

ARIZONA DEPARTMENT OF ECONOMIC SECURITY

Program Name: Vocational Rehabilitation (VR)

Policy Number: VR-2.2-v1

Effective Date: July 1, 2008

Last Revision: March 31, 2021

CHAPTER 2: Client Information and Case Requirements

Section 2.2: Address Confidentiality Program

I. Policy Statement

This policy provides the guidelines regarding the requirements of the State of Arizona Address Confidentiality Program (ACP). ACP allows VR applicants/clients who are survivors of domestic violence offenses, sexual offenses, or stalking to keep their residential addresses confidential.

II. Authority

Authority for policies contained in this document includes the following:

- Workforce Innovation and Opportunity Act (WIOA), 29 U.S.C. § 3101 et seq.
- Title IV Amendments to the Rehabilitation Act of 1973, 29 U.S.C. § 701 et seq.
- A.R.S. §§ 23-502 and 503
- A.R.S. §41-161 through 169
- DES Policy Address Confidentiality Program 1-01-45
- DES Procedure Requesting an ACP Participant's Actual Address 1-01-45-01

III. Applicability

This applies to applicants/clients who participate in the ACP. The applicant/client must:

- A. Provide VR with a copy of their ACP card.
- B. Notify VR to request that their ACP protection be discontinued.
- C. Consider the opportunity to register to vote.
 1. The applicant/client may leave a completed voter registration form with the VR Counselor or may submit the form directly to the County Recorder's Office.

2. If the applicant/client chooses to register to vote outside of the ACP process, the applicant/client must use their actual address on voter registration materials.
- D. Decide whether to disclose their telephone number and actual address to service providers is necessary for service provisions.

IV. Standards

- A. The VR Counselor and/or VR staff must contact the Secretary of State's ACP office to confirm the enrollment status of any applicant/client who discloses their participation in the ACP.
- B. In instances when an actual address is required, refer to the DES Procedure 1-01-45-01.
- C. The VR Counselor and/or VR staff must:
1. Create a new address and check the ACP box in the address section of the General Information and Referral form (GIR) in Libera within two days upon verifying ACP status.
 2. Use the substitute address provided by the ACP as the applicant/client's lawful address of record.
 3. Update the applicant/client's actual address with the substitute address including the applicant/client's unique 4-digit apartment number and the last 4 digits of zip code in the GIR.
 4. Contact Libera Help Desk for assistance removing or changing contact information on scanned documents dating 90 days prior to the ACP date within two business days.
 5. Confirm that all previous addresses are redacted from the case file.
- D. The VR Counselor must offer the applicant/client who participates in the ACP the following:
1. The opportunity to register to vote upon change of address.
 2. The option to use the Secretary of State's office to register to vote through the ACP process to maintain address confidentiality.
- E. VR must not intentionally or knowingly obtain or disclose the applicant/client's actual address or telephone number unless permissible by law or the applicant/client's permission is obtained.
- F. Service providers must be informed of the applicant/client's involvement in ACP unless they specifically request that their status in the ACP not be shared.

- G. In instances when a breach of confidentiality occurs, VR staff are subject to a class 1 misdemeanor and disciplinary action up to and including dismissal from employment or service.

V. Procedure

- A. Refer to IV.A-D and F above.
- B. Refer to Standard Work (if available).

VI. Documentation Requirements

The applicant/client's electronic case file must include the following:

- A. ACP authorization card or letter provided by the Secretary of State's ACP office.
- B. Refer to Section 2.7 Voter Registration policies for the required documentation.
- C. Documentation indicating the client's consent to disclose ACP status to service providers.