MODIFICATION NUMBER TWO
TO THE
MEMORANDUM OF UNDERSTANDING
BETWEEN
THE DISTRICT OF COLUMBIA
OFFICE OF NEIGHBORHOOD SAFETY AND ENGAGEMENT
AND
DEPARTMENT OF HUMAN SERVICES
FOR
FISCAL YEAR 2022

The Memorandum of Understanding (MOU), executed on January 5, 2021, was entered into between the District of Columbia (District) Office of Neighborhood Safety and Engagement (ONSE), and the Department of Human Services (DHS), Economic Security Administration (ESA), collectively referred to herein as "the Parties".

The Parties now desire to update the terms and conditions of the MOU as follows:

I. The Fiscal Year (FY) 2021 MOU Modification Number Two executed on January 5, 2021 is hereby renamed "MODIFICATION NUMBER ONE".

II. Section II. PROGRAM GOALS AND OBJECTIVES, is hereby deleted and replaced with the following:

"**II. PROGRAM GOALS AND OBJECTIVES**

The purpose of this MOU is to establish a cooperative and mutually beneficial relationship between the Parties and to set forth the responsibilities of the Parties. Furthermore, this MOU shall detail the terms and conditions for ONSE to provide employment and case management services to participants, defined as SNAP recipients that have been confirmed by DHS to be both eligible and suitable for SNAP E&T program services. ,

This MOU recognizes that ONSE shall recruit and enroll one hundred fifty (150) District residents registered and participating in a ONSE program and are eligible for the SNAP E&T program, including ONSE clients referred to ONSE through DHS/ESA. This allows DHS/ESA to expand the comprehensive range of services available to SNAP E&T clients and provide them with eligible employment and case management services.

In addition, this MOU sets forth the terms and conditions under which DHS/ESA shall transfer up to **one million one hundred thirty-one thousand five hundred forty-eight dollars ($1,131,548.00)** for eligible SNAP E&T program expenses to ONSE as reimbursement for eligible SNAP E&T employment and case management services provided."

III. Section III. SCOPE OF SERVICES, Sub-section A. RESPONSIBILITIES OF ONSE, Paragraphs 1-3 are deleted and replaced with the following:

1. "Recruit and enroll one hundred fifty (150) District residents that are registered and participating in a ONSE program who are eligible for the SNAP E&T program, including customers that are referred to ONSE through DHS/ESA. Eligible SNAP E&T clients are individuals who reside in the District and receive SNAP benefits, are at least sixteen (16) years of age or older, are not receiving Temporary Assistance for Needy Families (TANF) benefits or services and have a goal of obtaining unsubsidized employment.

    - ONSE shall submit information to DHS/ESA on each proposed participant to confirm their eligibility and suitability for program services using a template provided by DHS/ESA. Information requested on this template may include a proposed participant's name, address, date of birth, Social Security Number (SSN), and suitability documentation for program services offered by ONSE through this MOU. DHS/ESA shall verify SNAP eligibility and suitability of all proposed participants and notify ONSE within five (5) business days. Only individuals that DHS/ESA confirms to be eligible and suitable for program services through this process are eligible to receive SNAP E&T services associated with this MOU.

    - If a participant loses eligibility for SNAP benefits after the date of their initial verification and enrollment in program services through ONSE, DHS/ESA will notify ONSE. That participant must be exited from SNAP E&T services funded by DHS/ESA and coded in data submissions, except for participants in the Job Retention Component that may continue to be served. ONSE may choose to continue providing services to participants that lose eligibility if they support the full costs for additional services and do not request reimbursement from DHS/ESA. Participants that regain SNAP eligibility may resume receiving services supported through this MOU if confirmed by DHS/ESA.

Provide a combination of two (2) or more of the allowable SNAP E&T program Components listed below to each participant. Funds may be used for the outreach, planning, implementation, and operation of these Components. Allowable SNAP E&T program Components consist of the following types of services detailed in the table below, grouped under three categories: Non-Education, Non-Work; Education; and Work Experience:

Acronym	SNAP E&T Component	Component Definition
Non-Education, Non-Work Components		
JST	Job Search Training	Component activities consist of employability assessments; training in techniques to increase employability such as interviewing, resume development, and job application techniques; job placement services; other direct trainings or support activities, including educational programs, that can expand the job search abilities or employability of participants. Participants in this Component must be actively seeking employment and receiving sustained support from provider staff.

Acronym	SNAP E&T Component	Component Definition
JR[1]	Job Retention	Component activities consist of coaching, communication, training, or other services designed to ensure job retention after a participant has obtained employment; and assisting participants in obtaining eligible participant supports that are likely to improve retention outcomes. Services must be provided for not less than 30 days but not over 90 days (though providers may use their own resources to support ongoing retention services and other supports). This Component can only be entered after a participant becomes employed and exits all other SNAP E&T components, and cannot be the first Component an individual participates in. If an individual is employed but still receiving SNAP benefits and still pursuing other types of training or job placements, they are not considered in the Job Retention Component.
SET	Self-Employment Training	Component activities include training designed to increase the self-sufficiency of recipients through self-employment, including programs that instruct self-employment ventures. This includes entrepreneurship programs, assistance with developing business plans, access to financing, and other supports to start a new business. This Component should be used only for programs where the primary outcome goal for participants is starting their own business rather than moving into employment.
Education Components		
EPB	Educational Program, Basic Education and Foundational Skills Instruction	Component activities include adult basic education, basic literacy, instruction leading to high school equivalency (including GED or high school diploma), and developmental or remedial education. Participants must be adults or out-of-school youth aged 16, and older who are re-engaging their education to improve their employability. Participants may already have attained high school equivalency if they are otherwise basic skills deficient or need instruction to meet the Educational Functional Level (EFL) requirements of another employment-focused program.
EPC	Educ. Program, Career and Technical Education Programs or Other Vocational Training	Component activities include career and technical education programs or vocational training. Programs operating under this Component must provide participants with access to industry-recognized credentials, certifications, and licensure designed to move participants into employment, with a direct link to the local labor market. Programs under this Component should not include basic education instruction or credentials or lead to a post-secondary degree (see other Components for those circumstances).
EPEL	Educational Program, English Language Acquisition	Component activities include English Language Acquisition or instruction for English learners (ELs) designed to improve their English language skills and employability.

1 Job Retention cannot be offered as a standalone service but must instead be offered in addition to at least one other Component above.

Acronym	SNAP E&T Component	Component Definition
EPIE	Educational Program, Integrated Education and Training or Bridge Programs	Component activities consist of a service approach that provides adult education and literacy activities concurrently and contextually with workforce preparation activities and workforce training for a specific occupation or occupational cluster for educational and career advancement. Component activities should include a combination of activities falling under both the EPB and EPC Components.
EPWRT	Educational Program, Work Readiness Training	Component activities include work readiness or soft skills training designed to move participants into employment, with a direct link to the local labor market, but that does not participate access to industry-recognized credentials, certifications, and licensure. This Component excludes activities offered under the Job Search Training Component. Activities should be focused on meeting the documented needs of employers.
EPO	Educational Program–Other	Component activities include educational programs that provide post-secondary academic credit and can lead to a degree in a field with a direct link to employment, with a direct link to the local labor market. Note that academic programs that are not designed to lead directly into employment and those at the Bachelor's degree level and above are not eligible for inclusion in SNAP E&T.
*Work experience components**		
WBLI	Work-based learning, Internship	Component activities include paid or unpaid internships or externships that provide relevant experience to enter permanent employment opportunities in a related field. If opportunities are paid, individuals may be compensated via wages or a stipend.
WBLI-SUB^	Work-based learning, Internship, Subsidized by E&T	Component activities include paid internships or externships that provide relevant experience to enter permanent employment opportunities in a related field, and where wages are subsidized through SNAP E&T program funds. Individuals may be compensated via wages or a stipend.
WBLOJT	Work-based learning, On-the-job Training	Component activities include on-the-job training experiences where participants can be trained, receive mentorship, and be permanently hired as they become proficient in a particular skillset or job function.
WBLOJT-SUB^	Work-based learning, On-the-job Training, Subsidized by E&T	Component activities include on-the-job training experiences where participants can be trained, receive mentorship, and be permanently hired as they become proficient in a particular skillset or job function; and where wages are subsidized through SNAP E&T program funds.
WBLPA	Work-based learning, Pre-apprenticeship/ Apprenticeship	Component activities consist of active participation in a Registered Apprenticeship program authorized by the District or a federal or state government or active participation in a pre-apprenticeship program designed to prepare individuals to enter and succeed in a Registered Apprenticeship program. Apprentices must be paid based on their approved wage progression, but pre-apprentices may be paid or unpaid, and any compensation may be through wages or stipends.

Acronym	SNAP E&T Component	Component Definition
WBLPA-SUB^	Work-based learning, Pre-apprenticeship/ Apprenticeship, Subsidized by E&T	Component activities consist of active participation in a Registered Apprenticeship program authorized by the District or a federal or state government, or active participation in a pre-apprenticeship program designed to prepare individuals to enter and succeed in a Registered Apprenticeship program; and where wages are subsidized through SNAP E&T program funds. Apprentices must be paid based on their approved wage progression, but pre-apprentices may be paid through wages or stipends.
WBLTJ	Work-based learning, Transitional Jobs	Component activities consist of participation in transitional jobs, defined as time-limited subsidized work experiences that help individuals who are chronically unemployed and have barriers to employment establish a work history and develop skills to access unsubsidized employment and progress in the workplace. Individuals may be compensated via wages or a stipend.
*Work Experience Components (cont.)**		
WBLTJ-SUB^	Work-based learning, Transitional Jobs, Subsidized by E&T	Component activities consist of participation in transitional jobs, defined as time-limited subsidized work experiences that help individuals who are chronically unemployed and have barriers to employment establish a work history and develop skills to access unsubsidized employment and progress in the workplace; and where wages are subsidized through SNAP E&T program funds. Individuals may be compensated via wages or a stipend.
WBLO	Work-based learning–Other, State must provide a description	Other Work-based Learning activities include customized training and work experience activities tailored to the needs of one or more employers, include real-world work settings or simulated work environments, and foster in-depth, firsthand engagement with the tasks required in a career field, that are aligned to curriculum and instruction. These activities must emphasize employer engagement, include specific training objectives, and lead to regular employment. Activities may be paid, or unpaid, and individuals may be compensated via wages or a stipend.
WBLO-SUB^	Work-based learning–Other, Subsidized by E&T	Other Work-based Learning activities include customized training and work experience activities tailored to the needs of one or more employers, include real-world work settings or simulated work environments, and foster in-depth, firsthand engagement with the tasks required in a career field, that are aligned to curriculum and instruction; and where wages are subsidized through SNAP E&T program funds. These activities must emphasize employer engagement, include specific training objectives, and lead to regular employment. Individuals may be compensated via wages or a stipend.

* Work Experience Components include programs designed to improve individuals' employability through actual work experience or training, or both, and to enable individuals employed or trained under such programs to move promptly into regular public or private employment, including subsidized employment and apprenticeships. A SNAP E&T Work Experience Component activity must (1) not provide any work with the effect of replacing the employment of an individual not participating in the employment or training experience program, and (2) provide the same benefits and working conditions provided at the job site to employees performing similar work for comparable hours. Work experience is a planned, structured learning experience in a workplace for a limited period. Work experience may be paid or unpaid and consistent with other laws such as the Fair Labor Standards Act. Work experience may be arranged within the private for-profit sector, the non-profit sector, or the public sector. Labor standards

apply in any work experience setting where an employee/employer relationship exists as defined by the Fair Labor Standards Act.

All subsidized employment program models supported through SNAP E&T funds must be approved by USDA-FNS. Wages must stop being subsidized through the program when an individual loses SNAP benefits (which may occur with $1,500 or more in monthly earnings or about 100 hours of work at the District's minimum wage of $15.20 per hour; though precise maximum incomes for SNAP eligibility may vary based on individual circumstances). Projects may be selected for funding overall but have subsidized employment plans disapproved if additional USDA-FNS reviews do not result in approval.

3. Provide allowable SNAP E&T client reimbursements/expenses and supportive services that are reasonable and necessary to carry out SNAP E&T components. These expenses may include:

    i. Dependent care costs;
    ii. Transportation expenses to and from SNAP E&T Component activities and job and interview sites;
    iii. Clothing, personal safety items, tools or uniforms, or personal safety items to participate in a SNAP E&T Component or to be used for a job;
    iv. Licensing and bonding fees for work;
    v. Pre-employment requirements such as drug testing, fingerprinting, or health screenings;
    vi. Testing fees;
    vii. Application fees for employment, including application fees required to apply for entry into apprenticeship programs;
    viii. Tuition and course registration fees;
    ix. Books or training manuals;
    x. Eye or dental care (only if reasonable and necessary for participation in a SNAP E&T Component, only minor work allowed);
    xi. Legal services;
    xii. Laptops or other technology needed to participate in Components or employment (technology may be loaned out during participation or purchased for participants); and,
    xiii. Internet access–including through home service or mobile wi-fi hotspot.

III. Section III. SCOPE OF SERVICES, Sub-section B. RESPONSIBILITIES OF DHS/ESA, Paragraph 1 is hereby deleted and replaced with the following:

1. "Transfer up to one million one hundred thirty-one thousand five hundred forty-eight dollars ($1,131,548.00) in eligible SNAP E&T program expenses to ONSE as reimbursement for eligible SNAP E&T employment and case management services provided."

IV. Section IV. DURATION OF MOU is hereby deleted and replaced with the following: "**IV. DURATION OF MOU**

A. The period of this MOU shall be from October 1, 2021 through September 30, 2022, unless terminated in writing by the Parties before the expiration of this MOU.

B. This MOU shall terminate on September 30, 2022, but can be extended, contingent upon the availability of funds. This MOU may be extended in one (1) year increments, provided a written notice is given by the party seeking the extension at least thirty (30) days before the expiration date. The MOU shall not extend beyond four (4) option periods from the date that the original MOU (April 16, 2020).

C. Exercising an option period is subject to the availability of funds at the time of the exercise of the option.

V. **Section VI. FUNDING PROVISIONS, Sub-section A. COST OF SERVICES** is hereby deleted and replaced with the following:

1. "ONSE shall serve one hundred fifty (150) SNAP E&T participants at a total cost that shall not exceed two million eight hundred twenty-eight thousand eight hundred seventy-one dollars ($2,828,871.00) in allowable expenditures. In addition, through the use of federal SNAP E&T funding, DHS/ESA shall reimburse ONSE for forty percent (40%) of all allowable invoiced expenses, excluding participant reimbursement and subsidized employment expenses, which may be invoiced at fifty percent (50%) of allowable invoiced expenses, not to exceed one million one hundred thirty-one thousand five hundred forty-eight dollars ($1,131,548.00) in total reimbursements. Funding totals are contingent on approval in the FY 2022 DC SNAP E&T State Plan by FNS.

2. Only allowable participant and program expenditures incurred by ONSE are reimbursable. ONSE shall not use or commingle funds from this MOU with other federal funds. OMB Circular A-87 further specifies unallowable uses of SNAP E&T funds. Funds may not be used for the following purposes:

    i. In-kind services (any service donated or volunteered).
    ii. Funds used for SNAP E&T components cannot be already designated as match for another federal program.
    iii. Services for the purpose of overcoming barriers to SNAP participation that make them exempt from federal work registration altogether, such as mental health, drug or alcohol treatment and rehabilitation programs.
    iv. Services (including tuition and academic fees) above what is already charged to the public.
    v. Meals away from home.
    vi. Other disallowed costs, per OMB Circulars A-21 and A-87. Examples include:

        a. Bad debt expenses;
        b. Political contributions;
        c. Fines and penalties for failure to comply with federal or local laws;
        d. Legislative expenses;
        e. Losses not covered by insurance;
        f. Cost of construction or purchase of facilities or buildings;

g. Sectarian worship or proselytization;
h. Refreshment; and
i. Promotional items and memorabilia.

Items already deemed unallowable by USDA's Food and Nutrition Service (FNS) include:

i. Personal computers;
ii. Living stipends;
iii. Vehicle purchases;
iv. Automobile insurance;
v. Student loans;
vi. Relocation expenses; and
vii. Food and Parties."

VI. **Section VI. FUNDING PROVISIONS, Sub-section B. PAYMENT, Paragraph 1** is hereby deleted and replaced with the following:

1. "Payment for all eligible expenses shall be made through an Intra-District payment by DHS/ESA to ONSE based on monthly invoiced and reconciled amounts expended for services and goods, according to this MOU and the ONSE FY 2022 SNAP E&T budget. The total of all invoice payments under this MOU may not exceed one million one hundred thirty-one thousand five hundred forty-eight dollars ($1,131,548.00)."

All other terms and conditions of the MOU shall remain the same.

IN WITNESS WHEREOF, the Parties have executed this MOU:

FOR THE OFFICE OF NEIGHBORHOOD SAFETY AND ENGAGEMENT:

Delbert McFadden
Delbert McFadden (Jan 6, 2022 13:30 EST)

Date: Jan 6, 2022

Delbert McFadden
Director

FOR THE DEPARTMENT OF HUMAN SERVICES:

Laura Green Zeilinger/dca

Date: 11/22/2021

Laura Green Zeilinger
Director

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