults subject to time limit	Adults Disenrolled due to time limit
Jackson	LSA	McKee - Jackson County; Hazard - Perry County	Yes	Goodwill Industries of KY	493	56
Jefferson		Louisville - Jefferson County	Yes	KCTCS, Goodwill Industries of KY, KY Alliance of Boys and Girls Clubs**	6,219	1,391
Jessamine		Lexington - Fayette County	No	Goodwill Industries of KY, Employment Solutions**	388	100
Johnson	LSA	Paintsville (Affiliate) - Johnson County; Prestonsburg - Floyd County	Yes	Goodwill Industries of KY	876	89
Kenton		Covington - Kenton County	Yes	Brighton Center**	1,658	409
Knott	LSA	Hazard - Perry County, Hindman (Affiliate) - Knott County	Yes	Goodwill Industries of KY	937	70
Knox*	LSA	Hazard - Perry County; Barbourville (Affiliate) - Knox County	Yes	N/A - Paths 2 Promise	1,259	5
Larue		Elizabethtown - Hardin County	No	Goodwill Industries of KY	162	63
Laurel	LSA	Somerset - Pulaski County	No	Goodwill Industries of KY	1,381	145
Lawrence	LSA	Prestonsburg - Floyd County; Louisa (Affiliate) - Lawrence County	Yes	None	618	72
Lee	LSA	Hazard - Perry County; Beattyville (Affiliate) - Lee County	Yes	Goodwill Industries of KY	392	30
Leslie*	LSA	Hazard - Perry County; Hyden (Affiliate) - Leslie County	Yes	N/A - Paths 2 Promise	553	-
Letcher*	LSA	Whitesburg (Affiliate) - Letcher County; Hazard - Perry County	Yes	N/A - Paths 2 Promise	1,150	1
Lewis	LSA	Morehead - Rowan County; Maysville (Affiliate) - Mason County	No	None	370	34
Lincoln	LSA	Lexington - Fayette County	No	Goodwill Industries of KY	480	85
Livingston	LSA	Paducah - McCracken County	No	Goodwill Industries of KY	106	29

SNAP E&T In Kentucky

County	Labor Surplus Area	Closest Kentucky Career Center location offering E&T services	KCC providing E&T services in county?	SNAP E&T 50/50 provider	Adults subject to time limit	Adults Disenrolled due to time limit
Logan		Bowling Green - Warren County	No	Goodwill Industries of KY	205	49
Lyon		Hopkinsville - Christian	No	Goodwill Industries of KY	90	18
Madison		Lexington - Fayette County	No	Goodwill Industries of KY	1,755	218
Magoffin	LSA	Prestonsburg - Floyd County; Salyersville (Affiliate) - Magoffin County	Yes	Goodwill Industries of KY	746	61
Marion		Elizabethtown - Hardin County; Lebanon (Affiliate) - Marion County	Yes	Goodwill Industries of KY	250	119
Marshall		Paducah - McCracken County	No	Goodwill Industries of KY	268	94
Martin	LSA	Prestonsburg - Floyd County; Inez (Affiliate) - Martin County	Yes	None	613	51
Mason		Morehead - Rowan County; Maysville (Affiliate) - Mason County	Yes	Goodwill Industries of KY	400	42
McCracken	LSA	Paducah - McCracken County	Yes	Goodwill Industries of KY	889	213
McCreary	LSA	Somerset - Pulaski County	No	Goodwill Industries of KY	765	90
McLean		Owensboro - Daviess County	No	None	106	33
Meade		Elizabethtown - Hardin County; Fort Knox (Affiliate) - covers parts of Bullitt, Hardin and Meade Counties	Yes	Goodwill Industries of KY	229	99
Menifee	LSA	Morehead - Rowan County; Frenchburg (Affiliate) - Menifee County	Yes	Goodwill Industries of KY	181	19
Mercer		Lexington - Fayette County	No	Goodwill Industries of KY	284	57
Metcalfe		Bowling Green - Warren County	No	Goodwill Industries of KY	161	61
Monroe		Bowling Green - Warren County	No	Goodwill Industries of KY	179	63
Montgomery	LSA	Morehead - Rowan County	No	Goodwill Industries of KY	614	64

SNAP E&T In Kentucky

County	Labor Surplus Area	Closest Kentucky Career Center location offering E&T services	KCC providing E&T services in county?	SNAP E&T 50/50 provider	Adults subject to time limit	Adults Disenrolled due to time limit
Morgan	LSA	Morehead - Rowan County; West Liberty (Affiliate) - Morgan County	Yes	Goodwill Industries of KY	298	38
Muhlenberg	LSA	Hopkinsville - Christian County; Central City (Affiliate) - Muhlenberg County	Yes	Goodwill Industries of KY	444	106
Nelson		Elizabethtown - Hardin County; Bardstown (Affiliate) - Nelson County	Yes	Goodwill Industries of KY	385	138
Nicholas		Lexington - Fayette County	No	Goodwill Industries of KY	144	29
Ohio	LSA	Owensboro - Daviess County	No	Goodwill Industries of KY	352	81
Oldham		Louisville - Jefferson County	No	KCTCS, Goodwill Industries of KY	86	12
Owen		Covington - Kenton County	No	KCTCS, Goodwill Industries of KY, Brighton Center**	123	28
Owsley	LSA	Hazard - Perry County	No	Goodwill Industries of KY	338	16
Pendleton		Covington - Kenton County	No	Goodwill Industries of KY, Brighton Center**	183	49
Perry*	LSA	Hazard - Perry County	Yes	N/A - Paths 2 Promise	1,717	5
Pike	LSA	Pikeville - Pike County; (Affiliate); Prestonsburg - Floyd County	Yes	Goodwill Industries of KY	2,413	201
Powell	LSA	Lexington - Fayette County	No	Goodwill Industries of KY	453	100
Pulaski		Somerset - Pulaski County	Yes	Goodwill Industries of KY	1,189	176
Robertson	LSA	Morehead - Rowan County	No	Goodwill Industries of KY	46	6
Rockcastle	LSA	Somerset - Pulaski County	No	Goodwill Industries of KY	461	63
Rowan		Morehead - Rowan County	Yes	Goodwill Industries of KY	644	33
Russell	LSA	Somerset - Pulaski; Russell Springs (Affiliate) - Russell County	Yes	Goodwill Industries of KY	429	53
Scott		Lexington - Fayette County	No	Goodwill Industries of KY	408	60

SNAP E&T In Kentucky

County	Labor Surplus Area	Closest Kentucky Career Center offering E&T services	KCC providing E&T services in county?	SNAP E&T 50/50 provider	Adults subject to time limit	Adults Disenrolled due to time limit
Shelby		Louisville - Jefferson County	No	KCTCS, Goodwill Industries of KY	184	38
Simpson		Bowling Green - Warren County	No	Goodwill Industries of KY	133	26
Spencer		Louisville - Jefferson County	No	KCTCS, Goodwill Industries of KY	86	23
Taylor		Somerset - Pulaski County; Campbellsville (Affiliate) - Taylor County	Yes	Goodwill Industries of KY	541	57
Todd		Hopkinsville - Christian County	No	Goodwill Industries of KY	169	52
Trigg		Hopkinsville - Christian County	No	Goodwill Industries of KY	135	32
Trimble		Louisville - Jefferson County	No	Goodwill Industries of KY	76	21
Union	LSA	Owensboro - Daviess County	No	None	183	39
Warren		Bowling Green - Warren County	Yes	Goodwill Industries of KY	1,079	181
Washington		Elizabethtown - Hardin County	No	Goodwill Industries of KY	249	54
Wayne	LSA	Somerset - Pulaski County; Monticello (Satellite) - Wayne County	Yes	Goodwill Industries of KY	594	84
Webster		Owensboro - Daviess County	No	None	209	43
Whitley*	LSA	Somerset - Pulaski County	No	N/A - Paths 2 Promise	1,118	8
Wolfe	LSA	Hazard - Perry County; Jackson (Affiliate) - Breathitt County	No	Goodwill Industries of KY	389	24
Woodford		Lexington - Fayette County	No	Goodwill Industries of KY, Employment Solutions**	137	27

Source: KCEP analysis of data from the Kentucky Cabinet for Health and Family Services (January 2018) and Department for Workforce Investment, and the U.S. Department of Labor.

Note: Adult disenrollments due to time limit are cumulative for May through September 2018. Disenrollments in six of the eight exempt counties represent people who moved into the county after having had benefits terminated.

*In "Paths 2 Promise" SNAP grant program with additional work supports and training opportunities, and exempt from three-month time limit.

**Participating in the SNAP 50/50 E&T program, but did not provide services in 2018.

<FSET-101>
<(R. 1/18)>

COMMONWEALTH OF KENTUCKY
Cabinet for Health and Family Services
<Department for Community Based Services>
<Division of Family Support>

Date:<Date>
Case Number:<Case No.>

<Client First MI Last Name>
<Care of (c/o)>
<To Street Address Line 1>
<To Street Address Line 2>
<To City, State, Zip>

WORK REGISTRATION AND SNAP EMPLOYMENT AND TRAINING FACT SHEET

WORK REGISTRATION

Household members age 18-59 are required to register for work unless exempt. Exemptions include working the equivalent of 30 hours at minimum wage, receiving UIB or KTAP, being the primary caregiver to a child under age 6 or a disabled person, verified regular participation in a drug or alcohol treatment program, enrolled at least ½ time in a training or higher education program or being unfit for work. Members are registered when the SNAP application is signed.

ABAWD

Able-Bodied Adults Without Dependents (ABAWD) household members age 18-49 who do not have a child under age eighteen (18) in the household, are subject to additional work requirements.

If you are an ABAWD who must work register and you live in a county that must comply with the ABAWD time-limits, to continue receiving SNAP benefits you must:

- Work at least 20 hours per week (paid or unpaid);
- Participate in the SNAP Employment and Training (E&T) program; or
- Combine work and E&T participation to meet the 20 hour per week work requirement.

If an ABAWD fails to meet these work requirements for any 3 months in a 36 month period, the individual will be ineligible for SNAP benefits for the remainder of the 36 month period unless they have an exemption. Other than the work registration exemptions listed above, pregnancy will also exempt an ABAWD from work requirements.

Ask a DCBS worker if your county must comply with the ABAWD time-limits.

PARTICIPATION IN E&T IS AN OPTION

You may choose to participate in the E&T Program in order to meet work requirements. If you choose E&T as your way to meet work requirements, your education, prior work history and any barriers to employment will be reviewed in order to find the best path for you. All E&T activities require 20 hours per week of participation, except for Workfare. Participation hours for Workfare, which is an unpaid work experience component, are based on the amount of SNAP benefits received. The other options for E&T activities are:

- Work Experience;
- Vocational Education Skills (VES),
- Adult Education,
- Job Skills Training,
- Job Search,
- Job Search Training, and
- Job Retention Services.

Participation hours are monitored for compliance on a monthly basis.

KENTUCKY CAREER CENTERS

If you choose to participate in SNAP E&T to meet your work requirements, you will be contacted by a Career Coach to get started with your assessment and to find an activity. Prior to meeting with your Career Coach, please register with Focus/Career at:

<https://focuscareer.ky.gov/careerexplorer/home>

You can call <Tier 2 #- statewide KCC> or visit your local Kentucky Career Center office if you have questions. You can locate your nearest Kentucky Career Center at:

<https://kcc.ky.gov/Pages/Locations.aspx>

PARTICIPANT EXPENSES

When you participate in E&T, you will receive a payment for transportation expenses you incur in order to participate. Up to \$25 per month is paid for transportation expenses.

If you are not an ABAWD, but choose to participate in E&T, you may also be eligible for assistance with childcare expenses you incur while participating in E&T.

NON COMPLIANCE AND REGAINING ELIGIBILITY

For an ABAWD subject to the time-limit, failure to comply without good cause, may decrease or discontinue your SNAP benefits. If you fail to comply, contact your Career Coach if you think you have good cause. Each month that you do not comply without good cause, will be considered as a non-compliant month. Contact your Career Coach who will explain what you need to do next to comply. Before ABAWD compliance can be determined, you must complete the activity that you did not do, unless you become ABAWD exempt. For example: if you did not complete the number of hours you were required to complete, you will have to complete the hours before you are considered compliant. Once you have completed the activity, you must continue to comply with the work requirements.

When you have received 3 non-compliant months in a 36-month period, you will not be eligible to receive SNAP benefits. You may regain eligibility by fulfilling the ABAWD work requirement for 30 consecutive days, becoming exempt, or when the 36-month period ends. If you re-establish eligibility by becoming employed for at least 20 hours per week or complying with E&T for 30 days, and later lose the employment or become non-compliant, you may be eligible for 3 bonus months of eligibility in the 36-month period.

SNAP E&T participants that are not subject to the ABAWD time-limit, are not penalized and do not lose eligibility for failure to comply.

REPORTING CHANGES

If a household member, who is 18-49 years old, working and subject to the time-limits, begins to work less than 20 hours per week, it must be reported to DCBS no later than 10 days after the end of the month in which the change occurred.

HEARING RIGHTS

If you are denied benefits or have benefits stopped or reduced because of your failure to comply, you have a right to a fair hearing. Requests for a fair hearing must be made within 90 days of the date of the notice of action taken on your SNAP benefits case. If the hearing request is received within 10 days of the date on the notice, SNAP benefits may be continued until the hearing decision is made. If you request a hearing on your SNAP benefits and request continuation of benefits, and the hearing does not rule in your favor, you will owe the value of the extra benefits you received.

A fair hearing may be requested by calling or writing your worker or you may write to the Mail to:

Cabinet for Health and Family Services, Division of Administrative Hearings,
Families and Children Administrative Hearings Branch
105 Sea Hero Rd, Suite 2
Frankfort, KY 40601

NONDISCRIMINATION STATEMENT

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, religious creed, disability, age, political beliefs, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotape, American Sign Language, etc.), should contact the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at 1-800-877-8339. Additionally, program information may be made available in languages other than English.

To file a program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, (AD-3027) found online at: http://www.ascr.usda.gov/complaint_filing_cust.html, and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call 1-866-632-9992. Submit your completed form or letter to USDA by:

(1) mail: U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, DC 20250-9410;

(2) fax: 202-690-7442; or

(3) email: program.intake@usda.gov.

This institution is an equal opportunity provider.

You may also file your complaint with the Cabinet for Health and Family Services, Office of Human Resource Management, EEO Compliance Branch, 275 East Main Street, 5C-D, Frankfort, Kentucky 40621 or call (502) 564-7770 EXT 4107.

If you have other complaints about your SNAP case, you can call the Ombudsman's Office at 1-800-372-2973 or (TTY) 1-800-627-4702.

<>
<>

COMMONWEALTH OF KENTUCKY
Cabinet for Health and Family Services
<Department for Community Based Services>
<Division of Family Support>

Date:<Date>
Case Number:<Case No.>

<Client First Name, MI, Last Name>
<Care of (c/o)>
<To Street Address Line1>
<To Street Address Line 2>
<To City, State, Zip>

Able-bodied Adults Without Dependents (ABAWDs) between 18 and 49 years old must meet work requirements to remain eligible for Supplemental Nutrition Assistance Program (SNAP) benefits.

Beginning <Month Day, Year>, your county becomes subject to the ABAWD time limits. As a SNAP recipient that may be subject to the work requirements, you can choose to:

- Participate in the E&T Program to meet work requirements. The E&T Program is a work program that includes work experience, skills training, job search and education to help you prepare for and obtain paid employment or a better job. **(Contact a Career Coach to discuss this exciting opportunity by calling <Kentucky Career Center Number> or visiting your local Kentucky Career Center office at : <Career Center Address>);**
- Work at least 20 hours a week on average, either paid or unpaid, to meet work requirements on your own **(Report any job or activity to DCBS);** or
- Not meet work requirements. **(You will only be able to receive SNAP for 3 months during a 36-month period without meeting work requirements, unless you become exempt from work requirements.)**

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, religious creed, disability, age, political beliefs, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotape, American Sign Language, etc.), should contact the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, (AD-3027) found online at: http://www.ascr.usda.gov/complaint_filing_cust.html, and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

- (1) Mail: U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410;
- (2) Fax: (202) 690-7442; or
- (3) Email: program.intake@usda.gov.

This institution is an equal opportunity provider.

You may also file your complaint with the Cabinet for Health and Family Services, Office of Human Resource Management, EEO Compliance Branch, 275 East Main Street, 5C-D, Frankfort, Kentucky 40621 or call (502) 564-7770 EXT 4107.

If you have other complaints about your SNAP case, you can call the Ombudsman's Office at 1-800-372-2973 or (TTY) 1-800-627-4702.

<>
<>

COMMONWEALTH OF KENTUCKY
Cabinet for Health and Family Services
<Department for Community Based Services>
<Division of Family Support>

Date:<Date>
Case Number:<Case No.>

<Client First Name, MI, Last Name>
<Care of (c/o)>
<To Street Address Line1>
<To Street Address Line 2>
<To City, State, Zip>

Beginning January 1, 2018, the Kentucky Career Centers will begin administering the Employment and Training (E&T) program for SNAP participants. This change will provide E&T participants more options for work experience, education and skills training to help you prepare for and obtain paid employment or a better job.

What does this change mean to you?

If you have questions or need to discuss your E&T activities with a worker, you will now contact a Career Coach by:

- Calling: **<Kentucky Career Center Number>**; or
- Visiting your local Kentucky Career Center office at : **<Career Center Address>**;

Participation forms can be returned to the Kentucky Career Center address above or can still be sent to: **<Mail Center Address>**

Before you meet with a Career Coach, please register with Focus/Career. To register, use the steps below:

1. Click on [Register for an account] button on Focus/Career login page (<https://focuscareer.ky.gov/careerexplorer/home>).
2. Select your preferred language and complete the form by filling in all your required information, and click the [Next] button
3. Agree to the Terms and Conditions by clicking [I agree to these terms]
4. Finally, you will see the Focus/Career landing page

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, religious creed, disability, age, political beliefs, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotope, American Sign Language, etc.), should contact the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, (AD-3027) found online at: http://www.ascr.usda.gov/complaint_filing_cust.html, and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

- (1) Mail: U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410;
- (2) Fax: (202) 690-7442; or
- (3) Email: program.intake@usda.gov.

This institution is an equal opportunity provider.

You may also file your complaint with the Cabinet for Health and Family Services, Office of Human Resource Management, EEO Compliance Branch, 275 East Main Street, 5C-D, Frankfort, Kentucky 40621 or call (502) 564-7770 EXT 4107.

If you have other complaints about your SNAP case, you can call the Ombudsman's Office at 1-800-372-2973 or (TTY) 1-800-627-4702.

WORK RULES THAT START <01/01/18>

Starting <01/01/18>, the work rules change for your county. The work rules may affect you or someone in your household. Your household's benefits could go down or stop, depending on your situation. If you or someone in your household stops getting SNAP, you will get a notice in the mail. Please share this information with anyone in your household ages 18 through 49.

WORK REGISTRATION

Household members age 18-59 are required to register for work unless exempt. Exemptions include working the equivalent of 30 hours at minimum wage, receiving UIB or KTAP, being the primary caregiver to a child under age 6 or a disabled person, verified regular participation in a drug or alcohol treatment program, enrolled at least ½ time in a training or higher education program or being unfit for work. Members are registered when the SNAP application is signed.

ABAWD

Able-Bodied Adults Without Dependents (ABAWD) household members age 18-49 who do not have a child under age eighteen (18) in the household, are subject to additional work requirements.

If you are an ABAWD who must work register and you live in a county that must comply with the ABAWD time-limits, to continue receiving SNAP benefits you must:

- Work at least 20 hours per week (paid or unpaid);
- Participate in the SNAP Employment and Training (E&T) program; or
- Combine work and E&T participation to meet the 20 hour per week work requirement.

If an ABAWD fails to meet these work requirements for any 3 months in a 36 month period, the individual will be ineligible for SNAP benefits for the remainder of the 36 month period unless they have an exemption. Other than the work registration exemptions listed above, pregnancy will also exempt an ABAWD from work requirements.

Ask a DCBS worker if your county must comply with the ABAWD time-limits.

PARTICIPATION IN E&T IS AN OPTION

You may choose to participate in the E&T Program in order to meet work requirements. If you choose E&T as your way to meet work requirements, your education, prior work history and any barriers to employment will be reviewed in order to find the best path for you. All E&T activities require 20 hours per week of participation, except for Workfare. Participation hours for Workfare, which is an unpaid work experience component, are based on the amount of SNAP benefits received. The other options for E&T activities are:

- Work Experience;
- Vocational Education Skills (VES),
- Adult Education,
- Job Skills Training,
- Job Search,
- Job Search Training, and
- Job Retention Services.

Participation hours are monitored for compliance on a monthly basis.

KENTUCKY CAREER CENTERS

The Kentucky Career Centers are available to help you meet work requirements. If you want to find a job or if you choose to participate in SNAP E&T, a Career Coach can review your education and work history to help you meet SNAP work requirements. Prior to meeting with your Career Coach, please register with Focus/Career at: <https://focuscareer.ky.gov/careerexplorer/home>

You can call <Tier 2 #- statewide KCC> or visit your local Kentucky Career Center office if you have questions. You can locate your nearest Kentucky Career Center at: <https://kcc.ky.gov/Pages/Locations.aspx>

PARTICIPANT EXPENSES

When you participate in E&T, you will receive a payment for transportation expenses you incur in order to participate. Up to \$25 per month is paid for transportation expenses.

If you are not an ABAWD, but choose to participate in E&T, you may also be eligible for assistance with childcare expenses you incur while participating in E&T.

NON COMPLIANCE AND REGAINING ELIGIBILITY

For an ABAWD subject to the time-limit, failure to comply without good cause, may decrease or discontinue your SNAP benefits. If you fail to comply, contact your Career Coach if you think you have good cause. Each month that you do not comply without good cause, will be considered as a non-compliant month. Contact your Career Coach who will explain what you need to do next to comply. Before ABAWD compliance can be determined, you must complete the activity that you did not do, unless you become ABAWD exempt. For example: if you did not complete the number of hours you were required to complete, you will have to complete the hours before you are considered compliant. Once you have completed the activity, you must continue to comply with the work requirements.

When you have received 3 non-compliant months in a 36-month period, you will not be eligible to receive SNAP benefits. You may regain eligibility by fulfilling the ABAWD work requirement for 30 consecutive days, becoming exempt, or when the 36-month period ends. If you re-establish eligibility by becoming employed for at least 20 hours per week or complying with E&T for 30 days, and later lose the employment or become non-compliant, you may be eligible for 3 bonus months of eligibility in the 36-month period.

SNAP E&T participants that are not subject to the ABAWD time-limit, are not penalized and do not lose eligibility for failure to comply.

REPORTING CHANGES

If a household member, who is 18-49 years old, working and subject to the time-limits, begins to work less than 20 hours per week, it must be reported to DCBS no later than 10 days after the end of the month in which the change occurred.

HEARING RIGHTS

If you are denied benefits or have benefits stopped or reduced because of your failure to comply, you have a right to a fair hearing. Requests for a fair hearing must be made within 90 days of the date of the notice of action taken on your SNAP benefits case. If the hearing request is received within 10 days of the date on the notice, SNAP benefits may be continued until the hearing decision is made. If you request a hearing on your SNAP benefits and request continuation of benefits, and the hearing does not rule in your favor, you will owe the value of the extra benefits you received.

A fair hearing may be requested by calling or writing your worker or you may write to the Mail to:

Cabinet for Health and Family Services, Division of Administrative Hearings,
Families and Children Administrative Hearings Branch
105 Sea Hero Rd, Suite 2
Frankfort, KY 40601

NONDISCRIMINATION STATEMENT

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, religious creed, disability, age, political beliefs, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotope, American Sign Language, etc.), should contact the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at 1-800-877-8339. Additionally, program information may be made available in languages other than English.

To file a program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, (AD-3027) found online at: http://www.ascr.usda.gov/complaint_filing_cust.html, and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call 1-866-632-9992. Submit your completed form or letter to USDA by:

(1) mail: U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, DC 20250-9410;

(2) fax: 202-690-7442; or

(3) email: program.intake@usda.gov.

This institution is an equal opportunity provider.

You may also file your complaint with the Cabinet for Health and Family Services, Office of Human Resource Management, EEO Compliance Branch, 275 East Main Street, 5C-D, Frankfort, Kentucky 40621 or call (502) 564-7770 EXT 4107.

If you have other complaints about your SNAP case, you can call the Ombudsman's Office at 1-800-372-2973 or (TTY) 1-800-627-4702.