



DEPARTMENT OF ECONOMIC SECURITY

Your Partner For A Stronger Arizona

Supplemental Nutrition Assistance Employment & Training Program

STATE PLAN

Federal Fiscal Year 2016

Division of Employment & Rehabilitation Services

Employment Administration

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PART I: SUMMARY OF ARIZONA'S SUPPLEMENTAL NUTRITION ASSISTANCE EMPLOYMENT AND TRAINING (SNA E&T) PROGRAM

A. ABSTRACT OF ARIZONA'S SNA E&T PROGRAM

Arizona's Supplemental Nutrition Assistance Program (SNAP) employment program is the Supplemental Nutrition Assistance Employment & Training (SNA E&T) Program. The SNA E&T Program assists SNAP recipients in gaining skills, training, and work-related experience in order to increase their ability to obtain suitable employment and reduce SNAP dependency. The Employment Administration (EA), within the Arizona Department of Economic Security (DES), Division of Employment and Rehabilitation Services, administers the SNA E&T Program which is currently operated in Maricopa and Pima Counties.

The DES Division of Benefits and Medical Eligibility, Family Assistance Administration (FAA) determines eligibility for SNAP benefits. The FAA staff identifies and refers recipients, who do not meet a Federal or State defined exemption, to the SNA E&T Program using an automated interface between FAA's Arizona Technical Eligibility Computer System (AZTECS) and EA's Jobs Automated System (JAS).

Once they are referred to the SNA E&T Program, participants will receive an individual assessment identifying strengths and barriers to self-sufficiency and an interview emphasizing employment planning. The SNA E&T Program has high expectations for its participants and emphasizes personal accountability by encouraging them to pursue employment through education and work-related activities using labor-market relevant skills training, enabling them to secure employment with self-sustaining wages.

Arizona's amended 2015 SNA E&T State Plan sought FNS approval to expand Arizona's SNA E&T Program through a phased Personal Accountability Pilot.

1. PROGRAM CHANGES

- a) By taking advantage of the allowable 50 percent Federal Financial Participation (FFP) to support work-eligible individuals receiving SNAP benefits to participate in SNAP allowable activities, Arizona is restructuring the current service delivery model to allow the program to grow beyond its current limited service delivery area, while increasing the engagement of community partners by partnering with them to deliver allowable activities with SNAP-enrolled individuals if the allowable activities are initially paid for with non-federal funds that are not already used to match other federal funds.

- b) The Department will reinvest the Food and Nutrition Services (FNS) reimbursement into community and state employment and training activities that promote personal accountability and self-sufficiency for SNAP recipients. Specifically, the Department will direct 40 percent of the federal reimbursement back to the organization that provided the original activities for which reimbursement was made. The Department will direct a portion of the remaining 10 percent to activities that incentivize employers to hire SNA E&T Program participants, such as wage subsidy/on-the-job training and apprenticeship; and provider success, such as a pay for performance. A portion of the 10 percent will be retained by the Department to administer the program. Reinvesting the funds will expand opportunities for Able-Bodied Adults Without Dependents (ABAWD) and other work-eligible individuals to participate in employment and training activities that increase employment and earning potential.

- c) These partners will be central to the service delivery model by increasing the capacity of the program to provide formal access to the allowable employment and/or education services. This strategy will ultimately lead to the significant expansion of the SNA E&T Program through a phased Personal Accountability Pilot Program.

The Personal Accountability Pilot is being implemented in two phases with post-pilot implementation of effective strategies statewide by October 2016.

Phase I – The Department is in the process of establishing agreements with three community organizations in Maricopa County. Phase I will enable the Department to test referral processes, service delivery and coordination, data matching and reporting, and invoicing and fiscal management.

Phase II – In Phase II, the Department will expand agreements to an additional seven partners in both Maricopa and Pima Counties. The focus of Phase II will be the expansion and continued refinement of processes used during Phase I.

Post-Pilot Implementation – Effective strategies will be incorporated into new qualified contacts. The resulting contracts will be submitted to FNS with the 2017 SNA E&T State Plan and if approved, will be effective October 2016. DES will continue expanding the number of qualified contracts/partner agreements with each annual planning cycle thereafter.

This systematic expansion will allow EA to offer SNA E&T services to citizens on a much larger scale than has been previously possible. The need for such services are anticipated to grow as a result of (a) the expiration of

the ABAWD waiver beginning January 1, 2016; and (b) the reduction of Arizona's lifetime limit for receiving Temporary Assistance for Needy Families (TANF) Cash Assistance from 24 months to 12 months beginning July 1, 2016.

By engaging and expanding the capacity of community partners and state agencies providing employment and training services, DES will (a) increase the number of SNAP recipients who obtain and maintain jobs or better jobs, thus reducing the reliance on public services; (b) help more employers connect with job seekers; and (c) leverage and expand activities already underway in communities. To evaluate the efficacy of this approach, DES will track:

- The number of ABAWDs and other SNAP recipients enrolled in the SNA E&T Program;
- The number of ABAWDs and other SNAP recipients placed in jobs including;
 - Job retention at 60 days
 - Average wage at placement
- The number of employers that hire Personal Accountability Pilot participants;
- The level of community engagement as measured through the number of partner agreements;
- The amount of federal funds reimbursed; and
- The number of new jobs created by the partner organizations and agencies as a result of the federal funds reinvested.

d) A new SNA E&T Program participation exemption has been added for those in need of child care assistance as the SNA E&T program does not currently provide child care reimbursements.

2. ABAWD POPULATION

Arizona currently has a statewide ABAWD waiver which removes the requirement of the current ABAWD population to participate in qualifying activities in order to receive continued SNAP benefits beyond the statutory three-month period. Arizona will continue with the suspension of the time limits on the ABAWD population through December 31, 2015.

The Department proposes to seek an ABAWD waiver to be effective January 2016 for all geographic areas of the State excluding Maricopa and Pima counties, and strategically and systematically reduce the number of waivers sought over a three-year period to enable the establishment of community and state infrastructure that promotes personal accountability and self-sufficiency.

The Arizona SNA E&T Program anticipates that 24,343 ABAWDs will be served during Federal Fiscal Year (FFY) 2016 throughout Maricopa and Pima counties. Arizona will not utilize its 15 percent ABAWD exemption allowance at this time. However, Arizona reserves the right to reassess this position and choose to implement all or part of its 15 percent allocation for the benefit of current and future applicants during FFY 2016. Arizona is prepared to measure and track the 36-month period using a fixed clock.

3. ADDITIONAL ALLOCATION FOR "PLEDGE" STATES

Arizona plans to explore "Pledge" funding for the ABAWD population. Should Arizona opt to become a "pledge state", an amended plan will be submitted for FNS approval.

4. PROGRAM COMPONENTS

Currently, all SNAP recipients who do not meet a work registration or participation exemption are required as a condition of SNAP eligibility, to participate in employment and training components identified by the SNA E&T Program. Participants are required to participate in the components for a minimum of 20 hours averaged per week during a month, unless the component is subject to the Fair Labor Standards Act (FLSA). The total number of scheduled hours in activities must not exceed 30 hours per week with the exception of those involved in unsubsidized employment and court-ordered community service.

SNAP recipients involved in the voluntary Personal Accountability Pilot will not be subject to the 20 hour minimum and may participate up to 40 hours averaged per week during a month.

Effective January 1, 2016, ABAWDs subject to ABAWD work requirements and 3 month time limit may use the SNA E&T Program to meet the ABAWD Work Requirement. The participation hours and components are the same however, job search and job readiness components are only acceptable when combined with another allowable SNA E & T component and must be less than half of the 20-hour requirement.

The countable components/activities included in Arizona's SNA E&T Program Plan for FFY 2016 are:

- Job Search;
- Job Readiness;
- Education and/or Training:
 - Vocational Training;
 - High School Equivalency Diploma;
 - English for Speakers of Other Languages (ESOL);

- Remedial Education, including contextualized remediation; and
- Apprenticeships.
- Work Experience;
- Unsubsidized Paid Employment; and
- Community Service.

5. SEQUENCING COMPONENTS

The SNA E&T Program focuses each component/activity on the target goal of obtaining suitable unsubsidized employment. The SNA E&T Program may arrange the components/activities in any combination, without a specific sequence, allowing the participant to meet the required number of participation hours each week and to move forward in accomplishing their identified goals.

6. OTHER EMPLOYMENT PROGRAMS

The DES Employment Administration (EA) provides employment and training services to individuals seeking new jobs, better jobs, or first jobs. The program also assists employers with finding qualified applicants, job order postings and evaluation of potential applicants. Through the services provided by EA and its workforce partners, participants are able to locate and retain suitable jobs and build sustainable careers.

EA provides services to participants who receive both Temporary Assistance for Needy Families (TANF) cash assistance and SNAP benefits under separate programs. Individuals subject to the work provisions of TANF are served by the Jobs Program. SNA E&T Program participation will be reassessed for individuals in the Jobs Program when TANF eligibility ceases or the participant becomes exempt or disqualified from TANF.

EA is also responsible for the administration of a number of employment and training-related programs, including serving as the administrative and fiscal agent for the Workforce Innovation and Opportunity Act Adult, Dislocated, Worker, and Youth Programs; in addition to the Employment Service (Wagner-Peyser) Program.

SNA E&T Program Specialists or Personal Accountability Pilot staff directly deliver or arrange for delivery of job development, direct job referral, and work activity assignments through the collaboration and referral to community resources. Through the Personal Accountability Pilot, the SNA E&T Program will grow to enable participants to take advantage of these newly formed relationships to access more abundant employment-related resources. This expansion will assist with the anticipated increased need for SNA E&T Program services, given the pending end to the ABAWD waiver.

7. OUTCOME DATA

From October 1, 2014 through March 31, 2015, Arizona had 597 SNA E&T Program participants enter 667 jobs. Some participants obtained one or more part-time positions. The average wage at placement was \$9.65 per hour.

B. PROGRAM COMPONENTS

The SNA E&T Program Specialist or Personal Accountability Pilot staff will conduct a one-on-one employability assessment that identifies skills, employment history, literacy levels, educational background, family circumstance, and/or other limitations or factors such as learning disabilities. The ECDP is created through conversation and interaction between the participants and the SNA E&T Program Specialists or Personal Accountability staff, and by information gathered during the assessment. The ECDP:

- Reflects the component, or combination of components, agreed upon between the SNA E&T Program Specialist or Personal Accountability Pilot staff and participant;
- Ensures the participant meets the goal of suitable, unsubsidized employment; and
- Records employment goals, work components, supportive services, and the signatures of the participant and the SNA E&T Program Specialist or Personal Accountability Pilot staff.

Signatures on the ECDP identify discussion of, and agreement to, the goals.

1. NAME OF COMPONENT – JOB SEARCH

Description of component: Job Search is an intensive, structured component in which participants actively seek employment. Structured Job Search activities include: identifying employment opportunities, applying for employment, attending job fairs, and participating in job clubs where participants share experiences, successes, job leads, and referrals. All job-search participants are required to register in Arizona's automated labor exchange system – Arizona Job Connection, an internet-based job search engine that is accessible to job seekers, employers, and workforce partner staff.

Type of component: Job Search is a non-work component.

Geographic areas covered and variations among local areas: Job Search focuses on those areas of each county where active job seekers may find labor market potential. Of the 15 counties in Arizona, Job Search is currently delivered in Maricopa and Pima Counties. The Personal Accountability Pilot

will allow Arizona to expand the capacity within these two counties, to serve a greater number of participants, especially ABAWDs.

Targeted population: Participants with a recent work history, limited barriers to employment, and/or marketable skills in the local job market may be assigned to the component

Anticipated number of ABAWD and non-ABAWD participants who will begin the component: The SNA E&T Program anticipates approximately 15,139 participants in the Job Search component. Arizona does not require volunteers to participate in the Job Search Component.

Level of participant effort or number of hours of participation in the component and duration: A minimum of three employer contacts per week is required unless the local economy, labor market, or other circumstances do not permit this level of effort. Job Search requires a participation level to average 20 hours per week and is limited to 12 weeks in the preceding 12-month period. The 12 weeks do not have to be consecutive. When determining the 12-week limit, one week equals 20 hours. Participation in another allowable component is required upon reaching the 12-week limit.

Organizational responsibilities: The SNA E&T Program Specialist or Personal Accountability Pilot staff is responsible for conducting an employability assessment with the participant and developing an ECDP, which may include the Job Search component when applicable. The SNA E&T Program Specialist or Personal Accountability Pilot staff is responsible for monitoring participation in the selected activity.

Number of participants expected to receive a participant reimbursement and the estimated amount of reimbursement to be paid: The SNA E&T Program expects approximately 4,574 Transportation-Related Expense (TRE) allowance payments for participants who are in the Job Search component. The estimated cost is \$64.00 per payment. The TRE allowance will be limited to \$64.00 per every four-week period of verified participation. A total of \$292,736 is budgeted for this service for FFY 2016.

Eligibility for the allowance requires the participant to comply with the components identified in their ECDP for four consecutive weeks. Once an SNA E&T Program Specialist has verified participation in the assigned component(s), they process the TRE request in JAS. The participants will receive payments through an Electronic Benefit Transfer (EBT) on the Quest card issued by FAA, or by warrant (check) that is sent through the United States Postal Service (USPS).

Personal Accountability Pilot Staff will contact SNA E&T Program staff to issue the TRE payment in JAS when pilot participants have complied for four consecutive weeks.

The participant will not receive monetary payments for transportation when another program, including student financial aid, provides funding for the transportation-related expense. The TRE allowance for Job Search components is offered in conjunction with participation in other SNA E&T Program components.

Number of participants in Job Search expected to receive a clothing allowance and the estimated amount of reimbursements to be paid: The SNA E&T Program expects approximately 139 participants in the Job Search component to receive clothing allowances. The estimated cost is \$100.00 per SNA E&T Program participant per FFY for a total estimated annual cost of \$13,900.00.

SNA E&T Program Specialists may authorize clothing allowances for participants who need clothing to participate in work activities and/or to accept and maintain employment. Allowances are processed through JAS and participants are issued a warrant (check) that is sent through the USPS. Participants are required to return their receipt to their assigned SNA E&T Program Specialist for auditing purposes.

Personal Accountability Pilot Staff will contact SNA E&T Program staff to issue the clothing allowance in JAS when pilot participants identify the need.

Total cost of the component and cost per participant: The estimated total annual cost of administering the Job Search component is \$2,256,220.20. This is comprised of \$1,494,745.59 for Salaries and \$751,474.61 for participant allowances and other costs. The estimated cost per participant is \$149.03 based on the calculation of 15,139 participants divided into the total annual cost of the Job Search component (\$2,256,220.20).

2. NAME OF COMPONENT – JOB READINESS

Description of component: Job Readiness focuses on helping participants prepare to obtain and maintain employment. Skills taught in Job Readiness include: career exploration and planning, work ethics, personal appearance, résumé preparation, job search techniques, and other work-related activities. These activities can include completing an application, participating in interviews, dealing with rejection, job retention, career advancement, and conflict resolution; as well as leaving a job. Job Readiness is conducted in a structured group setting. If a group setting is not available, the participant is referred to a one-on-one setting. All job-ready participants are required to register in Arizona’s Labor Exchange system.

Type of component: Job Readiness is a non-work component.

Geographic areas covered and variations among local areas: Of the 15 counties in Arizona, Job Readiness is currently delivered in Maricopa and

Pima Counties. The Personal Accountability Pilot will allow Arizona to expand the capacity within these two counties, to serve a greater number of participants, especially ABAWDs. Refer to Attachment A: Arizona Map – County Divisions.

Targeted population: Job Readiness will be assigned to participants who need personal development and/or employment development to compete successfully in the labor market.

Anticipated numbers of ABAWD and non-ABAWD participants who will begin the component: The SNA E&T Program anticipates a total of 275 participants will begin the Job Readiness component. Arizona does not require volunteers to participate in the Job Readiness Component.

Level of participant effort or number of hours of participation in the component and duration: Job Readiness requires participation by participants for an average of 20 hours per week. Job Readiness is limited to 12-weeks in the preceding 12-month period. The 12-weeks do not have to be consecutive. When determining the 12-week limit, one week equals 20 hours. Participation in another allowable component is required upon reaching the 12-week limit.

Organizational responsibilities: SNA E&T Program staff or Personal Accountability Pilot staff are responsible for conducting an employability assessment of the participant and developing an ECDP with the assistance of the participant. This may include the Job Readiness component. SNA E&T Program Specialists or Personal Accountability Pilot staff are also responsible for monitoring participation in the selected activity.

Number of participants expected to receive a participant reimbursement and the estimated amount of reimbursements to be paid: The SNA E&T Program expects approximately 83 TRE allowance payments to participants in the Job Readiness component. The estimated cost of each payment is \$64.00, for a total amount of \$5,312.00 annually. The TRE allowance will be limited to \$64.00 per every four-week period of verified participation.

Eligibility for the allowance requires the participant to comply with the components identified in their ECDP for four consecutive weeks. Once an SNA E&T Program Specialist has verified participation in the assigned component(s), they process the TRE request in JAS. The participants will receive payments through an Electronic Benefit Transfer (EBT) on the Quest card issued by FAA, or by warrant (check) that is sent through the USPS.

Personal Accountability Pilot Staff will contact SNA E&T Program staff to issue the TRE payment in JAS when pilot participants have complied for four consecutive weeks.

The participant will not receive monetary payments for transportation when another program, including student financial aid, pays for the transportation-related expense. The SNA E&T Program offers the TRE allowance for the Job Readiness component in conjunction with participation in other SNA E&T Program components.

Number of participants expected to receive a clothing allowance and the estimated amount of reimbursements to be paid: The SNA E&T Program expects approximately three participants in the Job Readiness component will receive clothing allowances. The estimated cost is \$100.00 per SNA E&T Program participant per FFY totaling an estimated annual cost of \$300.00.

SNA E&T Program Specialists may authorize clothing allowances for participants who need clothing to participate in work activities and/or to accept and maintain employment. Allowances are processed through JAS and participants are issued a warrant (check) that is sent through the USPS. Participants are required to return their receipt to their assigned SNA E&T Program Specialist for auditing purposes.

Personal Accountability Pilot Staff will contact SNA E&T Program staff to issue the clothing allowance in JAS when pilot participants have expressed the need and submitted their receipt to pilot staff.

Total cost of the component and cost per participant: The estimated total cost of administering the Job Readiness component is \$239,475.34. This amount equals the sum of \$27,126.86 for salaries, \$198,482.00 for contractual costs, and \$13,866.48 for participant allowances and other costs.

The estimated cost per Job Readiness participant is \$870.82. The basis for this calculation is 275 participants divided into the total annual cost of the Job Readiness Component (\$239,475.34).

3. NAME OF COMPONENT – EDUCATION AND/OR TRAINING

Description of component: The Education and/or Training component includes Vocational Training, High School Equivalency Diploma, Remedial Education, and English for Speakers of Other Languages (ESOL) and Apprenticeships. Each part of this component has the following separate descriptions:

- Vocational Training consists of organized educational and/or training programs. The educational and/or training program must prepare the participant for employment in a current or emerging occupation. The Vocational Training component must relate directly to a career or occupation.

- High School Equivalency consists of structured activities that may include the use of learning centers, computer labs, and/or other supervised study environments. Participants learn subject matter equivalent to what is taught in high school in order to pass the GED exam.
- Remedial Education is for participants whose reading level is at or below the seventh grade level, or who have demonstrated an inability to participate in program components due to functional illiteracy. This component provides basic literacy skills or other basic educational skills not otherwise specified in a classroom or in a one-on-one setting.
- English for Speakers of Other Languages (ESOL) assists participants in their efforts to be more proficient in the English language and better prepared to compete in the labor market. Services provided may be in a classroom setting or through individual tutoring.
- Registered Apprenticeship is a voluntary industry-driven system for occupations requiring a broad range of high-level skills, and is full-time, paid employment and training with built-in career placement. Individuals learn how to complete a task by performing it on the job, and also learning why it is completed that way through Related Technical Instruction. A skilled mentor/journey worker is required to oversee and train the apprentice.

Type of component: Education and/or Training are non-work components.

Geographic areas covered and variations among local areas: Of the 15 counties in Arizona, Education and/or Training is currently delivered in Maricopa and Pima Counties. The Personal Accountability Pilot will allow Arizona to expand the capacity within these two counties, to serve a greater number of participants, especially ABAWDs. Refer to Attachment A: Arizona Map – County Divisions.

Targeted population:

Vocational Training targets participants with a high school diploma or equivalent certificate who are capable of completing the program and can subsequently move quickly into employment. The SNA E&T Program may not assign a participant to this activity if they already possess self-supporting skills for jobs available in the local community area.

High School Equivalency Diploma targets participants lacking a high school diploma or equivalent. SNA E&T Program staff will offer the High School Equivalency component to participants lacking a high school diploma or equivalent. Attendance in high school will be encouraged for teen participants.

Remedial Education targets SNA E&T Program participants who need written or verbal assistance to meet employer requirements in the hiring process and those who need to improve basic literacy skills necessary for job retention.

ESOL targets participants who do not speak English or those with very limited English language skills, and needing written or verbal assistance to meet employer requirements in the hiring process, improve language skills needed for job retention, and improve participant confidence.

Apprenticeships target participants with a high school diploma or high school equivalency certificate who would benefit from paid, on-the-job training, and related technical instruction in a classroom setting. An apprenticeship is ideal for individuals looking for a long-term career with little or no educational debt.

Anticipated numbers of ABAWD and Non-ABAWD participants who will begin the component: The SNA E&T Program anticipates a total of 1,458 participants in the Education and/or Training component. Arizona does not require volunteers to participate in the Education and Training Component.

Level of participant effort or number of hours of participation in the component and duration: The duration spent in Education and/or Training is determined by the educational activity not to exceed 24 months. The participant must remain in good standing as defined by the education and/or training provider. At any time during the education and training session, the decision may be made that the participant is not making suitable progress. The SNA E&T Program Specialist or Personal Accountability Pilot staff, the participant, or the educational and/or training institution will make the determination of unsuitable progress. When this occurs, the SNA E&T Program Specialist or Personal Accountability Pilot staff and the participant will revise the ECDP.

Organizational responsibilities: The SNA E&T Program Specialist or Personal Accountability Pilot staff is responsible for conducting an employability assessment of the participant, resulting in the development of an ECDP with the assistance of the participant. This may include the Education and/or Training component. SNA E&T Program or Personal Accountability Pilot staff must document in the participant's case record the identification of skills the participant currently possesses and weigh them against the skill gaps that are identified through assessment to determine the best course of how skills based training will improve his or her employability. The SNA E&T Program Specialist or Personal Accountability Pilot staff is responsible for monitoring the participation in the selected activity.

Number of participants expected to receive a participant reimbursement and the estimated amount of reimbursements to be paid: The SNA E&T Program expects approximately 440 TRE allowance payments to participants in the

Education and/or Training component. The estimated cost of each payment is \$64.00 or a total of \$28,160 on an annual basis. The TRE allowance will be limited to \$64.00 per every four-week period of verified participation.

Eligibility for the allowance requires the participant to comply with the components identified in their ECDP for four consecutive weeks. Once an SNA E&T Program Specialist has verified participation in the assigned component(s), they process the TRE request in JAS. The participants will receive payments through an Electronic Benefit Transfer (EBT) on the Quest card issued by FAA, or by warrant (check) that is sent through the USPS.

Personal Accountability Pilot Staff will contact SNA E&T Program staff to issue the TRE payment in JAS when pilot participants have complied for four consecutive weeks.

The participant will not receive monetary payments for transportation when another program(s), including student financial aid, funds the transportation-related expenses. The SNA E&T Program offers the TRE allowance for the Education and/or Training component in conjunction with participation in other SNA E&T Program components.

Number of participants expected to receive a clothing allowance and the estimated amount of reimbursements to be paid: The SNA E&T Program expects approximately 13 participants in the Education and/or Training component will receive clothing allowances. The estimated cost is \$100.00 per SNA E&T Program participant for a total of \$1,300.00 annually.

SNA E&T Program Specialists may authorize clothing allowances for participants who need clothing to participate in work activities and/or to accept and maintain employment. Allowances are processed through JAS and participants are issued a warrant (check) that is sent through the USPS. Participants are required to return their receipt to their assigned SNA E&T Program Specialist for auditing purposes.

Personal Accountability Pilot Staff will contact SNA E&T Program staff to issue the clothing allowance in JAS when pilot participants have expressed the need and submitted their receipt to pilot staff.

Total cost of the component and cost per participant: The estimated total cost of administering Education and/or Training is \$415,679.73. This is the sum of \$143,938.46 for salaries, \$198,482.00 for contractual costs and \$73,259.27 for participant allowances and other costs.

The estimated cost per Education and/or Training participant is \$285.10. This cost is arrived at by taking the 1,458 participants divided into the total annual cost of the Education and/or Training Component (\$415,679.73).

4. NAME OF COMPONENT – WORK EXPERIENCE

Description of component: Work Experience is any unpaid work performed in the public or private sector that improves the employability prospects of a participant who is not otherwise able to obtain employment. It allows participants to develop skills, good work habits and attitudes, establish a recent work history, and develop a networking system with the possibility of leading to full-time, paid employment. The SNA E&T Program Specialist or Personal Accountability Pilot staff will assign the participant to work experience designed to meeting their employment goals as identified in the ECDP.

The placement of participants with private or public work experience providers cannot be the direct cause of the displacement of persons currently employed by participating employers. The private or public work experience providers must allow the same training and working environment provided to the job site employees who perform comparable work for comparable hours.

Internships/externships are included under this component as a portion or extension of education and/or training in either public or private sector organizations that provide structured work experience in a specific occupational field.

Type of component: Work Experience is a work component.

Geographic areas covered and variations among local areas: Of the 15 counties in Arizona, Work Experience is currently provided in Maricopa and Pima Counties. The Personal Accountability Pilot will allow Arizona to expand the capacity within these two counties, to serve a greater number of participants, especially ABAWDs. Refer to Attachment A: Arizona Map – County Divisions.

Targeted population: Work Experience targets participants who have first completed Job Search and have been unsuccessful in obtaining employment.

Anticipated numbers of ABAWD and non-ABAWD participants who will begin the component: The SNA E&T Program anticipates approximately 324 participants will begin the Work Experience component.

Level of participant effort or number of hours of participation in the component and duration: Generally, a participant engaged in this component is subject to the FLSA. Some work experience positions may be exempt from the FLSA.

The SNA E&T Program cannot require a participant to engage in a Work Experience component that is subject to the FLSA for more hours than the

monthly SNAP benefit allotment divided by the federal or state minimum wage, whichever is higher. The exception is for participants who opt to volunteer with the Work Experience provider for more hours than allowed by the FLSA.

Organizational responsibilities: The SNA E&T Program Specialist or Personal Accountability Pilot staff is responsible for conducting an employability assessment of the participant and developing an ECDP with the assistance of the participant. This may include the Work Experience component. The SNA E&T Program Specialist or Personal Accountability Pilot staff is responsible for monitoring participation in the selected activity.

Number of participants expected to receive a participant reimbursement and the estimated amount of reimbursements to be paid: The SNA E&T Program expects approximately 650 TRE allowance payments to participants in the Work Experience component. The estimated cost of each payment is \$64.00, for a total of \$41,600. The TRE allowance will be limited to \$64.00 per four-week period of verified participation.

Eligibility for the allowance requires the participant to comply with the components identified in their ECDP for four consecutive weeks. Once an SNA E&T Program Specialist has verified participation in the assigned component(s), they process the TRE request in JAS. The participants will receive payments through an Electronic Benefit Transfer (EBT) on the Quest card issued by FAA, or by warrant (check) that is sent through the USPS.

Personal Accountability Pilot Staff will contact SNA E&T Program staff to issue the TRE payment in JAS when pilot participants have complied for four consecutive weeks.

The participant will not receive monetary payments for transportation when another program, including student financial aid, funds the transportation-related expenses. The SNA E&T Program offers the TRE allowance for the Work Experience component in conjunction with participation in other SNA E&T Program components.

Number of participants expected to receive a clothing allowance and the estimated amount of reimbursements to be paid: The SNA E&T Program expects 20 participants in the Work Experience component to receive clothing allowances. The estimated cost is \$100.00 per SNA E&T Program participant for a total of \$2,000.00 annually.

SNA E&T Program Specialists may authorize clothing allowances for participants who need clothing to participate in work activities and/or to accept and maintain employment. Allowances are processed through JAS and participants are issued a warrant (check) that is sent through the USPS.

Participants are required to return their receipt to their assigned SNA E&T Program Specialist for auditing purposes.

Personal Accountability Pilot Staff will contact SNA E&T Program staff to issue the clothing allowance in JAS when pilot participants have expressed the need and submitted their receipt to pilot staff.

Total cost of the component and cost per participant: The estimated total cost of administering Work Experience is \$320,874.20. The basis for this calculation is the sum of \$212,586.04 for Salaries and \$108,288.16 for participant allowances and other costs.

The estimated cost per Work Experience participant is \$149.04. This is 2,153 participants divided into the total annual cost of the Work Experience component (\$320,874.20).

5. NAME OF COMPONENT – UNSUBSIDIZED PAID EMPLOYMENT

Description of component: Unsubsidized Paid Employment is full-time or part-time employment with wages paid in totality by the employer. The ultimate goal of the SNA E&T Program is to help participants find permanent unsubsidized employment with wages that meet or exceed the FLSA standards and a benefit package enabling them to support themselves and/or their families. Unsubsidized Paid Employment must meet or exceed the higher of the state or federal minimum wage requirements. The following are types of unsubsidized employment:

- **Wages and Salaries** are defined as earnings in which hourly pay, including tips, meets or exceeds the applicable minimum wage.
- **Commission earnings** are defined as earnings from fees or percentages paid for services of the production or sale of goods.
- **Casual labor** is defined as intermittent or short-term employment with a normal duration of one to three days in length. Countable casual labor must pay at least the applicable minimum wage.
- **Self-employment** is defined as income generated as a result of working for oneself rather than for others. The number of hours for self-employment count toward participation as determined by calculating the participant's gross income, minus business expenses, divided by the applicable minimum wage.
- **In-kind income** is defined as work activities with wages applied towards goods or services.

Type of component: Unsubsidized Paid Employment is a work component.

Geographic areas covered and variations among local areas: Of the 15 counties in Arizona, Unsubsidized Paid Employment is currently delivered in Maricopa and Pima Counties. The Personal Accountability Pilot will allow Arizona to expand the capacity within these two counties, to serve a greater number of participants, especially ABAWDs. Refer to Attachment A: Arizona Map – County Divisions.

Targeted population: Unsubsidized Paid Employment targets all participants.

Anticipated number of ABAWD and Non-ABAWD participants who will begin the component: The SNA E&T Program anticipates approximately 1,705 participants will begin the Unsubsidized Paid Employment component.

Level of participant effort or number of hours of participation in the component and duration: When employment hours are less than 20 per week, an additional component(s) must be assigned to ensure participation requirements are met. When employment hours are 30 or greater per week for three months (90 days); the SNA E&T Program case is closed.

Organizational responsibilities: The SNA E&T Program Specialist or Personal Accountability Pilot staff is responsible for conducting an employability assessment of participant and developing an ECDP with the assistance of the participant. This may include the Unsubsidized Paid Employment component. The SNA E&T Program Specialist or Personal Accountability Pilot staff is also responsible for monitoring participation in the selected activity.

Number of participants expected to receive a participant reimbursement and the estimated amount of reimbursements to be paid: The SNA E&T Program expects approximately 3,035 TRE allowance payments to participants in the Unsubsidized Paid Employment component. The estimated cost of each payment is \$64.00, for a total of \$194,240 annually. The TRE allowance will be limited to \$64.00 per every four-week period of verified participation.

Eligibility for the allowance requires the participant to comply with the components identified in their ECDP for four consecutive weeks. Once an SNA E&T Program Specialist has verified participation in the assigned component(s), they process the TRE request in JAS. The participants will receive payments through an Electronic Benefit Transfer (EBT) on the Quest card issued by FAA, or by warrant (check) that is sent through the USPS.

Personal Accountability Pilot Staff will contact SNA E&T Program staff to issue the TRE payment in JAS when pilot participants have complied for four consecutive weeks.

The participant will not receive monetary payments for transportation when another program, including student financial aid, funds the transportation-related expense. The TRE allowance for the Unsubsidized Paid Employment

component is offered in conjunction with participation in other SNA E&T Program components.

Number of participants expected to receive a clothing allowance and the estimated amount of reimbursements to be paid: The SNA E&T Program expects 92 participants in the Unsubsidized Paid Employment component will receive clothing allowances. The estimated cost is \$100.00 per SNA E&T Program participant per FFY for a total of \$9,200.00 annually.

SNA E&T Program Specialists may authorize clothing allowances for participants who need clothing to participate in work activities and/or to accept and maintain employment. Allowances are processed through JAS and participants are issued a warrant (check) that is sent through the USPS. Participants are required to return their receipt to their assigned SNA E&T Program Specialist for auditing purposes.

Personal Accountability Pilot Staff will contact SNA E&T Program staff to issue the clothing allowance in JAS when pilot participants have expressed the need and submitted their receipt to pilot staff.

Total cost of the component and cost per participant: The estimated total cost of administering Unsubsidized Paid Employment is \$1,497,386.25. This is the sum of \$992,068.18 for salaries and \$505,318.07 for participant allowances and other costs.

The estimated cost per Unsubsidized Paid Employment participant is \$149.02. This is 10,048 participants divided into the total annual cost of the Unsubsidized Paid Employment component (\$1,497,386.25).

6. NAME OF COMPONENT – COMMUNITY SERVICE

Description of component: Community Service is defined as unpaid activities in the public or private sector designed for the good of the community-at-large and would not generally result in unsubsidized employment. Community Service activities are established among public or nonprofit organizations and must serve a useful purpose for the community in fields such as health care, social service, environmental protection, education, urban and rural development, welfare, recreation, public facilities, and public safety.

Type of component: Community Service is a work component.

Geographic areas covered and variations among local areas: Of the 15 counties in Arizona, Community Service is currently delivered in Maricopa and Pima Counties. The Personal Accountability Pilot will allow Arizona to expand the capacity within these two counties, to serve a greater number of

participants, especially ABAWDs. Refer to Attachment A: Arizona Map – County Divisions.

Targeted population: Community Service targets those participants who have first completed Job Search and subsequently have been unsuccessful in obtaining employment. Community Service activities are for participants unable to move into unsubsidized employment but may improve their employability skill level through the Community Service component while providing a direct benefit to the community.

Anticipated number of ABAWD and non-ABAWD participants who will begin the component: The SNA E&T Program anticipates approximately 555 participants will be enrolled in the Community Service component.

Level of participant effort or number of hours of participation in the component and duration: Generally, a participant engaged in this component is subject to the FLSA. However, some community service positions may be exempt from the FLSA.

A participant engaged in a Community Service component that is subject to the FLSA cannot be required to participate for more hours than the monthly SNAP benefit allotment divided by the federal or state minimum wage (whichever is higher). The exceptions are for participants opting to volunteer with the Community Service provider for more hours than allowed by the FLSA and for those with a court order.

Organizational responsibilities: The SNA E&T Program Specialist or Personal Accountability Pilot staff is responsible for conducting an employability assessment of the participant and developing an ECDP with the assistance of the participant. This plan may include the Community Service component. The SNA E&T Program Specialist or Personal Accountability Pilot staff is also responsible for monitoring participation in the selected activity.

Number of participants expected to receive a participant reimbursement and the estimated amount of reimbursements to be paid: The SNA E&T Program expects approximately 168 TRE allowance payments to nine participants who are enrolled in Community Service. The estimated cost of each payment is \$64.00, for a total of \$10,752.00 annually. The TRE allowance will be limited to \$64.00 per every four-week period of verified participation.

Eligibility for the allowance requires the participant to comply with the components identified in their ECDP for four consecutive weeks. Once an SNA E&T Program Specialist has verified participation in the assigned component(s), they process the TRE request in JAS. The participants will receive payments through an Electronic Benefit Transfer (EBT) on the Quest card issued by FAA, or by warrant (check) that is sent through the USPS.

Personal Accountability Pilot Staff will contact SNA E&T Program staff to issue the TRE payment in JAS when pilot participants have complied for four consecutive weeks.

The participant will not receive monetary payments for transportation when another program, including student financial aid, funds the transportation related expense. The TRE allowance for the Community Service component is offered in conjunction with participation in other SNA E&T Program components.

Number of participants expected to receive a clothing allowance and the estimated amount of reimbursements to be paid: The SNA E&T Program expects approximately five participants in the Community Service component will receive clothing allowances. The estimated cost is \$100.00 per SNA E&T Program participant per FFY for a total of \$500.00 annually.

SNA E&T Program Specialists may authorize clothing allowances for participants who need clothing to participate in work activities and/or to accept and maintain employment. Allowances are processed through JAS and participants are issued a warrant (check) that is sent through the USPS. Participants are required to return their receipt to their assigned SNA E&T Program Specialist for auditing purposes.

Personal Accountability Pilot Staff will contact SNA E&T Program staff to issue the clothing allowance in JAS when pilot participants have expressed the need and submitted their receipt to pilot staff.

Total cost of the component and cost per participant: The estimated total cost of administering Community Service is \$82,736.76. This is the sum of \$54,807.34 for Salaries and \$27,929.42 for participant allowances and other costs.

The estimated cost per Community Service participant is \$149.08. This is 555 participants divided into the total annual cost of the Community Service component (\$82,736.76).

C. INTERNAL CONTROLS: PERFORMANCE REVIEWS

1. QUALITY ASSURANCE (QA) UNIT

The Quality Assurance (QA) Unit, within the DES DERS EA, monitors the SNA E&T Program through continuous evaluation and monitoring activities. To this end, the primary purpose of QA is to:

- Improve programs by identifying those aspects that are working according to plan and those in need of correction;
- Track changes in the services provided and the desired results; and

- Provide technical assistance to support program performance.

The QA Unit monitors program goals and objectives on a quarterly basis in order to ensure the programmatic performance of the SNA E&T Program is at an acceptable level. Internal controls are monitored in two distinct ways:

- Utilizing case record reviews and data report analyses; and
- Ensuring any issues derived through internal control monitoring are addressed and resolved using quarterly performance reviews and the development of a corrective action plan.

The QA Unit conducts case record reviews using a random sampling methodology. The review examines the record for evidence that demonstrates adherence to the SNA E&T Program Plan policies and procedures, including whether the individual was engaged in a component correctly, whether the services matched the participant's goals and situation, and to ensure actions are well documented.

In addition to QA Unit case record reviews, monthly case record reviews will be completed by SNA E&T Program Supervisors. A random selection of the supervisor's direct report caseloads will be selected for supervisory case record review. The QA Unit ensures that the monthly supervisor case record reviews conducted are part of a corrective action requirement when applicable. The QA Unit completes the data report analyses each month consisting of the system-generated performance reports and assessments of work completed or submitted by SNA E&T Program Specialists. The QA Unit staff reviews performance reports to assess whether the programmatic performance meets program measures outlined in the SNA E&T Program State Plan.

Monitoring of the Personal Accountability Pilot will be coordinated with both fiscal and programmatic QA units to ensure program integrity during the pilot phase.

2. SNA E&T PROGRAM SUPERVISORS

SNA E&T Program supervisors ensure specialists adhere to the SNA E&T Program policies and procedures. The supervisors must monitor the activities of each SNA E&T Program Specialist through one-on-one discussions, case reviews, and data report analyses. The supervisors prepare statistical reports and examine performance-related reports that display the actions of the SNA E&T Program Specialist under review.

When a deficiency is noted, the supervisors will ensure that the SNA E&T Program Specialist understands the deficiency and makes necessary corrections.

PART II: PROGRAM PARTICIPATION AND EXEMPTIONS FOR FFY 2016

A. WORK REGISTRATION POPULATION

The SNA E&T Program caseload and the characteristics of the work registration population include:

1. NUMBER OF WORK REGISTRANTS

The number of work registrants expected as of October 1, 2015	169,031
The anticipated number of new work registrants to be added between October 1, 2015 and September 30, 2016	192,453
The total number of work registrants expected to be in the program between October 1, 2015 and September 30, 2016	361,483

2. UNDUPLICATED WORK REGISTRANT COUNT

The estimated number of work registrants is based on an unduplicated count of registrant Social Security Numbers (SSN). Once an individual's SSN is included in the count of work registrants, the SSN will not be included again in the count during the same FFY.

3. CHARACTERISTICS OF WORK REGISTRANTS

AGE	
16 – 17 = 0.8%	35 – 39 = 11.0%
18 – 19 = 4.5%	40 – 44 = 10.5%
20 – 24 = 14.8%	45 – 49 = 10.9%
25 – 29 = 13.6%	50 – 54 = 11.8%
30 – 34 = 12.1%	55 – 59 = 10.0%

SEX			
Female	49.9%	Male	50.1%

SPECIAL GROUPS ¹			
White	66.2%	Asian	0.8%
Am Indian	18.0%	Unknown	5.3%
Black	9.2%	Other	0.5%

¹ Migrant and Refugee populations are included in Other
 Note 25.8% specifically identified their ethnicity was Hispanic

PROGRAM STATUS	
TANF Households	0.5%
Non-TANF Households	99.5%

4. HOW DATA WAS COMPILED

The data pertaining to age, sex, and special group characteristics was compiled from the May 2015 AZTECS Extract Information.

5. RATIO OF WORK REGISTRANTS TO PROGRAM CASELOAD

Approximately one individual in every three SNAP households is a mandatory SNA E&T Program work registrant.

B. EXEMPTION POLICY

At the initial application for SNAP benefits, FAA determines which applicants are exempt from SNA E&T Program registration and participation. FAA further evaluates a recipient's exemption status at the time of recertification for the program or when any change occurs that affects a recipient's exemption status. Although some individuals may qualify as exempt, they can still volunteer to participate in the SNA E&T Program. Exempted individuals who volunteer are not subject to disqualification for failing to comply with program requirements.

WORK REGISTRATION EXEMPTIONS – SNAP applicants and recipients are exempt from SNA E&T Program registration when they are:

- Physically or mentally challenged causing the person to be incapable of engaging in gainful employment;
- Subject to and complying with work requirements under Temporary Assistance for Needy Families (TANF);
- A caretaker for dependent child(ren) under age six;
- Responsible for the care of an incapacitated individual;
- An applicant for or recipient of Unemployment Insurance compensation;
- Participating in a drug or alcohol treatment and rehabilitation program;

- Employed or self-employed for a minimum of 30 hours per week or receiving weekly earnings which meet or exceed the state or federal minimum wage, whichever is higher, when multiplied by 30 hours;
- A student enrolled at least half-time, as defined by the institution, in any recognized school including high school, training programs, or institutions of higher education provided that the placement in these educational activities is not the result of participation in the SNA E&T Program;
- Eligible for the Refugee Resettlement Program (RRP) and subject to the work requirements for RRP;
- Subject to mandatory participation in the TANF Tribal Native Employment Works (NEW) program; and
- Under age 18 or age 60 or older:
 - A SNAP recipient age 16 or 17 is **not** exempt when the participant is the SNA E&T Program head of household and is not attending school at least half-time or is not enrolled in an employment training program on at least a half-time basis.

PARTICIPATION EXEMPTIONS – SNAP applicants and recipients who are mandatory SNA E&T Program registrants meeting any of the following criteria will be exempt from SNA E&T Program participation:

- Residing in a geographically exempt area;
 - Geographically exempt areas are those outside of the SNA E&T Program coverage which are Maricopa and Pima Counties.
- Laid off from work or temporarily unemployed for a period anticipated to be less than 60 calendar days;
- Living at a nonpermanent residential address;
- Pregnant and in the second or third trimester;
 - Verification of pregnancy must be obtained from a licensed medical provider and include the expected date of delivery.
- Residing in a remote area;
 - Remote is defined as when a participant's residence is more than two hours (round trip) from the nearest local office, using public or private transportation, or walking. Staff must consider walking to the bus stop, traveling on the bus, transfer and waiting time, walking from the bus stop to the SNA E&T Program office, and waiting for a return bus when determining bus usage.
- Age 55 to 59 and participating in the Senior Community Services Employment Program (SCSEP);
- Residing in a SNAP household with an assigned approval period of two months or less; or
- Has a dependent child, under age 13, and is in need of child care to participate in the SNA E&T Program.

ABAWD EXEMPTIONS – ABAWD applicants and recipients are not subject to the three-month time limit for the receipt of SNAP benefits if they meet a Work Registration exemption or any of the following:

- Under age 18 or age 50 and over;
- Unable to work due to a medical or mental health condition;
- Living in a household where a household member is under age 18;
- Residing in a geographically waived area;
 - Geographically waived area is an area of the State granted a waiver of the three month time-limit.
- Pregnant, regardless of trimester
 - Verification of pregnancy must be obtained from a licensed medical provider and include the expected date of delivery.

C. NUMBER OF WORK REGISTRANTS EXEMPT FROM THE SNA E&T PROGRAM

The percentage of Arizona’s total number of work registrants expected to be exempted is 45.44 percent (Table 1: FFY 2016 Estimated Participant Levels).

D. PLANNED SNA E&T PROGRAM PARTICIPATION

The estimated number of ABAWD and non-ABAWD applicants and recipients Arizona expects to begin a qualifying component is 2,469. Refer to Table 2: FFY 2016 Estimated SNA E&T Program Placements and Participation.

E. ABAWD INFORMATION

Arizona expects 171,624 ABAWDs to be in the state during the fiscal year and anticipates 51,044 ABAWDs to be in waived areas of the state. Arizona will not utilize its 15 percent, or 48,415 total, ABAWD exemption allowance at this time. However, Arizona reserves the right to reassess this position and choose to implement all or part of its 15 percent allocation for the benefit of current and future applicants during FFY 2016. Refer to Tables 1 and 2.

PART III: PROGRAM COORDINATION

A. PROGRAM COORDINATION

1. NARRATIVE COORDINATION STATEMENT

FAA and EA are administrations within DES. FAA and EA coordinate to implement the SNA E&T Program. FAA staff determines SNAP eligibility, screens SNAP applicants for SNA E&T Program registration and participation,

and refers individuals accordingly. EA staff administers the SNA E&T Program and provides the employment-related services.

INTAKE, APPLICATION, RECLASSIFICATION

FAA performs these functions. Eligibility and SNA E&T Program referral or exemption entries are entered into AZTECS, the computerized eligibility determination system for SNAP benefits.

SCREENING FOR EXEMPTIONS

FAA screens all SNAP applicants/recipients for work registration or exemption status.

EMPLOYMENT & TRAINING PROGRAM COMPONENT ASSIGNMENT

SNA E&T Program Specialists send a letter to non-exempt, non-ABAWD participants for an initial appointment at least ten calendar days prior to the scheduled time. ABAWD participants who have voluntarily selected the SNA E&T Program to meet their work requirements, will be seen on a walk-in basis, and during these appointments, SNA E&T Program Specialists will facilitate a brief, group orientation which outline general program information. Immediately following the orientation, SNA E&T Program Specialists meet individually with participants to:

- Review and assess the participant's employability skills;
- Develop an ECDP with the participant;
- Ensure the individual understands each party's role in implementing the plan; and
- Explain good cause and the consequences of non-compliance with the program.

ABAWD and non-ABAWD individuals referred to the SNA E&T Program, who live outside of zip codes served by the existing SNA E&T Program offices but within the Personal Accountability Pilot service delivery area, will be notified in writing of the availability of SNA E&T Program services through the Personal Accountability Pilot's community providers. Once an individual contacts the provider, the provider will:

- Provide the participant with an explanation of the SNA E&T Personal Accountability Pilot, and the components offered;
- Explain participation is voluntary and obtain documentation of the participant's acknowledgement;
- Assess and evaluate the participant's career goals, skills, abilities, family obligations, and other job-related assets and barriers to determine suitable components;
- Develop an ECDP with the participant; and
- Ensure the participant understands each party's role in implementing the plan.

MONITORING COMPLIANCE WITH WORK REQUIREMENTS

All work activities must be monitored for participant progress and to ensure the participation hours are being met. SNA E&T Program Specialists and Personal Accountability Pilot staff must maintain thorough documentation of the verification used to substantiate recorded hours with the case record.

Documentation, verification and monitoring requirements for each component include:

- Job Search
Only actual time spent in the Job Search component is allowable. Actual hours in the Job Search component are established by using information recorded on the *Work Activity Report* form that is signed and dated by the participant attesting to the truthfulness of the information. The participant is required to submit the report on a weekly basis.
- Job Readiness
Determining the countable hours of actual participation occurs through confirmation of attendance by workshop facilitators. The confirmation must include the participant's name, the actual daily hours of participation, the name of the person verifying the hours, and their contact information. The documentation must be obtained weekly.
- Education and/or Training
The number of participation hours is determined by verification that identifies the number of hours per week that the participant attended the component. Countable hours consist of classroom time and laboratory hours. Up to one hour of homework time for each hour of class time may be counted as participation hours. Verification must include the participant's name, actual weekly hours of participation, name of the education and/or training provider, and the name and phone number of the person verifying the hours. When possible, the SNA E&T Program Specialist or Personal Accountability Pilot staff will use the funding program's records and verification to determine progress and compliance. Evidence of hours of participation must be obtained on a bi-weekly basis.
- Work Experience
The number of participation hours is determined by evidence from the work experience provider that substantiates the number of hours worked. Examples of verification include time sheets, sign-in/sign-out logs, or written and signed statements from the work experience provider substantiating the daily actual hours of participation. The verification must include the participant's name, actual daily hours of participation, name of the work experience provider, and the name and phone number of

the person verifying the hours. Evidence of actual hours of participation must be obtained on a bi-weekly basis.

- Unsubsidized Paid Employment

Evidence from the employer used to substantiate the number of hours worked determines the number of participation hours. Actual participation hours include hours for which the individual is paid but does not work, including paid leave, excused absences, and holidays.

Verification of the actual number of countable hours of participation occurs through the receipt of pay stubs, other employer produced documents, or well documented phone calls with the employer containing:

- The participant's name;
- Actual hours of participation;
- The name of the employer; and
- The name and phone number of the person verifying the hours.
This includes employment verification services such as TALX.

The SNA E&T Program may not count more hours toward the participation rate for a self-employed participant than the participant's self-employment income (gross income minus business expenses) divided by the federal or state minimum wage (whichever minimum wage is higher).

Actual hours of participation may be projected for a maximum of six months based on one full payment cycle/pay period that is representative of continuing circumstances. The hours are based on evidence received and verified by the employer. When there is a change in the participant's actual verified hours, the number will be recalculated and a new six-month projection will be applied.

If the pay cycle/pay period does not represent the continuing circumstances, actual hours will be used rather than projecting. When a full pay cycle/pay period represents ongoing weekly hours, the actual hours are used for projected hours. When bi-weekly hours are represented, the hours are divided by two to arrive at the average weekly hours used for projected hours. When semi-monthly hours are represented, the hours are divided by two point one-five and used for projected hours.

Unsubsidized Paid Employment must be monitored every 30 days to ensure participant success in their transition to self-sufficiency by ensuring the participant is aware of any support services needed to support continued employment and career advancement. The SNA E&T Program case is closed when the participant maintains employment for 30 hours or more per week for a period of 90 days.

- Community Service

Evidence from the community service provider that substantiates the number of hours worked also determines the number of participation hours. Examples of verification include time sheets, sign in/sign out logs, and written and signed statements from the community service provider substantiating the daily actual hours of participation. The verification must include the participant's name, actual daily hours of participation, name of the community experience provider, and the name and phone number of the person verifying the hours. Evidence of actual participation must be obtained bi-weekly.

ABSENCES

Up to 16 hours of excused missed participation per month can be counted as actual hours of participation, with a limit of 80 hours in the preceding 12-month period. The excused absences will count if the participant was scheduled to participate when the absence occurred. Excused absences can include sick days, medical appointments for the participant or family members, required appointments with service providers, court dates and job interviews. Any other absence not resulting in disciplinary action or termination by the component provider counts as an excused absence. In addition to the excused absences, ten state-recognized holidays count as actual hours of participation if the participant was scheduled to participate when the holiday occurred.

DETERMINATION OF GOOD CAUSE

When a mandatory participant fails, or refuses, to comply with the participation requirements without "good cause," they are subject to disqualification which is the loss of some or all of the household's SNAP benefits. Good cause is defined as any situation or circumstance beyond a participant's control that prevented engagement in the specific requirements identified by the SNA E&T Program. SNA E&T Program Specialists use reasonable judgment when making good cause decisions, keeping in mind that engagement of the participant is the goal.

The SNA E&T Program Specialist will make good cause determinations within seven calendar days and must:

- Determine whether a barrier to participation exists;
- Offer any available support services;
- Make every effort to ensure the participant is made aware of available services through the SNA E&T Program or referrals to outside or community resources when support services have not been offered to address an identified barrier;
- Grant good cause if services are not available to remove the barrier(s) to participation and work with the participant to find another activity for

engagement until a service becomes available or the barrier ceases to exist;

- Notify the participant of the incident of non-compliance and give ten days to provide good cause if barriers do not exist or services have been provided;
- Send a notice after the participant responds but does not establish good cause. Participants will be given a final opportunity for engagement. The notice will advise the participant that because they did respond with an attempt to comply, they are being offered an opportunity to start compliance by attending a new appointment and they can prevent their SNAP benefits from being cut or stopped; and
- Initiate the disqualification process when the participant does not attend the final appointment to prevent the disqualification.

DISQUALIFICATION PROCESS

When the participant does not participate with the program requirements and good cause is not established, the disqualification process begins. The SNA E&T Program Specialist sends a recommendation to FAA, through an automated alert to AZTECS, to impose a disqualification decision.

ABAWDs subject to time limited assistance and Personal Accountability Pilot participants are not subject to SNAP disqualifications.

NOTIFICATION OF NON-COMPLIANCE

FAA staff will review the case to determine if an exemption exists. If an exemption does not exist, FAA staff is responsible for taking the following actions:

- Establish the disqualification period.

The length of the disqualification period depends on whether the participant has previous disqualifications for non-compliance with the SNA E&T Program. The disqualification periods are:

First Disqualification	One Month
Second Disqualification	Three Months
Third and Subsequent Disqualifications	Six Months

- Determine the disqualification start date.

The disqualification begins the first month possible allowing for a notice of adverse action. A Notice of Adverse Action (NOAA) informs the SNA E&T Program household when a change results in a decrease in

the amount of their SNAP benefits or case closure. The NOAA must be sent to the SNAP household at least ten calendar days before the change occurs.

- Determination of whether the disqualification for SNAP benefits affects the entire household or only the non-compliant participant.
- Impose the disqualification and issue the appropriate NOAA in AZTECS. All households must receive a NOAA when a change results in a decrease in the amount of their SNAP benefits or case closure. FAA staff must send the notice at least ten calendar days before the change can occur to the SNAP benefits. This notice is considered part of due process providing information to the household regarding their right to file an appeal for a hearing due to the decrease of benefits or case closure.

2. INFORMATION COORDINATION AND EXCHANGE

The *Arizona Supplemental Nutrition Assistance Employment & Training Policy Manual* and the *Family Assistance Administration Policy Manual* describes the coordination and exchange of information between FAA and EA. Policies are coordinated between FAA and EA in order to administer the SNA E&T Program.

3. COORDINATION TIME FRAMES

No later than one day following the SNAP benefit payment, FAA will notify EA of each referred participant via a nightly batch process between AZTECS and JAS.

- Upon receiving the automated referrals in JAS, SNA E&T Program staff will select recipients who will attend the SNA E&T Program initial appointment. When SNA E&T Program staff makes a selection, JAS automatically sends an initial appointment notice to the individual. ABAWDs will be manually selected from JAS when they select the SNA E&T Program for assistance in meeting the ABAWD work requirement.
- SNA E&T Program staff will provide an overview of the SNA E&T Program and educate participants on the relationship between their participation and the ongoing receipt of their SNAP benefits.
- When the participant does not participate with the program requirements and does not establish good cause, the disqualification process begins. SNA E&T Program staff will send a "recommendation" to FAA, via an automated alert process, to impose a possible disqualification.

- Within ten days of receiving the disqualification alert, FAA staff will review the case to determine if an exemption exists. FAA is required to:
 - Establish the disqualification period;
 - Determine the disqualification start date;
 - Determine whether the disqualification for SNAP benefits affects the entire household or only the non-compliant participant; and
 - Impose the disqualification and issue the appropriate NOAA in AZTECS.

B. INTERAGENCY COORDINATION

Interagency coordination is summarized in Table 3: FFY 2016 Interagency Coordination for SNA E&T Program.

1. AREAS OF COORDINATION

FAA staff refers non-exempt SNAP recipients to the SNA E&T Program. Within DES, the SNA E&T Program is an employment and training program administered by the Division of Employment and Rehabilitation Services (DERS) Employment Administration. DERS has the authority for the following administrations that collaborate to provide services for the SNA E&T Program participants:

- Employment Administration (EA);
- Rehabilitation Services Administration (RSA); and
- Child Care Administration (CCA).

Community and faith-based organizations may provide assistance to participants for employment and other services.

2. METHODS OF COORDINATION

- Coordination emphasizes the earliest possible employment and levels of service ranging from self-service, group services, and individual services.
- Assistance may be secured through non-financial agreements, conferences, office visits, etc., for better utilization of community resources.
- EA delivers Job Readiness training in compliance with the SNA E&T Program work component definition.
- EA staff maintains membership on Local Workforce Development Boards (LWDB) and meets with members for coordination of work components with WIOA.
- Interagency coordination follows DES and departmental regulations, policies and procedures.

C. CONTRACTUAL ARRANGEMENTS

EA staff currently provides coordination services with community colleges, veteran service providers and other agencies through non-financial agreements. During FFY 2016, EA will contract with community providers to offer SNA E&T Program participants employment and training services. Contracted community providers will be responsible for the following:

- Intake and assessment;
- Case management;
- Case records; and
- Reporting requirements.

Community providers must have infrastructure (such as staffing) in place, and provide a minimum of five of the allowable components which must include Education and/or Training and Job Readiness. Community Providers must also be financially stable, have case management capabilities, and have existing automated data systems.

PART IV: PROGRAM COSTS AND FINANCIAL MANAGEMENT

A. PLANNED COSTS OF THE STATE SNA E&T PROGRAM

1. OPERATING BUDGET

SNA E&T Program expenditures for the components of Job Search, Job Readiness, Education and/or Training, and Work Experience are based on the expectation that the majority of participants will receive traditional services.

The estimated expenditures for the SNA E&T Program at 100 percent funding and participant reimbursements breakdown are as follows:

Chart of Percentages, Expenditures & Expenditure Categories		
<u>Percentages</u>	<u>Expenditure</u>	<u>Expenditure Category</u>
66.3%	\$2,925,273.00	Salaries and Benefits
20.2%	\$890,136.00	Other Costs, which include basic operating expenses such as: in-state travel; equipment; field supplies; etc.
6.9%	\$306,636.00	Job Search component
0.1%	\$204,094.00	Job Readiness component
0.7%	\$227,942.00	Educational component
1.0%	\$43,600.00	Work Experience component
4.6%	\$203,440.00	Unsubsidized Paid Employment component

0.3%	\$11,252.00	Community Service component
100%	\$4,812,373.00	TOTAL

SNA E&T FFY16							
Salary & Benefits							
Position Title	FTE	FFY15 Estimated Hours	Salary Hourly Rate	ERE Hourly Rate	Total Salary	Total Benefits	Total FFY16 Salary & Benefits
ADMV SECRETARY 1	1.00	2,080	\$13.23	\$6.65	\$27,518.40	\$13,832.00	\$41,350.40
PROG SVC EVALR 1	3.00	6,240	\$15.09	\$7.59	\$94,161.60	\$47,361.60	\$141,523.20
PROG SVC EVALR 3	41.00	85,280	\$17.74	\$8.92	\$1,512,867.20	\$760,697.60	\$2,273,564.80
PROG SVC EVALR 4	4.30	8,944	\$20.24	\$10.17	\$181,026.56	\$90,960.48	\$271,987.04
Caseworker Total	49.30	102,544	\$66.30	\$33.33	\$1,815,573.76	\$912,851.68	\$2,728,425.44
ADMV SVCS OFFCR 1	0.10	208	\$19.55	\$9.83	\$4,066.40	\$2,044.64	\$6,111.04
ADMV SVCS OFFCR 2	0.10	208	\$27.29	\$13.72	\$5,676.32	\$2,853.76	\$8,530.08
ADMV SVCS OFFCR 3	0.10	208	\$29.33	\$14.74	\$6,100.64	\$3,065.92	\$9,166.56
HELP DESK ANALYST	0.10	208	\$15.79	\$7.94	\$3,284.32	\$1,651.52	\$4,935.84
HUMAN SVCS PROG	0.40	832	\$19.46	\$9.78	\$16,190.72	\$8,136.96	\$24,327.68
DVMT SPCT INFO	0.20	416	\$21.27	\$10.69	\$8,848.32	\$4,447.04	\$13,295.36
SECURITY ANALYST	0.20	416	\$20.44	\$10.28	\$8,503.04	\$4,276.48	\$12,779.52
INFO TECH SPCT 3	0.20	416	\$26.25	\$13.20	\$10,920.00	\$5,491.20	\$16,411.20
MGT ANALYST 4	1.00	2,080	\$24.80	\$12.47	\$51,584.00	\$25,937.60	\$77,521.60
PROG SVC EVALR 5	0.30	624	\$25.35	\$12.74	\$15,818.40	\$7,949.76	\$23,768.16
SR BUSINESS ANALYST	0.30	624	\$25.35	\$12.74	\$15,818.40	\$7,949.76	\$23,768.16
Operations Total	2.70	5,616	\$278.80	\$140.15	\$130,992.16	\$65,854.88	\$196,847.04
Grand Total	52.00	108,160	\$345.10	\$173.48	\$1,946,565.92	\$978,706.56	\$2,925,272.48

FFY 2016: Other Costs	
Indirect Salary & ERE Costs	\$272,928
Professional and Outside Services	\$316,226
Travel	\$9,429
Other Operating	\$114,911
Occupancy	\$116,727
Capital Equipment	\$1,297
Noncapital Equipment	\$58,618
TOTAL	\$890,136

2. SOURCES OF FUNDING

The SNA E&T Program funding sources are 100 percent federal grant funds for administration with 50 percent match funding for transportation and other support services costs and 50 percent administration match funding for the Personal Accountability Pilot contractual costs. (See Table 5).

B. CONTRACTS

Under the Personal Accountability Pilot, it is anticipated that Arizona will have approximately \$396,964.00 in contractual expenditures from October 1, 2015 through September 30, 2016. These costs will be funded with the 50 percent administration match funding (See Table 5).

Through contract, Arizona plans to replace the current Management Information System (JAS) at the cost of approximately \$300,000.00. This cost has been included in the Professional and Outside service budget line in the FFY 2016: Other Costs table above.

C. PARTICIPANT REIMBURSEMENT

- TRANSPORTATION-RELATED EXPENSES (TRE) AND OTHER COSTS

The State of Arizona approved sufficient funding for transportation allowances and other matched costs for State Fiscal Year (SFY) July 1, 2015 through June 30, 2016.

- The TRE allowance will be limited to \$64.00 per every four-week period of verified participation. The participant will not receive monetary payments

for transportation if another program, including student financial aid, covers the transportation-related expense.

- o SNA E&T Program Specialists will determine eligibility for the TRE allowance and process the payments through JAS. The SNA E&T Program expects 8,950 TRE reimbursement payments for participants entered into a component during FFY 2016.
- The SNA E&T Program may purchase clothing that is necessary for participants to begin or continue participating in SNA E&T Program components and/or to accept and maintain employment. Purchases are limited to \$100.00 per participant in a FFY. The SNA E&T Program expects 272 participants to enter a component or combination of components and be issued the reimbursement during FFY 2016.
 - SNA E&T Program Specialists will determine the need and eligibility for the clothing allowance and issue the payment to the participant. When the funds are used with the provider, the participant will provide receipts for their purchases which will then be recorded in JAS by the EA Budget Unit.

- CHILD CARE

Currently, the SNA E&T Program does not reimburse the participant for child care expenses. Should this change, Arizona will submit an amended plan.

- JOB RETENTION

Arizona is opting not to provide job retention services during FFY 2016. Should this change, Arizona will submit an amended plan.

D. COST ALLOCATION

FAA passes through to EA 100 percent of the SNA E&T Program federal grant. All SNA E&T Program staff will devote their time to SNA E&T Program work activities. There are no shared costs to allocate with FAA.

PART V: PROGRAM REPORTING AND MANAGEMENT INFORMATION

A. METHOD OF OBTAINING INITIAL COUNT OF WORK REGISTRANTS

AZTECS has a designated field for coding work registrants. FAA local office staff will update the work status for each household member at the time of each application or recertification.

On or about November 25th of each year, AZTECS generates the annual SNA Employment & Training Program Report (FR-150). This report provides a “picture-in-time” of all existing SNA E&T Program registrant household members as of October 31st for each year. JAS maintains one database for SNA E&T Program referrals and one for active SNA E&T Program participants.

B. METHOD FOR ENSURING AN UNDUPLICATED WORK REGISTRANT

Each registrant/participant entry is compared with historical data going back to October 1st of the current FFY. Non-exempt SNA E&T Program individuals who have been certified to receive SNAP two or three times within a fiscal year are automatically excluded once their SSN is included in the work registrant count for the current fiscal year.

C. METHODS FOR MEETING ONGOING FEDERAL REPORTING REQUIREMENTS

1. MANAGEMENT INFORMATION SYSTEM (MIS) METHOD

- Type of MIS: Automated AZTECS and JAS
- Local Reporting Requirements
 - a. *Non-Financial:* Using JAS, staff will gather data pertaining to participants who begin a SNA E&T Program work activity and will electronically report this information to FAA on a quarterly basis. Information pertaining to new work registrants and participation exemptions will be gathered electronically by FAA through AZTECS. On a quarterly basis, staff will generate a report (FR-151) providing unduplicated counts of this data.
 - b. *Financial:* EA will report SNA E&T Program administrative and local office time-reporting and expenses to the FAA Accounting Administration and Division of Business and Finance (DBF) on a monthly basis. EA accounting will gather data pertaining to the transportation allowances from entries coded in JAS.

2. ORGANIZATIONAL RESPONSIBILITY FOR SNA E&T PROGRAM REPORTING

- Responsibility for Non-Financial SNA E&T Program Reporting: EA will be responsible for the completion of the FNS-583 *Non-Financial E&T Quarterly Report*.
- Responsibility for Financial SNA E&T Program Reporting: The Financial Service Administration (FSA) will be responsible for completion of the SF-425 *E&T Quarterly Report*.

- The contact persons for questions regarding Arizona's SNA E&T Program are:

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EXECUTIVE SUMMARY

The attached SNA E&T Program State Plan, as required by 7 CFR 273.7(c)(8), is an estimated operating budget for the SNA E&T Program covering the period October 1, 2015 through September 30, 2016. This plan also includes strategies the State of Arizona will implement to address the pending end of the current ABAWD waiver set to expire on December 31, 2015.

The plan is based on a level of work activities supported by a 100 percent federal funding appropriation of \$3,815,409 for FFY 2016. Any changes in actual USDA funding will affect the proposal as it is implemented.

Arizona Counties

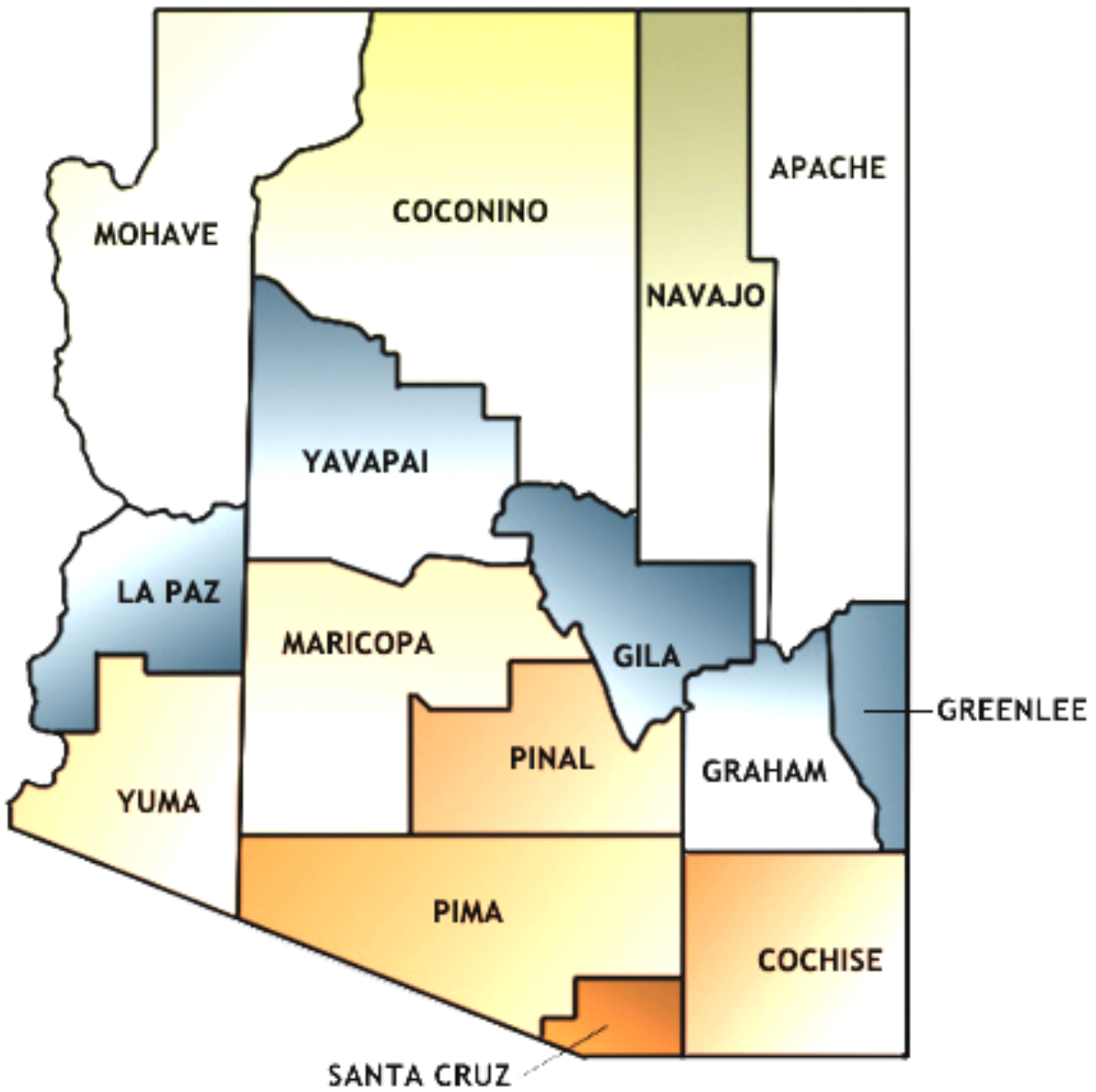


TABLE 1: FFY 2016 ESTIMATED PARTICIPANT LEVELS

A.	Anticipated number of work registrants in the state during FFY 2016	361,483
B.	List planned exemption categories and the number of work registrants expected to be included in each category during the fiscal year:	
	1. Geographical Location	100,006
	2. Temporarily Laid Off (60 days or less)	73
	3. Temporary Residence	52,999
	4. Pregnancy (second or third trimester)	1,840
	5. Remote Residence (more than two hours roundtrip)	8,803
	6. SCSEP (age 55 through 59 in Senior Community Service Employment Program)	162
	7. Short Approval Period (two months or less)	386
	TOTAL EXEMPTIONS	164,269
C.	Percent of all work registrants exempt from SNA E&T Program	45.44%
D.	Number of SNA E&T mandatory participants	197,214
E.	Anticipated number of ABAWDs in the state during the fiscal year	171,624
F.	Anticipate number of ABAWDs in waived areas of the state during the fiscal year	51,044
G.	Anticipated number of ABAWDs to be exempted under the State's 15	0

	percent ABAWD exemption allowance during the fiscal year	
H.	Number of at-risk ABAWDs expected in the state during the fiscal year	N/A

TABLE 2: FFY 2016 ESTIMATED SNA E&T PLACEMENTS AND PARTICIPATION

ESTIMATED SNA E&T PROGRAM PLACEMENTS FFY 2016		
1	Number of ABAWD applicants and recipients expected to participate in a qualifying ABAWD component each month	2,029
2	Number of applicants and recipients expected to participate in a component each month	440
3	Total number of applicants and recipients the State agency expects to participate in a component each month	2,469

ESTIMATED INDIVIDUAL PARTICIPATION FFY 2016	
Number of individuals expected to participate in the SNA E&T Program during FFY 2016	29,627

TABLE 3: FFY 2016 INTERAGENCY COORDINATION FOR SNA E&T PROGRAM

AREAS OF COORDINATION	AGENCIES INVOLVED	EXPECTED REFERRALS	COORDINATION METHODS
1. SNA E&T Program component delivery	Rehabilitation Services Administration Local Workforce Investment Areas – WIA One-Stop Operators Employment Service Community and Faith-Based Organizations	1,800	Joint Agreement
2. SNA E&T Program delivery of a component for another agency or program	Family Assistance Administration (FAA) Local Workforce Investment Areas – WIA One-Stop Operators	900	Joint Agreement
3. Joint component of the SNA E&T Program and another agency or program	Child Care Administration (CCA) Rehabilitation Services Administration (RSA) Local Workforce Investment Areas – WIA One-Stop Operators	700	Joint Agreement
4. SNA E&T Program referral to another program or agency	Community Colleges Employment Service Local Workforce Investment Areas – WIA One-Stop Operators AZ Women’s Employment & Education Agency Community Action Human Resource Agency Community-Based Organizations Faith-Based Organizations Temporary Employment Services Adult Basic Education Veteran’s Agencies and Organizations	1,300	Joint Agreement
5. Other forms of coordination	Department of Housing and Urban Development (HUD) – Subsidized Housing Veteran’s Agencies and Organizations Tribal TANF	100	Joint Agreement

TABLE 4: FFY 2016 OPERATING BUDGET

OPERATING BUDGET FISCAL YEAR 2016							
Components	State Agency Costs		Contractual Costs (50/50 Admin Funds)	Participant Reimbursement (State plus Federal)		State Agency Cost For Dependent Care Services	Total
	Salary & Benefits	Other Costs		Clothing	TRE		
Job Search	\$1,494,745.59	\$454,838.61	\$0.00	\$13,900.00	\$292,736.00	N/A	\$2,256,220.20
Job Readiness	\$27,126.86	\$8,254.48	\$198,482.00	\$300.00	\$5,312.00	N/A	\$239,475.34
Work Experience	\$212,586.04	\$64,688.16	\$0.00	\$2,000.00	\$41,600.00	N/A	\$320,874.20
Voc Ed & Training	\$143,938.46	\$43,799.27	\$198,482.00	\$1,300.00	\$28,160.00	N/A	\$415,679.73
Unsubsidized Paid Employment	\$992,068.18	\$301,878.07	\$0.00	\$9,200.00	\$194,240.00	N/A	\$1,497,386.25
Community Service	\$54,807.34	\$16,677.42	\$0.00	\$500.00	\$10,752.00	N/A	\$82,736.76
TOTALS	\$2,925,272.47	\$890,136.01	\$396,964.00	\$27,200.00	\$572,800.00	N/A	\$4,812,372.48
				Total Component Costs			\$4,812,373
				Overall State Agency SNAP E&T Operational Costs			\$498,482

TABLE 5: FFY 2016 PLANNED COSTS – STATE SNA E&T PROGRAM BY CATEGORY OF FUNDING

FUNDING CATEGORY	FFY 2015	FFY 2016
1. 100% Federal SNA E&T Program Grant	\$2,740,606	\$3,815,409
2. Share of \$20 Million ABAWD Grant (Pledge)	N/A	N/A
3. Additional SNA E&T Program Administrative Expenditures		
50% Federal	N/A	\$198,482
50% State	N/A	\$198,482
4. Participant Expenses:		
a. Transportation/Other		
50% Federal	\$265,000	\$300,000
50% State	\$265,000	\$300,000
b. Dependent Care		
50% Federal	N/A	N/A
50% State	N/A	N/A
5. Total SNA E&T Program Costs (1+2+3a+3b+4a+4b = 5)	\$3,270,606	\$4,812,373
6. 100% State Agency Cost for Dependent Care	\$0.00	\$0.00
7. Total Planned Fiscal Year Costs	\$3,270,606	\$4,812,373

Equal Opportunity Employer/Program · Under Titles VI and VII of the Civil Rights Act of 1964 (Title VI & VII), and the Americans with Disabilities Act of 1990 (ADA), Section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, and Title II of the Genetic Information Nondiscrimination Act (GINA) of 2008; the Department prohibits discrimination in admissions, programs, services, activities, or employment based on race, color, religion, sex, national origin, age, disability, genetics and retaliation. To request this document in alternative format or for further information about this policy, contact your local office; TTY/TDD Services 7-1-1. · Free language assistance for DES services is available upon request. · Ayuda gratuita con traducciones relacionadas con los servicios del DES está disponible a solicitud del cliente.