



America Forward Coalition Recommendations SNAP Employment & Training (SNAP E&T)

May 2026

The Federal Supplemental Nutrition Assistance Program (SNAP E&T) is **one of the nation's most significant federal workforce funding streams**. SNAP E&T supports self-sufficiency and economic mobility programs for SNAP participants and accounts for more than \$1 billion in expenditures in FY2026 across federal expenditures and matching funds, under a unique blend of reimbursable 100% funding and 50/50 matching funding. Definitionally, SNAP E&T emphasizes economic advancement for people with low-incomes, including many people reentering the workforce following interaction with the criminal justice system.ⁱ

SNAP E&T could not be more important at this moment, as states, providers, and SNAP participants prepare for implementation of the One Big Beautiful Bill Act (OBBBA) expansion of SNAP work requirements and Medicaid community engagement requirements. SNAP E&T offers a critical pathway for participants to both maintain their eligibility and make real progress towards self-sufficiency, stable employment, and economic mobility. Providers, including evidence-based models like sectoral employment programs and employment social enterprises, have increasingly pursued the “hidden secret” of SNAP E&T.

However, **challenges with SNAP E&T's statutory and regulatory framework have limited its impact** in spite of the tremendous potential of the model, and recent Farm Bill proposals have not addressed these challenges despite bipartisan efforts in the last Congress. Key issues include:

- **Participation remains low**, at only about 2 to 3 percent of SNAP participants subject to work requirements pre-OBBBA. One major reason is that the **bureaucracy of the SNAP E&T system**, ranging from data reporting to contract negotiations, is difficult for providers to navigate.
- SNAP income limits **impose a challenging benefits cliff** that excludes participants as soon as they earn more than SNAP eligibility limits, posing a major disincentive to progress on career pathways and preventing workers from completing programs like apprenticeships. There are also major **barriers for participants with past drug felonies**.
- There are **no significant incentives for the provision of evidence-based services** under SNAP E&T. Many SNAP E&T services are relatively thin, and evidence indicates that completion rates for many programs are low.ⁱⁱ
- While national intermediaries have broadened providers' participation through federal National Partnership Grants, **the current grants are set to expire in 2026 and 2027 without renewal**.

Congressional efforts on SNAP E&T can build on growing interagency efforts to align SNAP E&T with the broader set of federal workforce investments, including a recent agreement between the Departments of Labor and Agriculture to strengthen workforce/SNAP partnerships.ⁱⁱⁱ

We make the following 5 recommendations as Congress considers Farm Bill reauthorization. We are happy to share draft legislative text where relevant:

- 1) Address the SNAP E&T benefits cliff by including the bipartisan Training and Nutrition Stability Act
- 2) End the SNAP felony drug ban by incorporating the bipartisan RESTORE Act
- 3) Authorize National Partnership Grants to expand participation in SNAP E&T, following past appropriations
- 4) Create incentives to deliver evidence-based programs by incorporating the RESET for America’s Future Act
- 5) Strengthen data systems, administration, and performance measurement by building on the SNAP E&T Data and Technical Assistance Act

(1) Address the SNAP E&T Benefits Cliff

The Farm Bill must address the SNAP E&T benefits cliff that pushes out participants as soon as they earn more than the SNAP incomes threshold. As USDA has recognized, this issue requires a statutory fix and cannot be addressed in regulation.^{iv}

In 2025, Reps. Rob Bresnahan (R-PA) and Adriano Espaillat (D-NY) and Sens. Kirsten Gillibrand (D-NY) and Pete Ricketts (R-NE) and others re-introduced the **bipartisan Training and Nutrition Stability Act** ([H.R. 2974](#), [S. 1789](#)) to fix this issue by excluding participants’ earnings under SNAP E&T programs and other workforce programs.

As Sen. Gillibrand commented, “Loopholes in SNAP’s E&T program force job seekers to make an impossible choice: to participate in job training and potentially lose desperately needed nutritional assistance, or to give up employment opportunities in order to keep food on the table,”^v while Rep. Bresnahan said, “we should not punish taking advantage of learn-as-you-earn programs and forcing workers to choose between participation in proven SNAP [Employment and Training] programs and being able to receive their nutrition benefits.”^{vi}

(2) End the SNAP Felony Drug Ban

Nearly half of states impose some kind of limitation on SNAP participation for people with drug felonies, including limiting what convictions may be eligible or waiting periods.^{vii} These barriers impose an unfair, counterproductive barrier on such individuals’ effective reentry – and, because

SNAP E&T eligibility is tied to SNAP participation, a major barrier to their economic advancement.

Farm Bill reauthorization must include the bipartisan RESTORE Act of 2025 ([H.R.5223](#)), led by Reps. Steve Cohen (D-TN) and John Rutherford (R-FL) – alongside the RESTORE Act of 2023 ([S. 1753](#)) led by Sen. Cory Booker (D-NJ) in the Senate – to eliminate barriers to SNAP participation for people with drug felonies.

(3) Authorize National Partnerships Grants

Because E&T’s reimbursement model is distinct from other federal funding streams, it can be challenging for new providers and agencies to participate and for governments to administer the program: technical assistance is essential to help bridge that gap.

For the past several years, beginning in 2020, USDA has issued SNAP E&T National Partnership grants to national and local intermediaries to support expansion of SNAP E&T to serve low-income and low-skilled individuals. By leveraging the existing infrastructure of expansive national networks, these grants transform high-level federal funding into localized, accessible career pathways tailored to the unique needs of rural and urban SNAP participants. Already these grants have enabled the National Partnership organizations to enable hundreds of national providers, such as employment social enterprises, workforce boards, community colleges, and other community-based organizations, to participate in SNAP E&T and provide high-quality employment and training services to SNAP Participants. This strategic investment ensures that as work requirements expand, the supply of high-quality, specialized training providers grows in tandem, preventing service deserts and ensuring no participant is left without a viable route to access greater economic mobility.

However, the National Partnership grants have been issued under appropriated funding that lapses in 2027, threatening an enormous gap in services when this support is so keenly necessary as OBBBA implementation begins. Congress should formally authorize these grants and ensure funding of at least \$15,000,000 per year moving forward.

(4) Create Incentives for Evidence-Based Programs

We urge Congress to include incentives for the provision of evidence-based services under SNAP E&T to ensure participants and the public maximize the return on their time and financial investment. Senator Amy Klobuchar’s (D-MN) RESET for America’s Future Act of 2023 incorporates several key reforms that should be incorporated in the Farm Bill, including:

- *Match funding for evidence-based programs.* The RESET bill allows providers to count other federal funding, such as Workforce Innovation and Opportunity Act (WIOA) funding, towards the provider side of the 50/50 match so long as they are implementing a

program with a demonstrated evidence base or that is undergoing rigorous evaluation. This provision would create a major incentive to implement evidence-based approaches and to align funding streams, a continuing challenge in practice.^{viii} Another option is a competitive grants funding stream implemented by USDA.

- *Evidence-based definition.* The bill includes a definition of “evidence-based” programs aligned with the Reemployment Service and Eligibility Assessment (RESEA) program authorized by the 2018 Bipartisan Budget Act, to support a more coherent federal framework for evidence-based programs. (For reference, America Forward and Results for America recently [published a paper proposing a model definition of “evidence-based” services](#) building on RESEA.)
- *Full funding for supportive services.* States can only reimburse up to 50 percent of costs for supportive services that enable participants to engage in E&T. However, the evaluation of the congressionally-supported SNAP E&T pilots of a few years ago demonstrated the huge need for such services, such as transportation and childcare, to enable participants to complete and benefit from their SNAP E&T programs. RESET would make supportive services 100 percent reimbursable.^{ix}

(5) Strengthen Data Systems, Administration, and Performance Measurement

The data and performance infrastructure for SNAP E&T is in dire need of improvement. It is very challenging for states and providers to effectively implement, report on, and continuously improve their programs, particularly as SNAP E&T requires ongoing verification of participants’ SNAP eligibility. As FNS wrote in a grant notice in 2021 regarding SNAP E&T data, “Many States do not currently have a user friendly way to collect this data or conduct robust analyses of this data to continuously improve programs.”^x At the same time, there is very limited performance reporting available on states’ and providers’ outcomes from SNAP E&T to support effective transparency.

Congress should ensure the \$1+ billion in annual investment in SNAP E&T is effective. We encourage Congress to include the following elements in the Farm Bill:

- *Data infrastructure.* While States can leverage 100% E&T funds for data investments, we are concerned that ongoing challenges with data infrastructure have strained States’ ability to track eligibility, monitor performance, coordinate services, and ultimately improve outcomes. Since 2016, FNS has made multiple rounds of data grants funded through the appropriations process, but none since 2023. We urge Congress to incorporate Rep. Andrea Salinas’ (D-OR) SNAP E&T Data and Technical Assistance (DATA) Act ([H.R. 4347](#)) to codify and support this program with \$15,000,000 in annual funding moving forward.
- *Administration.* We urge Congress to require USDA to ensure that states establish appropriate, streamlined SNAP E&T provider eligibility processes to reduce red tape. We

encourage Congress to leverage a similar framework as the A Stronger Workforce for America Act’s proposed reforms to require states to establish procedures regarding provider eligibility for WIOA, including a requirement that “[t]his process shall be implemented in a manner that minimizes the financial and administrative burden on the provider” and that the state shall make determinations within 30 days.^{xi}

- *Performance reporting.* As the Government Accountability Office reported in 2019, “USDA lacks reliable data on participant characteristics and outcomes because of imprecise instructions on data collection forms and staff confusion at the state level. USDA has taken some steps to address these issues, but data reliability issues persist. As a result, USDA’s ability to assess whether agency goals are being met through the SNAP E&T program is limited.”^{xii} These challenges remained following an in-depth assessment, as reflected in USDA and Mathematica’s review in 2024.^{xiii} We urge Congress to require USDA to collect and annually report on state SNAP E&T participation and outcomes, including the use of standard, common data and involving disaggregation by demographics, institutionalizing and strengthening reporting under USDA’s 2024 rule.^{xiv} Congress should also require USDA to require reporting on provider-level participation and outcomes to the extent possible.

ⁱ See, e.g., Tuttle (2019), “Snapping Back: Food Stamp Bans and Criminal Recidivism,” *American Economic Journal: Economic Policy* 11(2): 301-327, available at <https://cdn.givingcompass.org/wp-content/uploads/2020/01/17153414/pol.20170490.pdf>.

ⁱⁱ See Rowe et al. (2017), SNAP Employment and Training (E&T) Characteristics Study: Final Report, Mathematica Policy Research, prepared for the U.S. Department of Agriculture, <https://www.mathematica.org/publications/snap-employment-and-training-e-t-characteristics-study-final-report>; Rowe et al. (2022), Expanding Opportunities & Reducing Barriers to Work: Final Summary Report, Mathematica Policy Research, prepared for the U.S. Department of Agriculture, <https://fns-prod.azureedge.us/sites/default/files/resource-files/SNAP-ET-FinalReport.pdf>.

ⁱⁱⁱ U.S. Department of Agriculture and U.S. Department of Labor (2025), “Memorandum of Understanding between the U.S. Department of Agriculture and the U.S. Department of Labor for Services related to the Supplemental Nutrition Assistance Program and the Workforce Innovation and Opportunity Act,” <https://www.dol.gov/sites/dolgov/files/OPA/newsreleases/2025/12/OSEC20251626.pdf>.

^{iv} <https://www.federalregister.gov/d/2020-28610/p-53>

^v See <https://www.gillibrand.senate.gov/news/press/release/gillibrand-announces-legislation-to-prevent-jobseekers-from-being-kicked-off-snap-benefits/>

^{vi} See <https://bresnahan.house.gov/media/in-the-news/bresnahan-introduces-bipartisan-training-and-nutrition-stability-act>

^{vii} See <https://drugpolicy.org/campaign/end-the-snap-drug-felony-ban-with-the-restore-act/>

^{viii} See Rowe (2022), “Considerations for Administering SNAP E&T Programs: Lessons from the SNAP E&T Pilots,” Mathematica Policy Research, prepared for the U.S. Department of Agriculture, <https://fns-prod.azureedge.us/sites/default/files/resource-files/SNAP-ET-Administration-Brief.pdf>.

^{ix} *Id.*

^x See U.S. Department of Agriculture (2021), “Supplemental Nutrition Assistance Program Fiscal Year 2021 Data and Technical Assistance (DATA) Grants Program,” https://files.simpler.grants.gov/opportunities/91c9846d-1764-4bcd-9fa4-4496a1777420/attachments/a7ac7c22-84ac-430a-a3d3-96b675f8d7b1/FFY_21_SNAP_ET_DATA_Grant_RFA.pdf.

^{xi} See Sec. 122 of A Stronger Workforce for America Act (H.R. 8210, 119th Congress), direct link at <https://www.congress.gov/bill/119th-congress/house-bill/8210/text#HAF4AE8B5CF7142C198BB2EB4396379D4>.

^{xii} U.S. Government Accountability Office (2018), *Supplemental Nutrition Assistance Program: More Complete and Accurate Information Needed on Employment and Training Programs*, <https://www.gao.gov/assets/700/696222.pdf>.

^{xiii} Robertson & Brown (October 2024), “Moving Forward to Improve SNAP E&T Data,” presentation at SNAP Employment & Training National Forum, U.S. Department of Agriculture and Mathematica, <https://fns-prod.azureedge.us/sites/default/files/resource-files/snaget-movingforward.pdf>.

^{xiv} U.S. Department of Agriculture (November 11, 2024), “Final Rule: Supplemental Nutrition Assistance Program (SNAP): Employment and Training Program Monitoring, Oversight and Reporting Measures,” 89 FR 90547, <https://www.federalregister.gov/documents/2024/11/18/2024-26809/supplemental-nutrition-assistance-program-snap-employment-and-training-program-monitoring-oversight>.