



State of New Mexico

Income Support Division

Supplemental Nutrition Assistance Program

Employment & Training State Plan

Federal Fiscal Year 2016

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# **SUMMARY OF NEW MEXICO HUMAN SERVICES DEPARTMENT'S SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM**

## **EMPLOYMENT AND TRAINING PROGRAM**

### **Part I**

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

##### **Overview/Summary**

The purpose of the E&T program is to assist SNAP participants to gain skills, opportunities, training or experience that will improve their employment prospects or earning potential. These activities enable eligible families and individuals to obtain the training and experience needed to become self-supporting, while providing support services necessary to participate in qualifying activities. In addition to reducing the participant's 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.

The Income Support Division (ISD) is responsible for planning and developing program policies that encourage participants to meet their employment goals. Service delivery is the responsibility of ISD field staff and the New Mexico Works (NMW) Service Provider.

As a condition of eligibility for participation in SNAP benefits, every SNAP household member ages 16 through 59 must register for work in accordance with 7 Code of Federal Regulation (CFR) 273.7(a), unless exempt by federal exemptions found at 7 CFR 273.7. All SNAP participants are considered registered for work with the head of household's signature on an application or recertification form for SNAP participation.

As part of formulating the 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. On October 15, 2015, NMHSD attended a formal Tribal Consultation with Tribal members and the United States Department of Agriculture (USDA) to listen to and address concerns regarding the implementation of the FFY 2016 E&T State Plan.

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:

- Implement the ABAWD 3- month time limit tracking beginning January 1, 2016;

- Report correct numbers for new and existing work registrants on the FNS 583 form. NMHSD has identified gaps in our 583 reporting and has under reported both our new and existing work registrants. The Department has received clear direction and information from the Food and Nutrition Services (FNS) regarding what needs to be captured on the FNS-583 report and the Department is in the process of updating the report to ensure that correct information is reported;
- Enhance the current IT and resource infrastructure for the E&T population to track activities that include but are not limited to placements, demographics, program successes and outcomes.

This State Plan is divided into the following three sections:

**Section 1:** Current E&T Program (October 1, 2015 through December 31, 2015)

**Section 2:** E&T Program implementing the 3-month time limit ABAWD requirements (January 1, 2016 through September 30, 2016)

**Section 3:** E&T Program implementing a mandatory E&T population (Beginning October 1, 2016)

**Section 1:** Current E&T Program (October 1, 2015 through December 31, 2015)

NMHSD requested and received approval for the 3-month state wide waiver extension for ABAWDs from Food and Nutrition Services (FNS) for the months of October 1, 2015 through December 31, 2015. During this time period, there will not be any changes implemented to the current E&T program. HSD will continue to operate a mandatory SNAP E&T program.

Currently the Department is operating a mandatory E&T program for participants that meet the following definition:

- 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

NMHSD is applying Federal Exemptions as outlined in 7 CFR 273.7(b)(1)(i)-(viii) and 7 CFR 273.7(d)(4)(v). If a participant qualifies for a federal exemption the participant is not required to register for work and is not subject to disqualification due to voluntary quit or reduction of hours.

NMHSD will also apply state exemptions as follows below. Participants exempted via state exemptions must still register for work and are subject to disqualification due to voluntary quit or reduction of hours.

- An individual younger than 18 years of age or an individual 50 years of age or older;
- 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;
- Workers in programs such as Volunteers in Service to America (VISTA), who average 30 or more hours of work per week are exempt, even though they earn less than minimum wage;
- 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.
- Individual's monthly expenses that are reasonably necessary and directly related to participation in the E&T program exceed the allowable reimbursement amount as determined by the Department. These individuals will be placed, if possible, in another suitable component in which the individual's monthly E&T expenses would not exceed the allowable reimbursable amount paid by the Department. If a suitable component is not available, these individuals will be exempt from E&T participation until a suitable component is available or the individual's circumstances change and his/her monthly expenses do not exceed the allowable reimbursable amount paid by the Department.

October 1, 2015 through December 31, 2015, participants that are mandatory to participate in the E&T program will be referred to the NMW Service Provider. These participants 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 (i.e. phone calls and in person applications are acceptable 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 NMDWS within 30 days of the Work Participation Agreement (WPA) approval. If the NMW Service Provider is unable to verify registration via interface, they will verify in accordance with the Department's policy for acceptable ways to obtain documentation. Participants who do not have access to the Internet will work directly with the NMW Service Provider to successfully meet the requirement or review the possibility of good cause.

During this same time period, 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.

**Section 2:** E&T Program implementing the 3-month time limit ABAWD requirements (January 1, 2016 through September 30, 2016)

Effective January 1, 2016, the E&T program requirements will become voluntary for the general E&T population through September 30, 2016. These participants will not be subject to disqualification during this time period for non-compliance with the E&T program.

Effective January 1, 2016 the 3-month time limit tracking will be reinstated for participant's ages 18 through 49 years of age without dependents, also known as able-bodied adults without dependents (ABAWDs). Those who do not meet a federal exemption will be subject to additional E&T activities to remain eligible for Supplemental Nutrition Assistance Program (SNAP) benefits in accordance with 7 CFR 273.7 and 273.24. Federal exemptions for ABAWDs are defined in the CFR and are different from the State exemptions.

**A. ABAWD Population**

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

**1. ABAWD Requirements:**

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. If the Department is granted the federal waiver, the ABAWD time limit tracking does not apply to ABAWDs who reside in those areas of the State granted a waiver that are determined to have an unemployment rate of 20% above the national average. The Food and Nutrition Act of 2008 limits ABAWDs eligibility for SNAP to 3 months in a 36-month period, unless the participant meets the ABAWD work requirement or is otherwise exempt or waived. An ABAWD is considered compliant if they:

- work 20 hours or more per week, averaged monthly; or
- participate in and comply with the requirement of a work program for 20 hours or more per week; or
- participate in and comply with other acceptable hours as determined by the Fair Labor Standards Act (FLSA) requirements for Community Service (CS) or Work Experience (WE); or
- complete 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.

**2. Waiver from E&T participation from activities:**

The following individuals will be waived from the ABAWD 3-month time limit:

- Individuals residing in one of the following counties, tribes, pueblos and nations will be waived if granted the federal waiver by FNS. Participants in any of these areas may not be subject to the ABAWD time limit tracking but are subject to the general work requirements under 7 CFR 273.7(a)(1) and will be subject to disqualification due to voluntary quit or reduction of hours. 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	Santa Ana Pueblo
Nambe Pueblo	Santo Domingo Pueblo
Navajo Nation	Taos Pueblo
Ohkay Owingeh Pueblo	Zia Pueblo
	Zuni Pueblo

**3. ABAWD Federal Exemptions:**

In addition to the above waiver from the E&T requirements, the ABAWD 3-month time limit does not apply to the following individuals:

- 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 Family Assistance Analyst (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 who is under 18 is not himself eligible for SNAP benefits;
- Residing in a SNAP household where a household member is under age 18, even if the household member who is under 18 is not himself 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);
- Is pregnant; or
- Individual's monthly expenses that are reasonably necessary and directly related to participation in the E&T program exceed the allowable reimbursement amount as determined by the Department. These individuals will be placed, if possible, in another suitable component in which the individual's monthly E&T expenses would not exceed the allowable reimbursable amount paid by the Department. If a suitable component is not available, these individuals will be exempt from E&T participation until a suitable component is available or the individual's circumstances change and his/her monthly expenses do not exceed the allowable reimbursable amount paid by the Department.
- Household members who are applying for SSI and for SNAP under 273.2(k)(1)(i) will have SNAP work requirements waived until they are determined eligible for SSI and become exempt from SNAP work requirements, or until they are determined ineligible for SSI, at which time their exemptions from SNAP work requirements will be reevaluated; or

#### **4. Estimated Number of ABAWDs:**

During FFY 2016, the statewide ABAWD population that is subject to the ABAWD 3-month time limit tracking requirement after applying the federal waiver is estimated to be 17,500.

#### **B. Good Cause for Non-Compliance**

A mandatory participant may obtain a temporary excusal for failure to meet their requirements; this is known as "Good Cause". In a case of non-compliance, the Department and/or NM Works Service Provider must determine whether good cause exists. Good cause is determined by considering the facts and circumstances involved, including information submitted by the participant, the participant's representative 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 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 five miles roundtrip;
- participant whose physical residence is more than 30 miles away from an income support field office, workforce solutions office or E&T program service provider;
- court appearance of participant or household member;
- 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.
- an absence of dependent care or transportation support services necessary for participation;
- participant's receipt of job referral that results in an offer below the federal minimum wage, except when a lower wage is permissible under federal minimum wage law;
- participant is a victim of family violence; or
- no available jobs within reasonable commuting distance; a distance is considered unreasonable if the round trip exceeds two hours by public or private transportation.

Good cause will be evaluated on an individual basis and will only be granted until the cause no longer exists (as voluntarily reported by recipient) or evaluation at recertification, whichever is sooner. Good cause will also be evaluated each time the recipient is in jeopardy of being disqualified for non-compliance prior to enforcing the disqualification.

### **C. Program Components**

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 either a Work Experience Training Agreement (WETA) or a Community Service Training Agreement (CSTA). The ultimate goal is to increase the potential for employment.

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 needed to achieve their employment goals. All mandatory E&T SNAP participants must be referred to the NMW Service Provider. The ISD field office is responsible for explaining the E&T requirements and emphasizing the participant's responsibility to engage in and fulfill program activities. ABAWDs will be required to participate in one or multiple components within the 36 month period to satisfy the 20 hour a week requirement, unless otherwise exempt or waived. If the ABAWD is placed into job search, the job search must be less than half of the required 20 hours (refer to Job Search Component description below).

# Individual or Group Job Search and Employer Contacts

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.

<b>Type of Component</b>	Non-pay
<b>Number of Job Contacts</b>	<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 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.</p> <p>All mandatory participants are required 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. If the participant does not have access to the Internet, they can utilize ISD lobby kiosks, DWS offices, any Workforce Board locations or any public library. Participants can submit hours spent looking for jobs on the time sheet (DWP 277). If they apply utilizing ads in the newspaper they would indicate that on the DWP 277. 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</p>

	Department of Workforce Solutions. If the NMW Service Provider is unable to verify registration via interface, they will verify in accordance with the departments policy for acceptable ways to obtain documentation.
<b>Geographic Areas Covered</b>	Statewide
<b>Targeted Population</b>	The targeted population will be ABAWDs as all other individuals are voluntary until September 30, 2016. The focus will be on 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.
<b>Organizational Responsibilities</b>	HSD 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. HSD is responsible to ensure that each household member who does not qualify for a federal exemption is registered for work. At initial application, recertification or any time a previously exempt participant becomes mandatory, HSD will explain and provide a notice to the participant explaining the pertinent work requirements, the rights and responsibilities of work-registered household members, and the consequences of failure to comply. HSD is responsible to screen each work registrant to determine whether or not it is appropriate to refer the participant to the NMW Service Provider. HSD will issue a notice to the participant informing them of the requirements of the component, what will constitute noncompliance and the disqualification process. HSD is responsible for issuing a Notice of Adverse Action (NOAA), if determined appropriate after reviewing all exemptions and good causes, within 10 days after learning of the non-compliance. If the participant complies before the end of the NOAA notice period, HSD will cancel the adverse action and will not enforce the disqualification. The NMW Service Provider is responsible for proper placement by ensuring that the assigned activity is going to benefit the participant, as well as educating the participant of their responsibilities. The NMW Service Provider is responsible for tracking participation and compliance in the activity and notifying HSD within 10 days if the E&T mandatory participant fails to comply with E&T requirements.

<b>Method for Monitoring</b>	The NMW Service Provider will verify a minimum of one job contact listed on the DWP 277 to verify the validity of the contact. The NMW Service Provider will notify the local Income Support Division County Office when a participant fails to comply with the requirements.
<b>Component Costs</b>	
<b>Transportation (per person) \$25</b>	ABAWDs and voluntary participants will receive a transportation reimbursement of \$25 per month, in accordance with 7 CFR 273.7(d)(4).
<b>Total transportation expenditure for this component:</b>	\$82,050.00
<b>Cost of the component, excluding reimbursement:</b>	\$225,000
<b>Total cost of component</b>	<b>\$307,050.00</b>

## Community Service (CS)

The purpose of the Community Service component is to provide opportunities for on-the-job skills training, improve employability and assist communities. Placements include opportunities with local and state government, private industry and non-profit entities. 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.

This is a Fair Labor Standards Act (FLSA) component. 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 State or Federal minimum wage, whichever is greater.

<b>Type of Component</b>	Non-pay
<b>Geographic Areas Covered</b>	Statewide
<b>Targeted Population</b>	The targeted population will be mandatory ABAWDs as all other participants are voluntary until October 1, 2016. The focus will be on those participants that will benefit from on-the-job skills training and work-like experience.
<b>Organizational Responsibilities</b>	HSD 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. HSD is responsible to ensure that each household member who does not qualify for a federal exemption is registered for work. At initial application, recertification or any time a previously exempt participant becomes mandatory, HSD will explain and provide a notice to the participant explaining the pertinent work requirements, the rights and

	<p>responsibilities of work-registered household members, and the consequences of failure to comply. HSD is responsible to screen each work registrant to determine whether or not it is appropriate to refer the participant to the NMW Service Provider. HSD will issue a notice to the participant informing them of the requirements of the component, what will constitute noncompliance and the disqualification process. HSD is responsible for issuing a Notice of Adverse Action (NOAA), if determined appropriate after reviewing all exemptions and good causes, within 10 days after learning of the non-compliance. If the participant complies before the end of the NOAA notice period, HSD will cancel the adverse action and will not enforce the disqualification. The NMW Service Provider is responsible for proper placement by ensuring that the assigned activity is going to benefit the participant, as well as educating the participant of their responsibilities. The NMW Service Provider is responsible for tracking participation and compliance in the activity and notifying HSD within 10 days if the E&amp;T mandatory participant fails to comply with E&amp;T requirements.</p>
<p><b>Method for Monitoring</b></p>	<p>Each organization will establish a point of contact as a liaison between the organization and the NMW Service Provider. The NMW Service Provider will complete random reviews of participation at each organization. If the NMW Service Provider learns that a participant is not meeting their hours they 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 evaluate the possibility of “Good-Cause” in not meeting the required monthly hours prior to alerting NMHSD of a possible disqualification.</p>

## Component Costs

<b>Transportation (per person) \$25</b>	ABAWDs and voluntary participants will receive a transportation reimbursement of \$25 per month, in accordance with 7 CFR 273.7(d)(4).
<b>Total transportation expenditure for this component are:</b>	\$492,075.00
<b>Dependent Care (per person) \$600</b>	N/A
<b>Total dependent care expenditure for participants in this component are:</b>	\$0
<b>Total reimbursement costs for Transportation and Dependent Care:</b>	\$ 492,075.00
<b>Cost of the component, excluding reimbursement:</b>	\$ 546,750.00
<b>Total cost of component</b>	\$1,038,825.00

## Work Experience (WE)

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 participants to move promptly into regular public or private employment. NMW Service Provider will not assign a participant to a training site if it would result in the partial or full displacement of an already employed worker, a worker on lay-off status, or infringe of the promotional opportunities of a worker. The organization shall provide the same working conditions that are provided at the job site to employees performing comparable work for comparable hours.

This is a Fair Labor Standards Act (FLSA) component. 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 State or Federal minimum wage, whichever is greater.

<b>Type of Component</b>	Non-pay
<b>Geographic Areas Covered</b>	Statewide
<b>Targeted Population</b>	The targeted population will be mandatory ABAWDs as all other participants are voluntary until October 1, 2016. The focus will be on those participants who will benefit from on-the-job skills training and work experience related to their occupational interests.
<b>Organizational Responsibilities</b>	HSD 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. HSD is responsible to ensure that each household member who does not qualify for a federal exemption is registered for work. At initial application, recertification or any time a previously exempt participant becomes mandatory, HSD will explain and provide a notice to the participant explaining the pertinent work requirements, the rights and responsibilities of work-registered household members, and the



	<p>consequences of failure to comply. HSD is responsible to screen each work registrant to determine whether or not it is appropriate to refer the participant to the NMW Service Provider. HSD will issue a notice to the participant informing them of the requirements of the component, what will constitute noncompliance and the disqualification process. HSD is responsible for issuing a Notice of Adverse Action (NOAA), if determined appropriate after reviewing all exemptions and good causes, within 10 days after learning of the non-compliance. If the participant complies before the end of the NOAA notice period, HSD will cancel the adverse action and will not enforce the disqualification. The NMW Service Provider is responsible for proper placement by ensuring that the assigned activity is going to benefit the participant, as well as educating the participant of their responsibilities. The NMW Service Provider is responsible for tracking participation and compliance in the activity and notifying HSD within 10 days if the E&amp;T mandatory participant fails to comply with E&amp;T requirements.</p>
<p><b>Method for Monitoring</b></p>	<p>Each organization will establish a point of contact as a liaison between the organization and the NMW Service Provider. The NMW Service Provider will complete random reviews of participation at each organization. If the NMW Service Provider learns that a participant is not meeting their hours they 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 evaluate the possibility of “Good-Cause” in not meeting the required monthly hours prior to alerting NMHSD of a possible disqualification.</p>
<h2>Component Costs</h2>	
<p><b>Transportation (per person)</b></p>	<p>ABAWDs and voluntary participants will receive a transportation reimbursement of \$25 per month, in accordance with 7 CFR 273.7(d)(4).</p>
<p><b>Total transportation expenditure for this component are</b></p>	<p>\$ 492,300.00</p>

<b>Dependent Care (per person) up to \$600</b>	N/A
<b>Total dependent care expenditure for participants in this component are:</b>	N/A
<b>Cost of the component, excluding reimbursement:</b>	\$ 547,000.00
<b>Total cost of component</b>	\$1,039,300.00

## **1. Support Services**

Both voluntary and mandatory participants may receive a transportation reimbursement. Regardless of the number of components, the reimbursement is a \$25 flat rate provided monthly to eligible participants.

To be eligible, the participant must provide documentation in accordance with 7 CFR 273.7(d)(4).

Transportation reimbursements are provided to participants as follows:

The NMW Service Provider will enter the transportation reimbursement into the Automated System Program and Eligibility Network (ASPEN) system in accordance with 7 CFR 273.7(d)(4). This disbursement is added to the EBT card and is designated separately from the SNAP benefits.

## **2. Sequencing of Components**

All E&T program participants will complete an assessment and shall be provided an orientation which explains the program and its objectives. Upon completion of the assessment and orientation, participants may be assigned to any of the available components based on their individual needs identified during the assessment. Activities may be assigned alone or in combination, so long as the total hours do not exceed the participants required number of hours.

ABAWDs are required to work 20 hours per week, averaged monthly, or participate in and comply with other acceptable hours as determined by FLSA requirements for Community Service (CS) or Work Experience (WE). ABAWDs are also allowed to complete job search or job search training activities as long as the job search or job search training activities equal less than half of the requirement and it is completed in conjunction with another qualified ABAWD activity. Voluntary participants, beginning January 1, 2016, will be allowed to participate in any of the three components offered.

### **D. Other Employment Programs**

The Department 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.

#### 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:**

**Northern Area Job Service Centers:** Espanola, Farmington, Gallup, Las Vegas, Santa Fe, and Taos.

**Central Area Job Service Centers:** Albuquerque, Bernalillo, Los Lunas, and Moriarty.

**Southwestern Area Job Service Centers:** Deming, Las Cruces, Silver City, Socorro and Truth or Consequences.

**Eastern Area Job Service Centers:** Alamogordo, Artesia, Carlsbad, Clovis, Hobbs, Roswell, and Ruidoso.

**Part II**

**PROGRAM PARTICIPATION AND EXEMPTIONS**

**A. Work Registrant Population**

**1. 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**

**1. 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 includes those individuals who do not qualify for a federal

exemption and whose records were not counted by the September cutoff, resulting in an unduplicated count of individuals during the fiscal year.

## **2. Characteristics of Work Registrants**

Work registrants are automatically referred to the E&T program if they are classified as mandatory ABAWD participants; non-mandatory participants will not be referred unless they choose to volunteer. 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.

## **3. Number of Work Registrants Exempt from the E&T Program**

The Department is requesting from FNS approval to exempt 10 counties and 17 tribes, pueblos and nations from the E&T program due to a high unemployment rate or lack of sufficient number of jobs available.

## **4. Planned E&T Program Participation**

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

## **5. 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 another qualified activity.

# **PART III**

## **PROGRAM COORDINATION**

### **A. Narrative Coordination Statement**

The NMHSD 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 expedited SNAP benefits. The interview is an official and confidential discussion of the household's circumstances so that the FAA can gather information and 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 program, eligibility requirements and the applicant's rights and responsibilities.

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 and E&T participation

are reviewed. The determination of work registration and participation in a component is made after reviewing all waivers, exemptions, barriers and possible “good-causes”.

The FAA explains and provides (hand delivers or mails) a copy of FSP 003 E&T Work Requirements form to the applicant. The FAA also informs the applicant 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 or voluntary participant.

Mandatory and voluntary participants will complete an assessment and attend an orientation 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 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 to include specific achievable goals and a plan for securing and maintaining employment.

Information gathered during the assessment will result in the creation of a mutually agreed upon Work Participation Agreement (WPA) between the participant and the Department. 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 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(s) 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 E&T program. 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 or terminated, the reason for the decrease or termination, 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 by HSD 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 by HSD in accordance with 7 CFR 273.7.

### **Individual Disqualification:**

ABAWDs who fail to complete their requirement will be limited to 3-months of SNAP benefits and may be subsequently disqualified. 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.

**B. Information Coordination**

On the basis of the information entered into the Department’s automated system, ASPEN, a daily list of all new SNAP participants coded as mandatory and voluntary is generated and made available to HSD and the NMW Service Provider. Existing active SNAP cases will also appear on this report if their E&T status changes from exempt to mandatory or voluntary. This report will indicate whether or not the participant is an ABAWD. 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 and job search forms). The requirements and expectations are clearly explained to the participants to ensure they have the resources needed to successfully comply with their requirements.

The mandatory ABAWD participant is considered to be out of compliance for failure to meet work requirements specified at 7 CFR 273.24(a)(1)(i)-(iv).

**C. Interagency Coordination**

NMHSD 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 HSD work in collaboration with the NMDWSD to coordinate the SNAP E&T Program. NMW Service Provider will utilize VOSS, interface through Workforce Solutions, to its maximum capacity to monitor and track participation and compliance.

**D. Methods of Coordination**

Newly work-registered household members classified as mandatory ABAWDs will automatically be referred to the NMW Service Provider through ASPEN. The FSP 003 will be given (hand delivered or mailed) to the participant by ISD to explain the E&T requirements and the timeframes. NMW Service Provider will complete and give the participant the FSP 005 verifying that an assessment has been completed and to identify the component in which the participant has been placed.

**E. 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 of the 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 from the date of compliance

**F. 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.

<b>Location of ISD Office</b>	<b>City</b>
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

**Section 3:** Effective October 1, 2016, New Mandatory E&T Population

Effective October 1, 2016, all newly eligible SNAP participants from the general E&T population, who do not meet an exemption or qualify for good cause, will be mandatory to participate in required program activities. Effective October 1, 2016, existing SNAP eligible participants from the general E&T population, who do not meet an exemption or qualify for good cause, will become mandatory for the E&T program at their next recertification as detailed in this section.

**PART IV** (applies to Section 1 and Section 2)

**PROGRAM COSTS AND FINANCIAL MANAGEMENT**

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

**A. Operating Budget**

October 1, 2015 through December 31, 2015, NMHSD will be operating a mandatory E&T program; during this period ABAWDs are not subject to the 3-month time limit tracking.

Effective January 1, 2016, NMHSD will be reinstating, state-wide, the ABAWD 3-month time limit tracking requirements in a 36 month period 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 ABAWDs.

**B. Sources of E&T Funds**

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

**C. Contracts**

HSD has contracted with a NMW Service Provider to assist the participant by completing an assessment, orientation, and identifying the component that best meets the mandatory ABAWD criteria and to monitor compliance with the E&T program requirements. The WPA identifies the participant’s required components and any support services needed. If the participant is placed in Community Service or Work Experience, an agreement form is also signed by the Community Service or Work Experience agency and the participant; these are known as the Community Service Training Agreement (CSTA) and the Work Experience Training Agreement (WETA).

## **D. Participant Reimbursement**

### **1. Transportation Reimbursement**

The NMW Service Provider will verify that the participant is entitled to the reimbursement based on submission of appropriate documentation and will select the field in ASPEN indicating that reimbursement eligibility has been determined which will allow the worker to disburse the corresponding reimbursement.

The ABAWD mandatory and E&T voluntary participants will be given a reimbursement, in accordance with 7 CFR 273.7(d)(4).

### **2. Method of Reimbursement**

Transportation reimbursements will be issued on the participant's EBT card.

### **3. 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.

## **E. 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**

#### **A. Method for Obtaining Initial Count of Work Registrants**

The NMHSD 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 ISD. 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.

**B. 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. ASPEN will establish files of unduplicated work registrants using unique individual identification numbers as the source for identifying duplications. The system counts the number of unduplicated individual ID's at the beginning of business on October 1, each year and will match the ID's on file with the ID numbers of each work registrant belonging to the recipient file each work day thereafter. If no match is found, the ID number is added to the file of unduplicated work registrant numbers and the count increased by one. Reports are generated quarterly.

**C. Methods for Meeting On-Going Federal Reporting Requirements**

**1. 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.

**D. Organizational Responsibility for E&T Reporting**

**1. 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.

**3. 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. NM will only operate a mandatory E&T program for ABAWD's. Therefore the individuals below do not meet the ABAWD definition and will only be served if volunteered.

1	Individuals under 18 or 50 years of age or older	21,915
3	Parent of a household member under age 18	29,776
4	Is residing in a household where a household member is under 18 even if the household member under age 18 is not eligible for SNAP	54
5	Is Pregnant	31
6	Requested Federal county Waiver	4,278

TOTAL EXEMPTIONS

56,054

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

76%

D. Number of E&T(ABAWDs subject to 3 month time limit tracking) 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

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

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

**<sup>2</sup> ESTIMATED INDIVIDUAL PARTICIPATION  
FISCAL YEAR 2016**

Number of individuals expected to participate in the E&T Program during the fiscal year	<u><b>24,224*</b></u>
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<sup>1</sup> 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.

<sup>2</sup> 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

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**SUMMARY OF INTERAGENCY COORDINATION FOR THE E&T PROGRAM**


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AREAS OF COORDINATION	AGENCIES (LIST ALL THAT ARE INVOLVED)	NUMBER OF E&T PLACEMENTS EXPECTED	METHODS OF COORDINATION
1. Delivers an E&T component	NMW Service Provider	24,224	Receipt of referrals from the FAA 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&amp;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 (OCTOBER 1, 2015 THROUGH DECEMBER 31, 2015)

**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
<b>1</b>	<b>100% Federal E &amp; T Grant:</b>		<b>\$819,208.00</b>	<b>\$466,029.00</b>
<b>2</b>	<b>Share of \$20 Million ABAWD Grant (if applicable)</b>			
<b>3</b>	<b>Additional E &amp; T Administrative Expenditures</b>		<b>\$1,025,192.00</b>	<b>\$1,530,800.00</b>
	<b>a.</b>	<b>50% Federal</b>	<b>\$512,596.00</b>	<b>\$765,400.00</b>
	<b>b.</b>	<b>50% State</b>	<b>\$512,596.00</b>	<b>\$765,400.00</b>
<b>4</b>	<b>Participant Expenses</b>			
	<b>a. Transportation</b>		<b>\$ 294,975.00</b>	<b>\$304,800.00</b>
		<b>50% Federal</b>	<b>\$147,487.50</b>	<b>\$152,400.00</b>
		<b>50% State</b>	<b>\$147,487.50</b>	<b>\$152,400.00</b>
	<b>b. Dependent Care</b>		<b>\$0.00</b>	<b>\$0.00</b>
		<b>50% Federal</b>	<b>\$0.00</b>	<b>\$0.00</b>
		<b>50% State</b>	<b>\$0.00</b>	<b>\$0.00</b>
<b>5</b>	<b>Total E&amp;T Program Costs (1+2+3a+3b+4a+4b)</b>		<b>\$2,139,375.00</b>	<b>\$2,301,629.00</b>