

# **Evaluation Strategies for Wisconsin's FoodShare Employment and Training Program**

**Prepared for Wisconsin Department of Health Services Division of Medicaid Services**

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## **Foreword**

This report is the result of collaboration between the Robert M. La Follette School of Public Affairs at the University of Wisconsin–Madison and the Wisconsin Department of Health Services Division of Medicaid Services, a state agency. The objective of this project is to provide graduate students at the La Follette School the opportunity to improve their policy analysis skills while contributing to the capacity of partner organizations.

The La Follette School provides students with a rigorous two-year graduate program leading to a master’s degree in public affairs. Students study policy analysis and public management, as well as concentrated study in at least one policy area. The authors of this report are in their final semester of their degree program and are enrolled in the course Public Affairs 869 Workshop in Public Affairs at the University of Wisconsin–Madison. Although studying policy analysis is important, there is no substitute for engaging actively in applied policy analysis as a means of developing policy analysis skills. The Public Affairs 869 Workshop gives graduate students that opportunity.

The Department of Health Services Division of Medicaid Services supports the state’s provision of critical public supports by administering the systems that serve families in communities. The Department has an ongoing focus on quality improvement, including through research partnerships with the University of Wisconsin–Madison. The State of Wisconsin has a strong history of working with La Follette School of Public Affairs students to perform rigorous research. This report includes interviews, reviews of studies, and administrative research, with the goal of helping the Department to improve the quality of support services for families statewide.

I am grateful to the Department for partnering with the La Follette School on this project. Department staff have been exceptionally generous with their time to support this project, including collaborating on data, interviews and processes. The students have collectively contributed hundreds of hours to this project, and in the process developed critical insights about key programs. The La Follette School is grateful for their efforts and hope that this report proves valuable for the Department and the State of Wisconsin to improve the outcomes of families.

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May 2018  
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## List of Abbreviations

<b>ABAWD:</b>	Able-bodied adult without dependents
<b>CSPED:</b>	Child Support Noncustodial Parent Employment Demonstration
<b>DHS:</b>	Department of Health Services
<b>DWD:</b>	Department of Workforce Development
<b>FPL:</b>	Federal Poverty Level
<b>FNS:</b>	Food and Nutrition Service
<b>FSET:</b>	FoodShare Employment and Training
<b>IM:</b>	Income maintenance
<b>IRP:</b>	Institute for Research on Poverty
<b>RFS:</b>	Request for Services
<b>SNAP E&amp;T:</b>	Supplemental Nutrition Assistance Program Employment and Training
<b>SNAP:</b>	Supplemental Nutrition Assistance Program
<b>USDA:</b>	United States Department of Agriculture
<b>W2:</b>	Wisconsin Works
<b>WIOA:</b>	Work Innovation and Opportunity Act
<b>WDA:</b>	Workforce Development Area

## Executive Summary

Employment and training programs play an increasingly important role in federal and state efforts to transition more able-bodied working-age adults without dependents enrolled in safety net programs into the labor force. Wisconsin is expanding the work requirements that certain working-age FoodShare beneficiaries must satisfy to receive benefits. The changes include applying the work requirement to able-bodied working-age adults with dependents and increasing the number of hours participants must work or participate in an employment and work training program in order to receive benefits. The success of these federal and state efforts is largely dependent on the effectiveness of the employment training and placement services that they provide.

As the State of Wisconsin implements these changes, the Department of Health Services (DHS) will evaluate the training and employment program for FoodShare – the FoodShare Employment and Training (FSET) program – to determine whether it improves employment and earnings outcomes and increases self-sufficiency.

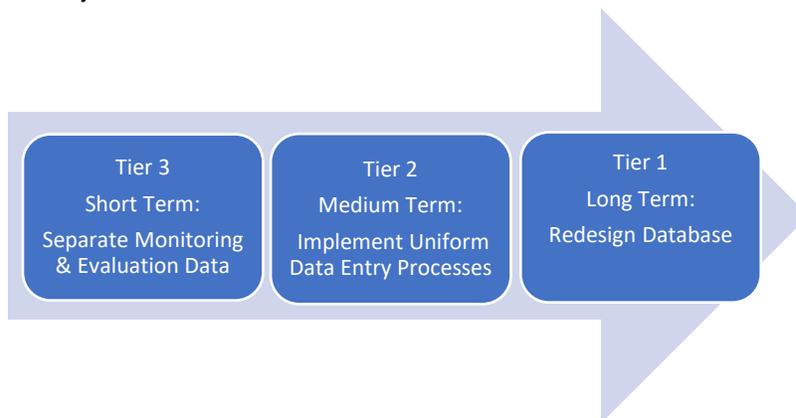
This report provides an assessment of the programs offered in Wisconsin including an overview of FSET, a review of the efficacy of FSET training activities, and an explanation of data sources, outcomes, and measures. The report concludes with recommendations DHS can implement over the short, medium, and long-term to conduct a quality evaluation of FSET.

Currently, the work requirement applies to only able-bodied working-age adults without dependents, also known as ABAWDs. FSET provides ABAWD FoodShare participants with opportunities to satisfy their monthly work requirement. Research has found mixed results regarding the impact of employment and training activities on participants' earnings and employment outcomes. The review concludes that offering participants comprehensive education and job-training services focused on in-demand occupations is the best way to ensure participants find gainful long-term employment.

DHS data collection is labor-intensive and overly complex due to federal regulations, outdated data storage, and reliance on third-party vendors to acquire earnings and employment data. Additionally, the accuracy of data regarding participation in FSET activities is sometimes diminished by inconsistent data entry practices among case managers. DHS must address these challenges to ensure it collects accurate earnings, employment, and participation data with which to evaluate FSET.

This report identifies recommendations for addressing unreliable and insufficient data collection, outdated data storage infrastructure, and methodology limitations. These recommendations vary in the time and resources necessary to complete. This report organizes its recommendations into three tiers based on the time, labor, and resources required to effectively implement. Figure 1 summarizes recommendations and tiers.

**Figure 1: Summary of Recommendation Tiers**



We hope this report provides DHS with valuable insights as it continues planning its FSET evaluation to determine the best way the program may serve enrollees transitioning to employment.

## Introduction

Over the past two decades, U.S. public policy shifted its focus on how to best aid low-income people, largely replacing open-ended cash and in-kind assistance with conditional assistance dependent on labor force participation paired with training programs to encourage employment. Wisconsin led the way in implementing these changes, with the Wisconsin Works program being cited as a model for federal welfare reform in 1996.

Since then, workforce and education training programs have become an invaluable resource to enrollees of safety net programs. Participation in such programs allows enrollees to satisfy the work requirement for assistance programs in lieu of employment and potentially improve skills, employment prospects, and future earnings.

The federal government is encouraging states to transition more low-income adults into the labor force by expanding work requirements to more “able-bodied” adults, increasing penalties for idleness, and lengthening the hours required to satisfy a work requirement. Indeed, an executive order issued April 10, 2018, specifically called for changes to safety net programs that

“improve employment outcomes and economic independence (including by strengthening existing work requirements for work-capable people and introducing new work requirements when legally permissible)” (Exec. Order No. 13828)

As states experiment with improving labor force participation for beneficiary populations, beneficiaries will increasingly rely on training programs to satisfy work requirements, continue receiving public support, and find gainful employment. Therefore, it is important to determine whether such programs actually improve employment outcomes for beneficiaries.

This report provides a set of recommendations for the Wisconsin Department of Health Services (DHS) Division of Medicaid Services to assess its FoodShare Employment and Training (FSET) program, including how activities may influence participant employment status, education outcomes, earnings, and reliance on safety net programs.

In Wisconsin, FoodShare is the state’s Supplemental Nutrition Assistance Program (SNAP), a federal program providing food assistance administered at the state level. Recent changes in the program have expanded work requirements that certain participants must fulfill to receive benefits.

As of April 2015, able-bodied adults without dependents (also labeled as “ABAWDs”) must satisfy a work requirement to continue receiving FoodShare benefits. ABAWD refers to working-age adults ages 18 to 49 who do not have a dependent and are not defined as being unable to work due to pregnancy, mental illness, homelessness, or participation in a drug/alcohol rehabilitation program. A dependent is defined as either a child younger than 18 living in the household or a member of the household who is unable to care for themselves. Qualifying dependents could include someone’s own children, children of roommates or live-in partners, or an elderly or disabled family member. Able-bodied adults *with* dependents are exempt from the requirement. If these participants do not satisfy the requirement, FoodShare benefits become time-limited to three months of benefits in any three-year period. ABAWD participants who are not employed can satisfy the requirement by completing 80 hours of education or job-training activities each month.

Like many states, Wisconsin is proposing changes similar to those being discussed at the federal level that would alter work requirements for major welfare programs. State agencies administering such programs are developing systems and tools to assess the effectiveness of these policies. State agencies also must determine if the benefits provided by education or job-training activities justify the costs to the state. Given variations in the implementation of programs within and across states, having robust program evaluation tools is important to understand the effects of FSET program participation.

## **SNAP and FoodShare**

The Federal Food Stamp Act of 1964 created the Food Stamps program, which was meant to provide low-income people with fresh, healthy food. By 1974, the program had expanded to all 50 states. In 2008, the Food Stamp program was renamed the Supplemental Nutritional Assistance Program (SNAP). Similar to other federally mandated programs, SNAP is funded at the federal level, but administered at the state level.

FoodShare is Wisconsin's SNAP program. While the program is mostly administered at the local level, the federal government funds benefit payments. Households with gross incomes below 200 percent of the poverty line are eligible to receive benefits (Wisconsin Department of Health Services 2017). Households with a blind, elderly, or disabled member with a gross income over 200 percent are still eligible to receive FoodShare benefits if the net income is below 100 percent of the poverty line and the person has less than \$3,500 in assets (Wisconsin Department of Health Services 2017). In 2017, FoodShare distributed \$867 million in benefits to 925,047 recipients, including more than 386,000 children (Wisconsin Department of Health Services 2018).

### **The FoodShare Employment and Training Program (FSET)**

The federal government requires every state to administer an employment and training program for its SNAP recipients, referred to as a SNAP E&T program. States have some discretion in administering this program regarding the services provided, populations served, methods of service delivery, and whether people are required to participate to avoid sanctions. Wisconsin's SNAP E&T program is called the FoodShare Employment and Training (FSET) program. In 2015, the State of Wisconsin implemented a work requirement for able-bodied adults without dependents – ABAWDs – wishing to receive FoodShare benefits, and FSET became one of several options available for satisfying that requirement.

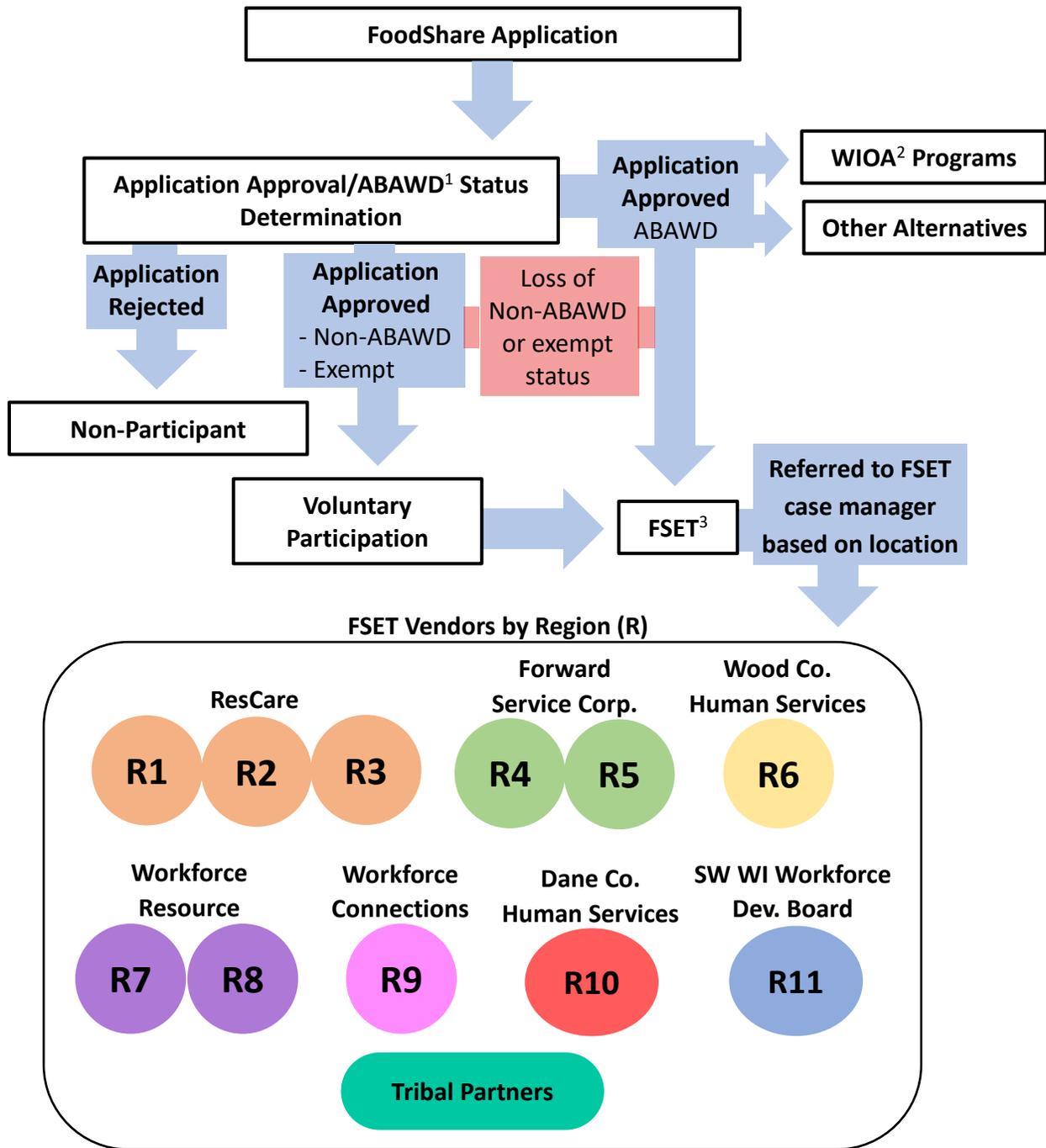
#### **Work Requirements**

There are three ways to satisfy the FoodShare work requirement in Wisconsin:

1. Work at least 80 hours each month, or
2. Take part in a qualifying work program such as FSET, Wisconsin Works (W-2), or certain programs under the Workforce Innovation and Opportunity Act (WIOA) at least 80 hours each month, or
3. Work and take part in an eligible work program for a combined total of at least 80 hours each month. (Wisconsin Department of Health Services 2017)

All beneficiaries subject to the work requirement receive a referral to FSET, but not all participate in the program. Some elect to satisfy their work requirement another way. While this report focuses on only FSET participants, crossover exists among other state programs. The FSET enrollment process is relatively straightforward. See Figure 1. After a person applies for FoodShare, a case worker determines if the work requirement is applicable. If so, the case worker refers the person to the FSET program.

Figure 2: FSET Application Process



Source: FSET Employee Handbook, 2018, Wisconsin Department of Health Services

<sup>1</sup> ABAWD: Able-bodied adult without dependents

<sup>2</sup> WIOA: Workforce Innovation and Opportunity Act

<sup>3</sup> FSET: FoodShare Employment and Training

After a FoodShare enrollment office refers a participant to FSET, an FSET case manager contacts the participant through mail or telephone to schedule an orientation appointment. During orientation, the potential FSET participant learns about available training options. If the participant decides to enroll in

FSET, the case manager conducts a personalized assessment to determine the person’s strengths, needs, employment preferences, job readiness, educational attainment, and any existing employment barriers. Following the assessment, the case manager assigns the participant to suitable employment and training activities, or components, which are discussed in the following sections.

## **Lessons from Other SNAP E&T Evaluations**

Before discussing the efficacy of individual program components meant to increase labor force participation as a requirement for receiving public aid, the effect of overall programs should be examined. In 1988, the federal Food and Nutrition Service (FNS) commissioned a study to analyze the SNAP Employment and Training (E&T) program. The evaluation followed 12,000 non-exempt work registrants who were assigned to randomized treatment and control groups in 53 program sites in 12 states (Kogan, Paprocki and Diaz 2016). Originally, SNAP E&T programs focused on low-budget programs that encouraged participants to find work quickly by requiring participation in job search and job search training components. Such programs were capable of creating short-term increases in employment and earnings, as well as reductions in reliance on public assistance. However, the results didn’t last much longer than participation in the program. The study found no evidence that the SNAP E&T program increased the likelihood of participants finding jobs. The study also failed to find any evidence that the program had any significant effects on hourly wages, hours worked per week, or length of job retention for those who did find employment.

No other comprehensive study was performed until 2009 when the Labor Market and Career Information (LMCI) Division of the Texas Workforce Commission released findings from a five-year study of its SNAP E&T program. The study found that the number of participants working at the end of the study was not significantly different from the percentage that had been employed at the beginning of the study (47 percent and 49 percent, respectively). Average quarterly earnings for those who participated in the study were about \$1,400 higher after completing the program, but the study found that the increased earnings were not enough to pull participants out of poverty (Kogan, Paprocki and Diaz 2016). More importantly, the applicability of this study is dubious at best because only 150 study participants out of 22,000 had participated in anything other than job search assistance. The study may be useful in determining the efficacy of job search assistance, but it does very little to examine the impacts of the SNAP E&T program as a whole.

## **Employment and Training Components**

Employment and training activities offered through FSET are organized into six components aimed at improving skills and educational attainment while also satisfying work requirements. The following section provides explanations of each component as well as a brief review of the relevant literature. Additional information is in Appendix 1, and a more detailed list of FSET components is in Appendix 2.

### *Job Search and Job Search Training*

The job search and job search training component is designed to support participants who are searching for employment, specifically those in need of general guidance with the job search process. People who complete this component receive assistance in, “developing, practicing, and applying job seeking skills with the goal of securing employment.” (Wisconsin Department of Health Services 2017) Activities include:

- Job development and placement
- Participation in job clubs
- Learning and practicing interview skills
- Resume development assistance

Research shows mixed results for the efficacy of job search assistance and job search training programs, specifically in improving earnings and employment outcomes. Certain studies indicate that job search activities increase short-term earnings but have muted impacts on long-term employment prospects and earnings (Kogan, Paprocki and Diaz 2016). Research identifies placement support, which uses employment agencies to find participants immediate employment, as one activity that affects short-term earnings but has little-to-no effect on long-term outcomes (Autor and Houseman 2006). Some studies show impacts on short-term outcomes while others show long-term benefits. Overall, research is inconclusive on which job search activities have the greatest impact on earnings and employment.

### *Education*

FSET provides education services to beneficiaries or financial assistance to beneficiaries attending a post-secondary education institution. The increase in technical skills required for many jobs has changed the program paradigm from an emphasis on general education to an emphasis on transferable, hard skills. Activities categorized under the education component include:

- Adult basic education
- Customized skills training
- Job skills training
- Vocational literacy
- English-as-a-second language
- Higher education
- High school equivalency diploma
- Driver's education

Measurements of education programs' effect on earnings and self-sufficiency show mixed results. D'Amico (2006) shows that classroom learning increases earnings and employment over the long-term if the education focuses on job-specific skills in a highly sought-after field. Education activities not focused on specific skills for high-demand occupations did not affect participant earnings or employment outcomes. Additionally, Heinrich (2008) finds that attending educational programming lowers participant earnings and employment due to the time spent in classrooms as opposed to time actually earning a wage. The long-term effects of such programs may not make up for the opportunity cost of attending class.

### *Workfare*

Workfare allows participants to build basic skills, employer references, and work history by placing them in an unpaid position with a public or nonprofit employer. Only FSET participants subject to the work requirement are allowed to take part in this component. FSET usually matches participants with placements requiring little training. FSET establishes relationships with public and nonprofit employers to provide placements, such as parks and sanitation departments, hospitals, and religious organizations. It is forbidden to subsidize wages for participants in workfare with FSET funds.

### *Work Experience*

Work experience offers participants opportunities for job-shadowing or short-term placement in a work or training site. Ideally, work experience assignments expose participants to different employment opportunities and ease transition to regular employment. This component includes transitional employment and community service. FSET places participants with public or private employers. Work experience activities must not prevent or replace regular employment. Additionally, work experience participants are entitled to the same benefits and work conditions provided regular employees for comparable work. FSET is statutorily required to oversee and evaluate workplaces to ensure they provide quality placements for participants and comply with requirements mentioned above.

Transitional employment increases short-term earnings but has no impact on long-term outcomes. Transitional employment also increases self-esteem and life stability, which improves self-sufficiency

(Kirby 2002). However, research shows the most effective work experience programs connect participants to regular, long-term employment opportunities (Hamilton 2012).

### *On-the-Job Training*

A small number of FSET enrollees participate in on-the-job training, in which other allowable programs subsidize wages of participants hired for regular, full-time positions with training opportunities conducted by an employer. Employers may be public, nonprofit or private for-profit organizations. FSET is prohibited from using its funding to subsidize participant wages. For participants enrolled in on-the-job training, FSET requires wages to be subsidized by specific public programs, such as WOIA or W-2.

Evaluations by the U.S Department of Labor and independent researchers find “on-the-job training is the most efficacious service for both adult women and men for whom this service activity was recommended” (U.S. Department of Labor 2014) (D’Amico 2006). A review of previous evaluations of on-the-job training demonstrations found on-the-job training creates lasting impacts on participants’ outcomes, including increased earnings, reduced reliance on public assistance programs and lower long-term poverty (Dutta-Gupta, et al. 2016). The review also identified programs with interventions longer than 14 weeks have a high likelihood of producing increased earnings for participants, meaning benefit duration could affect participant outcomes (Dutta-Gupta, et al. 2016). Programs with longer interventions or complementary supports such as retention services may be likely to improve earnings, but more research must be done to confirm this potential finding (Dutta-Gupta, et al. 2016).

### *Self-Employment*

Participants enrolling in self-employment receive technical assistance for starting their own businesses. This aid includes:

- Creating a business plan
- Locating financial resources, including low-cost loans and grants
- Resolving credit problems
- Developing successful marketing strategies

Self-employment services may be provided to participants for no more than 90 days after they no longer qualify for FoodShare. Independent research analyzing the effectiveness of self-employment strategies is lacking.

### *Job Retention*

This component assists employed FSET participants with transitioning into the labor force. Participants receive aid to maintain employment, meet workplace demands, and successfully meet employer expectations. The specific activity provided depends on participant need. For example, under this component, FSET is able pay for dry cleaning costs for a work uniform or provide transportation services for participants who need to travel to work but do not have an automobile or other mode of transportation. Participants are able to access these services for no more than 90 days after they first secure employment, regardless of whether they are still eligible for FoodShare. Butler et al. (2012) posits participants with barriers to employment – such as a criminal record – have particular trouble satisfying workplace and employer demands, so retention services is likely a crucial determinant on whether these participants maintain sustainable employment.

## **Summary of Components and Research**

FSET procedures seek to ensure case managers spend time and effort to effectively match participants with education and training activities based on their goals and preferences. This often entails enrolling FSET participants into more than one component. According to DHS data, in May 2017, over

70 percent of FSET participants enrolled in at least two components and 20 percent enrolled in three or more components.

#### *State Comparison*

In addition to the literature review of basic SNAP E&T components, an analysis of surrounding states is instructive. Examination of SNAP E&T practices within Illinois and Minnesota found similar outcome expectations; however, implementation is hardly consistent.

#### *Minnesota*

Minnesota's program offers many of the same services as Wisconsin's, but implementation varies. For example, while the FSET program is administered by regional vendors in Wisconsin, Minnesota's program operates at a county level. Similar services are offered, including job search assistance, training, education, and support services. The intake procedure in Minnesota is different in that each participant goes through an exhaustive interview in which rankings are assigned based on various categories such as financial support, home life, and access to transportation. Ideally, participants are then matched with programs to supplement the categories in which they were ranked lowest (Minnesota Department of Human Services).

In addition, Minnesota's program uses a form of enforcement in which financial penalties are placed on participants who fail to meet certain requirements. Wisconsin and Minnesota share a disqualification process. For example, when a person fails to attend orientation into the program, that participant is subject to separation from the FSET program as well as the potential removal of SNAP benefits.

#### *Illinois*

In 2017, the state of Illinois was under a federal waiver that allowed it to temporarily suspend the mandatory work requirement for its SNAP participants. The waiver has not yet been approved for 2018. Despite the federal ABAWD waiver, 29 counties operated a mandatory SNAP E&T program. ABAWDs in these counties risked losing their benefits if they failed to comply with the work requirement (Illinois Hunger Coalition 2017).

The regular SNAP E&T program requirements in Illinois are similar to those in Wisconsin. However, Illinois offers a spinoff program called EPIC, which is a program aimed at providing employment opportunities, personalized services, individualized training, and career planning. EPIC operates in five regions across Illinois as a collaboration between the Illinois Department of Human Services, the Illinois Department of Commerce Job Training and Economic Development, and Illinois Businesses (Illinois Department of Commerce 2017). No comprehensive analysis has been completed regarding the effects of the program, therefore a direct comparison cannot be made.

#### *Direct Comparison*

While other states may use the same basic structure for SNAP E&T programs, the actual implementation is quite different. In addition, the demographics between states are significantly different so a direct comparison should not be drawn. Cost of living, transportation mechanisms, and available public aid financed at the state level are inconsistent among states. The EPIC program in Illinois may provide comprehensive data regarding the effects of collaboration between multiple organizations, but to date, no such analysis has been completed. Due to the inconsistent method in which SNAP programs are administered by each state, no direct comparison could be drawn from comparing the implementation process between any group of states. Any analysis or recommendation should come from within programs focused on populations in Wisconsin.

## **FSET Vendors and Implementation**

FSET program implementation is divided among 11 regions, corresponding to the state's Workforce Development Areas. Independent vendors provide employment and training services in each region and are responsible for coordinating with employers, hiring caseworkers, and collecting administrative data. Vendors range from for-profit companies with experience operating similar welfare programs to nonprofit workforce development boards and county governments. Appendix 3 includes a map of vendors assigned to each development region. Vendors offer activities based on the opportunities and resources available in the region where they operate.

## **Evaluating the FSET Program**

This section provides an overview of data sources in greater detail, including the processes used by DHS and outside vendors to collect and access data, the purpose of each data collection activity, and difficulties inherent to data access and utilization.

### **Overview of Current Data Sources and Collection Methods**

DHS collects data from various sources to meet its statutory reporting responsibilities, monitor policy adherence, and evaluate participant outcomes. These sources can be divided into five broad categories: The FoodShare and FSET administrative databases, the Wisconsin Department of Workforce Development's (DWD) wage records database, FSET regional vendor records, FSET regional vendor caseworkers, and FSET participants.

#### *FoodShare and FSET Administrative Data*

Administrative data for the FoodShare and FSET programs are stored within separate online systems. The FoodShare data system, known as CARES Worker Web (CWW), contains various information regarding each FoodShare participant, including demographics, the number of adults and children in each household, and the monthly benefit received by each participant. This information is entered by county enrollment/benefit staff when a person applies to participate in the program. DHS staff have the ability to view individual and aggregate level participation records within CWW, while FSET vendor staff members are able to view only individual level records. The FSET data system, known as the FSET Tool, contains information such as the date a participant is referred to the program, activities the person participates in to fulfil his or her work requirement, and the number of hours of participation a person completes each month. This information is entered by county benefit/enrollment staff at the time a person is referred to the program as well as by FSET regional vendor staff during a person's participation in the program. DHS staff and regional FSET vendor staff have access to the FSET Tool.

The current data systems have two key limitations. First, data are collected as monthly snapshots of program participation and are not integrated into an annual report within the database. For example, one participant will have a unique entry in the database for each month that he or she has participated in either FoodShare or FSET. Aggregating monthly data is complicated and time consuming. Second, the FoodShare and FSET data systems were created independently and at a time when it wasn't necessary to integrate data from the two programs for evaluation purposes. As a result, it is very difficult for DHS staff to produce reports using participant data from both programs. However, to satisfy its federal reporting responsibilities, DHS must be able to match participant characteristics data in the FoodShare data system with data regarding participation in employment and training activities in the FSET data system. DHS does not possess the necessary personnel and resources to create annual data from monthly snapshots or to integrate data from the FoodShare and FSET data systems. Therefore, the department relies on Deloitte Consulting, a third-party data management firm, to perform these services. To obtain curated data from Deloitte, DHS must submit a request for services (RFS). The cost of each request depends on the personnel time required to fulfill it. Currently, the DHS submits two separate requests each year. The first

RFS concerns data related to participation in the FSET program, including the number of people referred to program, the number of participants, participants' demographic characteristics, and the types of employment and training activities in which the participants engage. The second RFS concerns necessary information to match FSET participant data to employment and income data collected by the Wisconsin Department of Workforce Development (DWD).

These administrative data systems are among the best sources of information for evaluating the FSET program due to the availability of information on all participants, including demographic characteristics and records of program participation. Additionally, this information can be matched with other agency databases using participants' social security numbers. However, administrative data is not without limitations. Participant data is entered into these databases by hundreds of different caseworkers employed by seven different vendors in eleven regions throughout the state. As a result, there is often a lack of uniformity in how the data is entered. For example, a caseworker in one region may record a computer literacy class as an education activity while a caseworker in another region may enter it as a job training activity. This reduces the overall accuracy of the data and must be considered when utilizing it for evaluation purposes.

#### *Department of Workforce Development Wage Records*

The federal government requires DHS to report the employment status and earnings of FSET participants in the second and fourth quarters after program completion. DHS obtains administrative data managed by the Institute for Research on Poverty (IRP) at the University of Wisconsin-Madison. IRP has access to a wide variety of state and federal agency databases including wage records from the Wisconsin Unemployment Insurance Program. DHS contracts with the IRP to obtain data regarding the number of and the median quarterly earnings of FSET participants who are in unsubsidized employment. DHS provides IRP with participant data based on reports from Deloitte Consulting. IRP matches participant records to employment data to produce a report for DHS containing employment and income data for FSET participants. DHS generates this report annually to satisfy federal requirements.

#### *Regional FSET Vendors Records*

To monitor policy compliance and identify service-provision trends, DHS reviews records maintained by each regional FSET vendor (Wisconsin Department of Health Services 2017). Vendor invoices are reviewed on a monthly basis to detect questionable spending or notable trends that need to be addressed with corrective action. Such invoices may be used for monitoring as well as evaluation. DHS staff visit each regional FSET vendor and at least one tribal partner once per year to evaluate whether practices at each site reflect standard operating procedures. Prior to each site visit, DHS reviews a sample of referral, enrollment, and disenrollment case records from each regional FSET vendor. This allows DHS staff to identify potential concerns before conducting each site visit. Additionally, the sample is useful for monitoring purposes. However, the information should not be used in a rigorous evaluation because it represents only a small sample of the overall information available. Each regional FSET vendor is also required to submit quarterly reports to DHS describing participant activities and employer partnerships within their region. These reports are useful for monitoring policy compliance by regional FSET vendors but should not be used in a rigorous evaluation because they contain primarily qualitative information that is difficult to compare across regions.

#### *Regional FSET Vendor Caseworkers*

DHS gathers information from FSET vendor caseworkers to assess trends in service provision and policy compliance (Wisconsin Department of Health Services 2017). Prior to each annual vendor site visit, the DHS distributes an online survey to each caseworker employed by that particular vendor. The survey contains 27 questions covering a variety of topics including the respondent's caseload, trends relating to the size of that caseload, the employment and training activities being provided to participants, and the supportive services available to participants. When utilizing information collected through this survey, DHS should be aware of the response rate. In 2018, FSET vendors distributed the caseworker

survey to 163 individuals. However, vendors collected only 49 responses, resulting in a response rate of approximately 30 percent. Therefore, the responses collected do not necessarily reflect the views and experiences of all FSET caseworkers.

During each onsite visit, DHS staff meet with caseworkers to discuss service delivery trends, coordination with income maintenance agencies, and best practices for that FSET region. DHS uses information collected during these discussions to create recommendations for process improvement. Information gathered from individual FSET caseworkers is useful for monitoring purposes but should not be used in a rigorous evaluation because it may not represent the views and experiences of all FSET caseworkers employed by a particular vendor.

#### *FSET Participants*

DHS gathers information directly from FSET participants to assess their experiences in the program, the barriers faced in finding and maintaining employment, and the services they do or do not receive through the program (Wisconsin Department of Health Services 2017). Before each annual vendor site visit, DHS distributes an online survey via email to FSET participants enrolled at that time by that particular vendor. The survey contains 30 questions covering various topics, including history of program participation, employment status, resources needed to find or maintain employment, and the types of employment and training activities the participant is engaging in through FSET. Most of the questions in the survey provide DHS with information regarding whether each FSET vendor is implementing standard operating procedures. In 2018, DHS added several questions to collect information that could be used to evaluate the program's effectiveness.

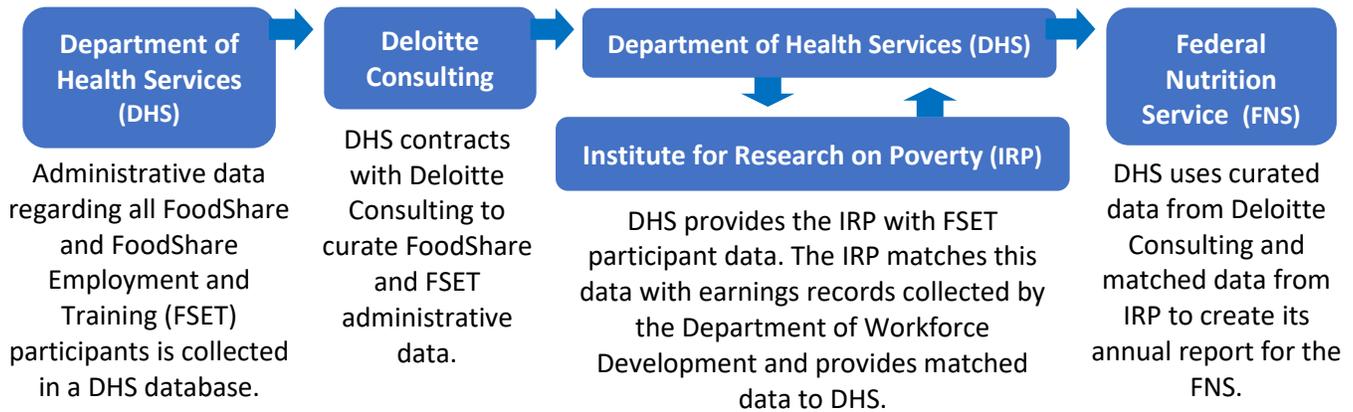
DHS distributes the survey to only those participants who have a valid email address on file. In 2018, FSET distributed the survey to 5,569 FSET participants, which is roughly half of the average number of participants enrolled at any given time during an average year. Of the 5,569 participants who received the survey, only 282 completed it, resulting in a response rate of approximately 5 percent of participants who received the survey and less than 3 percent of total FSET participants at any given time. Due to these low response rates, the participant survey may be a useful tool for monitoring policy compliance, but the data collected is most likely not representative of the entire FSET participant population. Therefore, it should not be used for evaluation purposes without significant improvements in response rates.

During each regional vendor site visit, DHS staff meet with participants to discuss their interactions with FSET staff, the services offered to them, and the barriers they face when trying to find and maintain a job. DHS uses information collected during these discussions to create process-improvement recommendations for each regional vendor. Information gathered from individual FSET participants is useful for monitoring purposes but should not be used in a rigorous evaluation because it may not represent the views and experiences of all FSET participants being served by a particular vendor.

#### **DHS Reporting Responsibilities**

Under Section 4022(a)(2) of the Agricultural Act of 2014, states must report data regarding participant outcomes following participation in SNAP E&T programs, such as Wisconsin's FSET program, to the FNS. In accordance with this rule, DHS must submit an annual report to the FNS containing a variety of information, including participant demographics, the number and percentage of participants who completed each type of employment or training activity, and median earnings of former participants. See Appendix 4 for a detailed list of the data required by the FNS. Annual reports are due to FNS no later than January 1 following the close of the federal fiscal year. Figure 1 illustrates the process by which the DHS collects the required data.

**Figure 3: DHS Data Collection for FNS Reporting Requirements**



*Source: State of Wisconsin FoodShare Employment & Training Program Plan: Federal Fiscal Year 2018, 2017, Wisconsin Department of Health Services*

### Key Challenges of Evaluating FSET

DHS would like to be able to evaluate the effectiveness of the FSET program based on five participant outcome goals:

1. Increased participant educational attainment. This is measured using the number of general education development (GED) credentials, certifications, etc., earned by participants.
2. Increased rate of employment among participants. This is measured using the number and percentage of former participants in unsubsidized employment during the second and fourth quarter after completing their involvement in FSET.
3. Increased longevity of employment by participants. This is measured using the number and percentage of participants in unsubsidized employment during the second and fourth quarter after completing their involvement in FSET.
4. Increased participant wages over time. This is measured using the median quarterly earnings of all participants during the second and fourth quarter after completing their involvement in FSET.
5. Decreased reliance on other public assistance programs by participants.

DHS faces three significant challenges to measuring achievement of these goals: significant heterogeneity in service delivery, the inherent limitations of its pre-post evaluation structure, and the lack of an appropriate comparison group. Seven unique vendors administer the FSET program by providing services in 11 regions throughout Wisconsin. Each vendor is responsible for providing services related to the six component categories. However, the services provided within these categories differ based on a variety of factors, including the region in which the services are provided, the vendor providing the services, and the specific location of the facility where the participant receives services. For example, 15 unique activities can be used to meet the educational and vocational training component. Additionally, FSET participants engage in numerous activities across multiple component categories, creating countless combinations of services. The significant heterogeneity of services and service combinations provided to participants makes evaluation extremely challenging because the standards of effectiveness applied to one activity may not be relevant to other activities. Also, the fact that FSET participants often engage in more than one activity necessitates an examination to determine whether certain combinations of activities are more effective than others.

The second challenge of evaluating the FSET program is the inadequacy of the pre-post evaluation structure that is often used to study the impacts of other SNAP E&T programs (Rosenbaum and Bolen 2016). This approach calls for collecting baseline data regarding key outcomes when a person begins participation in the program and comparing that data to participant outcomes after completion. A pre-post evaluation structure cannot prove that a certain intervention caused a certain outcome because it cannot isolate the impact of the treatment – in this case participating in a SNAP E&T program – from the impacts of other aspects of a person’s life. Changes in employment status, education, and earnings may be caused by participation in the program or they may be caused by other factors, including maturation, secular trends, and regression to the mean (Rosenbaum and Bolen 2016). Maturation refers to the possibility that changes in behavior and circumstances can simply be the result of the passage of time and would have occurred with or without the treatment. Secular trends include overall unemployment rates and the strength of the economy. These factors are independent of participation in a SNAP E&T program but can have significant impacts on participant outcomes. Regression to the mean refers to the fact that a baseline observation may be an extreme point relative to a person’s overall trajectory and that an individual is unlikely to remain at that extreme point for an extended period. For example, people tend to rely on nutrition assistance programs due to unexpected circumstances such as sudden loss of employment (Rosenbaum and Bolen 2016). Therefore, increases in wages after participation in a SNAP E&T program may simply reflect the fact that an individual has found new employment and has returned to his or her regular income trajectory.

To overcome the inadequacies of the pre-post evaluation approach, researchers often compare program participants to a control group, which is a group of people who are very similar to the participant group except for the fact they have not participated in the program. However, there is currently no suitable control group in which employment, education, and earnings outcomes can be compared to the outcomes of FSET participants. People who are referred to FSET but do not enroll in the program share many characteristics with people who complete the program. However, comparing the outcomes of these two groups ignores the possibility that an individual’s reasons for not participating in the program may be linked to the very outcomes that are being evaluated. This makes it very difficult to establish a causal link between participation in FSET and improved employment, education, and earnings outcomes.

Every state is federally required to offer employment and training opportunities for people in Supplemental Nutrition Assistance Programs. However, these programs, as well as job opportunities and economic conditions, vary widely from state to state. The variance among states makes direct comparisons of participant outcomes across state lines inherently difficult. Therefore, the most accurate comparison group would be one found in Wisconsin. This would seem to suggest that people who participate in other job training programs in Wisconsin, such as those funded by the Workforce Innovations and Opportunity Act (WIOA), represent another potential comparison group. However, ABAWD FoodShare recipients are permitted to utilize a combination of FSET and WIOA programs to fulfill work requirements. The participant cross-over between the two programs makes it difficult to isolate the impact of either program.

All current and future endeavors to evaluate the FSET program’s effectiveness should attempt to address the concerns raised in this section. Otherwise, these challenges will make the true impacts of program participation very difficult to determine.

## Recommendations

DHS faces numerous challenges as it attempts to evaluate the FSET program’s effectiveness. No single solution will resolve all challenges and many of them can be addressed only through a significant commitment of time and resources. In this section, we present three tiers of recommended changes that require varying levels of commitment. Tier three recommendations can be implemented in the near future without significant additional resources. Tier two recommendations require intermediate levels of additional time and resources. Tier one contains long-term recommendations that require significant additional resources.

### Tier 3 Recommendations: Immediate changes requiring few additional resources

The following recommendations can be implemented in the near-future without significant additional resources. These recommendations are not mutually exclusive. Each one addresses a unique evaluation challenge and can be implemented simultaneously with the other recommendations.

#### *Monitoring vs. evaluating data*

DHS collects data from various sources to evaluate the FSET program’s effectiveness and monitor policy compliance. It is important to ensure that DHS staff properly utilize each data source based on the extent to which the data is generalizable to the program as a whole. For example, a reliable data source that contains information on all or most of the participants in the program would provide very useful information in a rigorous evaluation of FSET because conclusions drawn from that data would apply to all or most of the program’s participants. This information would also be useful for monitoring policy compliance. On the other hand, a reliable data source that contains information on a small non-random sample of the participant population may not provide useful information for a rigorous evaluation because it cannot necessarily be generalizable to the population as a whole. However, such a data source may still provide information that would allow DHS to monitor whether regional FSET vendors and department staff are complying with the appropriate policies and procedures. Table 2 shows the appropriate use for each FSET data source.

**Table 1: Appropriate uses for FSET data sources**

<i>Data Source</i>	<i>Use</i>	
	<b>Monitoring</b>	<b>Evaluation</b>
<i>FoodShare and FSET Administrative Data</i>	√	√
<i>DWD Wage Records</i>	√	√
<i>Vendor Records: invoices</i>	√	√
<i>Vendor Records: vendor reports</i>	√	
<i>FSET Caseworker survey</i>	√	
<i>FSET Interviews with caseworkers</i>	√	
<i>FSET Participant survey</i>	√	
<i>FSET Interviews with participants</i>	√	

Source: State of Wisconsin FoodShare Employment & Training Program Plan: Federal Fiscal Year 2018, 2017, Wisconsin Department of Health Services

Data from the FoodShare participant database, the FSET participant database, and the DWD wage records database is suitable for use in a rigorous evaluation as well as for monitoring policy compliance because both contain individual-level information regarding all FSET participants. Therefore, conclusions based on these sources are generalizable to the FSET program as a whole. Monthly invoices submitted by vendors are suitable for use in a rigorous evaluation to compare the billing practices of each vendor. Quarterly reports submitted by vendors are suitable for monitoring policy compliance but should

not be used in a rigorous evaluation because the information they contain is qualitative in nature and is not easily comparable across regions. Data collected using the current participant and caseworker surveys is not suitable for use in a rigorous evaluation because each survey receives very low response rates in comparison to the total numbers of participants and caseworkers. Therefore, the data is not generalizable to the overall populations of FSET participants and caseworkers. However, it is still useful for monitoring policy compliance. For a further discussion of potential survey requirements and techniques, see Appendix 5.

Face-to-face interviews conducted with small numbers of caseworkers and participants present a similar situation. Information collected during these interviews is suitable for monitoring policy compliance but should not be used in a rigorous evaluation because it is not generalizable to the overall populations of FSET caseworkers and participants. Differentiating between data sources that are suitable for monitoring and data sources that are suitable for evaluation will ensure that the conclusions of an FSET evaluation will be generalizable to the program as a whole.

#### *County participation and demographics*

Determining the extent to which external factors influence FSET participant outcomes is crucial for isolating the impacts of program participation. To understand how regional differences in unemployment influence participant outcomes, DHS should compare the number of FSET referrals and enrollments per county, average county-level participant earnings, and employment outcomes to county-level unemployment data provided by the U.S. Bureau of Labor Statistics. Comparing FSET enrollment and referral rates for each county in Wisconsin to the unemployment rate in that county may shed light on whether people living in counties with higher levels of unemployment are more likely to participate in the program than people living in counties with lower levels of unemployment. Comparing county-level unemployment rates to the average employment and earnings outcomes of FSET participants in each county may allow the DHS to determine whether participants living in counties with higher levels of unemployment are less likely to have positive employment and earnings outcomes on average than participants living in counties with lower levels of unemployment. Determining the influence of regional-level factors, like unemployment, on FSET participation and employment-related outcomes will help DHS isolate the impact of the program itself.

#### *Standardize utilization of public funds*

DHS is interested in determining whether participation in FSET has any impact on participants' reliance on other public assistance programs. However, DHS does not have a clearly defined set of criteria for measuring the program impact. To establish such standards, DHS would need to first determine which public programs are most often utilized by FSET participants, acquire data regarding each program, and then match the data to the FSET participant database. However, most public assistance programs are available to only seniors, the disabled, and families with children; ABAWDs receiving FoodShare benefits are not eligible for most programs. Reliance on Medicaid, known in Wisconsin as BadgerCare, could potentially be used to measure reliance on public assistance programs because ABAWDs may be eligible depending on their gross income level. However, the single adult eligibility threshold for FoodShare is 200 percent of the federal poverty level (FPL) (McAtee 2018), while the single adult eligibility threshold for BadgerCare is 100 percent of the FPL (Wisconsin Department of Health Services 2017). The difference between FoodShare and BadgerCare suggests that using reliance on BadgerCare as a measure of reliance on all public assistance programs would fail to provide data on FSET participants between 100 and 200 percent of the FPL. To estimate the impact of FSET participating on an individual's reliance on other public assistance programs, DHS should establish clear criteria for measuring reliance on such programs. These criteria should include a list of public assistance programs that meet this definition and are commonly used by FSET participants.

## **Tier 2 Recommendations: Changes requiring some additional resources**

Implementing the following recommendations would require intermediate levels of additional time and resources. These recommendations are not mutually exclusive. Each one addresses a unique evaluation challenge and can be implemented simultaneously with the other recommendations.

### *Standardize tracking of FSET components*

Although there are six major categories of services, known as the six core components, the ways in which specific employment and training activities are reported vary from vendor to vendor. For example, a particular activity may be reported under the education component in one region but under a different component in another region. This variation makes it difficult to match specific activities to specific participant outcomes. We recommend that the DHS establish a set of standards for determining how employment and training activities are reported by FSET vendors. These standards could be incorporated into future procurement contracts with regional FSET vendors. Standardizing how activities are reported will make it easier to evaluate the effectiveness of individual activities, components, and the program as a whole. In conjunction with further caseworker training, such a standardization process would likely decrease administrative data errors.

### *Collaborative focus groups*

To provide and properly evaluate effective employment and training services, DHS must understand the barriers to employment facing FSET participants. DHS collects information regarding these barriers using a standardized assessment issued to participants at program intake. The assessment includes questions related to work history, legal issues, housing, and transportation and is valuable in determining the most useful services for a particular participant. However, the assessment neither enables caseworkers to fully understand how barriers impact a participant's ability to secure employment nor allows DHS to learn of employment barriers outside the specifics measured in the questionnaire. Gaining a deeper understanding of employment barriers is vital to the DHS's ability to provide and evaluate appropriate services.

We recommend that DHS work with the Institute for Research on Poverty (IRP) at UW–Madison or other appropriate partners to conduct in-depth focus groups with FSET participants. These focus groups would allow DHS to gain a deeper understanding of the employment barriers and how those barriers impact potential employment. This model will provide a variety of benefits over the current survey-based approach, including the ability to ask follow-up questions, pursue topics as they arise instead of simply going through a list of questions with multiple-choice answers, purposefully recruit a random sample of focus group participants, and purposefully attempt to include people who drop out of the program. The success of any focus group relies heavily on the experience and preparation of the person facilitating the process. We believe working with appropriate partners, including IRP, will allow DHS to take advantage of outside skills and experience. The specific topics discussed during each focus group should include circumstances that led participants to apply for FoodShare, perceived barriers to employment, reasons for ending participation before completing the program if applicable, and participant experiences at each stage of FSET participation. Gaining a deeper understanding of these topics will provide insights for improving service delivery and assessment practices.

To promote participation in focus groups, we recommend that DHS conduct a separate session in each region to minimize travel by participants. In addition, we advise DHS to set aside resources to provide local transportation and monetary incentives to program participants. To ensure the validity of collected information, we recommend potential focus group participants be selected randomly from the current FSET participant pool in each region. Each regional session should consist of no more than 10 to 15 people to ensure that all focus group participants are engaged in the process.

## **Tier 1 Recommendations: Changes requiring significant additional resources**

Implementing the following recommendations would require significant additional resources. These recommendations are not mutually exclusive. Each one addresses a unique evaluation challenge and can be implemented simultaneously with the other recommendations.

### *Explore options for streamlining data reporting processes*

Currently, all significant attempts to evaluate the effectiveness of the FSET program are impeded by the outdated design of the administrative data systems. FoodShare and FSET data are collected and stored in separate data systems and can be merged for evaluation only by engaging the services of a data management firm. This makes evaluating the program extremely difficult, expensive, and time consuming. To address these issues, we recommend that DHS work with a database management consultant to explore options for streamlining the data reporting process. Potential solutions may include the creation of a new unified data system or a software improvement that automates data integration. Any proposed solution should provide the ability to create annual reports from monthly snapshots and integrate FoodShare and FSET participation data in a single report without engaging the services of a data management firm. Achieving these goals would likely require a significant up-front investment. However, it would give DHS greater access to and control over its own data, which would streamline the evaluation process and eliminate the need for securing the services of a data management firm on an annual basis.

### *Data integrated evaluation approach*

Given the lack of a viable control group with which to construct an evaluation model, the best available model for evaluating FSET is a rigorous, resource intensive survey approach. IRP, which the DHS currently contracts to provide employment and earnings data on FSET participants, is currently in the process of conducting a rigorous multi-year evaluation of a five-year pilot program known as the Child Support Noncustodial Parent Employment Demonstration (CSPED). CSPED is an initiative of the Office of Child Support Enforcement in the U.S. Department of Health and Human Services' Administration for Children and Families. The program aims to increase child support payment compliance by providing noncustodial parents with a variety of services including, integrated case management, employment-oriented services, and parenting classes (Meyer, et al. 2015). In collaboration with Mathematica Policy Research, IRP is conducting an in-depth evaluation of the implementation and impacts of the CSPED program. The evaluation design calls for an integrated approach utilizing administrative data, data from various state and federal databases, responses to a survey of individual caseworkers, and responses to a rigorous, resource-intensive survey of CSPED participants.

We recommend that DHS work with IRP or other appropriate partners to implement a rigorous data-integrated evaluation of FSET based on IRP's ongoing evaluation of the CSPED program. This approach would require significant planning and coordination between the DHS and IRP, however, this section will provide several key recommendations regarding the evaluation's structure. The data-integrated FSET evaluation model would incorporate administrative data from FoodShare and FSET, data from other state agency databases provided by IRP, implementation insights from interviews and surveys with participants and caseworkers, and data from a rigorous resource-intensive multi-platform participant survey.

The participant survey would be the center-piece of this evaluation model. However, it would be much different from DHS's current participant survey. Survey participants would be randomly selected from current FSET participants, participants who have completed participation within the previous two quarters, participants who dropped out during the previous two quarters, and FoodShare applicants who were referred to FSET during the previous two quarters but did not enroll. The number of participants selected from each category would be determined by the percentage of total enrollees that fall into each category.

Ensuring a meaningful response rate will require a significant investment of time and money. Generally speaking, FSET participants are a difficult population to survey because they tend to be more

likely than the rest of population to lack stable housing and a mailing address, regular access to an email account, or regular access to a phone. As a result, securing a meaningful response rate will require a resource-intensive multi-wave survey approach. During wave one, the evaluation team would attempt to administer the survey via email. During wave two, the evaluation team would attempt to administer the survey to non-responders via postal mail or telephone. During wave three, the evaluation team would attempt to administer the survey to non-responders by visiting each person's last known residence. Monetary incentives such as gift cards for groceries or gas could be used to help to increase response rates (Singer and Ye 2013).

The total number of participants selected as subjects of this survey would depend on the resources available and the desired reliability of the results. Collecting responses from a greater percentage of the total participant population will result in more reliable results. For example, all else being equal, collecting responses from 500 randomly selected members of a total population of 10,000 people would allow the evaluators to say with 95 percent confidence that a particular value is within approximately 4 percentage points of the reported value. In comparison, all else being equal, collecting responses from 1,000 randomly selected members of a total population of 10,000 individuals would allow the evaluators to say with 95 percent confidence that a particular value is within approximately 3 percentage points of the reported value.

The survey should include questions pertaining to at least the following three topics. First, participant outcomes, including: employment, earnings, and reliance on public assistance programs. Second, barriers to employment, including: access to transportation, adequate skills and experience, and interactions with the criminal justice system. Third, resources that were useful in securing and maintaining employment, if applicable. Using a rigorous survey of a randomly selected sample of the FSET population to answer questions related to these three topics will allow DHS to conduct the most methodologically sound evaluation of FSET outcomes that is currently possible in the absence of a viable control group.

## **Legislative and Political Implications**

The nature of statewide policy is constantly changing, specifically when requirements and funding levels are mandated, at least in part, by the federal government. Various state legislatures have applied for work requirement waivers, and others – including Wisconsin – have actually increased the number of work hours required to qualify for SNAP benefits. The Wisconsin Legislature recently voted to make the following changes to the FSET program:

- Implement a performance-based payment structure for regional FSET vendors
- Increase the work requirement for ABAWD participants to 30 hours per week
- Establish drug-testing requirements for ABAWDs who intend to participate in FSET
- Mandate that able-bodied adult FoodShare beneficiaries with children participate in employment or training activities for 30 hours per week starting in 2019

It is important to note that the first two changes above will require a federal waiver before implementation. These changes would significantly alter the FSET program's implementation and evaluation. For example, to implement a performance-based payment structure for regional FSET vendors, DHS would need to consider the impact of whether job placements are permanent or temporary and whether childless adults and adults with children face different barriers to employment. Although changes to FSET will significantly impact the implementation of the program, the recommendations of this report remain unaltered because the proposed legislative changes do not alter the underlying need to streamline and restructure the data collection and evaluation process. Performance-based vendor payments, increased work requirements, and mandatory drug-testing will impact the FSET program in different ways. However, the need to accurately determine which FSET component is most effective remains consistent. Regardless of political or legislative actions regarding the requirements for FSET, we

urge DHS to move forward with the recommended changes to the data collection process and the FSET program.

## **Conclusions**

### **Data Needs**

DHS does not currently possess the data or evaluation framework needed to make causal claims regarding the FSET program's impacts on participant employment and earnings at a program level or at an individual component level. Current data practices make it difficult for DHS to gather sufficient information to conduct an effective evaluation. DHS relies on third-party contractors to create major reports on FSET participant earnings and employment outcomes. An outdated data infrastructure makes it labor-intensive to combine administrative FoodShare and FSET data. Standardizing entry practices for case managers reporting FSET participation data would make that data more reliable to use in an evaluation. Overhauling the data system, as recommended in tier 1, requires significant time, money, and labor investments, but would make it easier for DHS staff to access FoodShare and FSET administrative data.

### **Future Research**

Conducting a randomized control trial experiment, or another form of evaluation involving a control group, would be the ideal way to determine the existence of a causal link between FSET program participation and particular participant outcomes. Unfortunately, no suitable control group is currently available. Absent a random experiment, focus groups could be a first step to identifying a causal link between FSET and participant outcomes. Past research shows employment training programs' effectiveness is determined partially by how well it addresses specific employment barriers facing the populations it serves. Conducting focus groups of FSET participants will identify employment barriers facing FSET participants and how well the program's activities address those barriers.

### **Improved Metrics**

In the absence of a randomized control trial, implementing a rigorous evaluation framework, like the one described in Tier 1 of the recommendations section, and incorporating additional data would greatly improve DHS's ability to evaluate the FSET program's effectiveness. Researchers currently use a combination of federal and state administrative data and resource-intensive participant surveys to evaluate CSPED. DHS could implement a similar approach for FSET. Implementing such an approach requires significant long-term investments and collaboration with other actors, including IRP and the UW Survey Center. This approach allows DHS to collect data on participants' skills, past employment experience, and barriers to employment. The insights gained by implementing appropriate evaluation measures will increase policy-makers' abilities to make informed decisions about the FoodShare program's future.

### **Implications**

Potential policy changes, such as the implementation of a performance-based payment structure for FSET vendors, will not be feasible without reliable evaluation metrics. These metrics are needed to determine what information provides the best predictors of success, to set appropriate benchmarks linked to compensation levels, and to assess whether vendors are meeting these standards. Implementing a performance-based payment structure without first establishing these tools would greatly impair DHS's ability to create appropriate incentives for FSET vendors and accurately monitor participant outcomes. This example illustrates the importance of designing and implementing appropriate evaluation procedures before enacting major policy changes to existing programs.

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## Appendix 1: FSET Components Research

Due to the overall lack of consistent data analysis at the national level, individual states have been implementing pilot SNAP E&T programs. Within these programs, numerous components have been utilized. Not all components of employment training programs are equally effective because numerous variables can impact the people participating in specific programs. The U.S. Department of Agriculture (USDA) studied the following components: work requirements and work incentives, job search assistance and placement supports, subsidized employment, education and training, case management and supportive services, sectoral strategies, and collaboration with other programs to provide comprehensive services to targeted participants. While studying each component, the term *effective* must be defined. Each program and component is discussed as being successful or effective, but to analyze results, variables must be assigned to each component to determine what constitutes effective. The USDA used three primary variables to measure the effectiveness of each strategy – increased employment and earnings among participants, reduced public benefits dependency, and reduced government expenditures (D'Amico 2006). The USDA studied the impact and effectiveness of these strategies using multiple peer-reviewed sources. Summaries of each component are below.

### Work Requirements and Work Incentives

Some states have implemented workforce development programs as a requirement to receive defined benefits. Some of these programs require a specific number of hours worked. A program member participating in the labor force may receive additional financial benefits as a reward for work participation. Work requirements and work incentives are separate components within SNAP E&T programs.

Many of the programs studied by the USDA occurred during the first decade of true U.S. welfare reform after legislation was passed in 1996. Within the programs examined, two main mandatory activities were present. Job search only activities and education and training only activities were the most common mandatory components of the work requirements section of the programs studied. Many people participated in both job search and education and training activities. Rigorous studies have shown that participants who were assigned to a job search activity first were likely to gain employment sooner. The study also found that while participants who received education and training activities were more likely to catch up over time in obtaining employment, they did not appear to receive higher wages or earnings as a result of having received education. Each program intervention was more effective in connecting people to employment than no program at all (Hamilton 2012).

Work incentives provide financial benefits for work efforts. The most common incentive is the Earned Income Tax Credit (EITC), which offers all low- to moderate-income workers an offset to federal payroll and income taxes. Numerous states have established their own EITCs to supplement the federal credit. Research indicates that the EITC increases work activity but does not necessarily have a significant effect on low-income families' total earned income (Kogan, Paprocki and Diaz 2016). Work incentives have been shown to produce the strongest increases in employment and earnings when combined with job services.

Financial rewards differ from work incentives in that they incentivize certain behaviors instead of distributing cash benefits for employment. The impact of financial incentives on employment outcomes appears to be reliant on the employment status of the participant at the beginning of the intervention. People working full time at the beginning of the study were more likely to participate in targeted activities such as children's education and health, while people working part time were less likely to participate, and those who were unemployed were significantly less likely to earn supplements (Dechausay, Miller and Quiroz-Becerra 2014).

Both work incentives and financial rewards are most impactful for those who do not have barriers to employment. Studies have shown that common reasons for non-participation include having a

disability, being afraid of leaving part-time employment to look for full-time work, dependent care, and concern about the level of public assistance available (Klerman, et al. 2012).

## **Job Search and Placement Supports**

Job search and placement supports share the goal of quickly connecting participants with employment, without any emphasis on long-term earnings.

### *Job Search Assistance*

Job search assistance programs are meant to connect participants with available employment as quickly as possible. Two main functions of job search assistance are enforcement and training. Job search enforcement-based programs quickly find participants employment by placing sanctions on people who fail to secure employment, such as reduced benefits. Not surprisingly, enforcement-based programs are successful in reducing benefit receipt, but not necessarily in increasing earnings (Klerman, et al. 2012). Training-based programs aim to broaden search skills in addition to promoting pre-employment skills, such as resume writing and interviewing skills.

All forms of job search assistance have been shown to reduce Unemployment Insurance benefits in the short-term (Decker, Olsen and Freeman 2000). One study has shown that treatment was more effective at promoting reemployment to people who had marketable skills and less successful at reemploying people with preexisting barriers to employment (Decker, Olsen and Freeman 2000).

Overall, research on the effectiveness of job search assistance programs has produced mixed results. Some research suggests that these programs produce short-term earnings but are unlikely to produce long-term results, while other studies have shown no statistically significant differences in participant earnings or job retention. Some studies have even shown that job search programs focusing on employment search consistent with a participant's existing experience are just as effective – or ineffective – as those programs that focus on finding any employment as quickly as possible. Due to the mixed results from numerous studies, the effectiveness of job search assistance programs has not been accurately determined.

Placement support relies on employment agencies (temp agencies) connecting participants with temporary work meant to provide rapid employment and increase marketable skills. These programs often assume that participants will be able to make the transition from temporary worker to full-time employment with the selected firm. Again, studies have shown that “temp agencies” are successful at increasing short-term employment and immediate earnings, but fail to increase long-term earnings and even long-term employment (Kogan, Paprocki and Diaz 2016).

Programs utilizing “temp agencies” often assume that individual companies use temporary staffing to search for full-time employees. Instead, companies can use “temp agencies” to fill short-term project work or instead of hiring full time employees. As such, low-wage workers relying on temporary work are continuously susceptible to recurring periods of unemployment.

### *Subsidized Employment*

Subsidized employment programs link participants to employment positions that are financially supported by government or nonprofit workforce development programs. The purpose of subsidized employment is to improve future employability and marketable skills, thereby increasing long-term earnings in the unsubsidized labor market. The USDA categorizes two forms of subsidized employment – transitional employment and on-the-job training (OJT).

According to the USDA, most transitional job programs share the same basic components: placement in a temporary wage-paying job, support services with some form of case management, and job placement services to help the participant find a permanent job (Kogan, Paprocki and Diaz 2016). Similar to participants who utilized “temp agencies,” transitional jobs can produce significant short-term impacts on earnings, but over time, the impacts decrease. Some studies note that when subsidized employment programs actively attempt to connect participants to regular, stable employment, long-term

results can remain positive (Hamilton 2012). Subsidized employment is most effective when linked with occupational training in growing sectors of the economy, such as healthcare or technology-related fields, or vocational training and apprenticeships.

Numerous studies have shown that even if long-term effects on earnings are not visible, transitional jobs can produce an increase in soft skills such as self-esteem, life stability, and exposure to new opportunities – which are difficult to measure in any quantifiable way (Kirby, et al. 2002).

OJT is a form of subsidized employment in which an employer agrees to hire and train a participant while receiving a wage subsidy. According to the U.S. Department of Labor, evaluations of OJT programs have found that they lead to positive employment and earnings outcomes (U.S. Department of Labor 2014). D'Amico found that “OJT is the most efficacious service for both adult women and men for whom this service activity was recommended” (D'Amico 2006).

Research shows that while long-term welfare recipients assigned to classroom training experienced little-to-no impact on long-term earnings, participants assigned to OJT experienced substantial impacts in most years and a 12 percent earnings gain over the study period. Adult women saw the most benefit from OJT intervention (King 2004).

OJT programs are not without drawbacks. Indeed, criticisms of such programs highlight the worst-case scenario, in which the program is merely a payment from the government to a private firm to secure a job for a program participant, without significant oversight into the quality of training that occurs.

## **Education and Training**

Education and training is one of the broadest categories that encompasses many forms of intervention, including adult education, employer-driven occupational skills, vocational certificates, community college courses, and higher-level degrees. Due to the amount of time and money associated with associates and bachelor's degrees, some workforce development programs have instead focused on vocational education, certificates, and occupational skills.

Traditional education had been used prior to welfare reform during the 1990s. Since then, due to a changing economy, employers have been more focused on hiring people with specific skills, instead of those who are “ready to be trained.” The increase in technical skills required for many jobs has changed the program paradigm from an emphasis on general education to an emphasis on transferable, hard skills. D'Amico found that traditional classroom education alone does not improve employment or earnings outcomes for participants in mandatory work programs or for people from lower-income households who lack work experience (D'Amico 2006).

The USDA classifies occupational skills training into five separate components, but the specific applicability to Wisconsin suggests that four categories are most useful, (1) short-term classroom-based training, (2) online courses, (3) community college programs, and (4) apprenticeship programs. Data surrounding these components show mixed results. Each component is examined below.

Classroom training can be provided by public or private institutions or third-party training vendors. Research on classroom-based occupational training suggests that long-term benefits in terms of increased employment and earnings are highly dependent on the employment sector in which the training occurs. D'Amico's study suggests that classroom training *can* be effective if the instruction focuses on job-specific skills in highly sought-after fields (D'Amico 2006). Not surprisingly, studies have shown that earnings decrease while the participant is enrolled in classroom training, as the hours worked necessarily decline, but 18 to 24 months after program entry, earnings begin to increase (Heinrich, Mueser, et al. 2008).

Online courses must be addressed due to the increase in technology, and therefore increased usage. Online courses appeal to participants who wish to continue working or who require increased flexibility. Very few comprehensive studies have been performed regarding the long-term effects of online learning as a component of SNAP E&T requirements. As such, a recommendation cannot be made due to the lack of evidence supporting the efficacy of online education.

Consistent with other forms of education and training components, community college certificates can increase long-term earnings if earned in high-demand employment sectors. Few rigorous studies have been performed to measure the effectiveness of for-credit occupational certificates, therefore a recommendation cannot be made. While most reports indicate that completion of in-demand certificates that align with employers' needs may increase long-term earnings, rigorous causal studies have yet to be completed (Kogan, Paprocki and Diaz 2016).

The U.S. Department of Labor defines the Registered Apprenticeship program as “comprehensive, formal, workplace-based training supplemented by classroom training developed through a close public-private partnership of government, firms, unions, and training institutions” (U.S. Department of Labor 2014). Essentially, an apprenticeship is a connection between a person and an employer that provides a blend of basic skills as well as educational and occupational training.

Apprenticeship programs are relatively less common in the United States than in Europe. They exist mostly in trade or vocational employment, such as the plumbing, electrical, or construction sectors. In Europe, apprenticeships are much more common, and indeed, several studies have shown positive employment outcomes due to how well the programs address the labor market needs of specific employers (Heinrich 2013).

While studies of European apprenticeship programs cannot be extrapolated and applied to Wisconsin, the underlying results are similar to U.S.-based evaluations that show OJT and industry-specific training can yield long-term benefits.

## **Case Management and Supportive Services**

Case managers, or the frontline employees who interact with SNAP E&T participants, often have discretion when deciding which programs and components to apply to which participant. Case managers also approve funds for support services, such as childcare and transportation. Therefore, any study that aims to analyze the effectiveness of support services must also account for disparities between case managers.

Working conditions of case managers can impact the assignment and delivery of services. Indeed, one study found negative effects on employment and earnings for program participants based on case management (Rangarajan, Meckstroth and Novak 1998). Another study found that implementation of case management by front-line employees was unsatisfactory due to the very large caseload assigned to each caseworker (Holzer and Martinson 2006). The impact of case managers, like employees in other industries, can be a function of workload and employee motivation. Individual case workers with an overabundance of cases may move quickly to assign people to temp agencies just to complete a short-term metric.

According to the USDA, childcare is an allowable supportive service expense for SNAP E&T, but because of the high costs, relatively few states offer reimbursement of dependent-care expenses (Kogan, Paprocki and Diaz 2016). In fiscal year 2013, only 10 states spent SNAP E&T money on dependent care.

Consistent with most studies of SNAP E&T effectiveness, results depend on subsidy recipients. Few experimental studies have been performed, but based on analysis of literature for existing participants, childcare subsidies may be associated with an increase in earnings. Numerous non-experimental studies have found a childcare subsidy may increase self-sufficiency of a single mother living at the federal poverty level by 3.6 percent, increase the likelihood that a single mother enrolls in courses at a school or university by 13 percentage points, and decrease the probability of ending employment over the study period by 43 percent (in Illinois) (Herbst and Tekin 2011) (Lee, et al. 2004). While these studies seem to indicate childcare programs are beneficial, no experimental studies have been performed that could create a causal relationship between childcare subsidies and long-term benefits.

Transportation services can be anything from gas subsidies, rail cards, or bus passes provided through SNAP E&T programs. In fiscal year 2013, 48 states provided “transportation and other”

supportive services to program participants (Kogan, Paprocki and Diaz 2016). A frequent issue with program participants is employment location relative to the person's home. Employers may be spread across suburbs while participants are in more urban areas. Public transportation outside urban areas is often lacking, therefore the lack of transportation is often seen as a barrier to employment. Despite the popularity of transportation as a funded, or partially funded component of SNAP E&T programs, very few detailed analyses have been performed. A study by D'Amico found that access to transportation to suburban areas did not increase employment or income for participants (D'Amico 2006). Due to the lack of causal, rigorous literature concerning transportation supportive services, a recommendation cannot be made.

## **Sectoral Strategies**

Sectoral strategies focus on preparing people for work in growing, dynamic, and demanding industries. Specific industries require more and more employees as sectors expand. Sectoral strategies are collaborative and cooperative by nature. They involve various organizational entities, including unions, community colleges, and nonprofit entities that work together to fill the needs of employers and program participants. Sectoral strategies involve multiple components of SNAP E&T programs such as occupational training, education, and job search assistance.

The Sectoral Employment Impact Study completed by Public/Private Ventures developed an experiment to examine three programs across the United States, all of which trained low-income people for employment in expanding sectors of their regional economies, ranging from computer technology to medical billing. The study confirmed that over a two-year period after random assignment, program participants were more likely to be employed than members of the control group, with participants working an average of 1.3 months more over the course of a two-year period, while also earning 18 percent more on average (Maguire, et al. 2010). These results show that sectoral strategies can be very beneficial to low-income workers. Successful strategies involve a high level of cooperation and collaboration among private companies, nonprofit organizations, and the government.

## **Impacts**

Studies have shown that adult women benefit from SNAP E&T programs more than any other demographic (Card, Kluve and Weber 2010) (D'Amico 2006). Female participants, as well as long-term unemployed people tend to see larger program effects than other groups. According to one study, most of the impacts of intervention programs for women were positive and sizeable (Card, Kluve and Weber 2010). Conversely, effects of program intervention on men are less noticeable, and positive gains are more likely to decay after a few years, and ultimately disappear after around six years (D'Amico 2006).

Participants with barriers to employment, such as criminal records or health conditions, are more difficult to measure. Indeed, such barriers can be a source of difficulty in obtaining permanent employment. Studies have shown that of the programs specifically targeted to participants with barriers to employment, few have proven successful in the long-term. The successful programs focused on providing transitional, subsidized jobs, or a combination of unpaid work experience, job placement, and education (Butler, et al. 2012). In this meta-study, Butler et al. noted that sustaining employment, rather than gaining initial employment, may be the true barrier for many people. These findings suggest that retention services may be especially important for those with barriers to employment.

## Appendix 2: FSET Components

Below is a matrix displaying each component of Wisconsin’s FSET program, as well as various subcomponents that can be used to satisfy work requirements.

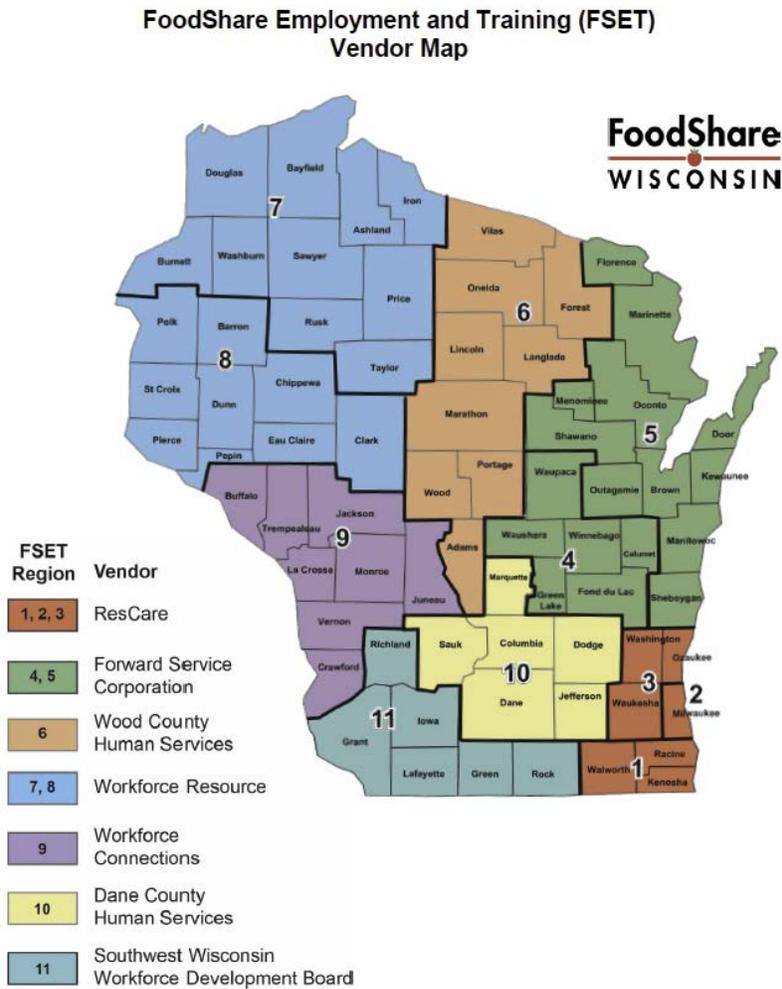
**Table 2: FSET Components**

<b>Qualifying Component</b>	<b>FSET Activity</b>
<b>Job Retention</b>	Job retention services
<b>Job Search</b>	Employment search
	Career planning
	Occupational testing
	Workfare job search
	Career advancement
<b>Self-Employment</b>	Self-employment
<b>Educational And Vocational Training</b>	Literacy skills
	Part-time student
	Post-secondary ED. (2 years or less)
	General education development
	Job skills training
	Job readiness/motivation
	Adult basic education
	English-as-a-second-language (ESL)
	Vocational Adult Basic Education (ABE) (Wisconsin Department of Health Services 2017)
	Driver's education
	Full-time student
	Vocational literacy
	Customized skills training
	High School equivalency diploma
	Vocational ESL
<b>Work Experience</b>	W-2 (Co-enrollment)
	Transitional employment (Co-enrollment)
	Community service
	Trial job (Co-enrollment)
	Work experience/FSET
	On-the-job training
<b>Work Fare</b>	Workfare

### Appendix 3: FSET Vendor Map

For purposes of the FSET program, Wisconsin is divided into 11 regions served by seven vendors. The map in Figure 3 depicts the geographic boundaries.

Figure 4: FSET Vendor Map



## **Appendix 4: Federal Nutrition Service Reporting Requirements**

The Wisconsin Department of Health Services is required to report the following data regarding the FoodShare Employment and Training program to the Federal Nutrition Service (FNS) under Section 4022(a)(2) of the Agricultural Act of 2014 (U.S. House. 2014):

- Participant characteristics at enrollment, including whether the participant is a voluntary or mandatory participant, education level, able-bodied adult without dependents (ABAWD) status, primary language, gender, and age.
- Certain ABAWD-specific data points such as the average number of people who are offered positions and participate in work programs, as well as the impacts of the three-month time limit and 15% exemption policies on ABAWDs.
- The number and percentage of participants who completed a training, educational, work experience, or on-the-job training component.
- The number and percentage of FSET participants and former participants who are in unsubsidized employment during the second and fourth quarters after completion of FSET participation.
- The median quarterly earnings (based on total quarterly earnings data) of all E&T participants and former participants who are in unsubsidized employment during the second quarter after completion of participation in FSET.

This data must be submitted to the FNS no later than January 1 following the close of the federal fiscal year (October 1 through September 30).

## Appendix 5: Survey

Administering a survey to program participants is a costly endeavor. The methods and characteristics of the survey should be analyzed to determine the best form of delivery, collection, and utilization (Center for Innovation in Research and Teaching 2018) (University of Wisconsin Survey Center 2010). See below.

**Table 3: Survey Methodology Matrix**

	<b>Advantages</b>	<b>Disadvantages</b>	<b>Tier</b>
Face-to-Face	Highest cooperation High quality responses Follow-up questions	Most expensive and time consuming Subject to interviewer bias No anonymity	Tier 1
Telephone	Better response rates than mail or internet Shorter data collection time and less expensive than face-to-face Can use software to coach interviewer	Must be kept short Language barriers Not all participants are reachable by phones	Tier 2
Mail	Lower costs Smaller administrative team Access to broad population Participants don't need computer skills	Lower response rates Most likely need an incentive Slower data collection Must have up-to-date addresses	Tier 2
Internet	Lowest cost Reduces time Preprogram software for question flow Easy data collection	Not every respondent has a computer Getting a representative sample may be difficult Need valid email addresses for each participant	Tier 3

Face-to-face interviews are, perhaps, the best form of data collection. However, they also are the most time consuming and expensive. Surveys administered via the internet are the most widely available, but they also are subject to the most barriers to participation. People must be technologically inclined, have access to a computer, and preferably access to high-speed internet. Response rates are usually highest for face-to-face interviews, but the rate is subject to influence by the interviewing organization. Incentives may be offered for survey participation, provided such incentives are not large enough to distort responses or the sample size. There is no agreed-upon minimum response rate, but the more responses received, the more likely a statistically significant conclusion can be drawn (University of Wisconsin Survey Center 2010). The UW Survey Center normally receives a 60 percent to 70 percent response rate to mailed surveys and a 30 percent to 40 percent response rate for online surveys.