



HUMAN SERVICES

DEPARTMENT

State of New Mexico

Income Support Division

Supplemental Nutrition Assistance Program

Employment & Training State Plan

Federal Fiscal Year 2016

Susana Martinez
Governor

Brent Earnest
Cabinet Secretary

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SUMMARY OF NEW MEXICO SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM

EMPLOYMENT AND TRAINING PROGRAM

Part I

Abstract of the State Employment & Training (E&T) Program

1. Overview/Summary

The New Mexico Human Services Department (NMHSD) operates New Mexico's Employment and Training (E&T) program and administers it statewide. The E&T program includes two populations, able bodied adults with dependents (mandatory E&T participants) and able bodied adults without dependents (ABAWD). The purpose of this program is to assist Supplemental Nutrition Assistance Program (SNAP) participants to gain skills, opportunities, training or experience that will improve their employment prospects or earning potential. These activities ensure that eligible families and individuals get the training and experience needed to become self-supporting, while providing support services necessary to participate in qualifying activities. In addition to reducing the participants need for assistance, the E&T program seeks to enhance the participant's sense of self-worth and esteem. Working parents provide an appropriate role model for children in the home, thereby contributing to a reduction in multi-generational dependency. Both staff and participants understand that successful employment is the ultimate goal of the program.

New Mexico's E&T program is administered by the Income Support Division (ISD). ISD is responsible to plan and develop program policies that encourage participants to meet their employability and employment goals. Service delivery is the responsibility of ISD field staff and the New Mexico Works Employment and Training Service Provider.

NMHSD is requesting additional 100% funds for FFY 2016 in order to effectively administer the elements within the E&T State Plan for the following reasons:

- Implementation of ABAWD 20 hour a week work requirement beginning January 1, 2016;
- NMHSD has identified gaps in our 583 reporting and has under reported both our new and existing work registrants;
- Enhance the current IT and resource infrastructure for the E&T population to track activities that include but is not limited to placements, demographics, program successes and outcomes.

Prior to the implementation of the E&T State Plan, NMHSD hosted two round table discussions with Tribal members from tribes, pueblos and nations in New Mexico. NMHSD's Cabinet Secretary addressed members of the All Pueblo Council of Governors on June 18, 2015 regarding the department's proposed E&T State Plan. During the Annual State Tribal Summit

on July 1, 2015 officials from NMHSD spoke with tribal leaders regarding the proposed E&T State Plan. Tribal members were in attendance at the formal public hearing held on July 17, 2015 to provide public comment on our proposed State rules.

2. Program Changes

NMHSD is requesting from the Southwest Regional Food and Nutrition Services (FNS) the 3-month waiver extension for ABAWDs for the months of October 1, 2015 through December 31, 2015, which will enable NMHSD to waive the ABAWD participation time limits. During this time period, there will not be any changes implemented to the current NMHSD E&T program. HSD will continue to operate a mandatory SNAP E&T program for adults without dependents.

From October 1, 2015 through December 31, 2015, an adult without dependents is defined as:

- Physically and mentally able to work
- Age 18 through 49
- No dependent or child under the age of 18 is residing in the participating SNAP household

From October 1, 2015 through December 31, 2015, the following participants will be exempt from the SNAP E&T requirements:

- An individual younger than 18 years of age or an individual 50 years of age or older;
- An individual who is physically or mentally unfit for employment; if physical or mental unfitness is claimed but not evident, verification is required; verification may consist of receipt of temporary or permanent disability benefits issued by government or private sources, or a statement from a physician or licensed or certified psychologist;
- A natural parent, adoptive or step parent or individual residing in a SNAP household that includes a child younger than age 18, even if the child is not eligible for SNAP benefits;
- A parent or other household member who is responsible for the care of an incapacitated person; the incapacitated person need not be considered a member of the SNAP household or even reside with the household; the exemption will not apply if the dependent or incapacitated person resides with others who provide the care;
- An individual subject to and complying with any work requirement under Title IV of the Social Security Act, including TANF work requirements;
- An individual who receives unemployment compensation benefits and is subject to and complying with a federal or state unemployment compensation system; an individual who has applied for but who has not yet received UCB is exempt if required to register with the department of labor as part of the unemployment compensation application process;
- An individual who is a regular participant in a state certified drug or alcohol treatment and rehabilitation program;

- An individual who is employed or self-employed and working a minimum of 30 hours a week or receiving weekly earnings at least equal to the federal minimum wage multiplied by 30 hours;
- Migrant and seasonal farm workers who are under contract or similar agreement with an employer or crew chief to begin employment within 30 days are exempt, although this does not prevent such individuals from seeking services from the E&T program;
- Workers in ACTION programs (such as VISTA) who average 30 or more hours of work per week are exempt, even though they earn less than minimum wage;
- A student who is eligible to participate in the SNAP program, and who is enrolled at least half time in any recognized school, high school, training program, or institution of higher education; this exemption remains in effect during normal periods of class attendance, vacations, and recess, unless the student graduates, is suspended or expelled, drops out, or does not intend to register for the next normal school term (excluding summer session);
- A household member who has made application for SSI and SNAP benefits at the social security administration, and whose application for SNAP benefits has been received by HSD, and who is determined eligible for SNAP benefits, shall be exempt from work registration until an SSI determination is made; a household member who is determined ineligible for SSI shall have the exemption from E&T work requirements evaluated at the time of the denial of SSI;
- A pregnant woman; or
- Residing in a county with greater than 10 percent unemployment rate as defined by the department.

Participants that are mandatory to participate in the E&T program will be referred to the NMW Service Provider. These individuals will be required to meet the requirements of Individual and Group Job Search. To successfully complete Individual and Group Job Search, a participant is required to make at least 12 job contacts with potential employers within a one month period, for a minimum of 24 job contacts, within a two month period. A job contact, at a minimum, requires participants who have access to the Internet, to register as a “job seeker” with the Virtual One Stop System (VOSS) through the “New Mexico Workforce Connection” online portal for job-matching services and resources, which is administered by the New Mexico Department of Workforce Solutions (NMDWS). The participant may use this online service to apply for jobs. The NMW Service Provider will verify completion of the registration via an interface provided by the Department of Workforce Solutions within 30 days of the Work Participation Agreement (WPA) approval.

Estimated Number of Mandatory E&T Participants (October-December 2015)

During FFY 2016, the statewide mandatory E&T participant population is estimated to be 17,500.

During this time period, October 1, 2015 through December 31, 2015, participants who fail to comply with the E&T requirements and who do not meet an exemption or qualify for good cause will be disqualified as follows:

1. **First Occurrence.** Until compliance or for three (3) months, whichever is later.
2. **Second Occurrence.** Until compliance or for six (6) months, whichever is later.
3. **Third Occurrence.** Until compliance or for one (1) year, whichever is later.

Mandatory E&T and ABAWD Implementation

The E&T requirements will be voluntary for SNAP recipients who are mandatory E&T participants from October 1, 2015 to September 30, 2016; these individuals will not be subject to disqualification during this time period for non-compliance with the E&T program. As of October 1, 2016, all newly eligible SNAP participants who do not meet an exemption or qualify for good cause, will be mandatory for the E&T program. The existing SNAP eligible participants who do not meet an exemption or qualify for good cause as of October 1, 2016, will become mandatory for the E&T program upon recertification.

Effective January 1, 2016, ABAWD program requirements will be reinstated. ABAWD requirements and time limits are being implemented in accordance with the Food and Nutrition Act and Title 7 of the Code of Federal Regulations, part 273. ABAWDs, who are not waived by a Federal law or exempt by a State waiver, will be required to participate in a qualifying component to remain eligible for SNAP benefits. Federal exemptions for ABAWDs are defined in the Code of Federal Regulations and are different from the State exemptions.

A. ABAWD Population (effective January 1, 2016)

An ABAWD is a healthy adult, is 18 through 49 years of age, and is subject to E&T requirements and the 3-month time limit.

a. ABAWD Requirements: (effective January 1, 2016)

Federal Law at 7 USC §2015(o)(2) outlines the requirements for the number of hours an ABAWD must participate in a component to be considered meeting the required number of hours. The ABAWD requirement does not apply to ABAWDs who reside in areas of the State granted a waiver of the 3-month time limit, determined by the State, due to the lack of a sufficient number of jobs to provide employment. An individual meeting the criteria of an ABAWD is not eligible to receive SNAP benefits for more than three months in a 36-month period during which the individual does not comply with one of the following:

- work 20 hours or more per week, averaged monthly;
- participate in and comply with the requirement of a work program for 20 hours or more per week;
- participate in and comply with other acceptable hours as determined by FLSA requirements for Community Service (CS) or Work Experience (WE) or;
- job search or job search training activities as long as the job search or job search training activities equal less than half the work requirement.

ABAWDs will follow a fixed 36 month period that will begin on January 1, 2016 and end on December 31, 2018.

b. ABAWD Exemptions: (effective January 1, 2016)

The following individuals are exempt from the ABAWD requirement:

- Under 18 or 50 years of age or older;
- Determined by the State agency to be medically certified as physically or mentally unfit for employment; at the next certification, the FAA will verify if the disability still exists. If it does not, the participant is no longer exempt from participation.
- Is a parent (natural, adoptive, or step) of a household member under age 18, even if the household member is not eligible for SNAP benefits;
- Residing in a SNAP household that includes at least one child under the age of 18, even if the child is not eligible for SNAP benefits;
- Exempt from work registration under section 6(d)(2) of the Food Stamp Act, as implemented in regulations at §273.7(b);
- A pregnant woman; or
- Resides in a county that is waived by federal waiver.

In addition to the above exemptions from the ABAWD work requirements, effective January 1, 2016, individuals residing in one of the following counties, tribes, pueblos and nations will not be mandatory for the ABAWD work requirement if granted the federal waiver by FNS. As of the submittal date of the E&T State Plan, the most current data was used to identify that the following counties, tribes, pueblos and nations have a two year average unemployment rate 20% above the national average, based on data from the Bureau of Labor Statistics. The two-year average for the counties, tribes, pueblos and nations is based on data from March 2013-February 2015:

Counties

Cibola County	Rio Arriba County
Guadalupe County	Sierra County
Luna County	Taos County
McKinley County	Torrance County
Mora County	Valencia County

Tribes, Pueblos and Nations

Acoma Pueblo	Picuris Pueblo
Jemez Pueblo	San Felipe Pueblo
Jicarilla Apache Nation	San Ildefonso Pueblo
Laguna Pueblo	Sandia Pueblo

Mescalero Nation
Nambe Pueblo
Navajo Nation
Ohkay Owingeh

Santa Ana Pueblo
Santo Domingo Pueblo
Taos Pueblo
Zia Pueblo
Zuni Pueblo

c. **Estimated Number of ABAWDs:** (January-September 2016)

During FFY 2016, the statewide ABAWD population that is subject to the E&T requirement after applying the federal waiver is estimated to be 17,500.

B. **Mandatory E&T Population (non-ABAWD)** (effective October 1, 2016)

NMHSO will offer a voluntary E&T program for non-ABAWDs through September 2016. The Department will implement a mandatory E&T program for the non-ABAWD population effective October 1, 2016. The Department will define the requirements and exemptions in the FFY 2017 State Plan.

C. **Good Cause for Non-Compliance for ABAWD and/or Mandatory E&T Recipients**

(Effective October 1, 2015)

In addition to the ABAWD and mandatory E&T participant exemptions above, a participant may obtain a temporary exemption known as “Good Cause” for failure to meet their requirements. In a case of non-compliance, the NM Works Service Provider may determine whether good cause exists for a participant’s failure to comply with E&T requirements. The NM Works Service Provider must consider the facts and circumstances, including information submitted by the household member involved and any information received from the Work Experience or Community Service site.

Good Cause: circumstances beyond the member’s control, including but not limited to:

- Participant household member’s illness;
- Illness of another household member requiring the presence of the participating member;
- An individual or family crisis or a family circumstance that may preclude participation;
- Lack of transportation and the distance to walk to the activity site exceeds 5 miles roundtrip;
- No available jobs within reasonable commuting distance; a distance is considered unreasonable if the round trip exceeds 2 hours by public or private transportation;
- Individual whose physical residence is more than 30 miles away from an income support field office, Workforce Solutions Office or an E&T service provider;
- Court appearance;
- Farmworkers who are away from their permanent residence or home base who travel to work in agriculture or a related industry during part of the year and are under contract or

- similar agreement with an employer to begin work within 30 days of the date the individual notified HSD or E&T work program service provider;
- An absence of dependent care or transportation support services necessary for participation;
 - Receipt of job referral that results in an offer below the federal minimum wage, except when a lower wage is permissible under federal minimum law; or
 - Individual is a victim of family violence.

Good cause will be evaluated on an individual basis and will only be granted until the cause no longer exists or at the next recertification, whichever is sooner. At the next recertification, it will be determined by the NMW Service Provider if the good cause still exists. If it does not, the participant is no longer exempt from participation. Good cause will be evaluated when the recipient is in jeopardy of being disqualified for non-compliance prior to placing the disqualification.

3. Program Components (Effective January 1, 2016)

The NMW Service Provider has established relationships with for-profit, non-profit, and state and local governmental and private entities in each area to serve as community service and work experience placements. The NMW Service Provider, the participant, and the organization sign a formal agreement subsequent to the participant referral. The formal agreements are called the Work Experience Training Agreement (WETA) and the Community Service Training Agreement (CSTA). The ultimate goal, with each placement, is to ensure that there is a potential for hire.

HSD has designated three components to be used in the E&T Program: Individual and Group Job Search, Community Service, and Work Experience. These components are structured to provide participants with the support and structure needed to achieve their employment goals and assist them in gaining skills and employer qualifications needed to secure and retain employment. All mandatory participants are required to register for work and must be referred to the New Mexico Work Program (NMW) Service Provider for participation. All SNAP participants are considered registered with the head of household's signature on any HSD program application. The ISD field office is responsible for explaining the E&T requirements to the participant and emphasizing the participant's responsibility to fulfill and engage in program activities. ABAWDs will be required to participate in any one or multiple components within the 36 month period to satisfy the 20 hour a week requirement, unless otherwise exempt.

Individual or Group Job Search and Employer Contacts

Effective January 1, 2016

The purpose of the Job Search component is to provide the participant a reasonable opportunity to find suitable employment. This component may also include a Job Club geared to helping the E&T participant set goals, acknowledge barriers to employment, accept responsibility for their employment goals, and gain the confidence needed to secure and maintain employment. Pre-employment skills training may include an evaluation, resume development, job application preparation, mock interviews, telephone techniques, job search and job retention techniques, work place ethics and employer's performance requirements, and assistance with identification of available jobs and employers.

Type of Component	Non-pay
Number of Job Contacts	<p>ABAWDs can participate in Job Search the first 30 days following the initial certification. After the first 30 days, Job Search can be allowed in conjunction with Work Experience as long as Job Search makes up less than half of the required hours, to equal no more than 9 hours a week of the 20 hour a week requirement. For ABAWDs, Job Search is part of Work Experience, and not a Job Search “program” so participants are considered to be participating in and complying with the requirements of Work Experience, thereby meeting the participation requirement for ABAWDs.</p> <p>A job contact, at a minimum, requires participants to register as a “job seeker” with the Virtual One Stop System (VOSS) through New Mexico Workforce Connection online portal for job-matching services and resources, which is administered by the New Mexico Department of Workforce Solutions (NMDWS).</p>

	<p>The participant will use this online service to apply for jobs. The NMW Service Provider will verify completion of the registration within 30 days after the Work Participation Agreement (WPA) is approved via an interface provided by the Department of Workforce Solutions.</p>
Geographic Areas Covered	Statewide
Targeted Population	<p>Participants who will benefit from completing job searches or those that will benefit from pre-employment skills training and assistance with identification of available jobs and employers.</p>
Organizational Responsibilities	<p>HSD ISD and the NMW Service Provider will ensure that the participant receives the type of service from this component that they will benefit from the most.</p>
Method for Monitoring	<p>Mandatory participants are required to complete the Job Search Training and Employer Contacts to ensure continued compliance with the SNAP E&T Program. If an individual does not have access to the Internet, the participant will document the job contacts and submit proof to the NMW Service Provider on the Job Search Card (DWP 277).</p> <p>The NMW Service Provider will verify completed job search activities either through the VOSS system or with the DWP 277 provided by the participant. The NMW Service Provider will notify the local Income Support Division County Office when an individual fails to comply with the requirements.</p>
Component Costs	

Transportation (per person) \$25	Mandatory participants may receive a one-time transportation reimbursement of \$25 upon timely successful completion of this component.
Total transportation expenditure for this component:	\$82,050.00
Dependent Care (per person) \$40	N/A
Total dependent care expenditure for participants in this component are:	\$0
Total reimbursement costs for Transportation and Dependent Care:	\$82,050.00
Cost of the component, excluding reimbursement:	\$225,000
Total cost of component	\$307,050.00

Community Service (CS)

Effective January 1, 2016

The purpose of the Community Service component is to provide opportunities for on-the-job skills training, improve employability and/or assistance to communities. Placements include opportunities with local and state government, private industry and non-profit entities. Sponsoring agencies may be entities such as libraries, charities, churches, and schools. To qualify as a community service placement, the activities must be similar to those normally carried out by a volunteer working with the agency, as opposed to those carried out by an employee. Federal guidelines for determining whether an activity is performed as a “volunteer” or “employee” must be followed by the sponsoring agency.

The total number of hours that a participant is required to complete must not exceed the number of hours equal to the household's allotment for that month divided by the Federal minimum wage.

Type of Component	Non-pay
Geographic Areas Covered	Statewide
Targeted Population	Mandatory participants who will benefit from on-the-job skills training and work-like experience as well as assisting their communities.
Organizational Responsibilities	HSD ISD or NMW Service Provider will provide information on approved sites.

<p>Method for Monitoring</p>	<p>Each organization has established a point of contact that oversees the participant’s daily hours. At the end of each month, the participant provides the timesheet to the NMW Service Provider ensuring they have met their hours. When a participant does not show to their assigned location, the organization must inform the NMW Service Provider with 5 days of the determination of non-compliance. If this continues to occur and the participant is not going to meet the monthly hours, the NMW Service Provider will attempt to make contact with the participant. This allows the NMW Service Provider to address any issues in the participant’s attendance and to review the possibility of “Good-Cause” in not meeting the required monthly hours prior to issuance of a disqualification.</p>
<p>Component Costs</p>	
<p>Transportation (per person) \$25</p>	<p>ABAWD: ABAWDs will receive a transportation reimbursement of \$25 per month upon successful completion of the component.</p>
<p>Total transportation expenditure for this component are:</p>	<p>\$492,075.00</p>
<p>Dependent Care (per person) \$600</p>	<p>N/A</p>
<p>Total dependent care expenditure for participants in this component are:</p>	<p>\$0</p>

Total reimbursement costs for Transportation and Dependent Care:	\$ 492,075.00
Cost of the component, excluding reimbursement:	\$ 546,750.00
Total cost of component	\$1,038,825.00

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Work Experience (WE)

Effective January 1, 2016

The purpose of the Work Experience component is to improve the employability of household members through actual work experience or training, or both, and to enable individuals involved with such programs to move promptly into regular public or private employment. Such an employment or training experience must not provide any work that has the effect of replacing the employment of an individual not participating in the employment or training experience program and provide the same benefits and working conditions that are provided at the job site to employees performing comparable work for comparable hours.

The total number of hours that a participant is required to complete must not exceed the number of hours equal to the household's allotment for that month divided by the Federal minimum wage.

Type of Component	Non-pay
Geographic Areas Covered	Statewide
Targeted Population	Mandatory participants who will benefit from on-the-job skills training and work experience related to their occupational interests.
Organizational Responsibilities	HSD ISD or NMW Service Provider will provide information on approved sites.
Method for Monitoring Job Contacts	Each organization has established a point of contact that oversees the participant's daily hours. At the end of each month, the participant provides the timesheet to the NMW Service Provider ensuring they have met their hours. When a participant does not attend or show to their assigned location, the operating agency must notify the NMW Service Provider of noncompliance within five days of such a determination so that the NMW Service Provider can make a final determination.

If this continues to occur and the participant is not going to meet the monthly hours, the NMW Service Provider will attempt to make contact with the participant. This allows the NMW Service Provider to address any issues in the participant's attendance and to review the possibility of "Good-Cause" in not meeting the required monthly hours prior to issuance of a disqualification.

Component Costs

Transportation (per person)	ABAWD: ABAWDs will receive a transportation reimbursement of \$25 per month upon successful completion of the component.
Total transportation expenditure for this component are	\$ 492,300.00
Dependent Care (per person) up to \$600	N/A
Total dependent care expenditure for participants in this component are:	N/A
Cost of the component, excluding reimbursement:	\$ 547,000.00
Total cost of component	\$1,039,300.00

4. Support Services

Mandatory E&T: (October through December 2015) transportation reimbursements.

ABAWD: (January through September 2016) transportation reimbursements.

Mandatory E&T participant reimbursements for monthly support services vary depending upon the component:

<u>Component</u>	<u>Dependent Care</u>	<u>Transportation</u>
Individual or Group Job Search	N/A	\$25

Mandatory E&T participant reimbursements are paid out upon successful completion of the component.

ABAWD reimbursement for monthly support services:

<u>Component</u>	<u>Transportation</u>
Individual or Group Job Search	\$25
Work Experience	\$25
Community Service	\$25

ABAWD reimbursements, reimbursements are paid monthly upon successful completion of the component.

Reimbursements are provided to participants as follows:

A. Transportation Reimbursement (Effective October 1, 2015)

The NMW Service Provider will enter the transportation reimbursement into the Automated System Program and Eligibility Network (ASPEN) system upon successful completion of the activities assigned on the WPA. When a given component is completed by a participant the reimbursement can be issued by the NMW Service Provider. This disbursement is added to the EBT card and is designated separately from the SNAP benefits.

5. Sequencing of Components

All E&T Program participants will complete an assessment. Upon completion of the assessment, participants may be assigned to any of the available components based on their individual needs. Activities may be assigned alone or in combination, so long as the total required hours do not exceed the participants required number of hours.

6. Other Employment Programs

The New Mexico Human Services Department (HSD) assumes responsibility through NMW Service Provider to contract with private and non-profit agencies for delivery of employment services to SNAP participants in the state.

A. **New Mexico Department of Workforce Solutions**

The New Mexico Department of Workforce Solutions (DWS) is a market-driven workforce delivery system that prepares New Mexico job seekers to meet current and emerging needs of New Mexico businesses. DWS ensures that every New Mexico citizen who needs a job will have one; and that every business who needs an employee will find one with the necessary skills and work readiness to allow New Mexico businesses to compete in a global economy.

DWS provides a consistently high quality workforce preparation service that is responsive to businesses, job seekers, and worker's needs. DWS prepares job seekers to find assistance in looking for or getting placed in a new job; and teaches them how to choose a career, find an ideal job, develop a resume, prepare for an interview, and learn skills to retain and advance once employment is obtained.

DWS Service Areas:

- a. **Northern Area Job Service Centers:** Espanola, Farmington, Gallup, Las Vegas, Santa Fe, and Taos.
- b. **Central Area Job Service Centers:** Albuquerque, Bernalillo, Los Lunas, and Moriarty.
- c. **Southwestern Area Job Service Centers:** Deming, Las Cruces, Silver City, Socorro and Truth or Consequences.
- d. **Eastern Area Job Service Centers:** Alamogordo, Artesia, Carlsbad, Clovis, Hobbs, Roswell, and Ruidoso.

Part II

PROGRAM PARTICIPATION AND EXEMPTIONS

1. Work Registrant Population

A. Number of Work Registrants

- a. The number of work registrants expected to be in the State as of October 1, 2015.
73,575
- b. The anticipated number of new work registrants to be added between October 1, 2015 and September 30, 2016.
61,312
- c. The total number of work registrants in the State between October 1, 2015 and September 30, 2016. (a + b = c)
134,887

B. Unduplicated Work Registrant Count

At the beginning of the Federal Fiscal Year, the projected work registrant numbers are based on data secured through the Department's Automated System Program and Eligibility Network (ASPEN), an automated data gathering system used in determining eligibility. The count of new work registrants excludes those individuals who do not qualify for a federal exemption and whose records were counted at the September cutoff, resulting in an unduplicated count of individuals during the fiscal year.

C. Characteristics of Work Registrants

Work registrants are automatically referred to the E&T program if they are classified as mandatory E&T or ABAWD participants. The characteristics of work registrants were compiled based on data from historical participation data. Unemployment data regarding the counties, tribes, pueblos and nations was compiled by the Center on Budget and Policy Priorities.

D. Number of Work Registrants Exempt from the E&T Program

Effective January 1, 2016, New Mexico has identified 10 counties and 17 tribes, pueblos and nations that will be exempt from the E&T program due to a high unemployment rate or lack of sufficient number of jobs available.

E. Planned E&T Program Participation

Table 2 provides an estimate of the number of ABAWDs expected to begin components.

F. ABAWD Information

Table 1 and Table 2 provide the estimated number of ABAWDs that will be in the state during the FFY 2016, the estimated number that will reside in waived areas, the estimated number that will be placed in Work Experience or Community Service and the estimated number that will participate in Job Search in conjunction with Work Experience.

PART III

PROGRAM COORDINATION

1. Narrative Coordination Statement

The Family Assistant Analyst (FAA) is responsible for intake at initial certification and recertification and they are also responsible to process the application. An interview is scheduled when the application is received and must be conducted prior to disposition, unless it is determined that the applicant is eligible for emergency benefits. The interview is an official and confidential discussion of the household's circumstance so that the FAA can gather information and/or clarify any unclear or incomplete information, so that a correct eligibility determination can be made. It is intended to provide the applicant with information about the E&T and eligibility requirements.

At the time of application, recertification, or when changes are reported, if it is determined that the SNAP applicant is eligible for benefits, the requirements for work registration is reviewed. The determination of work registration and participation in a component is made after reviewing all exemptions, barriers and possible "good-cause".

The FAA explains and provides a copy of FSP 003 E&T Work Requirements Form to the applicant. The applicant is informed of the time limits for contacting the NMW Service Provider. Upon approval of the SNAP benefits, a referral is created to the NMW Service Provider informing them of the mandatory participant.

Mandatory participants will attend an orientation and assessment session with the NMW Service Provider. The assessment will include an interview with the participant to discuss strengths, needs, and preferences. The purpose of the assessment is to formally and informally assess each participant's education history, skills, prior work experience, employability, short-term career goals, and any barriers to employment, interests and aptitudes. Assessments may include a referral for counseling if a barrier to employment exists related to alcohol and/or other drug abuse and/or mental health needs.

The participant may also complete an Individual Responsibility Plan (IRP) with the assistance of the NMW service provider. The IRP is a personal planning tool intended to assist the participant in long-term career planning, setting realistic long-term employment goals and identifying any barriers to securing and maintaining employment. This plan will assist the participant in identifying what steps are necessary to achieve the stated goals.

Information gathered during the assessment will result in the creation of a mutually agreed upon Work Participation Agreement (WPA). The WPA is used to assure that the activities that the participant will engage in meet the E&T program requirements and that the participant is referred to available support services such as transportation and dependent care reimbursements.

The NMW Service Provider completes the FSP 005 E&T Work Activity Form, verifying that an assessment has been completed and identifies the component in which the client has been placed. The original form may be hand delivered or mailed to the participant.

The NMW Service Provider monitors compliance with the activities by requesting documentation of progress. For Job Search activities, the NMW Service Provider will utilize the VOSS interface through New Mexico Workforce Solutions to monitor compliance unless the participant does not have Internet access. If a determination is made that a participant has failed to comply with E&T requirements, the result would be an issuance of a Notice of Adverse Action (NOAA). The purpose of the NOAA is to provide the participant notice that SNAP benefits are being decreased, the reason for the decrease, an opportunity to come into compliance, and the opportunity to request a fair hearing. Prior to issuing the NOAA and during the NOAA time period, good cause can also be established to avoid a disqualification. If good cause is established or the participant completes the requirements before the end of the month of the proposed closure, SNAP benefits will continue without interruption. If good cause is not determined or the requirements are not completed, the disqualification will be applied.

Individual Disqualification:

ABAWD and mandatory E&T participant disqualifications are placed on the individual who failed to comply; the remainder of the household members will continue to receive SNAP benefits, if otherwise eligible.

2. Information Coordination

On the basis of the information entered into the Department's automated system, ASPEN, a list of SNAP participants coded as mandatory, including both ABAWD and mandatory E&T participants, is generated and made available to HSD ISD and the NMW Service Provider on a daily basis. This ensures that actions are taken timely on all mandatory participants.

When participants meet with the NMW Service provider they are given or mailed the required forms for demonstrating compliance (e.g. timesheets, job search forms, and invoice for dependent care reimbursements). The requirements and expectations are clearly explained to the participants to ensure they have the resources needed to successfully comply with their requirements.

The participant is considered to be out of compliance for failure to complete one or more of the following within the specified timeframes:

- Obtain an assessment within 15 calendar days after application approval;
- Complete the Work Participation Agreement (WPA) within 30 days after application

approval;

- Register with the Department of Workforce Solutions - Workforce Connections as a "job seeker" within 30 days from assessment completion date;
- Failure to complete the minimum required individual employer contacts within 30 and 60 days from the initial WPA date, if applicable;
- Failure to provide verification of completion of the required hours by the 5th of each month (depending on ABAWD or mandatory E&T participant status) for Work Experience (WE) or Community Service (CS).

3. Interagency Coordination

The HSD is the single agency responsible for SNAP and exercises authority in the determination of eligibility, approval of the WPA, and hours spent in the component. The Governor of New Mexico has requested that the Human Services Department work in collaboration with the Department of Workforce Solutions to coordinate the SNAP E&T Program. SL Start will utilize VOSS, interface through Workforce Solutions, to its maximum capacity to monitor and track participation and compliance.

4. Methods of Coordination

Newly work-registered household members classified as a mandatory E&T participant or ABAWD will be automatically referred to the NMW Service Provider through ASPEN. The FSP 003 E&T Work Requirements Form will be given to the participant by ISD to explain the requirements and the timeframes. NMW Service Provider will complete and give the participant the FSP 005 E&T Work Activity Form verifying that an assessment has been completed and to identify component in which they have been placed.

5. Coordination Time Frames

Activity	Process Time
Referral of work registrants to NMW Service Providers	Daily
Detailed Assessment	15 days from case approval
Work Participation Agreement approval	30 days from case approval
Issuance of Notice of Non-Compliance	10 working days after receipt of notification from NMW Service Provider of noncompliance
Imposition of Disqualification	Effective the benefit month following the 10th day after the notice of noncompliance.

Processing of support services reimbursements	5 working days
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6. Contractual Arrangements/Service Providers:

SL Start and Associates, LLC has been contracted as the NMW Service Provider Statewide. The NMW Service Provider provides mandatory SNAP E&T participants and ABAWDs program case management in conjunction with each Income Support Division Office in the following counties.

Location of ISD Office	City
Bernalillo County (4 offices)	Albuquerque
Catron County	Socorro
Chaves County	Roswell
Cibola County	Grants
Colfax County	Raton
Curry County	Clovis
De Baca County`	Santa Rosa
Dona Ana County	Las Cruces (2 offices) and Anthony
Eddy County	Artesia and Carlsbad
Grant County	Silver City with itinerant services in Lordsburg
Guadalupe County	Santa Rosa
Harding County	Tucumcari
Hidalgo County	Silver City with itinerant services in Lordsburg
Lea County	Hobbs
Lincoln County	Ruidoso
Luna County	Deming
McKinley County	Gallup
Otero County	Alamogordo
Quay County	Tucumcari
Rio Arriba County	Espanola
Roosevelt County	Portales
Sandoval County	Rio Rancho
San Juan County	Farmington
San Miguel County	Las Vegas
Santa Fe County	Santa Fe
Sierra County	Truth or Consequences
Socorro County	Socorro
Taos County	Taos
Torrance County	Moriarty
Union County	Tucumcari
Valencia County	Belen and Los Lunas

PART IV

PROGRAM COSTS AND FINANCIAL MANAGEMENT

1. Planned Costs of the State E&T Program (non-AB AWD and ABAWD)

A. Operating Budget

Effective October 1, 2015 through December 31, 2015, NMHSD will be operating a mandatory E&T program for a certain population. Effective January 1, 2016, NMHSD will be reinstating, state-wide, the ABAWD requirements in accordance with Federal Law at 7 USC §2015(o)(2) which outlines the requirements for the number of hours an ABAWD must participate in a component to be considered meeting the required number of hours.

Table 4 and Table 5 list each component for mandatory E&T participants and ABAWDs.

The Department currently provides funding to the NMW Service Provider to pay for dependent care expenses for SNAP participants. The Department has budgeted approximately \$0 for dependent care.

HSD provides travel reimbursement based on the participants successfully completing the requirements of the assigned component.

B. Sources of E&T Funds

The funding sources available to the E&T Program during the FFY 2016 are identified in Table 5.

2. Contracts.

HSD has contracted with a NMW Service Provider to assist the individual by completing an assessment and identifying the component that meets mandatory E&T participants and ABAWD criteria and to monitor compliance with the E&T program requirements. The WPA identifies the individual's component and any support services needed.

3. Participant Reimbursement

A. Transportation Reimbursement

The NMW Service Provider will verify that the participant is entitled to the reimbursement and that the participant hasn't already exhausted their reimbursement amounts (dependent on mandatory E&T participants and ABAWD requirements). The NMW Service Provider selects the field in ASPEN indicating that the component has been successfully completed which will allow the worker to disburse the corresponding

reimbursement. Transportation reimbursements are added to the EBT card and are designated separately from the SNAP benefits.

Activities that do not meet requirements for a given participant will not be accessible to the NMW Service Provider for selection. Reimbursements are given to mandatory E&T participants if they successfully complete the required components within 90 days from the date of approval of the SNAP benefits for Individual Job Search and/or completes the required monthly hours for Work Experience and/or Community Service. Reimbursements are given to ABAWD participants monthly if they provide verification of successful completion of hours by the 5th of each month, showing compliance for the previous month.

B. Method of Reimbursement

Transportation reimbursements will be issued on the participants EBT card and dependent care reimbursements will be issued through a voucher system directly to the participants.

C. Procedure for Reimbursement

Once authorized by the NMW Service Provider, reimbursements are transferred into the household's EBT Cash Account, separate from the SNAP account. An EBT account can accommodate cash payments as well as SNAP benefits. These payments are reported monthly to HSD's Administrative Service Division (ASD), which tracks these payments and correctly debits for E&T transportation.

4. Cost Allocation

The cost allocation plan describes HSD's step-down method of allocating the administrative costs to the various programs administered by HSD. The primary purpose of the process is to allocate indirect costs based on methods that comply with OMB Circular A-87. Indirect costs are those: (a) incurred for a common or joint purpose benefiting more than one cost objective and (b) which are not readily assignable to a cost objective specifically benefited without effort disproportionate to the results achieved. A cost objective is a function, organizational subdivision, contract, grant, or other activity for which cost data are needed and for which costs are incurred.

The goal is to arrive at an indirect cost to be claimed under the various federal and state programs. This cost allocation process is performed quarterly. The plan is a "Total Modified Cost Allocation" plan in which all costs are allocated, less major contracts or vendor/client payments, capital outlay, and any major cost that may be unallowable in the allocation process.

PART V

PROGRAM REPORTING AND MANAGEMENT INFORMATION

1. Method for Obtaining Initial Count of Work Registrants

The Human Services Department implemented ASPEN, an on-line interactive system used in determining eligibility and providing benefits and assistance payments for SNAP and TANF program participants, for the programs administered by the Income Support Division. ASPEN is the system currently being utilized to generate a daily report of new work registrants; it will be used to obtain the initial count of work registrants for October 2015. The FAA determines SNAP applicants' work registration status and then enters the appropriate valid value in ASPEN. A work registrant report is generated through ASPEN which shows the number of work registrants in the state.

2. Method for Ensuring an Unduplicated Work Registrant Count

The State of New Mexico has the capability of providing a number of unduplicated work registrant counts. The projected work registrant numbers are based on data secured through ASPEN.

3. Methods for Meeting On-Going Federal Reporting Requirements

A. Management Information System (MIS) Method

a. Type of MIS

Data collection and participation tracking is accomplished by entering data into the NMW Service Provider's Database and ASPEN. The NMHSD and the NMW Service Provider maintains client records through timely entry of dates and valid values relating to an E&T program component. Both systems will provide a consistent methodology for tracking participant activities or non-compliance.

b. Local reporting requirements

Information entered into the ASPEN system is captured at the central office level through reports. The reports show information on the number of work registrants and the participation level.

Data for the reports is compiled from information entered into ASPEN and the NMW Works Service Provider's database.

NMW Service Providers will provide a monthly report on the number of assessed participants and the number of participants placed in activities.

B. Organizational Responsibility for E&T Reporting

a. Responsibility for non-financial E&T reporting

Marisa Vigil, SNAP Program Manager, Human Services Department, Income Support Division, is responsible for the compilation of the data for the federally required non-financial E&T reports and Robert Chavez, Deputy Director of Programs, Human Services Department, Income Support Division, validates and submits the reports.

b. Responsibility for financial E&T reporting

Annette Jacques, Staff Manager, Grants Bureau, Human Services Department, Administrative Services Division, is responsible for all financial E&T reports required by the Food and Nutrition Service of the U.S. Department of Agriculture.

TABLE 1

**ESTIMATED PARTICIPANT LEVELS
FISCAL YEAR 2016**

A. Anticipated number of work registrants as defined by CFR in the State during the Fiscal year.

73,575

B. List planned exemption categories and the number of work registrants expected to be included in each during the fiscal year.

1	Individuals 16-17 and 50 -59	21,915
2	Migrant workers	54
3	Pregnancy	31
4	Residing in a county with an unemployment rate greater than 20%.	4,278
5	Child in home under the age of 18	29,776

TOTAL EXEMPTIONS

56,054

C. Percent of all work registrants exempt from E&T (B/A)

76%

D. Number of E&T mandatory participants (A-B)

17,500

E. Anticipated number of ABAWDs in the State during the Fiscal year.

21,778

F. Anticipated number of ABAWDs in waived areas of the State during the fiscal year.

4,278

G. Anticipated number of ABAWDs to be exempted under the State's 15 percent ABAWD exemption allowance during the fiscal year

0

H. Number of at-risk ABAWDs expected in the State during the fiscal year

0

TABLE 2

**1. ESTIMATED E&T PLACEMENTS
FISCAL YEAR 2016**

1.	Number of ABAWD applicants and participants expected to participate in a qualifying ABAWD component each month.	<u>4,375*</u>
2.	Number of all other applicants and participants (including ABAWDs involved in non-qualifying activities) expected to participate in a component each month.	<u>2,889*</u>
3.	Total number of applicants and participants the State agency expects to participate in a component each month during the fiscal year.	<u>7,264*</u>

**2. ESTIMATED INDIVIDUAL PARTICIPATION
FISCAL YEAR 2016**

Number of individuals expected to participate in the E&T Program during the fiscal year	<u>24,224*</u>
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¹ Estimate the numbers that will participate in components each month and total them on line 3. This information represents a duplicate count of participants over the course of the fiscal year and corresponds to lines 3 and 4 on the FNS-583, E&T Program Activity Report.

² Estimate the unduplicated numbers of individuals who will participate during the fiscal year. This information corresponds to line 7 on the FNS-583, E&T Program Activity Report.

*Numbers subject to change upon validation of the accuracy of the FNS-583.

TABLE 3

SUMMARY OF INTERAGENCY COORDINATION FOR THE E&T PROGRAM

AREAS OF COORDINATION	AGENCIES (LIST ALL THAT ARE INVOLVED)	NUMBER OF E&T PLACEMENTS EXPECTED	METHODS OF COORDINATION
1. Delivers an E&T component	SL Start, Inc. NMW Service Provider	24,224	Receipt of referrals from the ISD Caseworker after certification and recertification interviews
2. The E&T program delivers a services for another agency or program	None	None	Not applicable
3. Joint component of the E&T program and another agency or program	None	None	Not applicable
4. Referral of individuals from the E&T program to another program or agency	New Mexico Department of Workforce Solutions	24,224	Labor Market Exposure during Individual Job Search, self-referral by participants. Services provided as part of regular employment search program, formal agreement required.
5. Referral of individuals from the E&T program to another program or agency			
6. <i>Other of forms of coordination (Specify): Electronically tracking E&T participants through the EBT Time and Attendance Tracking System.</i>	<i>Work Programs NMW Service Providers and Management Information Bureau/ Electronic Benefit Transfer Section</i>	This function has been put on hold, indefinitely	Coordinated with the Work Programs NMW Service Providers to accurately record the participant's attendance in an approved work component. Utilizing the EBT tracking system.

TABLE 4 MANDATORY E&T PARTICIPANTS
OPERATING BUDGET OCTOBER-DECEMBER 2015
FISCAL YEAR 2016

Components	State Agency Costs		Contractual Costs	Participant Reimbursements (State Plus Federal)		State Agency Cost for Dependent Care Services	Total
	Salary & Benefits	Other Costs		Dependent Care	Transportation & Other Costs		
First Component Individual or Group Job Search	\$ -	\$ -	\$ 225,000.00	\$ -	\$ 82,050.00	\$ -	\$ 307,050.00
Total Component Cost							\$ 307,050.00
Total State mandatory E&T participant Costs							\$ 307,050.00

TABLE 5 ABAWD

**OPERATING BUDGET JANUARY-SEPTEMBER 2016
FISCAL YEAR 2016**

Components	State Agency Costs		Contractual Costs	Participant Reimbursements (State Plus Federal)		State Agency Cost for Dependent Care Services	Total
	Salary & Benefits	Other Costs		Dependent Care	Transportation & Other Costs		
First Component Work Experience ABAWD	\$ 0	\$ -	\$ 547,000.00	\$ -	\$ 492,300.00	\$ 0	\$ 1,039,300.00
Second Component Community Service ABAWD	\$ 0	\$ -	\$ 546,750.00	\$ -	\$ 492,075.00	\$ 0	\$ 1,038,825.00
Total Component Costs for ABAWD							\$2,078,125.00
Total State Costs for mandatory E&T Participants							\$ 307,050.00
Total State Costs for ABAWD & E&T Participants							\$ 2,385,175.00

**TABLE 6
OPERATING BUDGET
FISCAL YEAR 2016
PLANNED FISCAL YEAR COSTS OF THE STATE E&T PROGRAM BY CATEGORY OF FUNDING**

Funding Category		FFY 2015 Budget	Proposed FFY 2016 Budget
1	100% Federal E & T Grant:	\$819,208.00	\$1,691,200.00
2	Share of \$20 Million ABAWD Grant (if applicable)		
3	Additional E & T Administrative Expenditures	\$1,025,192.00	\$669,175.00
a.	50% Federal	\$512,596.00	\$334,587.50
b.	50% State	\$512,596.00	\$334,587.50
4	Participant Expenses		
a.	Transportation	\$ 294,975.00	\$1,066,425.00
	50% Federal	\$147,487.50	\$533,212.50
	50% State	\$147,487.50	\$533,212.50
b.	Dependent Care	\$0.00	\$0.00
	50% Federal	\$0.00	\$0.00
	50% State	\$0.00	\$0.00
5	Total E&T Program Costs (1+2+3a+3b+4a+4b)	\$2,139,375.00	\$3,426,800.00