

Developing a SNAP E&T Intermediary Handbook: A State Agency Guide

Introduction

Background

In the Food Security Act of 1985¹, the **Supplemental Nutrition Assistance Program (SNAP) Employment and Training (E&T)** was established as a companion program to SNAP, the nation's largest nutrition assistance program. SNAP provides monthly benefits to help eligible individuals and families purchase nutritious food. Beyond addressing immediate food needs, SNAP supports economic stability by freeing up household resources for other essentials. It also serves as the foundation for SNAP E&T, which helps SNAP recipients build skills, gain work experience, and move toward long-term economic mobility while also helping to address state and local workforce needs². One of the key strengths of the SNAP E&T program design continues to be its flexibility to include partnerships with community organizations that already provide employment and training services to potential SNAP participants, including community development organizations, community colleges, career and technical education providers, and other community-based organizations. These **third-party partnerships (TPPs)** serve as critical collaborators with state SNAP E&T agencies in delivering program services across a state.

Once SNAP E&T was federally established, state programs developed gradually; however, over time states have increasingly expanded their third-party partner (TPP) networks. While this growth created new opportunities for SNAP E&T participants nationwide, it also increased demands on state agency staff. One proven strategy to help states address this increased workload has been to engage an intermediary to help reduce administrative burden. A **SNAP E&T intermediary** is a specific type of third-party partner that supports the administration of the program and relationship with direct service providers. Intermediaries often assume a level of responsibility for the state's management of partners, which may include activities such as recruiting, training, developing agreements with, and/or monitoring of those providers; in these cases an intermediary serves as a liaison between SNAP E&T state program staff and third-party providers. Intermediaries vary widely in structure and function depending on the needs of the state agency. There is no one-size-fits-all model.

¹ See <https://www.congress.gov/bill/99th-congress/house-bill/2100/text>

² See 7 USC § 2015(d)(4)(A)(i)

This Guide's Purpose

Once a state decides how they would like to engage with an intermediary organization, this Intermediary Handbook Guide walks an agency through the creation of an intermediary handbook, outlining the day-to-day operations and expectations for the partnership between the agency and the intermediary. Before interacting with this Guide, state agencies should refer to Designing a SNAP E&T Intermediary: State Pre-Assessment Tool, which outlines three initial decision categories that state agencies should determine before an intermediary handbook is drafted. The Pre-Assessment can be found in Appendix A.

A Note About Successful State-Intermediary Partnerships

As part of the development of this guide, interviews were conducted with intermediaries across the country representing a range of models—from statewide intermediaries to county-level intermediaries, provider-specific intermediaries, and intermediaries focused solely on technical assistance. A key finding emerged across all interviews: no two intermediaries are alike, but open communication between state agency staff and intermediary staff is universally critical. Regular meetings and clearly established expectations consistently support successful intermediary relationships. Based on observations of successful intermediaries, when working through this Intermediary Handbook Guide and drafting how the agency will coordinate with an intermediary, keep in mind that the state agency-intermediary relationship works most effectively as a partnership.

How to Use this Guide

As its name suggests, this Intermediary Handbook Guide's purpose is to direct a state agency through the creation of an intermediary handbook, which outlines for an intermediary the day-to-day operational expectations for the partnership between the agency and the intermediary. Because intermediary models vary widely in structure and function, the Pre-Assessment outlines a variety of tasks an intermediary may perform for a state agency. State agencies will need to identify which of these outlined tasks the intermediary will assume. Any sections regarding tasks for which the intermediary will not be responsible can be disregarded and thus excluded in the state's intermediary handbook. Every state has a unique SNAP E&T program. While this Intermediary Handbook Guide includes recommended content for the handbook, state staff must tailor the specifics.

If a state has more than one type of intermediary or has a hierarchy of intermediaries (i.e., intermediaries that partner with another intermediary), the agency will need to decide how to structure its intermediary handbook(s) in light of this. The agency might choose to write one handbook, using agreements to indicate which handbook sections correlate with each intermediaries' responsibilities; two separate handbooks; or require the intermediary that partners with a sub-intermediary to create their own handbook for the vendor intermediary. Each situation will be different just as all SNAP E&T programs are different. This Intermediary Handbook Guide assumes a single intermediary but can easily be modified using the Role Section (pp. 8)

State agency staff can engage with this Intermediary Handbook Guide by following six sequential steps:

Step 1: Complete the Pre-Assessment to Determine the Structure of the Intermediary Partnership

The *Designing a SNAP E&T Intermediary: State Pre-Assessment Tool* (found in Appendix A) is designed to help a state determine the general structure of an intermediary partnership. For example:

- What duties will the intermediary be responsible for?
- How will the intermediary be funded?
- Will the intermediary also function as a direct service provider?

Step 2: Review the Intermediary Handbook Guide and Remove Non-Applicable Sections

The intermediary likely will not be responsible for all the possible SNAP E&T administrative duties outlined in the Intermediary Handbook Guide. All non-applicable sections should be removed.

- **Example:** If the intermediary will not conduct monitoring, remove the Annual Program and Fiscal Management Evaluation section.

Step 3: Draft the State Agency's Intermediary Handbook Using the Guide's Provided Prompts

The Intermediary Handbook Guide provides prompts and guidance to support the writing process. After defining intermediary roles, state agencies can use it to identify key topics for each section. Each section should function as a procedural guide to help intermediaries understand and carry out their SNAP E&T responsibilities. This guide is intended as a reference and decision-making tool—not for direct copy and paste.

The intermediary handbook should be treated as a living document and updated as questions arise or program needs evolve.

Step 4: Identify Which Appendices Are Relevant for the State's Program

The Intermediary Handbook Guide provides several example appendices. Keep only what is relevant for the state agency and intermediary.

- **Example:** Example Appendix 1: Approved Forms and Documents has a list of forms used in SNAP E&T programs. If this is covered in the Third-Party Provider (TPP) handbook, it may not need to be part of this handbook.

Step 5: Create a Table of Contents

Be sure to create a table of contents for the intermediary handbook that includes only the sections selected from this Intermediary Handbook Guide during Step 2. For electronic use, it is a recommendation to create an interactive table of contents with links to each section.

Step 6: Use the Handbook to Support Onboarding of New Intermediary

The state agency's intermediary handbook should now outline expectations, functions, and procedures, serving as a foundation for onboarding and training materials.

Intermediary Handbook Guide

Table of Contents

This section should include a final table of contents listing each section of the state agency's intermediary handbook. Upon completing the handbook's other sections, create the table of contents. Below is a table of contents of each of the sections included in this Guide.

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General Program Information

This section allows the state to provide information about its E&T program that will help the intermediary gain an overview of the program. Please add or remove content as needed to ensure the information is relevant and reflective of the agency's specific program.

1. Mission/Vision of (State) E&T Program

1.1 Mission

This section is for the state to describe the mission of their SNAP E&T program.

1.2 Vision

This section is for the state to describe the vision of their SNAP E&T program.

2. Background

Describe any background information about the state's E&T program that would be helpful for an intermediary. There may be similar pieces in the state plan that can be utilized here.

Think About

This section may include how long the state has operated a TPP program, the types of TPPs in the state, the state's strategy for program outreach, the onboarding and continuous training process for new programs and continuing programs, etc.



3. Use of Intermediary Handbook

This section should describe how the state wants the intermediary to use the handbook. This should be language like the Third-Party Provider (TPP) handbook but with intermediary language.

Best Practices

Having a TPP handbook can be a vital resource in supporting TPPs and intermediaries. The TPP handbook, similar to the intermediary handbook, helps define the SNAP E&T program for TPPs and answer their day-to-day questions. Also, the TPP handbook can be a complimentary piece to the intermediary handbook. If a state does not have an existing handbook for TPPs, taking the time to create one is recommended.

Example

The purpose of this handbook is to provide a standard set of procedures and guidelines under the (STATE) Employment and Training (E&T) Program. The (STATE AGENCY NAME) may update this Intermediary Handbook periodically. The Agency will notify intermediaries when updates are made to this handbook informing partners that all updates must be reviewed and enacted as of the stated date.



4. Intermediary-State Relationship

This section is used to describe the relationship between the state agency and the intermediary. The decisions made in the Pre-Assessment will assist in the completion of this section.



Best Practice

Clearly identify the roles and responsibilities up front in an intermediary relationship. Make it clear who does what and how those roles will work together.

A. Roles

A.1 State Agency Responsibilities:

In this section, explain the role of the state agency. Below are some examples observed in other states.

Examples

- *The state maintains final authority over the E&T program.*
- *State agency will monitor the intermediary on a yearly basis to ensure all expectations and regulations are met.*
- *State agency will issue reimbursements to intermediaries on a monthly/quarterly basis for the intermediaries to disperse to their TPPs, or State agency will issue reimbursements directly to TPPs.*
- *State agency will meet with the intermediary on a monthly/quarterly basis to check in and answer any ongoing questions.*
- *State agencies are responsible for eligibility determinations and disputes.*
- *Any other state responsibilities can be added here.*

A.2 Local Office Responsibilities:

This section is added for county-administered states or states that have specific SNAP E&T functions that county offices perform. If county offices are not included in SNAP E&T administration, remove this section.

A.3 Intermediary Responsibilities:

In this section, clearly outline the roles that are expected of the intermediary. From the examples below, the listed roles and responsibilities would need to include detailed procedural descriptions and expectations. Build out the intermediary roles based on the decisions made in the Pre-Assessment (Appendix A) or in the SNAP E&T Intermediary Role Assignment: Decision Guide for State Agencies (Appendix B). Remove any topics the intermediary will not be responsible for.

Examples

- *Outreach and recruitment of TPPs*
- *Entering into agreements with TPPs*
- *Technical assistance (TA) to TPPs*
- *Collaboration on policy development and implementation*
- *SNAP E&T eligibility verification for billing purposes*
- *Communication about direct and reverse referrals*
- *Invoicing and reimbursement as a consolidated fiscal agent*
- *Participation and outcome reporting processes*
- *Help with program and fiscal monitoring*
- *State plan process support*
- *Any other expected intermediary responsibilities to support the SNAP E&T program*

A.4 Provider Responsibilities:

Simply referring to the TPP handbook is sufficient. If certain items change because there is an intermediary, add them here for clarity to the intermediary. In addition, if the intermediary is also a SNAP E&T provider, ensure that you share any specific information that they should know about certain populations (i.e., if they are serving people who need to report their hours worked every month) in the TPP handbook.

B. Funding

In this section, explain the method by which the intermediary is funded. Based on the state's answers to the funding section in the Pre-Assessment (Appendix A), determine the best funding mechanism to offer the intermediary. Multiple funding models could be used. Descriptions of the three mechanisms are below.

B.1 100 Percent Administrative Funds:

Determine whether the state will reserve 100% funds for internal administration and capacity needs, and/or allocate a portion to support an intermediary in carrying out specific functions under state oversight.

If offering 100 percent funds:

- Will funds be available for a start-up period or on an ongoing basis?
- Will there be a set amount allocated year after year, or will the amount be based on duties and number of vendors?

Best Practice

Clearly explain how this funding will be determined and distributed as well as timelines for duration of funding availability, especially if funds are allocated for a start-up period.

B.2 50 Percent Reimbursement on Planning, Implementing, and Operating Tasks:

States and/or intermediaries can fund intermediaries' SNAP E&T program administration costs with non-federal funding sources and request up to 50 percent reimbursement. If 100% funds are not available, the state could opt for allowing the intermediary to create a 50-50 budget and request reimbursement from FNS for allowable SNAP E&T administrative costs.

B.3 Holdback from TPP Vendors:

All financial decisions are made by the state when determining how the intermediary will be funded. Intermediaries that operate as the fiscal pass-through for TPPs can ask permission of the state to hold back a percentage of the reimbursement funds from the TPPs with which they contract. States using this intermediary funding mechanism typically allow intermediaries to withhold 5 to 10 percent to cover administrative costs.

C. Agreements

In this section, describe the annual agreement development process for intermediaries.

C.1 Forming Agreements and Timeline:

List important dates here for the completion of the state plan and the processes that lead to it.

Example

- *Early April: Intermediary selection process opens*
- *Early May: Submission period closes*
- *Early June: State agency and selected intermediary enter discussions on scope, budget, and expected outcomes*
- *Mid-July: Final revisions and refinements are due*
- *August 15: State agency submits the state plan*

C.2 Procedure for Developing an Agreement:

Provide a description of the agreement development process.

Think About

Think about adding agreement specifics, including:

- Information on whether there is an RFP to apply to be an intermediary and, if so, whether it is separate from the TPP RFP.
- If there is not an RFP, describe the process for initiating an intermediary relationship.
- Explain the budget submission process - if there is an intermediary-specific budget form it can be included in Example Appendix 1: Approved Forms and Documents.
- If approved as an intermediary, describe the state's process and timeline for developing an agreement.
- Clarify whether intermediaries receive annual or multi-year agreements and include the re-submission process information.

Resource Spotlight

Did you know APHSA has a THRIVE E-Learning designed for intermediaries focused on forming agreements? You can access the course [here to share with your intermediary](#); they'll need to [create a learner profile](#) first.

D. Intermediary Scope

State agencies can decide that the intermediary may also be a SNAP E&T provider. If the intermediary serves in both roles, state agencies may choose to whom the intermediary will provide services:

- **D.1 Key Populations Served by the Intermediary**

The state agency may refer specific populations to the intermediary organization, depending on the services they provide (e.g., case management, direct services, and referrals to outside services). Use this section to describe which populations the intermediary will serve.



5. Administrative Processes

This section of the handbook focuses on the processes the intermediary will be performing. Select the appropriate sections based on the decisions made either through the Pre-Assessment (see Appendix A) or the Intermediary Role Assignment Decision Guide (see Appendix B) and outline the responsibilities in this section. Any areas the state has decided will not be a task performed by the intermediary can be removed or marked as N/A.

Example

If the intermediary is not doing outreach and recruitment, then remove section 5 A.

A. Outreach and Recruitment of TPPs

Outreach and recruitment of TPPs may not be needed in states with strong interest from potential TPPs and formal RFP processes. Outreach may be done primarily through providing general program information to potential TPP applicants. If, however, states are working on growing their geographic area, populations served, and/or services provided, they may want assistance from an intermediary to engage in outreach and recruitment of potential providers.

Yes, the intermediary will provide outreach and recruitment of TPPs. Include information here on recruitment and outreach expectations.

Examples

- *Recruitment with state approved materials (if existing, list here).*
- *Recruitment from the intermediary service area, specific geographic area(s), or provider types.*
- *Recruitment of member organizations (a state-wide community action network intermediary recruiting member community action agency TPPs).*
- *The state agency is defining the number of new providers they expect to be recruited and onboarded, based on the state agency or intermediary capacity and budget.*

No, the intermediary will not conduct provider outreach. The state agency will recruit potential TPPs, share partnership information, and retain control over targeted providers and outreach messaging.



Think About

Some state agencies involve the intermediary in information delivery while maintaining oversight. In this section, specify any outreach and recruitment functions the intermediary is expected to support.

B. Developing Agreements with TPPs

State agencies often choose intermediaries to enter into agreements with TPPs to take advantage of existing state-wide provider networks and relationships, avoid arduous state contracting processes, and relieve agreement management responsibilities. Some state agencies choose to manage the responsibility of forming agreements with TPPs in-house to maintain control over the agreement development process as well as the overall TPP program.

Will the intermediary enter into agreements with TPPs?

Yes, the intermediary will negotiate and enter into agreements with TPPs as its own vendors. The intermediary will manage agreements and ensure that agreement requirements and deliverables are met.

No, the intermediary will not enter into agreements with TPPs. The state agency will execute and manage agreements with TPPs. While the intermediary will not execute agreements with TPPs, they may have other roles in working with TPPs in support of state agency priorities.

• B.1 Agreement Development Process for TPPs

Use this section to describe any parameters the state has for the intermediary with regards to entering into agreements with TPPs.

Think About



State agencies form agreements with partners using various methods. Some states utilize a formal RFP process resulting in a written contractual relationship with intermediaries and/or TPPs. Others may opt for a less rigid Memorandum of Understanding (MOU) to guide the relationship and articulate expectations of the relationship. When partnering with small organizations, a rigid contracting process could be burdensome on both the state agency as well as the provider. Consider if and when a formal contract is necessary to form an agreement with a SNAP E&T partner.

• B.2 Timeline

Use this section for all important dates for the intermediary.

Think About



State agencies will want to define timelines for execution agreements with TPPs, either directly or through intermediary subagreements, to ensure that the services, enrollment projections, and budget projections can be included in the annual state plan or state plan amendments.

• B.3 Requirements

Use this section for any specific state agreement requirements.

Think About



The state agency will want to clearly indicate any agreement requirements of vendors in its agreement with the intermediary and ensure that state agreement requirements are met during the agreement monitoring of the intermediary. This may include data security, insurance, or confidentiality requirements.

• B.4 Expectations

Use this section to clearly identify intermediary outcome expectations regarding vendors. Intermediaries who enter into agreements with TPPs are ultimately responsible for the compliance, reporting, and outcomes of their vendors, but the state agency may include language to ensure consistency across intermediaries and TPPs.

Think About



While the state agency may want an intermediary to enter into agreements with TPPs, they may also want to maintain some control over the types of TPPs that are vendors to the intermediary and what may be included in agreements to meet program priorities. The state agency can choose to execute an agreement with an intermediary that supports its program priorities and can maintain a good relationship to support program growth and additional TPP opportunities. The state agency's agreement with the intermediary may also direct the intermediary regarding the types of TPPs with whom it can form agreements, like the parameters included in the Outreach and Recruitment section above.

C. Technical Assistance

This section breaks down the TPP Technical Assistance (TA) leadership and delivery responsibilities. State agencies can choose how much or how little they want the intermediaries to lead or carry out TA activities based on state agency capacity. It is important to clearly delineate the TA duties or to work collaboratively with the intermediary for TA delivery.

Will the intermediary provide Technical Assistance to TPPs?

Yes, the intermediary will lead technical assistance to their TPPs vendors regarding state agency policies and procedures. This section can be used to describe what TA the state would like the intermediary to provide.

Examples

- *Onboarding and training of new providers*
- *Ongoing technical assistance (TA), including day-to-day operations, questions, and training new TPP staff on SNAP E&T*
- *Scheduled TA visits virtually or in-person both as part of a monitoring visit and as needed for the TPP*
- *Knowledge sharing and peer learning among providers*
- *Type and frequency of TA delivery*
- *Other TA needs and expectations*

No, the intermediary will not be the primary provider of technical assistance to their TPP vendors. The state agency will maintain leadership in TA development and delivery. The intermediary may have a support role in providing TA to TPPs. This section can be used to define the intermediary role, if any.

Resource Spotlight



To learn how monitoring of TPPs and technical assistance are intricately connected, explore APHSA's THRIVE E-Learning on monitoring. You can access the course [here to share with your intermediary](#); they'll need to [create a learner profile](#) first.

D. Collaboration on Policy Development and Implementation

In this section, the state agency will delineate to what extent the intermediary is invited to collaborate on policy development and implementation responsibilities. State agencies can choose how much or how little they want the intermediaries to support development and communication regarding the state's policy guidance.

Will the intermediary collaborate with the state agency about SNAP E&T policy development and implementation?

Yes, the intermediary will collaborate on the development and implementation of SNAP E&T policies and procedures in a shared, concerted process with the state agency. The state agency should clarify responsibilities related to the state's policy handbook, TPP handbook, and other policy-related guidance to TPPs; they should be sure to clarify final approval lies with the state agency.

No, the intermediary will not be involved in the creation of the state's SNAP E&T policy and procedure, but may be included for review and feedback. The state agency may utilize the intermediary for dissemination of policy-related information and materials.

In the handbook, provide state agency contact information for policy questions and access to policy and provider handbooks.

• D.1 Timelines

Indicate when specific updates to the policy and/or TPP handbook are expected to be drafted, provided to the state agency, and finalized, and when/how updates are communicated to TPPs.

Best Practice

A rigid binary, state agency or intermediary, may not be the appropriate structure for policy development and implementation. The recommended best practice for state agencies is to maintain a collaborative relationship with the intermediary to include input from the intermediary and TPPs to develop policies and procedures informed through the experience of administering SNAP E&T while meeting state and federal requirements.



E. SNAP E&T Eligibility Verification for Billing Purposes

In this section, the state agency will outline how the intermediary will interact with the state when it comes to verifying SNAP E&T eligibility for billing purposes.

Will the intermediary support processes to verify SNAP E&T participant eligibility for billing purposes?

Yes, the intermediary will support processes to verify SNAP E&T participant eligibility for billing purposes.

No, the intermediary will not support processes to verify SNAP E&T participant eligibility for billing purposes.

• E.1 Initial and Ongoing Eligibility Verification for Billing Purposes

If the answer is **yes to initial and ongoing verification**, for enrollment and billing purposes, use this section to explain the process the intermediary will use for initial and ongoing eligibility confirmation including timelines, verification procedures, data format, and communication with the state agency.

If the answer is **no**, this section can be removed. It is likely that the initial and ongoing eligibility verification process will be outlined in the TPP handbook.

Whether the intermediary and/or TPPs are allowed access to state data systems with confidential benefits information may help determine the eligibility verification process. Some state agencies are more restrictive in who is granted access to confidential data systems, which can result in only state staff being able to verify participant eligibility, whereas if access is less restrictive, the state agency would have more flexibility in determining the process.

Process Example #1

Intermediaries must compile a list of new TPP enrollments weekly to submit to the state agency. The intermediary receives and combines weekly enrollment lists from the TPPs and uploads this information into a secure file or emails using a secure email to the state agency for SNAP E&T verification. (Link/email to be provided when onboarding and included in TPP handbook.) The agency will return the verified list to the intermediary within three days, and the intermediary disburses the relevant information to each TPP.

Process Example #2

At the end of each month, the intermediary will collect all rosters of SNAP E&T enrolled clients from their TPPs. The intermediary, with read-only access to the SNAP eligibility data system, will verify each participant on the roster for SNAP eligibility. Within three business days, the intermediary will return completed rosters to each TPP for billing purposes.

F. Communication about Direct and Reverse Referrals

In this section, the state agency will describe the intermediary's role in supporting the communication of referrals and reverse referrals. Screening and referral decisions for SNAP E&T are conducted by the state agency as part of the certification process prior to any engagement with intermediaries. The state agency may also describe how its screening and referral processes interface with intermediary functions, including timelines and expectations for referral communication and processing.

Will the intermediary help to communicate regarding direct and reverse referrals?

Yes, the intermediary will be involved in supporting participant referral processes for SNAP E&T.

No, the intermediary will not be involved in supporting participant referral processes for SNAP E&T.

• F.1 Referral Process

If the intermediary will support communication processes regarding referrals, then the process should be outlined here, including timelines, documentation, and communication expectations.

• F.2 Reverse Referral Process

If the intermediary will support communication processes regarding the reverse referrals, then the process should be outlined here, including timelines, documentation, and communication expectations.

Referral Process Example

The state agency will send referrals to the intermediary to be distributed to the TPPs, as appropriate to geographic area and participant needs. The intermediary has three business days to distribute the referrals to their TPPs and ensure the TPPs have followed up with the referral with five business days.

Reverse Referral Process Example

Reverse referrals from the intermediary TPPs will be sent to the intermediary. The intermediary will send the reverse referrals to the state agency for eligibility verification. After SNAP E&T eligibility is verified, approvals will be returned to the intermediary, which communicates them to the TPP.

Think About



Including an intermediary when communicating about referrals can ensure clear communication but may delay referrals reaching TPPs and the verification and return of reverse referrals. Encouraging direct communication between TPPs and state agencies can shorten the timeline from referral to enrollment; meanwhile, intermediaries remain valuable for tracking and reporting purposes.

G. Participation and Outcome Reporting

In this section, the state will explain the intermediary's role in participation and outcome reporting and the process required for timely reporting to the state.

Will the intermediary collect participation and outcome data from its TPP vendors and submit it to the state in one report?

Yes, the intermediary will assist the state in collecting participation and outcome reporting on a monthly/quarterly/yearly basis. The intermediary will work with TPPs to ensure the validity of their data, and make updates and corrections, after which data will be sent to the state. The intermediary will provide information to the state based on state timelines for the agency's quarterly 583 and annual outcomes report, along with any additional state-defined component measures or other reporting.

No, the intermediary will not be involved in the quarterly/annual reporting process unless they are a direct service provider. TPPs will submit monthly, quarterly, and annual reporting directly to the state agency. The state agency will work with TPPs to verify information and adjust as necessary.

• G.1 Third-Party Partners

Describe expectations for the intermediary to collect accurate information from TPPs, including verification and corrections procedures on reported data.

• G.2 Timeline

Provide the intermediary with deadlines for monthly, quarterly, and annual reporting, including state and fiscal year-end.

Best Practice



When determining deadlines for the intermediary to provide reporting data, factor in the time it takes for TPPs to prepare data and the intermediary to collect and verify TPP data. Seeking feedback on timetables and ensuring that verification process can occur at the TPP and intermediary levels will lead to more accurate reporting.

• G.3 Reports

- Outline all reporting requirements for the intermediary.
- Detail the reporting format, predetermined forms, and/or procedures for compiling accurate data for the state agency. If the state agency utilizes a data management system, it may include what information in participant records needs to be updated and when. If the state agency has reporting forms, they can be included in Example Appendix 1: Approved Forms and Documents.

Best Practice



Many intermediaries use shared databases and dashboards, standardized templates and checklists, or reporting systems that are aligned with state requirements in order to manage the complexity of multi-provider reporting; you might consider discussing which of these your intermediary can leverage to improve the quality and ease of their reporting.



H. Invoicing and Reimbursement

In this section, the state agency can describe the process for how the intermediary will seek payment from the state for its own expenses as well as its TPP vendors. Portions of this process will depend on the decisions made previously in this handbook.

Will the intermediary operate as the consolidated fiscal agent for its TPPs?

Yes, the intermediary will combine the invoices of their TPP vendors and submit one invoice to the state for reimbursement, in addition to billing its own expenses as an intermediary and possibly a TPP.

No, the intermediary will not be the fiscal agent for TPPs. TPPs will submit invoices to the state agency, and the state agency will issue reimbursement according to the terms of their agreement with the TPP. As such, the intermediary will submit invoices for only its **own** intermediary expenses and TPP expenses (if applicable).

• H.1 Allowable Funds for Reimbursement

Funds submitted for Federal 50/50 reimbursement must be for allowable E&T costs for the planning, implementing, and operation of the program. If the intermediary is the fiscal agent for TPPs and/or is allowed to submit a 50% reimbursement budget for its own expenses, the intermediary should verify that all costs are allowable for 50/50 reimbursement prior to submission to the State. For intermediaries that will submit a 50% reimbursement budget for their own expenses, it is worth noting that all guidelines for non-federal funds that are used for the TPP program hold true for the intermediary. For consistency, the state agency may include here the same information as is in the TPP handbook.

• H.2 Invoicing Process and Timeline

Detail the monthly/quarterly invoice submission deadlines, including state and federal fiscal year end variances, invoice submission procedures, and process for corrections and appeals.

Think About

In determining timelines for submission, make sure to give the intermediary enough time to collect all the information from their TPPs and review it for expense eligibility before submitting it for reimbursement.



• H.3 Documentation Requirements

Include the expectations for invoicing format, included documentation from the intermediary and its TPP vendors, and expectations for intermediary and TPP vendor expense verification. If there are approved invoicing forms, they can be included in Example Appendix 1: Approved Forms and Documents.

Examples

- *The intermediary will collect all documentation from their TPP vendors as required in the TPP handbook. The intermediary will confirm all required documentation matches the amount on the TPP invoice for reimbursement and is within eligible dates of service.*
- *Documentation for each TPP vendor (including the intermediary, if applicable) will be sent in a file marked [Name of Program] [month/quarter of documentation] to the designated shared folder or email address.*
- *The intermediary will submit two invoices to the state agency for each billing period: one invoice and related documentation for the intermediary expenses, and a second invoice and related documentation including the total of all the individual TPP expenses.*

• H.4 Reimbursement

In this section, describe timelines and procedures for reimbursement to the intermediary for disbursement to the TPPs.



I. Supporting Program and Fiscal Monitoring

In this section, the state agency may describe the intermediary's role in supporting Annual Program and Fiscal Monitoring of TPPs. If intermediaries assist with monitoring activities, the state agency and intermediary must collaborate to implement state-established monitoring processes, with the state retaining full responsibility for policy, guidance, and oversight of all monitoring activities. As is discussed in the next section, the state must also monitor the intermediary's SNAP E&T work, regardless of whether the intermediary supports monitoring of TPPs.

Will the intermediary support the state agency with program and fiscal monitoring tasks?

Yes, the intermediary will play a role in monitoring TPPs (of the intermediary's vendors and possibly other TPPs) for SNAP E&T compliance.

No, the intermediary will not play any role in monitoring TPPs for SNAP E&T compliance. The state agency will maintain responsibility and direction over monitoring to ensure TPPs are following SNAP E&T policies.

• **I.1 Monitoring Scope**

Define expectations regarding the scope and level of the intermediary's monitoring of TPPs, including financial oversight, compliance reviews, program monitoring, agreement compliance, and expected sample sizes.

• **I.2 Monitoring Procedures**

Provide a description of how the intermediary is expected to conduct, document, and report monitoring activities, including monitoring forms, expectations for reporting monitoring results to the state agency and TPPs, and corrective action procedures.

• **I.3 Monitoring Timeline**

Indicate the requirements for frequency of TPP monitoring, timeline for reporting monitoring results, and corrective action communication and completion.

• I.4. TPP Monitoring Expectations

Describe the intermediary's role in supporting Annual Program and Fiscal Monitoring of TPPs. See several examples below.

Examples

- *Intermediaries will follow the same procedures as the state for monitoring TPPs. Please see the TPP state handbook for procedures.*
- *Submit a yearly monitoring plan to the state by the beginning of November of the current federal fiscal year.*
- *Included with monitoring plan, submit any documentation intermediary will send to the TPPs about the monitoring, including:*
 - *Letter of intent to monitor*
 - *Monitoring checklist*
 - *List of participant record requirements to be checked*
 - *Fiscal monitoring checklist*
 - *Calendar of monitoring visits*
 - *Sample letter of response after monitoring*
 - *Plan of Improvement letter of approval*
 - *Plan of Improvement letter of completion*
- *Submit all letters of response to state Agency upon completion of monitoring by [date].*
- *Submit any TPP Plans for improvement if findings are found by [date].*
- *Submit a letter of completion when TPP has completed their Plan of Improvement by [date].*
- *Submit a summary report of all monitoring at the end of the fiscal year by [date] to [email address].*

Resource Spotlight



APHSA has a THRIVE E-Learning designed for intermediaries who monitor TPPs. To access the course click [here to share with an intermediary](#) or organization interested in becoming one; they'll need to [create a learner profile](#) first.

• I.4 Monitoring of the Intermediary

The state agency will also need to determine and communicate fiscal and performance monitoring procedures for the intermediary, including the monitoring timeline, procedures, and expectations.



Think About

The monitoring plan for the intermediary can be structured similarly to the monitoring plan for TPPs.



Best Practice

To develop an understanding and strong relationships with the intermediary and TPPs, state agencies can accompany the intermediary when it conducts some monitoring visits of TPPs. In addition, this gives an opportunity to the state agency to monitor and support the intermediary.



J. State Plan Process Support

The state agency needs to determine how much support it would like from the intermediary to develop the annual SNAP E&T state plan and provide clear expectations for the intermediary support.

Yes, the intermediary will support the development and drafting of the annual SNAP E&T state plan. The state agency is ultimately responsible for the writing and submission of the state plan to FNS, but the intermediary provides support in drafting a portion or the full state plan. The state agency can choose how independent or collaborative the drafting process will be.

No, the intermediary will not support the development or drafting of the annual SNAP E&T state plan. The state agency will compile the state plan. The intermediary and any other TPPs will submit proposals to the state agency by requesting to develop participation and financial projections.

• J.1 Agreements

Describe how the intermediary will support the annual agreement development process and how it aligns with the state plan.

• J.2 Budget and Narrative

Describe how the intermediary will support annual budget projection development for TPPs. The intermediary may review TPP budget projections, review past years' expenditure data, discuss goals, and determine future growth of their programs prior to submission.

• J.3 Timeline

List important dates for the completion of the state plan and the processes that lead to it.

Example

- *Early April: Release of TPP agreement process*
- *Early May: TPP agreement submissions due*
- *June: Discussions between state agency and intermediary on agreements, budget, outcomes*
- *Mid-July: Final revisions to agreements due*
- *August 15: State plan submitted*

• J.4 State Plan

Include here any specific items the intermediary can provide to support the state agency in writing the state plan, including program changes, services narratives, or additional programs. Include any important dates to keep partners and the state plan on track.

K. Data Sharing Process

Data sharing needs to be clearly defined between the intermediary, the state agency, and counties, if needed.

- **K.1 Identify the requirements for data sharing between the intermediary and the TPP and the intermediary and the state.**

Think About



In some states without statewide data sharing agreements, it has been more difficult for intermediaries to support the administration of SNAP E&T. In addition, intermediaries in some county-administered states need to establish data sharing agreements with each individual county, which can be burdensome. If state-administered or county-administered SNAP E&T programs are considering entering into an agreement with an intermediary, a statewide data sharing agreement can support more streamlined, efficient processes between the state agency and intermediary.

L. Communication and Collaboration

Include in this section any identified communication channels and scheduled meetings between state agency and intermediary. Use the Roles definitions from Section 4 A.

Think About



In research done with current intermediaries, the most mentioned reason for success or struggle for an intermediary was communication with the state agency. If communication was good and collaborative, the intermediary felt supported and better equipped to keep the program in compliance. If communication was not regular and not separate from TPP communication, the intermediary felt unsupported and unsure of their roles and responsibilities.

- **L.1 Point of Contact**

Include state agency staff or positions who will serve as direct points of contact, both general communications and specific administrative topics.

- **L.2 Timeline of Meetings**

Determine the types of meetings and how frequently they occur.

Examples

- *Monthly partnership meetings*
- *Annual reviews*
- *Ad hoc meetings, including fiscal teams or programming teams*

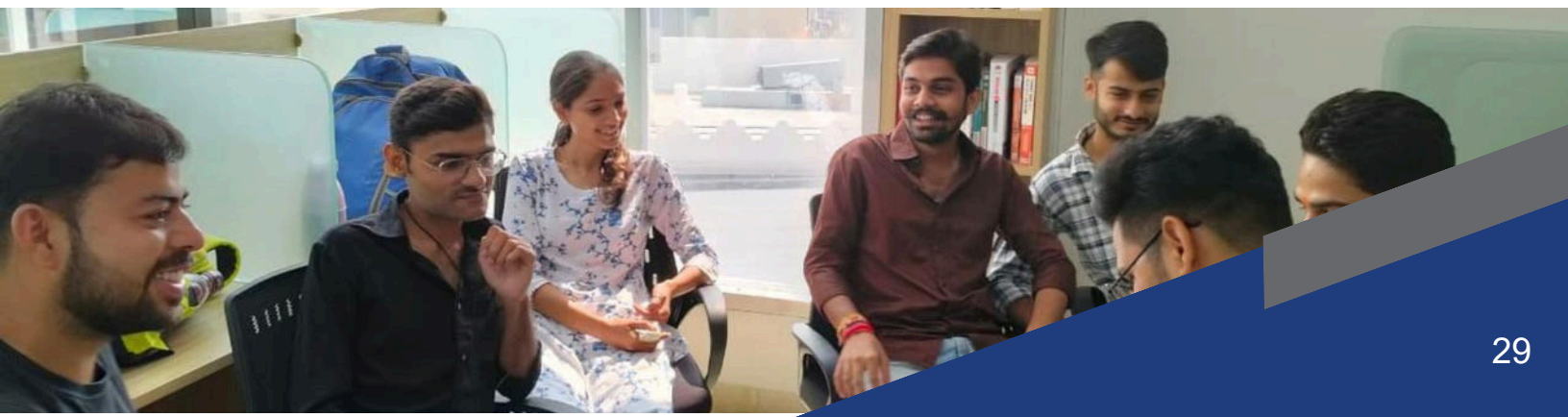
Best Practice



Regular meetings should be scheduled between the state and its intermediaries; these could be monthly or quarterly. Two-way communication in these meetings will help with relationship building, allowing the agency to discuss any issues and new policies and the intermediary to discuss issues relevant to their work and TPPs. Also, setting up the meeting calendar at the beginning of the year can ensure that all expected attendees will have meetings on their calendars.

M. “Other”

Add anything here that was listed as other in the Activities Checklist from the Pre-Assessment (Appendix A).



Example Appendix 1

The Appendices section can be adapted to the needs of the state's E&T program. Examples are provided below for possible appendices.

Approved Forms and Documents

This is a common list of forms used by states. Please adapt this list to the states list of forms.

SNAP E&T Forms

1. E&T Referral Form
2. Participant– Agency Contract/Agreement
3. Participant Status Form
4. SNAP E&T Supportive Service Log
5. SNAP E&T Workfare Site Agreement
6. SNAP E&T Workfare Plan
7. SNAP E&T Workfare Hours of Participation Worksheet
8. SNAP E&T Data Collection and Reports
9. SNAP E&T Client Component Tracking
10. SNAP E&T Program Participation Report
11. SNAP E&T Statistics Report
12. SNAP E&T Client Component Tracking Report
13. SNAP E&T Expense Report/Invoicing Form
14. Additional SNAP E&T Documents
15. SNAP E&T Intermediary Monitoring Form
16. Annual Civil Rights Training Form
17. Annual Nondiscrimination Form
18. Annual Confidentiality and Nondisclosure Form

Example Appendix 2

Terms and Acronyms

This is a common list of compiled terms and acronyms. Please make sure to add any new ones used when the handbook is created. Utilize the list of acronyms that are included in the state plan or TPP handbook.

Acronym	Full Form	Description
ABAWD	Able-Bodied Adults Without Dependents	SNAP participants who are subject to specific work requirements as adults without dependents. Note that this document refers instead to “Time-Limited Participants;” either term is acceptable to refer to these individuals.
E&T	Employment and Training	A program under SNAP that helps participants gain skills, training, or work experience to increase employability.
FNS	Food and Nutrition Service	The United States Department of Agriculture Agency that administers SNAP and develops policy, provides national oversight of, and promotes innovation in the national SNAP E&T program.
ME	Management Evaluation	A review process to ensure compliance and effectiveness of SNAP E&T programs and intermediaries.
RFP	Request for Proposal	A formal process for soliciting bids or proposals from potential intermediaries or providers.
SNAP	Supplemental Nutrition Assistance Program	A federal program providing nutrition benefits to eligible low-income individuals and families.
TA	Technical Assistance	Support provided to intermediaries or providers to help implement SNAP E&T policies and procedures.
TPP	Third-Party Provider	Organizations who have entered into agreements to deliver SNAP E&T services under the state agency or an intermediary.

Additional Terms States May Considering Adding

SNAP E&T-Specific Terms

- IEP: Individualized Employment Plan
- MPR: Monthly Participation Report
- Components:
 - ABE: Adult Basic Education
 - SWBL: Subsidized Work-Based Learning
 - VESL: Vocational English as a Second Language

Agency and Partner Names (Examples)

- DHHS: Department of Health and Human Services
- GWDB: Governor's Workforce Development Board
- USDA FNS: United States Department of Agriculture Food and Nutrition Service
- WDB: Workforce Development Board
- Systems and Other Relevant Terms (Examples)
- Case management system – WF1: Workforce One (MN), eJAS: Electronic Jobs Automated System (WA)
- SNAP eligibility system – ONE: OregONEligibility System (OR), AZTECS: Arizona Technical Eligibility Computer System (AZ)
- TANF: Temporary Assistance for Needy Families
- WIOA: Workforce Innovation and Opportunity Act

Example Appendix 3

Resources

Add any websites, policy guidance documents, FNS documents and other items that would be helpful for the intermediary to have access to.

Conclusion

This suite of Intermediary Handbook Development Tools was created as part of the SNAP E&T National Partnership grant by the American Public Human Services Association (APHSA), with significant support from Seattle Jobs Initiative (SJI). The examples, best practices, and considerations included throughout the suite were informed by interviews with nine intermediary organizations, as well as a review of primary FNS regulations, guidance, and related resources. These tools are intended to reflect APHSA's and SJI's current understanding and recommendations based on available information and practitioner experience; however, intermediary organizations should ultimately defer to official guidance and direction from the U.S. Department of Agriculture's Food and Nutrition Service (FNS) and applicable state agencies when making programmatic or policy decisions.



Appendix A: Designing a SNAP E&T Intermediary: State Pre-Assessment Tool

Purpose

This tool is the second in a suite of tools designed to assist state agencies in developing an intermediary handbook for the SNAP Employment and Training (SNAP E&T) program. The Pre-Assessment tool below is intended to help a state determine the general structure of their intermediary partnership and identify key decisions in advance to help ensure that an intermediary handbook is developed is aligned with program requirements and prioritizes what is most needed.

Overview

When incorporating an intermediary into a SNAP E&T program, the state agency needs to make three critical decisions to support the intermediary's success and maintain a strong working relationship:

1. **Define Intermediary Functions.** Determine the activities the intermediary will perform to enhance efficiency, support program expansion, and advance State objectives.
2. **Establish Funding Structure.** Identify how the intermediary will be funded, considering available options and program requirements.
3. **Determine Intermediary Program Scope.** Decide whether the intermediary will also function as a direct service provider.

The below Pre-Assessment is designed to guide state agencies through several high-level decisions to facilitate the development of a comprehensive intermediary handbook (See Developing a SNAP E&T Intermediary Handbook: A State Agency Guide for a step-by-step guide to drafting a state agency intermediary handbook).

Instructions

This Pre-Assessment should be completed by the state agency SNAP E&T team as a collaborative activity. It is meant to be a support in moving through necessary state approval processes before an intermediary formally enters into an agreement with the state agency and a state's intermediary handbook is written (using the State Agency Guide).

Part 1: Define Intermediary Functions

From the list below, select all activities the SNAP E&T program is considering assigning to the intermediary. Additional activities may be included in the “Other” fields provided. Any of the activities checked should be included and detailed in the intermediary handbook.

Checkbox	Activity
☐	Outreach and recruitment of third-party providers
☐	Entering into agreements with third-party providers
☐	Technical assistance for third-party providers
☐	Collaboration on policy development and implementation
☐	SNAP E&T eligibility verification for billing purposes
☐	Communication about direct and reverse referrals
☐	Participation and outcome reporting
☐	Invoicing and reimbursement as a consolidated fiscal agent
☐	Program and fiscal monitoring support
☐	State plan process support
☐	Program data management and sharing
☐	Other: _____
☐	Other: _____
☐	Other: _____

Part 2: Establish Funding Structure

Intermediaries are often funded through one or more of the following methods. Select all applicable options:

Checkbox	Funding Method
☐	100 percent administrative funds
☐	50 percent reimbursement funds
☐	Administrative holdback from providers' reimbursement
☐	Other: _____

If "100 percent administrative funds" is selected, indicate when the intermediary will receive these funds:

Checkbox	100 Percent Administrative Funding Details
☐	Start-up period funding (e.g., for the first agreement year)
☐	Ongoing funding (e.g., annually) ☐ Ongoing funding will be based on a set amount year after year. ☐ Ongoing funding will be determined based on selected activities and the number of TPP vendors.

Part 3: Determine Intermediary Program Scope

Indicate whether the intermediary may also function as a direct service provider or a 50-50 third-party partner (TPP). This means they directly deliver SNAP E&T services (such as case management, job readiness training, education, and supportive services) to participants rather than solely coordinating or overseeing those services.

Checkbox	Service Roles
☐	Yes, they will deliver SNAP E&T services.
☐	No, they will not deliver SNAP E&T services.

If "Yes" is selected, specify the scope:

Program Scope
Which target SNAP E&T populations will the intermediary serve?

Appendix B: SNAP E&T Intermediary Role Assignment Framework: Decision Guide for State Agencies

This Guide's Purpose

This Decision Guide is intended to help state agencies determine the role that an intermediary can play in administering a SNAP E&T program. State agencies are responsible for numerous tasks to ensure their SNAP E&T programs run smoothly—not only within their agency but also for providers and, most importantly, for participants. State agencies can enter into agreements with intermediaries to support SNAP E&T program administration, increasing the program's capacity and reach. No uniform scope for intermediaries' roles and responsibilities exists—it varies greatly from state to state. As such, state agencies have the flexibility to determine what tasks an intermediary will be assigned.

How to Use This Guide

This Decision Guide includes a series of questions about SNAP E&T program responsibilities that state agencies might assign to an intermediary. Below each question is a decision on whether the state agency will continue to maintain responsibility over the task or whether the intermediary will be given the responsibility with state oversight. After each decision, there are suggestions on what can be added to an intermediary handbook as well as other policy and procedure considerations.

This tool can help a state agency determine the general structure of the relationship with an intermediary and clarify shared responsibilities. Once completed, the results can inform the drafting of an intermediary handbook. See *Developing a SNAP E&T Intermediary Handbook: A State Agency Guide* for more.

For states with more than one type of intermediary or a hierarchy of intermediaries (i.e., an intermediary that forms an agreement with another intermediary), this tool can help determine roles and responsibilities. Each situation will be different, just as all SNAP E&T programs are different. If a state agency is pursuing multiple intermediaries with different roles, this tool can be used for each individual intermediary agreement.

Think About



The tool asks state agencies to define administrative responsibilities with intermediaries using a simple binary—either the intermediary performs a task or it does not. Some selections may ultimately translate into shared or blended responsibilities. When working through the tool, agencies should keep in mind that the tool is intended to support the design of a structure and working relationship that best fits an agency's SNAP E&T program, rather than to prescribe a single “right” approach.

SNAP E&T Program Responsibility Decisions Included

This Decision Guide includes ten responsibilities a state agency might assign to an intermediary, listed in the left-most column in Table 1 below. For a more detailed guide, examples, best practices, and additional considerations about any of these decisions, please refer to *Developing a SNAP E&T Intermediary Handbook: A State Agency Guide*. It outlines, step-by-step, the process for drafting a state agency's intermediary handbook. Sections within the Intermediary Handbook Guide that correspond with a key decision are listed in the right-most column.

SNAP E&T Program Responsibility	Key State Decision (Y/N)	Page Number Within This Tool	Corresponding Section in the Intermediary Handbook Guide
Outreach and recruitment of Third-Party Providers (TPPs)	Will the intermediary provide outreach and recruitment of TPPs?	3	Section 5.A
Entering into Agreements with TPPs	Will intermediary enter into agreements with TPPs?	4	Section 5.B
Technical assistance for TPPs	Will the intermediary lead Technical Assistance for TPPs?	5	Section 5.C
Collaboration on policy development and implementation	Will the intermediary collaborate with the state agency about SNAP E&T policy development and implementation?	6	Section 5.D
SNAP E&T eligibility verification for billing purposes	Will the intermediary support processes to verify SNAP E&T participant eligibility for billing purposes?	7	Section 5.E
Communication about direct and reverse referrals	Will the intermediary help to communicate regarding direct and reverse referrals?	8	Section 5.F
Participation and outcome reporting	Will the intermediary collect and submit participation and outcome data from its TPP vendors?	9	Section 5.G
Invoicing and reimbursement as a consolidated fiscal agent	Will the intermediary support invoicing and reimbursement, operating as the consolidated fiscal agent for its TPPs?	10	Section 5.H
Supporting program and fiscal monitoring	Will the intermediary support the state agency with program and fiscal monitoring tasks?	11	Section 5.I
State plan process support	Will the intermediary support the development of the annual state plan?	12	Section 5.J
Program data management and sharing	N/A – Data sharing needs to be clearly defined between the intermediary, the state, and counties, if needed.	N/A	Section 5.K

Will the intermediary provide outreach and recruit Third-Party Providers (TPPs)?

Yes, the intermediary will provide outreach and recruit its own providers.



No, the intermediary will not provide outreach and recruit its own providers.

What to include in the handbook:

- Expectations for meeting the state agency's priorities for program expansion
- Identify and Recruit New TPPs
 - Specify whether the intermediary will recruit from its own membership or more broadly, and how much input the state agency will have on the process
- Provide TA on SNAP E&T and the TPP agreement process
 - Define the level of TA the intermediary will provide to interested TPPs, if at all, and document those expectations in the intermediary agreement process.

This means that the state agency will provide information on partnerships and recruit any potential TPPs. It is important to clarify that the state agency will maintain control of which service providers are targeted and the outreach messaging.

What to include in the handbook:

- Overview of how the state agency will promote SNAP E&T partnership opportunities and recruit potential TPPs or remove Section 5.A.

Will the intermediary form agreements with Third-Party Providers (TPPs) and manage relationships with those vendors?



Yes, the intermediary will negotiate with and enter into agreements with TPPs as its own vendors.



No, the intermediary will not enter into agreements with TPPs.

What to include in the handbook:

- State Agency Expectations and Guidelines
- Timeline
 - Provide clarity as to when the intermediary may issue new and renewed agreements. Keep the state plan timeline in mind and whether TPPs may be added mid-year.
- Requirements
 - Requirements of the intermediary's agreement with vendors, including issuance, any standard language inclusion, monitoring expectations, and other program information to ensure compliance.
- Expectations
 - The state agency can define expectations regarding who the intermediary forms agreements with. Also, indicate responsibilities for the compliance, reporting, and outcomes of intermediary's vendors.

What to include in the handbook:

- Instructions for the intermediary to guide potential TPPs to the state agency's agreement development process or remove Section 5.B.

Will the intermediary lead Technical Assistance for TPPs?

Yes, the intermediary will lead technical assistance to TPPs on state agency policies and procedures.

What to include in the handbook:

- Expectations for TA and policy guidance, including benchmarks and schedules, tied to monitoring and program outcomes.
- Initial and Ongoing Technical Assistance
 - Direction on new TPP onboarding, training for new TPP staff, and ongoing TA, including day-to-day operations questions, scheduled in-person TA, and LMS content development.

No, the intermediary will not be the provider of direct technical assistance.

The state agency will provide onboarding, answer day-to-day operations questions, and lead any scheduled or annual training.

What to include in the handbook:

- State agency contact information for policy questions and access to policy and provider handbooks.

Will the intermediary collaborate with the state agency about SNAP E&T policy development and implementation?



Yes, the intermediary will collaborate with the state agency about SNAP E&T policy development and implementation.



No, the intermediary will not have responsibility related to SNAP E&T policy development and implementation, including policy and provider handbooks.

What to include in the handbook:

- Expectations for leadership of the intermediary and/or collaboration with the state agency on policy development.
- Policy Development
 - Indicate the intermediary's clear roles and responsibilities regarding their support with collaboration on the state agency's policy handbook, provider handbook, and other policy-related guidance to TPPs. Final approval lies with the state agency.
- Timelines
 - Indicate timelines for policy and provider handbook drafts and when/how updates are communicated to TPPs.

What to include in the handbook:

- Information on state agency contact information for policy questions and access to policy and provider handbooks.

Will the intermediary support processes to verify SNAP E&T participant eligibility for billing purposes?



Yes, the intermediary will support processes to verify SNAP E&T participant eligibility for billing purposes.

No, the intermediary will not support processes to verify SNAP E&T participant eligibility for billing purposes.

What to include in the handbook:

- Expectations for the intermediary and details on the process of confirming initial and ongoing SNAP E&T eligibility.
- Process and timelines
 - Include technical aspects of each process, including data systems, required forms, communication with TPPs and state agency, and timelines.

What to include in the handbook:

- Refer to the TPP handbook for SNAP E&T screening, referral, and eligibility verification policies, processes and procedures, or remove Section 5.E.

Will the intermediary help to communicate regarding direct and reverse referrals?



Yes, the intermediary help will help to communicate regarding direct and reverse referrals.



No, the intermediary will not help communicate about direct or reverse referrals.

What to include in the handbook:

- Expectations for how the intermediary will communicate about direct and reverse referrals, and whether they will support one or both processes.
- Referral Process (Section 5.F.1)
 - Explanation of how the intermediary will communicate about direct referrals, the flow of communication from state SNAP E&T eligibility staff through intermediary to TPP, including expectations and timelines for TPP engagement with referred participants.
 - If intermediary does not support the communication regarding direct referrals, remove Section 5.F.1.
- Reverse Referral Process (Section 5.F.2)
 - Explanation of how the intermediary will communicate about reverse referrals, the flow of communication from the TPP, including responsibilities of the intermediary and state agency, and timelines for response and enrollment.
 - If intermediary does not support the communication regarding reverse referrals, remove Section 5.F.2.

What to include in the handbook:

- Refer to the TPP handbook for referral processes or remove Section 5.F.

Will the intermediary collect and submit participation and outcome data from its TPP vendors?



Yes, the intermediary will assist the state in collecting participation and outcome reporting on a monthly/quarterly/yearly basis.



No, the intermediary will not be involved in supporting participant referral processes for SNAP E&T.

What to include in the handbook:

- Clear instructions on what information is needed from the intermediary, in what format, and when it is expected to the state agency.
- Third-party partners
 - Expectations for the intermediary to collect accurate data from TPPs, including verification and corrections procedures.
- Timeline
 - Provide the intermediary with deadlines for monthly, quarterly, and annual reporting, including state and fiscal year-end.
- Reports
 - Detail the reporting format, predetermined forms, and/or procedures for compiling accurate data for the state agency, including data management system use.

What to include in the handbook:

- Information relevant to the intermediary's reporting needs, if any, or remove Section 5.G.

Will the intermediary support invoicing and reimbursement, operating as the consolidated fiscal agent for its TPPs?



Yes, the intermediary will be the consolidated fiscal agent for its TPPs serving as vendors.



No, the intermediary will not be the fiscal agent for TPPs.

What to include in the handbook:

- Clear policy guidelines on allowable reimbursable funds, expectations for invoice verification and submission, and expectations for reimbursement of the intermediary's vendors.
- Allowable Funds
 - Clear policy and rules on allowable, non-federal funding sources eligible for reimbursement.
- Invoicing Process and Timeline
 - Explanation of ongoing deadlines for submission, state and/or federal fiscal year-end deadlines and procedures, invoice submission procedures, and process for corrections and appeals.
- Documentation Requirements
 - Expectation for invoicing format, including documentation and expense verification.
- Reimbursement Process and Timeline
 - Explanation of timeline for reimbursement from the state agency to the intermediary and from the intermediary to TPPs, and tracking and auditing expectations.

TPPs will submit invoices to the state agency, and the state agency will issue reimbursement directly to the TPPs.

What to include in the handbook:

- Include only information relevant to the intermediary invoicing for its own services. Refer to the TPP handbook for billing and reimbursement processes or remove Section 5.H.

Will the intermediary support the state agency with program and fiscal monitoring tasks?



Yes, the intermediary will support the state agency with program and fiscal monitoring of TPPs (of the intermediary's vendors and possibly other TPPs) for SNAP E&T compliance.



No, the intermediary will not support the state agency with program and fiscal monitoring of TPPs for SNAP E&T compliance.

What to include in the handbook:

- Clear expectations of the scope, procedures, and schedule for compliance and performance monitoring that fit state agency needs.
- Monitoring Scope
 - Define expectations regarding the scope and level of the intermediary's monitoring of TPPs, including financial oversight, compliance reviews, program monitoring, agreement compliance, and expected sample sizes.
- Monitoring Procedures
 - Expectations of how the intermediary is to conduct, document, and report monitoring activities, including monitoring forms, reporting monitoring results, and corrective action procedures.
- Monitoring Timeline
 - Requirements for frequency of TPP monitoring, timeline for reporting monitoring results, and corrective action communication and completion.

State agency will monitor the TPPs and the intermediary.

What to include in the handbook:

- Include only information relevant to monitoring the intermediary's agreement with the state agency. Refer to the TPP handbook for TPP monitoring procedures or remove Section 5.I.

Think About



Regardless of whether the intermediary will be responsible for monitoring TPPs, as with all SNAP E&T partners, the state agency will need to monitor the intermediary for relevant program, data, fiscal, and other compliance.

Will the intermediary support the development of the annual state plan?



Yes, the intermediary will support the development and drafting of the annual SNAP E&T state plan, providing support in drafting relevant sections.



No, the intermediary will not support the development and drafting of the annual SNAP E&T state plan.

What to include in the handbook:

- Describe the level of responsibility expected of the intermediary, including drafting specific sections and deadlines for submission.
 - Agreements: Describe how the intermediary will support the annual agreement development process and how it aligns with the state plan.
 - Budget and Narrative: Describe how the intermediary will support and compile annual budget projections for TPPs.
 - Timeline: Provide the intermediary with a deadline for submission of state plan budgets and descriptions.
 - State Plan: Describe other information that would be helpful to the state agency's completion of the state plan. List specific sections of the state plan and clear expectations for drafts.

The state agency will communicate directly with TPPs to compile the state plan.

What to include in the handbook:

- Describe what is expected of the intermediary, including a budget projection, changes to agreements with vendors, or other relevant aspects to support the state agency's completion of the state plan.