



Innovative Workforce Solutions

**WORKFORCE ARIZONA COUNCIL
Q2 Executive Committee Meeting**

Thursday, April 9th, 2026 | 1:00 pm – 3:00 pm

Virtual Meeting:

<https://us02web.zoom.us/j/82228161039?pwd=RxabjwrHX1sod6sMmXUd5k0roNgMDr.1>

Meeting ID: 822 2816 1039 Passcode: 520469

1. **Welcome & Call to Order, Chair Mark Gaspers** (2 minutes)
2. **Roll Call, Giselle Retana** (2 minutes)
3. **Call to the Public, Chair Mark Gaspers** (3 minutes per person)
4. **Approval of Q1 February 12th, 2026 Executive Committee Meeting Minutes, Chair Mark Gaspers** (5 minutes)
5. **Chairman Reports, Chair Mark Gaspers** (3 minutes)
6. **Governance and Compliance, Patrick Brown** (10 minutes)
 - a. **LWDB Job Center Recertification (NEW CENTER), Vote**
 - i. Yavapai County Comprehensive One-Stop #1, American Job Center, Yavapai College Prescott Campus
 - b. **2025 LWDB Recertification Updates**
 - i. Coconino County Workforce Development Board
 - ii. Arizona Tribal Workforce Development Board
7. **Coconino County Local Workforce Development Board Inquiry Report, Vote, Patrick Brown** (10 minutes)
8. **State Plan Modification Updates, Patrick Brown** (10 minutes)
9. **Workgroup Updates, Janice Garza** (10 minutes)
 - a. Continuous Improvement
 - b. Training Effectiveness
 - c. Increasing Apprentices
10. **Agency Updates:**
 - a. **OEO: Director Mary Foote** (20 minutes)
 - i. General Updates
 - ii. Welcome: New Workforce Arizona Council Staff and Council Officers
 - iii. 2026 Arizona Workforce Summit Update
 - iv. Latest AZ Employment Report, Doug Walls
 - b. **DES: DERS Assistant Director, Anna Hunter** (15 minutes)
 - i. WIOA Rapid Response Unit
11. **Title Partner Updates** (15 minutes)
 - a. Title IB and Title III, Matthew Smith
 - b. Title II, Beverly Wilson
 - c. Title IV, Kristen Mackey
12. **Adjournment, Chair** (2 minutes)

Pursuant to A.R.S. § 38-431.02, notice is hereby given to members of the Workforce Arizona Council and to the general public that the Council will hold a meeting open to the public, on Thursday, April 9th, 2026 at 1:00-3:00pm. via Zoom.

Persons with a disability may request reasonable accommodation, such as a sign language interpreter, by calling (480) 904-0826. Requests should be made as early as possible to allow time to arrange the accommodation. A copy of the material provided to Council members (with the exception of material relating to possible executive sessions) is available for public inspection at the Office of Economic Opportunity, located at 1400 W Washington St., Phoenix, AZ 85007.

Under A.R.S. § 38-431.03(A)(3), the Council may vote to go into executive session, which will not be open to the public, for the purpose of obtaining legal advice on any item on the agenda.

At its discretion, the Council may consider and act upon any agenda item out of order. Members of the Council may appear by telephone.



OFFICE OF
**ECONOMIC
OPPORTUNITY**

Workforce Arizona Council Meeting

Executive Committee

April 9, 2026

Welcome & Call to Order

Mark Gaspers, Chair



Roll Call

Giselle Retana, Workforce Arizona Council
Administrative Coordinator



Call to the Public

Mark Gaspers, Chair



Approval of Minutes

- Q1 February 12, 2026 Executive Committee Meeting

Mark Gaspers, Chair



Chairman Reports

Mark Gaspers, Chair



Governance and Compliance

Patrick Brown, Workforce Council Administrator



Job Center Certification (New Center)

Patrick Brown, Workforce Council Administrator



LWDB Job Center Certification

- **Policy Goals:**

- Ensure ARIZONA@WORK job centers meet performance and operational standards.
- Foster continuous improvement and innovation in service delivery.

- **Key Policy and Compliance Requirements:**

Local Workforce Development Boards are tasked with the completion of the certification assessment tool and letter signed by the LWDB Chair and Executive Director certifying their comprehensive and affiliate sites to the Council. The following requirements are outlined in the assessment:

- Physical accessibility
- Programmatic accessibility
- Career services
- Business services
- Employment and training
- Youth measures
- Continuous improvement



LWDB Job Center Certification

RECOMMENDATION
LWDB Job Center Certification

Yavapai County Local Workforce
Development Board

“NEW CENTER”
Yavapai County Comprehensive One-Stop #1, American Job
Center, Yavapai College Prescott Campus
1100 E. Sheldon Street, Prescott, Arizona

Action Item: Motion to approve the recommended Yavapai County Local Workforce Development Board’s new Comprehensive One-Stop #1, American Job Center - Job Center Certification to the Full Council.



2025 LWDB Recertification Updates

Patrick Brown, Workforce Council Administrator



LWDB Recertification Overview

Purpose & Importance

- Ensures LWDB compliance with WIOA regulations and state policies
- Promotes accountability, transparency, and effective governance
- Supports sound financial management and public trust in workforce programs

Scope

- Applies to all Arizona LWDBs
- Requires submission of signed governance, compliance, and operational documents
- Confirms adherence to policies on membership, financial oversight, service provider agreements, and open meeting laws

Key Policy & Compliance Requirements

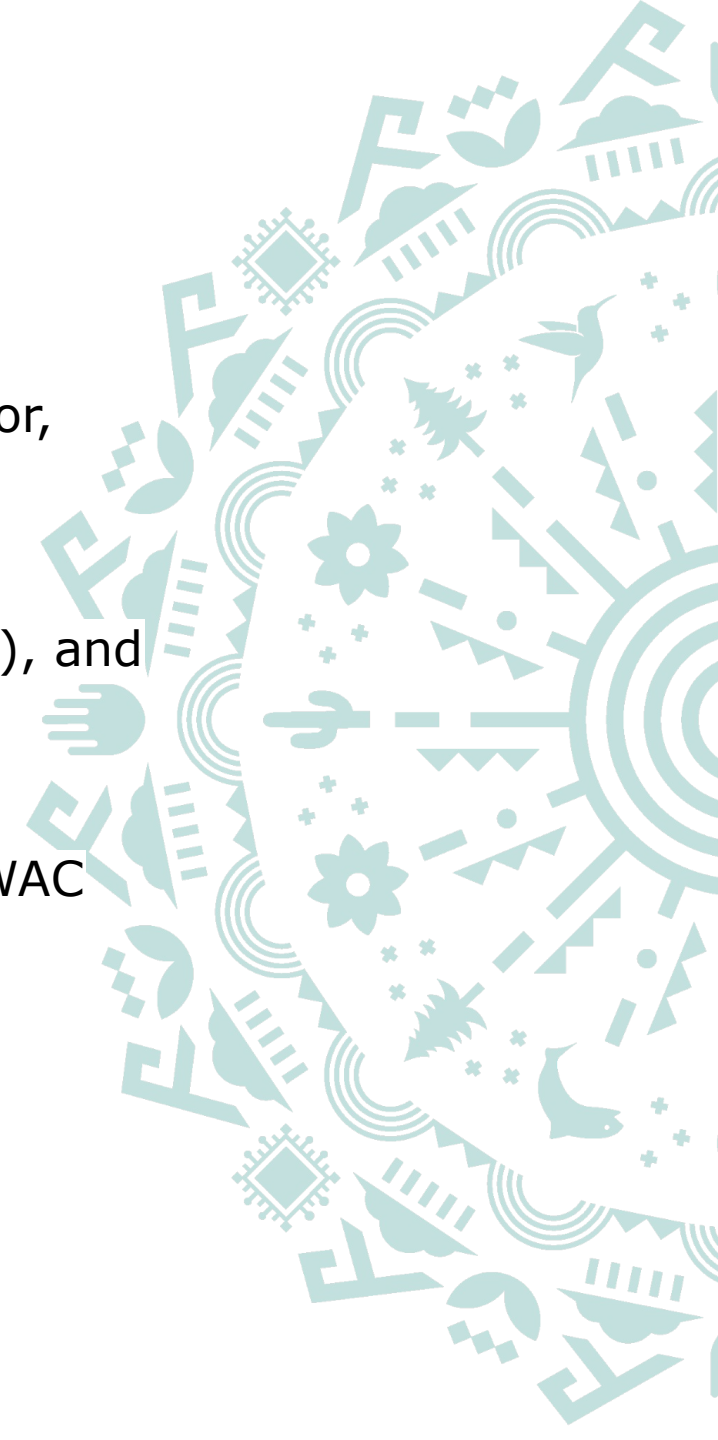
- Membership Roster & Standing Committees
- Bylaws & Consortia Agreement (if applicable)
- Shared Governance Agreement & Organizational Chart
- Service Provider and One-Stop Operator Agreements
- Local Plan, MOU/IFA, and Policy Development
- Conflict of Interest, Training Services, Oversight, & Funds Management
- Sunshine Provision & AZ Open Meeting Law
- Self-Assessment Checklist



2025 LWDB Recertification Updates

Coconino County Workforce Development Board

- Compliance Report
 - CCWDB has approved the appointment of a new Executive Director, pending final board processes.
- Recertification
 - CCWD approved its bylaws, Shared Governance Agreement (SGA), and overall recertification package at its most recent meeting.
 - CCWDB is looking at addressing board composition and filling membership openings on the board
 - Currently on track for Q2 recertification recommendation to the WAC



2025 LWDB Recertification Updates

Arizona Tribal Workforce Development Board

- **Key Outcomes:** Established a timeline for completion and submission of remaining recertification documents
- **Documents successfully submitted:**
 - Signed Consortium Agreements (all 13 tribal governments)
 - Signed Shared Governance Agreements (all 13 tribal governments)
 - MOUs (all 13 Tribal Governments)
- **Remaining/ongoing items:**
 - Local Plan in progress; anticipated completion: June 2026
 - One-Stop Operator: ATW had considered “sole-source option” to meet the OSO requirement. DES and Council staff presented a new option: pursue a federal waiver for both requirements and allow each of the 13 tribal nations to define how services will be delivered in their own communities.
- **Staff summary / next steps:**
 - ATW is making measurable progress toward recertification
 - Staff will continue technical assistance, monitor the timeline, and provide additional updates and recommendations as submissions are received and reviewed



Coconino County Local Workforce Development Board Inquiry Report

Patrick Brown, Workforce Council Administrator



Coconino County Local Workforce Development Board Inquiry

Overview:

- **Inquiry found that Coconino County's issues had escalated from recertification delay to governance and compliance risk.**
- **Original findings included concerns related to the 2025 Shared Governance Agreement, 2023 bylaws, role clarity, and documentation of leadership actions.**
- **Through the recertification process, Coconino County has addressed the Shared Governance Agreement, bylaws, and roles/responsibilities issues.**
- **The inquiry remains part of the official record because some original governance actions, including the LWDB Chair removal process, could not be fully verified at the time of review.**

Action Item: Motion to approve and accept the recommendations in the inquiry report and move to Full Council for formal notification to the Coconino County Workforce Development Board.

State Plan Modification

Patrick Brown, Workforce Council Administrator



WIOA Unified Plan Modification

Purpose and Scope

This work plan is a step-by-step outline for producing Arizona's required two-year modification of the WIOA State Plan, with a WIOA Unified submission due **April 30, 2026**

Compliance Anchors

- States must submit a two-year modification of the WIOA Unified State Plan; normal submission deadline is March 3, 2026 (TEGL 07-25, p. 1-2) - *Note: DES is requesting a submission extension of April 30, 2026*
- By February 02, 2026, the Governor's Office must submit a designee letter/email identifying the official plan submitter (TEGL 07-25, p. 8) - SUBMISSION SENT
- State Plan modifications must provide an opportunity for public comment and input, including accessible engagement approaches (TEGL 07-25, p. 6-7).
- Modifications must identify expected performance levels for PY 2026 and PY 2027, then update with negotiated levels before approval (TEGL 07-25, p. 10-11).
- Use the OMB-approved ICR structure (Strategic Elements, Operational Elements, Coordination, Assurances, Program-specific requirements) as the organizing framework (WIOA Unified/Combined State Plan ICR 1205-0522, p. 2, 4).

WIOA Unified Plan Modification

Governance Roles, and operating cadence

- **Executive Sponsor:** Governor's Office + Workforce Arizona Council (WAC) Chair, Superintendent of Public Instruction
- **Project Director:** Office of Economic Opportunity (Workforce Council Staff)
- **Section Leads:** WIOA Title I-B (ADES), Title II (ADE Adult Education), Title III (ADES Employment Services), Title IV (ADES RSA)
- **LMI / Data Lead:** OEO LMI + State Demographer
- **Performance/Accountability Lead:** OEO/ADES performance teams
- **Public Comment Lead:** OEO comms + WAC staff

Meeting Cadence

- Weekly Update Meeting - Governance Leads
- 48-hour turnaround rule for section edits during February

WIOA Unified Plan Modification

The workstreams below maps to the ICR structure and address identified gaps in the current Arizona plan (e.g., an unfinished Executive Summary, updated LMI Data) and narratives framing Arizona WIOA State Plan PY 2024-2027.

Key Milestones

MILESTONE	TARGET DATE	CITATION
Governor's designee letter/email submitted	2/2/2026 - submitted	TEGL 07-25, p. 8
Full draft compiled	3/6/2026 - Completed	
WAC Full Council Update	3/12/2026 - Completed	
Public comment complete + responses finalized	3/23 - 4/3/2026 - Completed	TEGL 07-25, p. 6-7
WAC Executive Committee Update	4/9/2026	
WAC Special Meeting: Final approval complete	4/16/2026	
Submission to State Plan Portal	4/30/2026	TEGL 07-25, p. 1-2

Workgroup Updates

Janice Garza, Workforce Policy Manager



Continuous Improvement Workgroup

Next Meeting Date: 4/23/26

- **WAC Policy 15- Strategic Recapture and Reinvestment Policy**
 - Concluded ongoing discussions from Q2 of 2025,
 - The Workgroup established respective roles and responsibilities and four requirements to develop a draft policy on 1/22/26
 - A draft policy was released for a public comment period between 1/28-2/10
 - Additional workgroup input was also provided
 - Upon further review of the public comment and additional workgroup input, the policy was scheduled to be revised and prepared for an executive committee review and vote for in Q2 2026-Delayed
 - The policy is currently being reviewed to broaden the narrow scope and address policies developed around Governor reserve funding and statewide workforce development activities
- John Walters will provide a full update to include details on the policy projects during the next Full Council meeting

Training Effectiveness Workgroup

Next Meeting Date: 4/21/26

- **Workgroup Engagement**
 - HIT data outreach is largely complete, with training delivered to most local workforce boards and the Arizona Tribal Workforce Board; minimal follow-up questions indicate general understanding but continued support is planned.
 - The group is planning a panel session for the Arizona Workforce Summit focused on how High Impact Training (HIT) data can support decision-making, career advising, and training program selection.
 - Three panel approaches were discussed: operational (career advisors and service delivery), strategic (board-level funding and ETPL decisions), and a future end-to-end system perspective including employers and participants.
 - Key themes highlight that HIT tools are valuable for decision-making, but challenges differ by geography—urban areas must filter many options, while rural areas face limited training availability.
 - The workgroup agreed to recognize high-performing training providers and outlined next steps, including finalizing the panel proposal, identifying speakers, and preparing data visuals and recognition materials
- Kristen Mackey will provide a full update to include details on the project status during the next Full Council meeting

Increasing Apprentices Workgroup

Last Meeting Date: 4/8/26

- The workgroup met for the last time and their work has concluded.

Agency Updates





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OEO Updates: Director Mary Foote

- General Updates
- Welcome: New Workforce Arizona Council Staff and Council Officers
- 2026 Arizona Workforce Summit Update
- Latest AZ Employment Report, Doug Walls

Registration Opens Soon

- **Date:** June 9-10, 2026
- **Location:** Mesa Convention Center
- **Online registration:** Opens April 30, 2026 via the OEO website
- **Agenda**
 - Call for Proposals
 - More breakout sessions
 - National speakers
 - Requesting the Governor
 - Media sponsors



Thank You!

- Amkor Technology, Inc
- National University
- South32
- Salt River Project (SRP)
- Tucson Medical Center (TMC)



Latest AZ Employment Report

Doug Walls, Labor Market Information Director

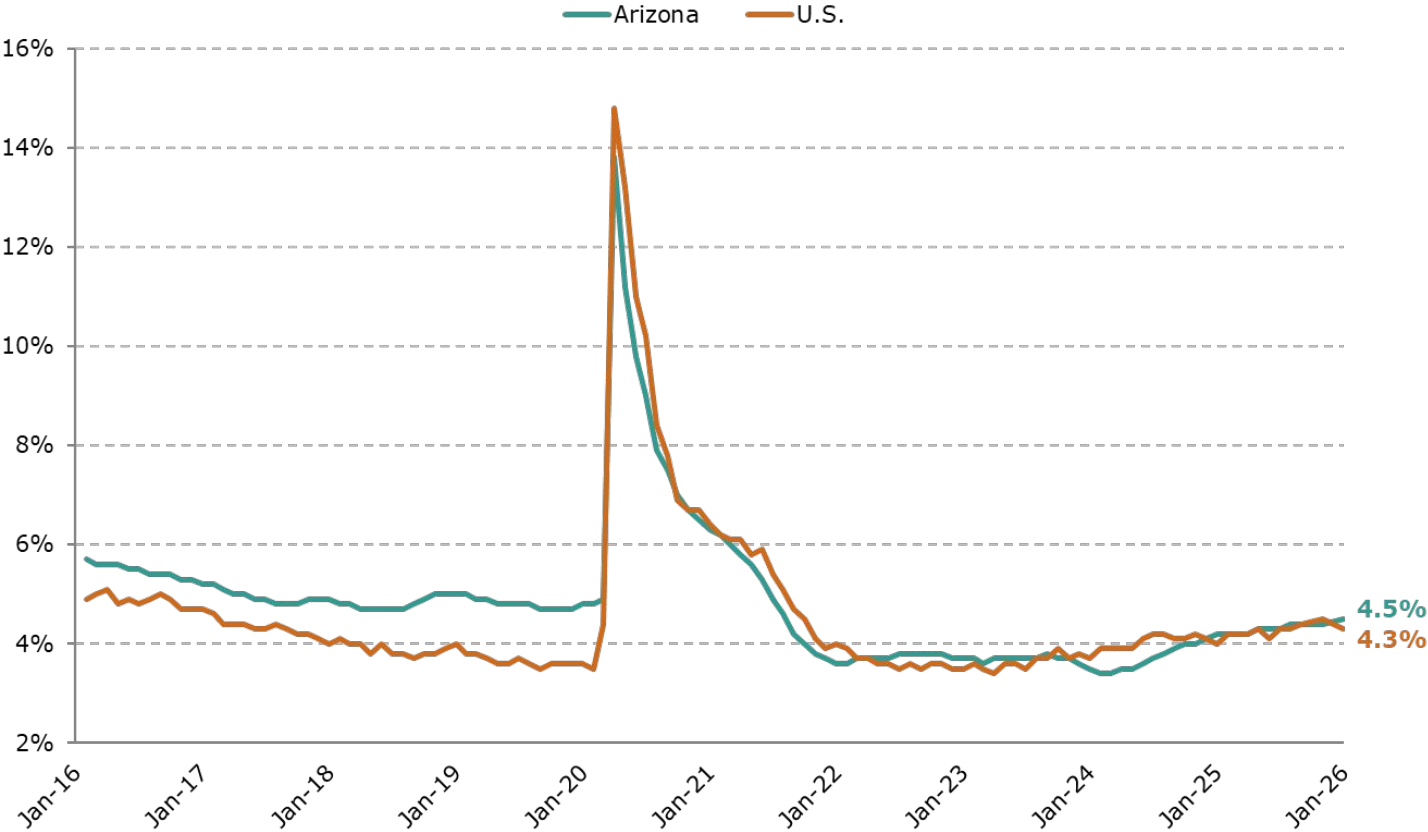


January 2026 EMPLOYMENT REPORT HIGHLIGHTS

- Over-the-month, Arizona not-seasonally adjusted (NSA) total nonfarm employment decreased by 46,200 jobs (-1.4%)
- The Arizona SA unemployment rate increased to 4.5% in January 2026
- The U.S. SA unemployment rate decreased to 4.3% in January 2026 from 4.4% in December 2025
- The Arizona SA labor force decreased by 710 individuals month-over-month, but increased by 32,986 individuals year-over-year
- Over-the-year, Arizona NSA nonfarm employment decreased by 19,400 jobs (-0.6%)

U.S. AND ARIZONA UNEMPLOYMENT RATES

Seasonally Adjusted, Rounded to Nearest Hundred



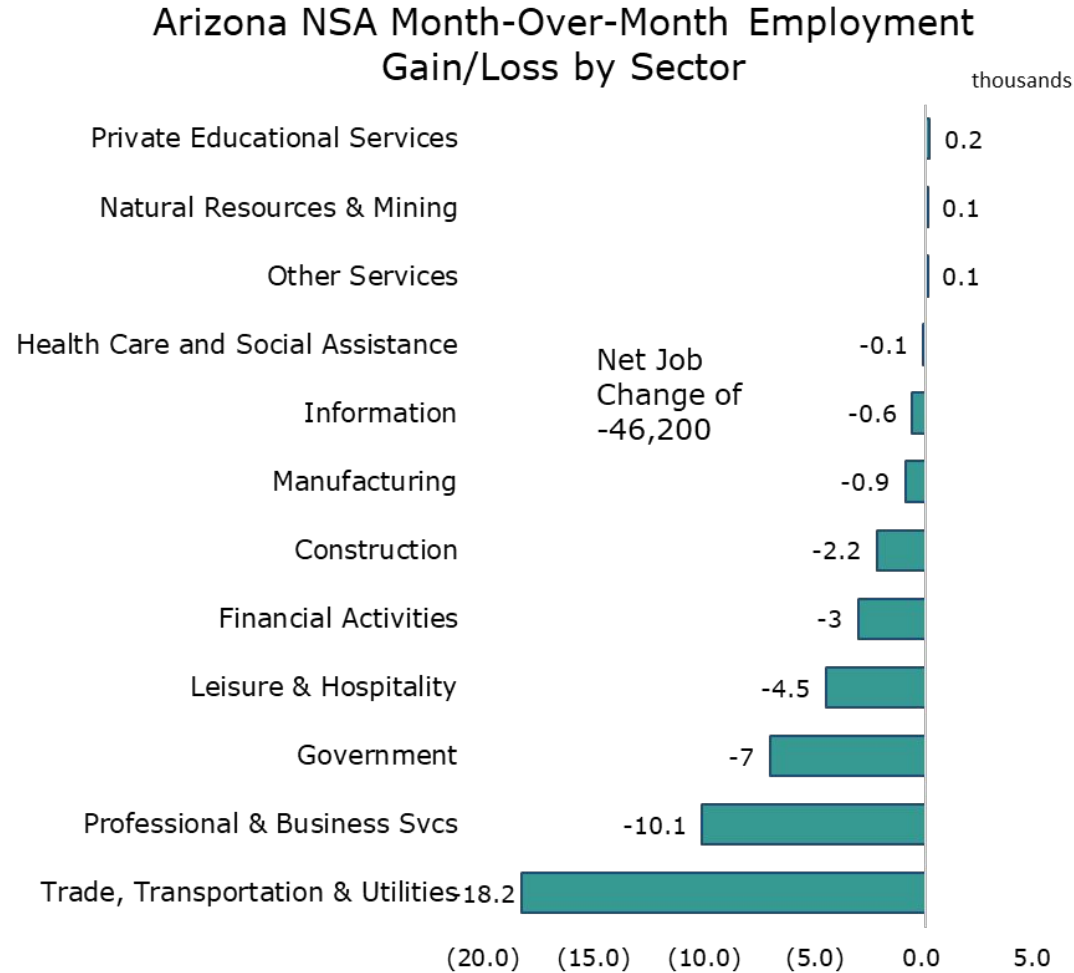
PERIOD	LABOR FORCE	EMPLOYMENT	UNEMPLOYMENT	UNEMPLOYMENT RATE
Jan-26	3,814,200	3,642,800	171,400	4.5%
OTM CHANGE	-700	-4,800	4,100	0.1
OTY CHANGE	33,000	18,700	14,300	0.3

Source: Produced by the Arizona Office of Economic Opportunity in Cooperation with the U.S. Dept. of Labor, BLS. October 2025 entry not included due to data unavailability



MONTH-OVER-MONTH EMPLOYMENT CHANGE

Not Seasonally Adjusted, January 2026

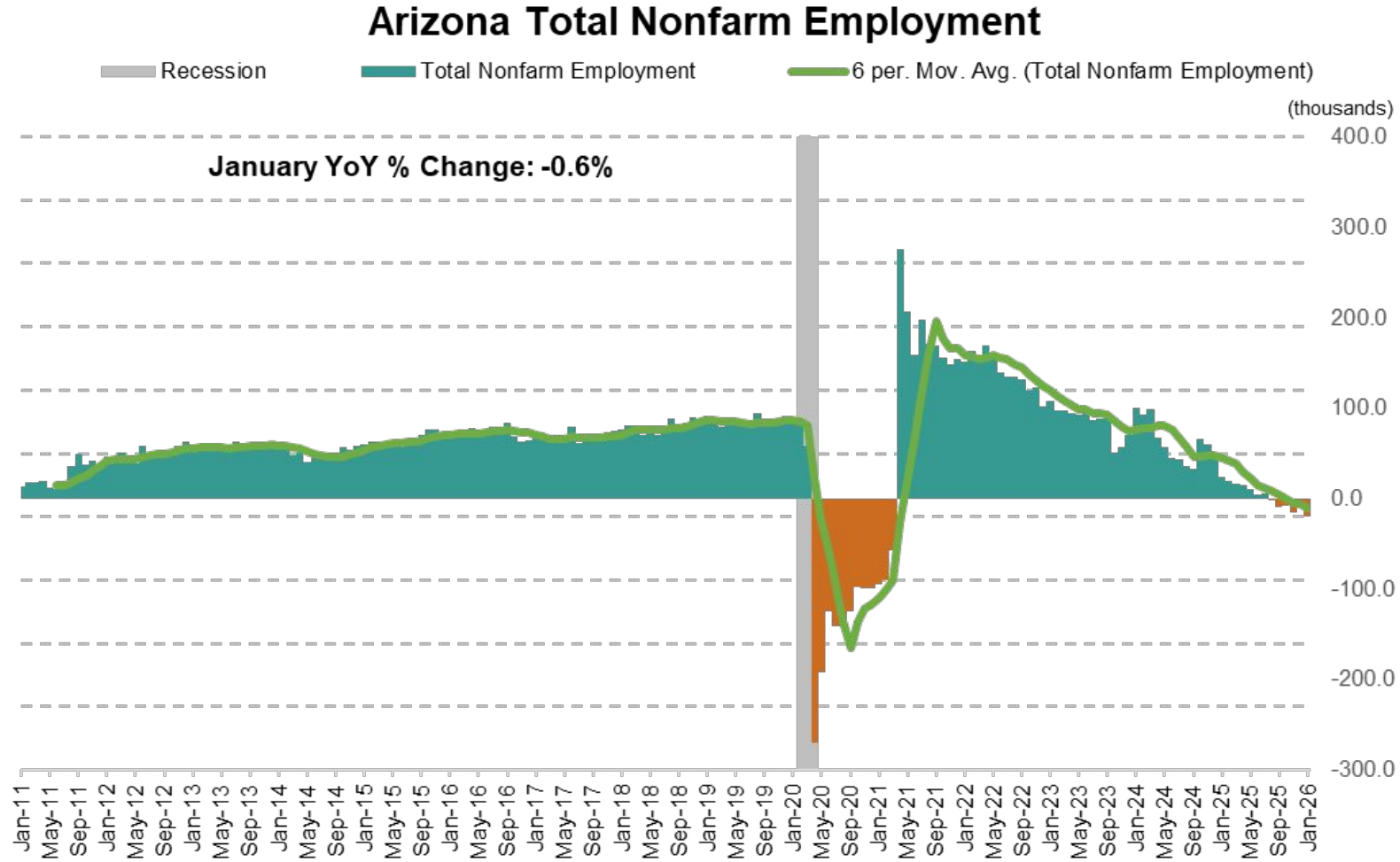


Source: Produced by the Arizona Office of Economic Opportunity in Cooperation with the U.S. Dept. of Labor, BLS



YEAR-OVER-YEAR EMPLOYMENT CHANGE

Not Seasonally Adjusted



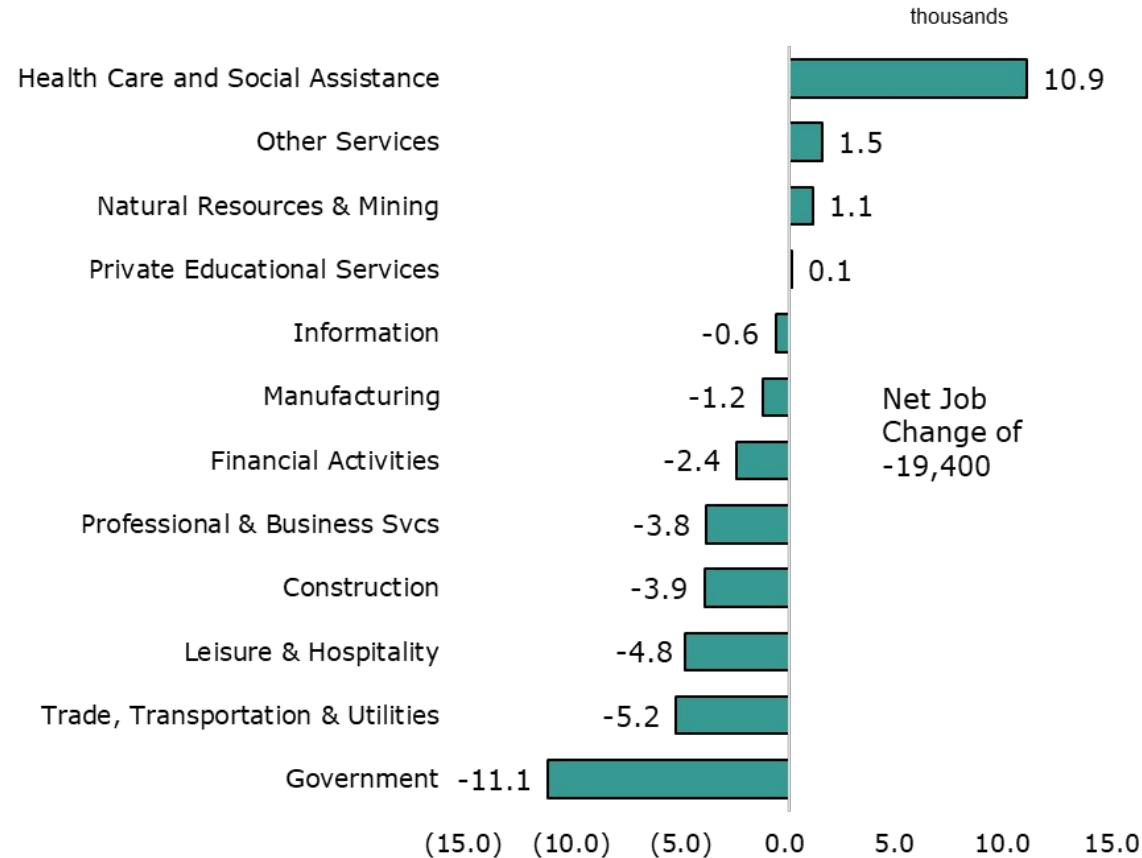
Source: Produced by the Arizona Office of Economic Opportunity in Cooperation with the U.S. Dept. of Labor, BLS



YEAR-OVER-YEAR EMPLOYMENT CHANGE

Not Seasonally Adjusted, January 2026

Arizona NSA Year-Over-Year Employment Gain/Loss by Sector

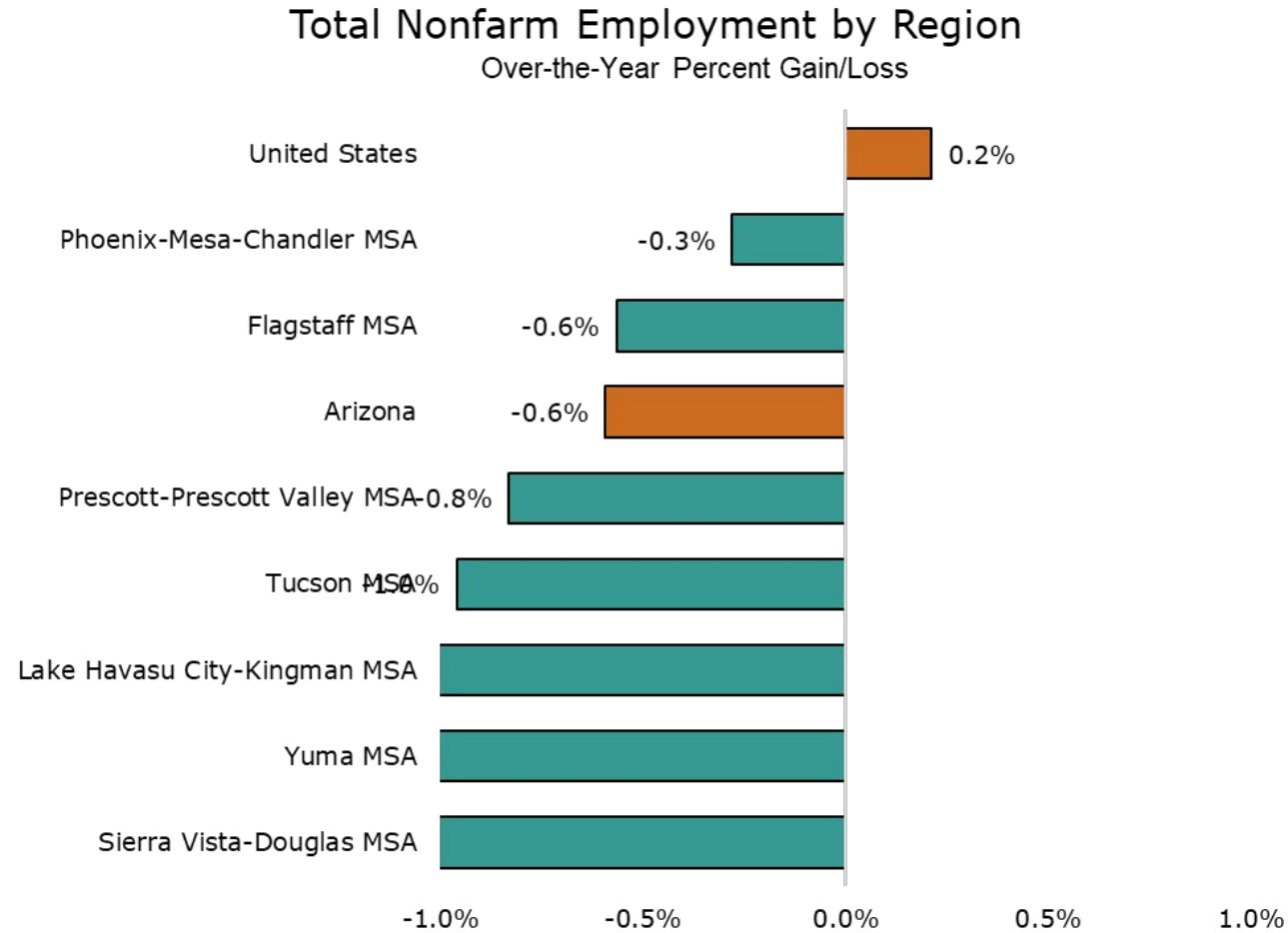


Source: Produced by the Arizona Office of Economic Opportunity in Cooperation with the U.S. Dept. of Labor, BLS



YEAR-OVER-YEAR EMPLOYMENT CHANGE

Not Seasonally Adjusted, January 2026

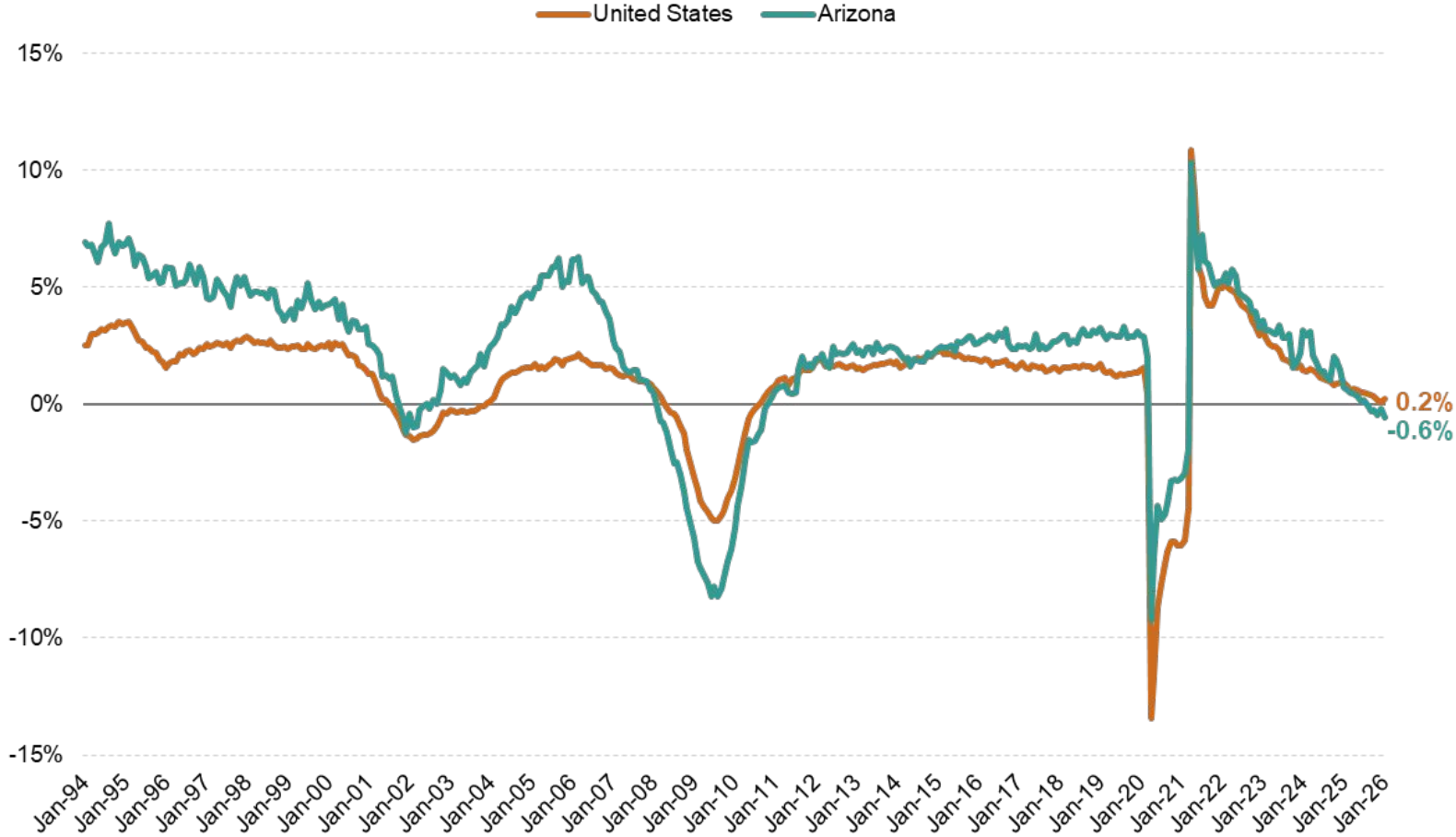


Source: Produced by the Arizona Office of Economic Opportunity in Cooperation with the U.S. Dept. of Labor, BLS



YEAR-OVER-YEAR NONFARM EMPLOYMENT CHANGE

Not Seasonally Adjusted

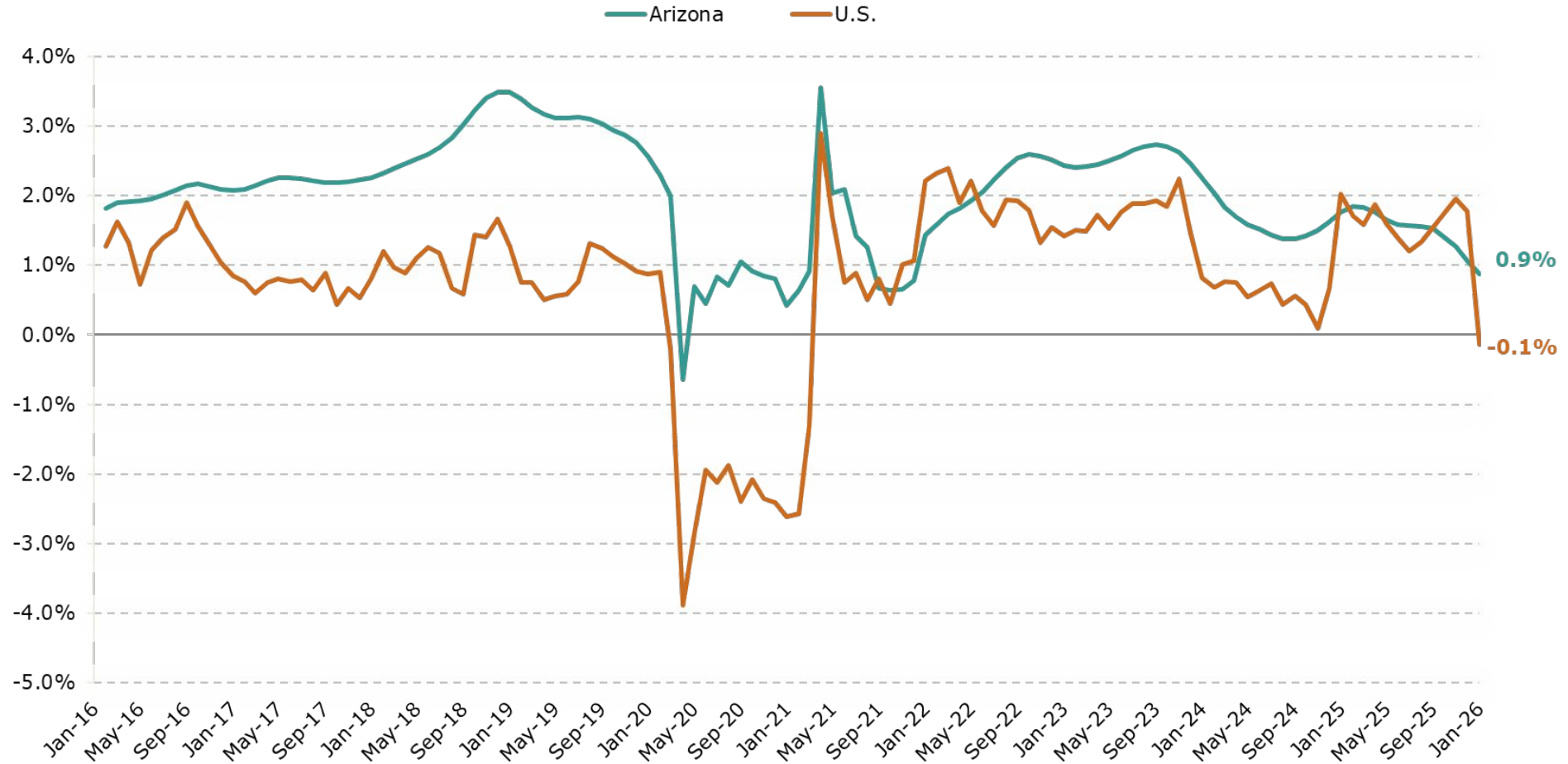


Source: Produced by the Arizona Office of Economic Opportunity in Cooperation with the U.S. Dept. of Labor, BLS



ARIZONA & U.S. LABOR FORCE YEAR-OVER-YEAR PERCENTAGE CHANGE

Seasonally Adjusted



Source: Produced by the Arizona Office of Economic Opportunity in Cooperation with the U.S. Dept. of Labor, BLS





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Workforce Innovation and Opportunity Act (WIOA) Rapid Response Unit

Anna Hunter, DERS Assistant Director

Rapid Response Update

FY26 Layoff Activity Data to Date

(07/01/2025 - 02/28/2026)

- **38** WARNs affecting **7997** workers
- **19** Non-WARNs affecting **996** workers

Top 5 Layoff-Affected Industries by number of companies to date

(07/01/2025 - 02/28/2026)

1. Health care and social assistance - **7**
2. Transportation and warehousing - **6**
3. Retail trade - **6**
4. Manufacturing - **5**
5. Accommodation and food services - **5**

Top 5 Layoff-Affected Industries by number of affected workers to date

(07/01/2025 - 02/28/2026)

1. Health care and social assistance - **4703**
2. Information Technology (IT) - **876**
3. Accommodation and food services - **694**
4. Transportation and warehousing - **603**
5. Professional, scientific and technical services - **511**

Arizona Rapid Response
Layoff Dashboard



Rapid Response Update - Continued



Mobile Resource Units (MRUs) Project

61% complete as of February 28, 2026

Project Public Launch: January 2027

The Mobile Resource Units (MRUs) will primarily function to conduct statewide Rapid Response and Layoff Aversion activities, especially in high demand areas needing workforce reduction support due to mass layoffs, business closures, disasters, or demographic shifts.

- The MRU Project consists of 11 Phases broken into 100 Project Tasks - 4 phases are 100% complete.
- The project is in the technology, outfitting, administrative, and training phases.
- MRUs will support planned local area Rapid Response Events and activities, State initiatives, and State emergencies.
- When extended services are needed, MRUs will be brought on location to support resource and service delivery.
- MRUs are equipped with 6 workstations, large internal monitor, two external monitors; printer, modem & satellite internet broadband access; lift access.
- An asset management system will be used to reserve the units to be brought and operated on-site (State staff to operate).

Rapid Response Comprehensive Communication & Outreach Project (RR CCOP)

84% complete as of February 28, 2026

Project completion date: 06/30/2026

The project will produce a video and print materials library and tool kits for Arizona Rapid Response service delivery that can be utilized and customized by each local area ARIZONA@WORK partner, bringing consistent messaging and resources statewide; Supplying the local areas with additional resources and tools to provide effective Rapid Response service delivery.

These materials include instructional videos, desk aids, and informational flyers to support Rapid Response activities. All materials will be produced in English and Spanish and include English Closed Captioning and ASL in the videos.

The library will include videos and print materials for:

- How to Create a Resume
- How to Prepare for an Interview
- Unemployment Insurance Benefits Initial Application Information
- Job Seeker Resources
- Arizona Rapid Response for Employers
- Transferable Skills -Tools for Employers



Questions?

Title Partner Updates

Core Agency Title Partners





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PY2024 WIOA State Performance Assessment

Matthew Smith, Business Intelligence Analyst, Finance
& Business Operations Administration, DERS

PY2024 WIOA State Performance Assessment

Overview



- WIOA state performance is assessed annually (WIOA Section 116)
- Measure success or failure to meet the primary indicators of performance
- Assessment results provided via web-based report ([Arizona PY24 State Performance Assessment](#))



PY2024 Assessment Summary ([Training and Employment Notice 01-25](#))

- All Title Partner Core Programs
 - 2nd Quarter after Exit Employment Rate
 - Measurable Skill Gains
- Titles I, III and Title IV only
 - 4th Quarter after Exit Employment Rate
 - Median Quarterly Earnings, 2nd Quarter after Exit
- Title I and IV only
 - Credential Attainment Rate
- Overall State Indicator Scores
 - 2nd Quarter after Exit Employment Rate
 - Measurable Skill Gains
- Overall State Program Score
 - Titles I, III and IV

Arizona PY2024 State Assessment Results

	Adult	Dislocated Worker	Youth	Adult Education	Wagner-Peyser	Vocational Rehabilitation	Overall Indicator
ERQ2	98.6% <small>71.7% / 72.7%</small>	108.3% <small>81.5% / 75.2%</small>	100.1% <small>77.2% / 77.1%</small>	101.6% <small>40.9% / 40.2%</small>	97.4% <small>62.7% / 64.3%</small>	97.6% <small>49.0% / 50.1%</small>	100.6%
MEQ2	98.4% <small>\$9,192 / \$9,334</small>	100.6% <small>\$9,923 / \$9,860</small>	113.7% <small>\$7,349 / \$6,463</small>	Not Yet Assessed	101.7% <small>\$8,750 / \$8,601</small>	88.3% <small>\$5,103 / \$5,776</small>	Not Yet Assessed
ERQ4	98.3% <small>67.7% / 68.8%</small>	108.3% <small>75.8% / 70.0%</small>	99.7% <small>74.5% / 74.7%</small>	Not Yet Assessed	93.6% <small>58.1% / 62.0%</small>	100.3% <small>47.2% / 47.0%</small>	Not Yet Assessed
CRED	96.2% <small>72.6% / 75.4%</small>	88.5% <small>72.5% / 81.9%</small>	89.4% <small>58.7% / 65.6%</small>	Not Yet Assessed	Not Applicable	123% <small>28.4% / 23.1%</small>	Not Yet Assessed
MSG	98% <small>74.6% / 76.1%</small>	103.8% <small>82.2% / 79.1%</small>	92.4% <small>69.6% / 75.3%</small>	114.7% <small>53.6% / 46.7%</small>	Not Applicable	59.6% <small>27.4% / 46.0%</small>	93.7%
Overall Program	97.9%	101.9%	99.1%	Not Yet Assessed	97.6%	93.7%	

 Meets/Exceeds Adjusted Level ($\geq 100.0\%$)
 Below Adjusted Level ($< 100.0\%$) but Above Failure Threshold for Overall Scores ($\geq 90.0\%$) or Individual Indicator Scores ($\geq 50.0\%$)

 Below Failure Threshold for Overall Scores ($< 90.0\%$) or Individual Indicator Scores ($< 50.0\%$)
 Report(s) Overdue

Resources

- [Arizona PY24 State Performance Assessment](#)
- [TEGL 11-19, Change 2: Negotiations and Sanctions Guidance for the Workforce Innovation and Opportunity Act \(WIOA\) Core Programs](#)
- [Training and Employment Notice \(TEN\) 01-25](#)



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PY2025 Q2 WIOA Performance Report (Titles I and III)

PY2025 Q2 YTD WIOA Performance, Titles I & III

Individual Indicator		Title I			Title III
		Adult	Dislocated Worker	Youth	Wagner - Peyser
Employment Rate 2nd Quarter after Exit	PY25 Q2 YTD Actual	72.2%	76.3%	75.2%	64.4%
	PY25 Negotiated	73.9%	78.0%	76.0%	63.5%
	Unadjusted Indicator Score	97.7%	97.8%	98.9%	101.4%
Median Quarterly Earnings 2nd Quarter after Exit	PY25 Q2 YTD Actual	\$9,150	\$9,797	\$8,348	\$8,850
	PY25 Negotiated	\$9,328	\$9,738	\$8,188	\$8,379
	Unadjusted Indicator Score	98.1%	100.6%	102.6%	105.6%
Employment Rate 4th Quarter after Exit	PY25 Q2 YTD Actual	64.3%	72.5%	75.9%	58.8%
	PY25 Negotiated	68.5%	74.0%	74.0%	57.8%
	Unadjusted Indicator Score	93.9%	98.0%	102.6%	101.7%
Credential Attainment Rate	PY25 Q2 YTD Actual	64.5%	65.7%	58.3%	N/A
	PY25 Negotiated	74.0%	75.0%	62.0%	
	Unadjusted Indicator Score	87.2%	87.6%	90.8%	
Measurable Skill Gains Rate	PY25 Q2 YTD Actual	45.0%	44.2%	38.7%	N/A
	PY25 Negotiated	75.0%	76.0%	66.0%	
	Unadjusted Indicator Score	60.0%	58.2%	58.6%	
Unadjusted Overall State Program Score		87.4%	88.4%	90.7%	102.9%

		Adult	Dislocated Worker	Youth	Wagner - Peyser	Titles I & III
Effectiveness in Serving Employers	PY25 Q2 YTD Actual	63.1%	72.4%	62.6%	62.6%	62.8%
	PY24 Annual Actual	63.7%	75.2%	63.7%	61.1%	61.7%



**ADULT EDUCATION
SERVICES**

WIOA AZ Title II Performance Measures – 2025 – 2026 - Q.2

Beverly Wilson, Deputy Associate Superintendent-Adult
Education and High School Equivalency Services

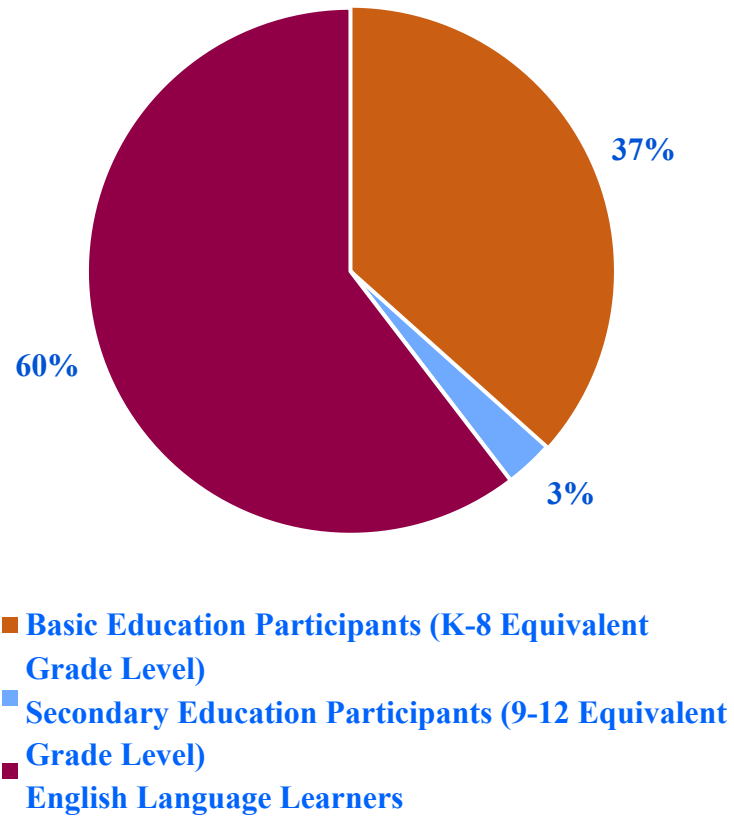
AZ Title II Performance Measures – Q2 (July-Dec 2025)

- Total Participants with at least 12 hours of attendance: **10,310**
- MSG Rate: **48.62%**
- Employment 2nd Quarter after exit (through Q1): **10.45%**
- Median Earnings 2nd Quarter after exit (through Q1): **\$8,353.29**
- Employment 4th Quarter after exit (through Q1): **18.39%**
- Number of High School Equivalency Diplomas earned: **239**
- Number of Industry Recognized Credentials earned through Integrated Education and Training (IET): **1,224**
- Participants enrolled in an Integrated Education and Training (IET) course: **3,344**

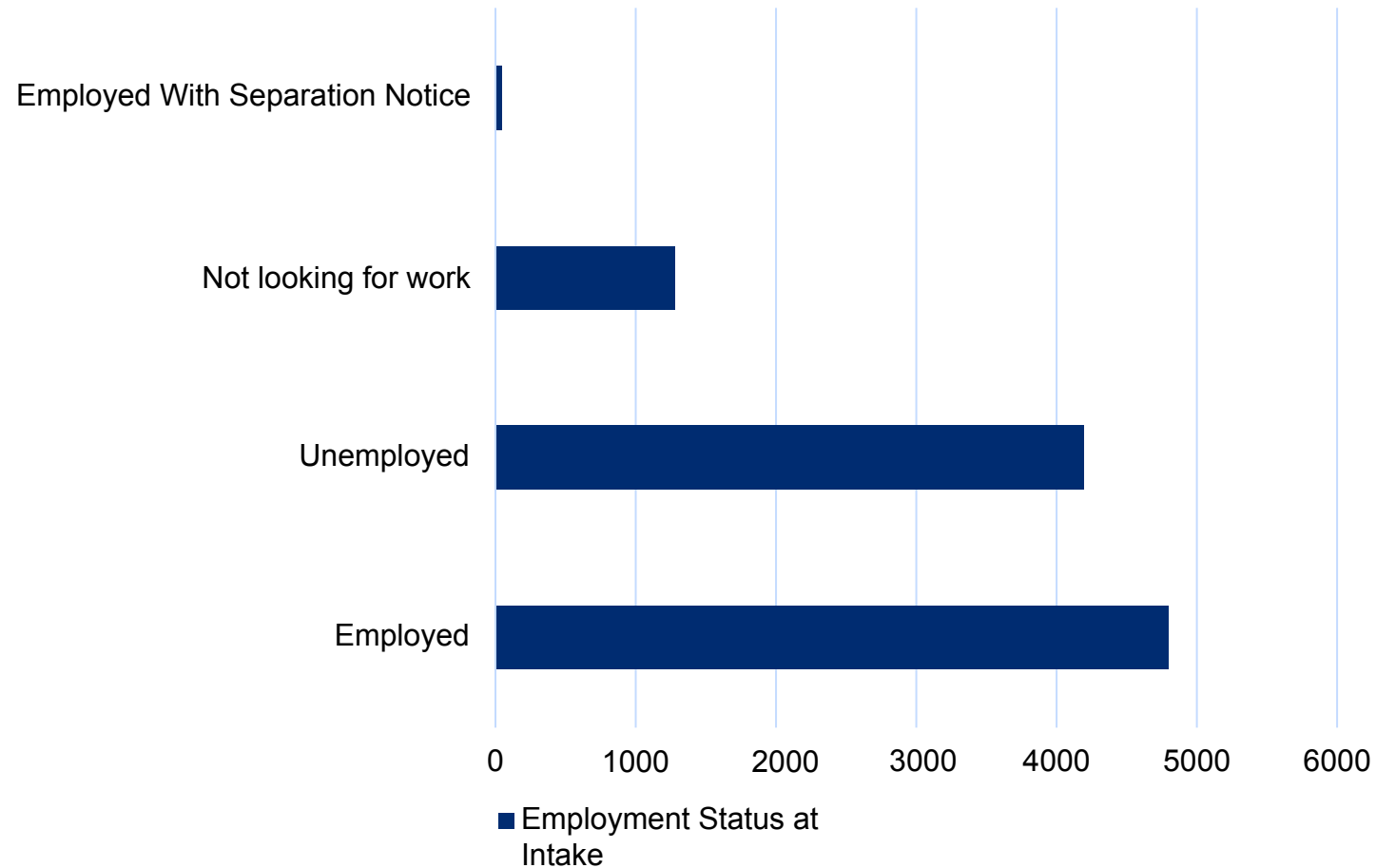


AZ Title II Demographics – Q2

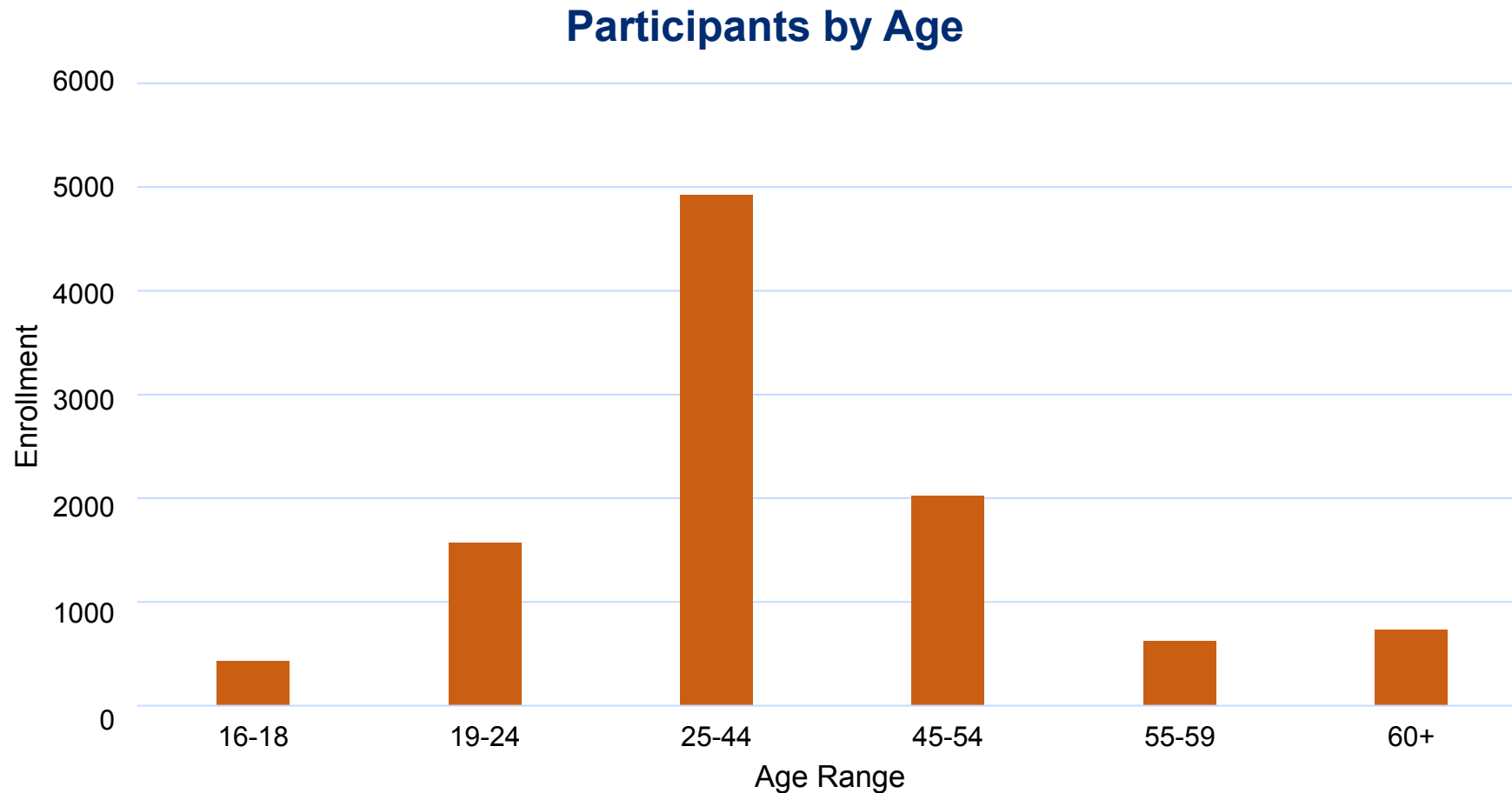
Number of Participants



Employment Status at Intake



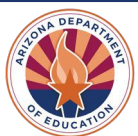
AZ Title II Demographics – Q2 (continued)



AZ Title II Performance Measures – Q1 v Q2

Measure	Quarter One Summary (July-Sept. 2025)	Quarter Two Summary (July-Dec. 2025)
Participants with at least 12 hours of attendance	9,027	10,310
MSG Rate (Measurable Skill Gains per participant)	19.20%	48.62%
Number of High School Equivalency Diplomas earned	110	239
Number of Industry Recognized Credentials earned through Integrated Education and Training (IET)	389	1,224
Number of participants enrolled in Integrated Education and Technology courses	1,749	3,344
Employment 2 nd Quarter after Exit	10.45%	*--
Median Earnings 2 nd Quarter after Exit	\$8,353.29	*--
Employment 4 th Quarter after Exit	18.39%	*--

**Currently not available-revised data sharing agreement with DES in process*





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PY2025 Q2 WIOA Performance Report Title IV

Kristen Mackey, Administrator, Rehabilitation
Services Administration, DERS

Individual Indicator	Title IV PY25 Q2	
Employment Rate 2nd Quarter after Exit	PY25 Q2 Actual	24.0%
	PY25 Q2 Negotiated	50.0%
	<i>Unadjusted Indicator Score</i>	48.0%
Median Quarterly Earnings 2nd Quarter after Exit	PY25 Q2 Actual	<i>unavailable</i>
	PY25 Q2 Negotiated	\$5,300
	<i>Unadjusted Indicator Score</i>	<i>unavailable</i>
Employment Rate 4th Quarter after Exit	PY25 Q2 Actual	37.1%
	PY25 Q2 Negotiated	43.7%
	<i>Unadjusted Indicator Score</i>	84.9%
Credential Attainment Rate	PY25 Q2 Actual	29.0%
	PY25 Q2 Negotiated	38.0%
	<i>Unadjusted Indicator Score</i>	76.3%
Measurable Skill Gains Rate	PY25 Q2 Actual	20.4%
	PY25 Q2 Negotiated	38.0%
	<i>Unadjusted Indicator Score</i>	53.7%

REMINDERS:

- **Special Full Council Meeting 04/16/2026**
Virtual via Zoom
**** quorum is required**
- **Full Council Meeting 5/14/2026**
Hybrid Meeting (Zoom) & In-Person: 1700 W Washington Street, 2nd Floor Conference Room
- **Arizona Workforce Summit 6/9/2026-6/10/2026**
Mesa Convention Center, Building C, 263 N Center St, Mesa, AZ 85201

Thank You!





Innovative Workforce Solutions

WORKFORCE ARIZONA COUNCIL Q1 Executive Committee Meeting

Thursday, February 12th, 2026 | 1:00 pm – 3:00 pm

Virtual Meeting:

<https://us02web.zoom.us/j/82228161039?pwd=RxabjwrHX1sod6sMmXUd5k0roNgMDr.1>

Meeting ID: 822 2816 1039 **Passcode:** 520469

1. Call to Order

Chair Mark Gaspers welcomed Executive Committee members and the public to the Executive Committee meeting. Reminding those attending that only members of the Executive Committee are permitted to vote and to be respectful and remember to mute your microphones.

2. Roll Call

Giselle Retana conducted a roll call, a quorum was present.

Attending: Chair Mark Gaspers, Vice-Chair John Walters, Second Vice-Chair Michelle Bolton, Director Michael Wisehart, Kristen Mackey, Karla Moran, Alex Horvath, Beverly Wilson (Absent: Jenna Rowell)

3. Call to the Public

Chair Gaspers opened the call to the public. No members of the public spoke.

4. Approval of Minutes

a. Q3 August 14th, 2025 Executive Committee Meeting

b. Q4 November 12th, 2025 Executive Committee Meeting

MOTION: Chair Gaspers called for a motion to approve the minutes for the Q3 August 14th, 2025 Executive Committee Meeting and the Q4 November 12th, 2025 Executive Committee Meeting. Vice-Chair John Walters made a motion; Second Vice-Chair Michelle Bolton seconded the motion.

All in Favor Vote Held:

In Favor: Chair Mark Gaspers, Vice-Chair John Walters, Second Vice-Chair Michelle Bolton, Kristen Mackey, Karla Moran, Alex Horvath, Director Michael Wisehart, Beverly Wilson (Absent: Jenna Rowell)

Opposed: None

Motion Passed

5. 2025 Recertification Updates

a. Coconino County

b. Northeastern Arizona

c. Arizona Tribal Workforce Development Board

The presentation focused on the status of pending Local Workforce Development Board recertifications, focusing on three areas: Coconino County, Northeastern Arizona, and the Arizona Tribal Workforce Development Boards. For Northeastern Arizona, recertification had been temporarily paused due to a potential redesignation request by Gila County, but the board is proceeding with recertification while scheduling further discussions, targeting an April Council agenda for action. In Coconino County, progress continues on shared governance agreements, bylaws, board appointments, and director recruitment, with recertification now shifted to a realistic Q2 timeline pending final approvals and the Attorney General's review of a related compliance inquiry. The Arizona Tribal Workforce Area reported notable progress, particularly toward finalizing a streamlined intergovernmental agreement focused on fiscal agent responsibilities, alongside completed Job Center certification and executed governance agreements; Workforce Council staff will continue technical assistance and provide updated certification status at the next Full Council meeting.

6. State Plan Modification Update, Vote

Chair Gaspers noted that this agenda item was no longer up for a vote, but rather a recommendation. No action was taken besides discussion as follows:

Patrick Brown, the Workforce Council Administrator, presented an update on the Arizona WIOA State Plan modification process, including timelines, governance roles, and key milestones. Following recent guidance from the U.S. Department of Labor, staff are moving forward with the required two-year modification, currently due March 3, 2026, while awaiting a decision on a requested extension to April 30. The Governor's Office has submitted and secured acceptance of the official designee to submit the plan, and weekly coordination is underway among OEO, Workforce Council staff, and WIOA title partners to develop sections, performance targets, and public comment processes under a compressed timeline. A full draft is targeted for completion by February 21, followed by public comment and Council consideration. Given the tight schedule, staff recommended reserving February 27 for a special Workforce Arizona Full Council session to review and approve the plan if the extension is not granted, ensuring the state remains compliant with federal requirements.

7. Coconino County Local Workforce Development Board Report Update

Patrick Brown provided a progress update on a compliance inquiry involving the Coconino County Local Workforce Development Board, which was initiated in mid-October 2025 after concerns were raised regarding actions taken by the Coconino County Board of Supervisors in its role as Chief Elected Official. The issues under review include potential interference with local workforce governance, delays in board recertification, and proposed changes to board size and composition that may affect compliance with WIOA and state workforce policy. Council staff have completed a draft report and findings, but the Arizona Attorney General's Office has requested additional time for review, so the findings are expected to be presented at the next Executive Council meeting. In the interim, Council staff will continue providing technical assistance to the local board to support compliance with WIOA Section 107, state governance requirements, and the shared governance agreement, while maintaining program integrity and recertification.

8. Workgroup Updates

Janice Garza, Workforce Policy Manager, provided an update on the Workforce Arizona Council's active workgroups:

a. Continuous Improvement

The update focused on the Continuous Improvement Workgroup's recent meeting on January 22 and its ongoing work on Workforce Arizona Council Policy No. 15, the Strategic Recapture and Reinvestment Policy. While a draft policy was not ready for Executive Committee review at this meeting, the workgroup has been advancing the effort since the second quarter of last year and plans to present a revised policy for Executive Committee review and approval in the second quarter of this year. Vice Chair Walters, serving as the Executive Sponsor, will provide a more detailed progress update at the next Full Council meeting.

i. Eligible Training Provider List (ETPL) Policy, **Vote**

- The Continuous Improvement Workgroup provided an update on revisions to the Workforce Arizona Council Eligible Training Provider List (ETPL) policy, noting that three targeted components were added without changing the policy's original intent. These additions were made in preparation for Workforce Pell and short-term Pell implementation, with the goal of reducing the risk of waste, fraud, or abuse from short-term or "pop-up" training programs and better protecting WIOA participants. Vice Chair Walters emphasized that the updates strengthen the focus on quality over quantity, align with trends around stackable and micro-credentials, and reflect strong stakeholder input, particularly from local areas, including calls

for greater transparency in recaptured funds. Public comments received during the comment period largely addressed broader aspects of the policy that were outside the scope of this revision and will be retained for a full policy review planned for Program Year 2026.

MOTION: Chair Gaspers called for a motion to approve the recommended Eligible Training Provider List Policy updated as presented to the Full Council. Alex Horvath made a motion; Vice-Chair John Walters seconded the motion.

All in Favor Vote Held:

In Favor: Chair Mark Gaspers, Vice-Chair John Walters, Second Vice-Chair Michelle Bolton, Kristen Mackey, Karla Moran, Alex Horvath, Director Michael Wisheart, Beverly Wilson (Absent: Jenna Rowell)

Opposed: None

Motion Passed

b. Training Effectiveness

The Workgroup's recent progress and next steps noted that its last meeting was held on December 16 and that additional engagement activities are underway. Since that meeting, staff delivered two training webinars—one for training providers and one for local workforce development boards—to explain the evaluation methodology used for Title I Adult Training Programs, which underpin the high-impact training dashboards. The updated report now includes data from the past three years, with individualized reports shared with each local area, while the webinars focused on methodology, performance measures, and upcoming enhancements. Participation and feedback have been strong. In response to a survey from local workforce development boards requesting more hands-on support, the workgroup is planning to build support teams and provide targeted technical assistance. The workgroup will continue advancing its Q1 strategy and priorities, and a more detailed status update, including performance metrics and progress toward Council goals, will be presented by Kristen Mackey, the Executive Sponsor at the next Full Council meeting.

c. Increasing Apprentices

It was highlighted that the workgroups' last meeting was held on January 28, 2026, where members reviewed progress on apprenticeship expansion efforts, discussed barriers and promising practices, and examined opportunities for better funding alignment. The workgroup identified next steps to continue supporting local areas and strengthening the statewide apprenticeship strategy. Based on this progress, the Deputy Director recommended beginning preparation of future recommendations to the Full Council, as the original Council goal and the purpose outlined in the workgroup charter have been achieved. Additional details on the specific outcomes, accomplishments, and priorities for the next quarter will be shared by Dennis Anthony, Executive Sponsor at the Full Council meeting.

9. WAC Election Procedures

OEO Director Mary Foote outlined the upcoming election procedures for Vice Chair and Second Vice Chair and the selection process for the Chair for the Workforce Arizona Council. These elections align with the Governor's selection of the Chair to ensure leadership continuity, with all new leaders formally assuming their roles at the next full Council meeting. An email requesting Chair recommendations and Vice Chair and Second Vice Chair nominations has been distributed, with submissions due by close of business on March 2, 2026.

Position(s): Vice Chair and Second Vice Chair

Election Procedures

- The Vice Chair and Second Vice Chair serve three-year terms.
- Both officers must be current Council Members representing business or an organization.
- Elections for Vice Chair and Second Vice Chair coincide with the Governor's Chair selection.
- Upon conclusion of the Vice Chair and Second Vice Chair's terms, an election will be held at the first full Council meeting of that year.
- The newly selected Chair and newly elected Vice Chair and Second Vice Chair will assume their respective positions effective at the next full council meeting.
- An email communication was sent out today to submit a recommendation for the Chair selection and a nomination for the Vice Chair and Second Vice Chair.
 - DUE: March 2, 2026, COB.

Position(s): Chair

Election Procedures: Chair Recommendation

- COMMITMENT EXPECTATION
 - Up to 5 days of travel per year
 - Minimum 30 hours annually, including:
 - 4 Full Council meetings
 - 4 Executive Committee meetings
 - Monthly coordination with workforce staff
 - Additional meetings, speaking engagements, or briefings as needed
- LEADERSHIP ROLE
 - Lead state, regional, and local workforce partners
 - Strengthen workforce system capacity and performance
 - Align and improve workforce program outcomes and investments
 - Promote economic growth statewide
- STRATEGIC ALIGNMENT
 - Engage business, education, labor, and economic development partners
 - Support implementation of the State Plan
 - Advance Arizona's workforce vision under WIOA
- FINAL SELECTION
 - Governor selects the WAC Chair from the recommendation list
 - Term: 2026-2029

10. 2026 Workforce Arizona Council Retreat Update

Patrick Brown shared the outlined plans for the 2026 Workforce Arizona Council (WAC) Retreat, which is designed to provide dedicated time for the Council to realign its role as Arizona's statewide workforce policy and strategy body under WIOA. The retreat will be facilitated by Ken Mall, Managing Partner at Innovative Learning Solutions, who brings more than two decades of experience working with employers, labor, government partners, and the Arizona workforce system. The retreat will focus on clarifying the Council's shared identity and purpose, strengthening governance and decision-making, and setting a clear, employer-driven and outcomes-focused strategic direction. Participants can expect a working session that includes reviewing system performance and impact, discussing major industry and workforce trends, identifying a short list of high-impact strategic priorities for the next two years, and clarifying governance and participation expectations. The retreat will conclude with a concrete action plan, defined next steps, and ownership, with the overall goal of strengthening how the Council operates and ensuring members have meaningful opportunities to shape its future work.

11. Agency Updates:

a. OEO: Director Mary Foote

OEO Director Mary Foote shared the following updates:

i. New OEO Staff

Welcomed Katie Belous, who's going to be serving as the Workforce Sector Strategies Administrator and also welcomed Dante Mitchell, who's going to be serving as the Chief Government and Community Affairs Liaison.

ii. 2026 Arizona Workforce Summit Update

It was highlighted that the 2026 Arizona Workforce Summit is scheduled for June 9–10 at the Mesa Convention Center. New elements include a Call for Proposals focused on highly requested interactive breakout sessions and expanded opportunities for partner collaboration. A Champions of the Workforce Awards Luncheon will be added on June 10, with active outreach for sponsors and nominations forthcoming. The goal is to raise \$30,000 to fully fund the luncheon and reception, allowing existing funds to support other summit components. Additional details and links are being shared via the OEO Summit webpage and a follow-up email to council members and stakeholders.

iii. Rural Healthcare Transformation Program (RHTP)

The presentation outlined the state's Rural Health Transformation Program, created in response to Medicaid cuts under HR1 that were expected to disproportionately impact rural areas. In late November 2025, Arizona applied for the program and received \$167 million in year-one funding given our urban to rural population (out of a potential \$200 million) from a five-year federal program, with approximately \$47 million dedicated to workforce development after proportional reductions - our original application was \$57 million for year one. The workforce strategy focuses on expanding rural healthcare training capacity, building career awareness pipelines, offering targeted financial incentives tied to five-year rural service commitments, addressing burnout and retention through wellness and upskilling supports, and establishing a dedicated workforce project within the Office of Economic Opportunity to coordinate with the Workforce Arizona Council. Significant emphasis is placed on partnerships with rural CTEDs and community colleges, data and analytics to benchmark progress, and measurable outcomes such as increased learners, placements, and retention. The state has submitted a revised budget for the grant and has also filed a FOIA request to better understand how the federal grant scoring was determined, particularly given concerns that Arizona's large rural footprint was not fully reflected in the award amount. Approval of the revised budget is anticipated by early March, with contract development occurring through the remainder of the current fiscal year and contract execution expected in the early part of the next fiscal year. Because funds must be encumbered by the start of the next federal fiscal year on October 1, timelines are tight, and required approval processes present some constraints, though the state is moving as quickly as possible. Program implementation and formal measurement of effectiveness are expected to begin at the start of the next calendar year. Investments in data and analytics will be used not only to demonstrate program effectiveness to Centers for Medicare & Medicaid Services, but also to support a broader advocacy effort that clearly shows the return on investment and impact of healthcare workforce funding in rural communities.

In the discussion, it was suggested potential partnership with institutions like ASU Helios for development of data systems and visualization to support accountability, program agility, and long-term advocacy by demonstrating return on investment in rural healthcare workforce development.

iv. Latest AZ Employment Report

Doug Walls, Labor Market Information Director presented on Arizona's latest employment trends through December 2025, highlighting continued but uneven economic growth amid reporting delays caused by last fall's federal shutdown. Overall employment increased year over year, supported by a strong December gain of about 6,500 jobs, with above-average growth in construction, healthcare, and

financial activities, while healthcare remained the leading contributor despite moderating from earlier peaks. Labor force growth was a key theme, with more than 9,500 people entering the labor force in December and nearly 100,000 over the year, signaling continued optimism among jobseekers; notably, the unemployment rate held steady at 4.3%, below the U.S. average and pre-pandemic norms. At the same time, challenges persist, including continued job losses in manufacturing—particularly in semiconductor-related segments—and declines in government employment tied to federal buyouts and education funding pressures. Regionally, growth was strongest in the Phoenix metro area, while Tucson and Flagstaff saw year-over-year declines, underscoring a mixed but generally resilient outlook for the Arizona economy.

Additional discussion clarified that the March 2025 revision is not yet reflected in the current employment figures because it is part of the annual benchmark revision to the monthly CES employment data. This process recalibrates survey-based estimates—drawn from roughly 25–33% of employers—against more complete but less timely data that lag by six to seven months. The final benchmark revisions will be released in April with the January 2026 data, and early expectations are for notable upward revisions to employment levels in the first quarter of 2025, likely offset by slower growth or downward adjustments in the third and fourth quarters, reflecting a pattern similar to prior benchmark revisions for Arizona.

b. DES: DERS Assistant Director, Anna Hunter

DES Assistant Director for the Division of Employment and Rehabilitation Services, Anna Hunter provided the Committee information on the Workforce Innovation and Opportunity Act (WIOA) Waiver Information.

i. Workforce Innovation and Opportunity Act (WIOA) Waiver Information

The information centered on the federal guidance received via the Training and Employment Guidance Letter (TEGL) No. 05-25 issued by the U.S. Department of Labor (DOL) that expands opportunities for states to request waivers under the Workforce Innovation and Opportunity Act (WIOA) to promote flexibility and innovation in service delivery. It was noted that recent guidance from the U.S. Department of Labor outlines how waivers can be requested through the state plan or later modifications, with approval from the Secretary of Labor, while noting certain statutory limits that cannot be waived. Arizona currently has two approved waivers—allowing individual training accounts for in-school youth and reducing the out-of-school youth expenditure requirement—and there is strong interest in extending them. Local workforce boards broadly supported exploring additional waivers, including extending supportive services after exit, increasing flexibility in training contracts, and expanding on-the-job training reimbursements. Overall, the focus was on using the waiver process strategically, informed by local input and practices from other states, to modernize Arizona’s workforce system and better meet participant and employer needs.

12. Title Partner Updates

a. Title IB and Title III

Matthew Smith, Business Intelligence Analyst, Finance & Business Operations Administration with DERS shared an update on first-quarter performance for WIOA Titles I and III programs for Program Year 2025, noting that the official PY2024 assessment has not yet been released by the U.S. Department of Labor due to pending statistical adjustments.

Using unadjusted indicator scores as a preview, most performance measures are meeting or exceeding negotiated targets, with the exception of measurable skill gains, which appear lower in Q1 because the measure captures real-time progress and participants have the full program year to achieve gains. Title III performance is strong across indicators, and overall program scores are expected to improve as skill gains are realized later in the year. The update also highlighted solid performance in effectiveness in serving employers, tracking closely with prior-year results. Questions from Council members clarified that higher-than-negotiated earnings outcomes reflect stronger participant wage results, and while cost-per-participant data was not included in this quarterly update, it is tracked in annual reports to help assess return on investment and training effectiveness.

b. Title II

Beverly Wilson, Deputy Associate Superintendent for Adult Education and High School Equivalency Services, presented an overview of Arizona's WIOA Title II Adult Education program, outlining its scope, reach, and outcomes. Title II serves individuals age 16 and older who are no longer enrolled in K-12, providing adult basic education, high school equivalency, English language acquisition, integrated education and training (IET), and pathways to postsecondary education, training, and employment. The state contracts with 21 providers and serves approximately 15,600 students annually, despite a target population nearing one million undereducated adults; limited funding caps enrollment and has resulted in waitlists. With an average cost of \$1,500 per participant, the program is highly cost-effective. Enrollment has steadily rebounded since COVID, supported by a diverse provider network that is especially critical in rural areas. Performance exceeds national benchmarks, including nearly 54% measurable skill gains and strong employment and earnings outcomes, with further improvements anticipated following the implementation of a new data management system.

c. Title IV

Kristin Mackey, Administrator, Rehabilitation Services Administration for DERS provided an update on first-quarter performance and data system improvements for Arizona's WIOA Title IV program. Building on the context set by Title I and III reports, she explained that this quarter represents the first full data snapshot from a newly implemented system, which is being used as a baseline to identify data gaps and guide process improvements. Preliminary outcomes showed employment rates of about 18% in the second quarter after exit and 15% in the fourth quarter after exit, credential attainment at 28%, and measurable skill gains (MSG) initially reported at 4.4%.

Significant challenges were identified with data timeliness and accuracy, particularly around employment outcomes due to lags in unemployment insurance wage data and reliance on manual staff entry. Efforts are underway to explore system integrations and automated data sharing to improve real-time reporting. Additionally, issues with MSG calculations were discovered and corrected through updated system scripts and staff training, resulting in recent improvements (with achievements increasing from 17% to 29%). The program is also pursuing a contract with the National Student Clearinghouse to strengthen credential and education outcome tracking. Overall, the update emphasized data quality improvements, staff training, and system integration as key priorities to strengthen Title IV performance reporting in Arizona.

13. Adjournment

Chair Gaspers provided the following reminders for upcoming meetings and events:

- Friday, February 27, 2026: Special Full Council meeting focused on the WIOA State Plan Modification.
- Thursday, March 12, 2026: Next Full Council Meeting
- Thursday, April 9, 2026: Next Executive Committee Meeting

MOTION: Chair Gaspers called for a motion to adjourn the meeting. Vice-Chair John Walters made a motion; Beverly Wilson seconded the motion.

All in Favor Vote Held:

In Favor: Chair Mark Gaspers, Vice-Chair John Walters, Second Vice-Chair Michelle Bolton, Kristen Mackey, Karla Moran, Alex Horvath, Director Michael Wisehart, Beverly Wilson (Absent: Jenna Rowell)

Opposed: None

Motion Passed

DRAFT

Executive Summary

This inquiry was conducted by Workforce Arizona Council (WAC) staff, with support from the Office of Economic Opportunity (OEO), in response to information received between October 13–16, 2025 regarding governance actions affecting the Coconino County Local Workforce Development Board (LWDB).

The purpose of this review is to document relevant facts, assess alignment with the Workforce Innovation and Opportunity Act (WIOA), applicable federal regulations, state policy, and local governance documents, and to provide information to support the Governor’s and Arizona Department of Economic Security’s (ADES) oversight responsibilities.

Under 20 CFR § 683.410, the Governor is responsible for ensuring that WIOA-funded entities substantially comply with applicable requirements. ADES, as the State’s designated administrative entity under A.R.S. § 41-1954, carries primary responsibility for monitoring and reporting on WIOA programs.

Consistent with 20 CFR Part 679 Subpart A, the State Workforce Development Board supports the Governor by advising on system alignment, identifying risks, and promoting continuous improvement. In this capacity, WAC staff conducted this inquiry as a fact-finding and advisory review.

The purpose of this inquiry is to:

- Document the sequence of governance and recertification-related event’s;
- Assess alignment with WIOA §107, 20 CFR Part 679, state policy, and local governance documents; and
- Provide observations and considerations to support the Governor and ADES in determining whether further review, monitoring, or corrective action is warranted.

This review focuses on:

- LWDB governance structure and actions;
- The relationship between the Chief Elected Official (CEO) and the LWDB;
- Recertification processes and delays; and
- Documentation, transparency, and procedural consistency.

This inquiry does not evaluate program performance or service delivery outcomes.

Role of WAC and OEO

The WAC serves as Arizona’s State Workforce Development Board pursuant to A.R.S. § 41-5401. OEO provides staffing and system support under A.R.S. § 41-5303 and § 41-5402. Under 20 CFR § 679.130, State Workforce Development Boards are responsible for:

- Assisting the Governor in the development and implementation of the State Plan;
- Identifying barriers and opportunities within the workforce system;
- Supporting continuous improvement; and
- Providing policy guidance and recommendations.

WAC and OEO do not independently administer WIOA funds or exercise direct enforcement authority. Accordingly, this inquiry was conducted in an advisory capacity to inform state-level oversight and decision-making.

Background and Context

Origin of the Inquiry

Between September 2024 and September 2025, WAC staff worked with the Coconino County LWDB to support recertification. Despite multiple extensions and technical assistance, required materials were delayed or incomplete.

By mid-2025, WAC staff had worked toward a path to recertification, contingent upon CEO approval. In October 2025, new concerns emerged, including:

- Allegations of governance interference;
- Removal of the LWDB Chair;
- Administrative leave of the Executive Director;
- Delays in recertification approval; and
- Proposed structural changes to board composition.

These developments elevated the situation from an administrative delay to a governance and compliance risk, prompting this inquiry.

Scope and Methodology

Scope

This compliance inquiry assesses whether the Coconino County Local Workforce Development Board (LWDB) and the Coconino County Chief Elected Official (CEO) acted in accordance with the Workforce Innovation and Opportunity Act (WIOA), applicable federal regulations, Workforce Arizona Council policies, and the LWDB's shared-governance agreement and bylaws in connection with actions taken beginning in October 2025. Central to this review is an examination of the process, authority, and compliance basis for the removal of the LWDB Chair, including whether such actions adhered to the procedural and substantive requirements established in governing documents.

The inquiry encompasses statutory and policy requirements governing LWDB leadership structure ([20 CFR 679.330](#)), board member appointment ([20 CFR 679.310\(a\)](#)) and removal authority, conflict-of-interest rules, officer-role expectations, and due-process protections afforded under the LWDB's bylaws ([20 CFR 679.310\(g\)](#)) and shared-governance agreement ([20 CFR 679.310\(c\)](#)). It evaluates whether the decision-making process related to the Chair's removal followed required procedures—such as notice, documentation, board action, CEO involvement, voting procedures, and adherence to state and federal oversight expectations. The review also examines whether the LWDB and CEO fulfilled their respective responsibilities ([20 CFR 679.390](#)) regarding communication, transparency, and documentation during and after the removal action.

Boundaries of the inquiry are limited to governance, legality, and procedural compliance related to the removal of the LWDB Chair and associated board actions. The review does not include personnel performance evaluations unrelated to statutory board duties, internal county administrative issues not tied to WIOA governance, or any matters predating October 2025 except where necessary to establish context for current compliance questions. The inquiry does not evaluate program effectiveness or outcomes for participants; its focus is solely on whether leadership-removal actions adhered to WIOA, state policy, the shared-governance agreement, and LWDB bylaws.

Methodology

This review included:

- Document analysis (agreements, bylaws, correspondence, agendas);
- Interviews with board members, county officials, and stakeholders;
- Review of meeting recordings and public records; and
- Comparison against WIOA statute, 20 CFR Part 679, and state policy.

Findings are based on available documentation and information provided. In some instances, verification was limited due to unavailable or privileged information.

This compliance inquiry was conducted using a structured, multi-method approach designed to evaluate whether the actions surrounding the removal of the LWDB Chair, and related governance decisions taken after October 2025, conformed to requirements under WIOA, Workforce Arizona Council policies, the local shared-governance agreement, and the LWDB's bylaws.

Document Review

The inquiry included a comprehensive review of written materials relevant to LWDB governance and the specific events under examination. Documents reviewed included emails and written correspondence; meeting agendas and minutes; board resolutions and voting records; the LWDB's bylaws; the shared-governance agreement between the LWDB and the Coconino County Chief Elected Official (CEO); organizational policies; Workforce Arizona Council policy documents; and any supplemental materials presented to the board or the CEO during the removal process. Contractual documents, procedural guidance, and public records were also examined to assess alignment with statutory and policy requirements.

Interviews and Meetings

Interviews or information-gathering meetings were conducted with individuals directly involved in or knowledgeable about the LWDB Chair removal, including board members, county officials, staff supporting the LWDB, and other stakeholders as needed. These conversations focused on understanding the sequence of events, the rationale behind actions taken, the interpretation of governing documents, and the decision-making processes used during the relevant period.

Policy and Compliance Analysis:

All collected information was evaluated through a structured comparison against applicable requirements found in WIOA statute and regulations, Workforce Arizona Council policies, and the LWDB's governing documents. This analysis included assessing procedural compliance (such as notice, quorum, voting, and documentation), authority boundaries between the board and the CEO, and adherence to transparency and due-process expectations. Where relevant,

data and timelines were cross-checked for consistency across multiple sources to validate accuracy and completeness.

This methodology ensured that the inquiry's findings were based on verifiable evidence, interpreted within the appropriate legal and policy frameworks, and analyzed in a manner consistent with accepted practices for governmental compliance review.

Limitations

The scope of this compliance review was limited by the availability and completeness of documentation provided by the Local Workforce Development Area, which constrained the ability to fully verify compliance with Workforce Innovation and Opportunity Act (WIOA) governance requirements.

Summary of Information Gathered

The following chronology summarizes key events related to governance, leadership actions, and documentation associated with the Coconino County Local Workforce Development Area (LWDA), based on records reviewed.

In February 2019, the Coconino Workforce Development Board (CWDB) operated under formally established bylaws. In May 2021, a Shared Governance Agreement (SGA) was executed between the Chief Elected Officials (CEO) and the Local Workforce Development Board (LWDB), establishing roles and responsibilities under WIOA.

In February 2023, updated bylaws were developed; however, available documentation indicates these were not formally approved, creating uncertainty regarding the governing framework in effect. Throughout 2024, governance training and supporting materials were provided to LWDB leadership, including guidance on WIOA requirements and local oversight structures.

On March 15, 2024, the LWDB formally communicated its intent to move forward with a Request for Proposals (RFP) for WIOA Title I-B services. In 2025, several governance-related actions were initiated, including the engagement of legal counsel (January 29, 2025) and implementation of a performance review process for the Executive Director (March 12, 2025). On April 10, 2025, proposed updates to governance roles and responsibilities were documented.

Between June 16 and June 23, 2025, a revised Shared Governance Agreement was developed between the CEO and LWDB; however, records indicate this version was not formally approved by the full Board. A publicly recorded LWDB meeting was held on July 17, 2025, reflecting ongoing coordination between the LWDB and County officials.

In September 2025, communications among LWDB leadership and County officials reflect increasing concerns regarding governance structure, committee roles, and communication protocols.

Beginning October 13, 2025, multiple communications raised concerns regarding governance actions, including allegations of interference, retaliation, and risks to LWDB recertification and WIOA funding. On October 14, 2025, the Coconino County Board of Supervisors (BOS) held a public meeting, approved Resolution No. 2025-65, and took action to remove the LWDB Chair.

Formal notification of this action was provided on October 15, 2025, by the County Attorney's Office, along with related correspondence regarding board governance and officer elections.

Between October 15 and October 21, 2025, extensive correspondence between LWDB members and County officials documented disputes regarding governance authority, due process, and alignment with WIOA and the Shared Governance Agreement. These communications also raised concerns regarding leadership removals, board independence, and adherence to established procedures. A subsequent LWDB meeting was noticed on October 17, 2025.

On October 22, 2025, a special LWDB meeting was held, which included discussion of placing the Executive Director on administrative leave.

In November 2025, communications indicate that the Executive Director was dismissed, with concerns raised regarding the process and alignment with governance agreements. The meeting minutes approved on November 4, 2025, documented actions taken by the BOS during an open meeting which included the removal of the LWDB Chair.

Between November 19 and November 20, 2025, OEO staff initiated follow-up inquiries with County officials as part of a compliance review. On December 9, 2025, the County Attorney's Office provided a formal response addressing questions related to governance actions, including the removal of the LWDB Chair and Executive Director, with supporting documentation for review.

Findings

The following findings present an assessment of the actions taken by the Coconino County Local Workforce Development Board (LWDB) and the Board of Supervisors (BOS)/Chief Elected Official (CEO) related to the removal of the LWDB Chair and associated governance activities occurring after October 2025. Findings are organized by key issues and themes identified during the inquiry, including adherence to statutory and policy requirements, compliance with the LWDB's governing documents, procedural accuracy, communication and documentation processes, and alignment with Workforce Arizona Council expectations for local board governance.

Each finding reflects the information gathered through document review, interviews, and policy analysis, and is presented without interpretation or judgment beyond the factual determination of compliance or noncompliance.

Finding #1: Removal of LWDB Chair – Verification Limitations

Based on available information, the basis and process for removal of the LWDB Chair could not be fully verified due to limited disclosure. The County indicated that supporting details were protected under attorney–client privilege.

As a result, it could not be determined whether all procedural and documentation requirements under WIOA §107 and applicable governance policies were followed.

Risk: This lack of verifiable documentation presents a risk of misalignment with:

- WIOA governance transparency expectations;

- Documentation standards necessary for state oversight; and
- Shared governance principles between the CEO and LWDB.

Description: The Local Workforce Development Area is non-compliant because the CEO prevented verification of statutory procedures being followed. The CEO also failed to establish LWDB bylaws consistent with state policy and federal requirements for inclusion of any other conditions governing appointments and membership. Furthermore, the CEO did not ensure that board business was conducted openly, as information regarding LWDB activities that are required under the bylaws were not made available to the public. Collectively, these issues demonstrate non-compliance with state and federal governance requirements.

- **Relevant Policy/Requirement:**

- WIOA Sec. 107(b) – Board Membership and Structure
Requires that Local Workforce Development Board (LWDB) appointments and removals follow established statutory and procedural requirements to ensure transparent and compliant governance.
- WIOA Sec. 107(c)(1) – Authority of Chief Elected Officials
CEOs are responsible for appointing LWDB members but must do so in accordance with WIOA, local governance agreements, and state policy—requiring documentation sufficient to verify compliance.
- WIOA Sec. 107(e) – Transparency and Accountability
Requires LWDBs and CEOs to operate in a manner consistent with applicable federal and state policies, including maintaining adequate documentation to substantiate governance actions such as removals.
- Workforce Arizona Council (WAC) – Local Governance Policy
Requires each local area to maintain a written governance agreement that outlines the procedures for LWDB member appointment and removal, including documentation standards that allow state-level compliance verification.
- Workforce Arizona Council (WAC) – LWDB Bylaws Requirements
Mandates that LWDB bylaws include clear, documented procedures for removing board members or officers, including the LWDB Chair, to ensure consistency, transparency, and auditability.
- Workforce Arizona Council (WAC) – Recordkeeping and Public Accountability Requirements
Requires local areas to maintain records demonstrating compliance with governance procedures so the State can verify that actions, including removals, were conducted according to approved policies and bylaws.

- **Supporting Information:**

- [October 14, 2025 Board of Supervisors Revised Agenda](#)
- [October 14, 2025 Board of Supervisors Meeting Summary](#)
- [2021 Shared Governance Agreement](#)
- [2025 Shared Governance Agreement](#) (see Finding #2)
- [October 20, 2025 Coconino County/OEO Meeting Transcript](#)
- [December 9, 2025 County Attorney Email](#)

- **Impact: Proactive measures are recommended to mitigate the potential for worsening effects.** Failure to document and follow required governance procedures under WIOA and WAC policy creates significant compliance risks, including:

- Breakdown in Required Shared Governance
WIOA requires CEOs and LWDBs to jointly manage workforce-system governance; lack of transparency or documentation undermines this statutory partnership.
- Risk to Local Area Certification
WAC policy ties LWDB compliance, including adherence to approved bylaws and governance agreements to ongoing local board certification and eligibility to administer WIOA funds.
- State Oversight and Corrective Action Exposure
Incomplete or non-verifiable documentation can trigger corrective action requirements from the State, including mandated revisions to governance processes.
- Reduced Public Accountability
WIOA and Arizona’s public-governance standards emphasize transparency; withholding the basis for significant board actions diminishes public trust and impedes state-level monitoring.

Finding #2: Shared Governance Agreement (2025)- Lack of Formal Approval

The 2025 Shared Governance Agreement was signed but not formally approved by the full LWDB. As a result, reliance on this agreement for governance actions may create ambiguity regarding which governing framework was in effect.

Risk:

- Potential inconsistency in application of governance authority;
- Uncertainty regarding validity of actions taken under the agreement;
- Misalignment with WIOA expectations for clearly established governance structures.

Description: A review of CWDB meeting minutes indicates that, although the 2025 Shared Governance Agreement update was shared with the LWDB and signed by the CWDB Chair, it was never formally presented for approval by the full LWDB. Because this agreement was referenced by the CEO as the basis for the removal of the CWDB Chair and Executive Director—and lacked formal Board approval—the governance structure defaults back to the previously approved Shared Governance Agreement.

Relevant Policy/Requirement:

- WIOA Sec. 107(c)(1) – Roles and Responsibilities of CEO and LWDB
Requires the establishment of local governance structures in accordance with state procedures, including agreements that define the roles, responsibilities, and authorities of the CEO and LWDB. Governance agreements must comply with state-established processes.
- Workforce Arizona Council (WAC) – Local Governance Policy
The LWDB and the CEO must enter into a written agreement that describes how the parties will carry out their shared governance functions and meet other LWDB requirements such as membership criteria, local policy, and communicating with elected officials and the public.

- **Supporting Information:**

- [2021 Shared Governance Agreement](#)

- [2025 Shared Governance Agreement](#)
- **Impact: Left unmitigated, this issue could pose a greater impact over time.**
Failure to obtain formal CWDB approval for the 2025 Shared Governance Agreement presents several compliance and operational risks under WIOA and Workforce Arizona Council policies. Specifically, relying on an unapproved agreement to make leadership or structural decisions may:
 - Invalidate or Call Into Question Actions: Including the removal of the CWDB Chair and/or Executive Director, due to the lack of an authorized governing document.
 - Undermine Required Transparency and Accountability: As mandated by WIOA that Board actions, including approval of governance documents, occur through documented, open-meeting processes.
 - Create Misalignment with Workforce Arizona Council Policies: Require Boards to operate under formally adopted governance structures and maintain clear, approved roles and authorities.
 - Expose the LWDB and CEO to Compliance Findings or Corrective Action: Decisions made without an approved governance framework may be viewed as exceeding delegated authority.
 - Disrupt Continuity of Operations: Uncertainty regarding which governance agreement is valid can impede decision-making, oversight responsibilities, and the proper separation of duties required under WIOA.

Finding #3: Bylaws Adoption- Incomplete Formalization

The 2023 bylaws were reviewed but not formally adopted by the LWDB in final form.

Risk:

- Lack of a clearly established governance framework;
- Uncertainty regarding procedures for board actions;
- Increased risk of inconsistent or unverifiable governance practices.

Description: During the review of CWDB governance documents and discussions regarding multiple versions of the bylaws to determine the most current version, it was identified that the 2023 bylaws, while reviewed by the CWDB, were never formally approved in their final form. As a result, the bylaws were not properly adopted in accordance with required governance and approval procedures, creating uncertainty regarding which bylaws are valid and enforceable.

- **Relevant Policy/Requirement:**
 - WIOA Section 107(b) and 107(c)
Requires Local Workforce Development Boards (LWDBs) to operate as formal governing bodies with clearly defined roles, responsibilities, and procedures. Board governance actions, including adoption of bylaws, must be conducted through official board action to ensure lawful and accountable operations.
 - 20 CFR § 679.310(a) – Local Workforce Development Board Functions
Assigns the LWDB responsibility for governance, policy development, and oversight of local workforce activities. This includes maintaining governing documents—such as bylaws—that are formally adopted and guide board operations.

- 20 CFR § 679.320(a) – Local Workforce Development Board Authority
Clarifies that the LWDB must exercise its authority in accordance with applicable federal, state, and local governance requirements, including adherence to formally approved governing documents.
 - Workforce Arizona Council (WAC) – Local Governance Policy
Workforce Arizona Council policy requires each LWDB to maintain current, formally approved bylaws that define board structure, membership, officer roles, meeting procedures, voting requirements, and other governance functions.
 - Workforce Arizona Council (WAC) – Local Governance Policy
WAC policy requires that bylaws be formally adopted by the LWDB through documented board action, typically via a vote conducted in compliance with open meeting requirements. Draft or reviewed versions that are not formally approved are not considered valid or enforceable.
 - Workforce Arizona Council (WAC) – Local Governance Policy
Local areas must ensure that governance documents, including bylaws, are current, internally consistent, and clearly identifiable as the operative version. Failure to formally approve bylaws creates uncertainty regarding board authority and compliance with state oversight expectations.
- **Supporting Information:**
 - [2019 CWDB Bylaws](#)
 - [2023 CWDB Bylaws](#)
- **Impact: The matter carries risk that may intensify under certain conditions(i.e:open meeting laws).**
Failure to formally approve the 2023 CWDB bylaws presents several governance and compliance risks under WIOA and Workforce Arizona Council policies. Specifically, the lack of formally adopted bylaws may:
 - Invalidate or Call Into Question Board Actions: Without a formally approved set of bylaws, it is unclear which governance rules are in effect, potentially affecting the validity of board decisions, officer elections, and procedural actions.
 - Undermine Required Transparency and Accountability: WIOA and WAC policies require board actions, including adoption of governing documents, to occur through documented, open-meeting processes. Draft or unapproved bylaws do not meet this standard.
 - Create Misalignment with Workforce Arizona Council Policies: Boards are required to operate under formally approved governance structures that clearly define roles, authorities, and responsibilities. Failure to adopt bylaws compromises compliance with these requirements.
 - Expose the LWDB and CEO to Compliance Findings or Corrective Action: Operating without formally approved bylaws may be viewed as exceeding delegated authority or failing to meet governance obligations, potentially triggering corrective action from the state.
 - Disrupt Continuity of Operations: Uncertainty regarding which bylaws are valid can impede decision-making, oversight responsibilities, officer roles, and the consistent application of governance procedures, impacting the CWDB’s ability to carry out its WIOA-mandated functions.

Finding #4: Executive Director Action- Governance Framework Ambiguity

Actions related to the Executive Director relied, in part, on provisions from governance documents that were not clearly established as being approved.

Risk:

- Potential misalignment between actions taken and governing authority;
- Reduced clarity in roles and responsibilities;
- Increased exposure to governance disputes.

Description:

A review of documents and meeting records determined that the removal of the CWDB Executive Director was not conducted in compliance with the currently valid 2021 Shared Governance Agreement (SGA). The CEO referenced the unapproved—and therefore invalid—2025 SGA when taking action to remove the Executive Director. The 2025 SGA, though never approved by the CWDB, states that the LWDB Executive Director “reports to the LWDB and to the CEO” and that “hiring, evaluation, and dismissal shall be a collaborative effort of the LWDB and CEO.” In contrast, the 2021 SGA, which remains the only approved and governing document, specifies that the LWDB Executive Director “functionally reports only to the LWDB” (with administrative payroll routing through the Coconino County Public Affairs Director) and that the LWDB retains full oversight, hiring, and dismissal authority for the Executive Director.

During the October 22, 2025 public CWDB meeting, the County shared its reasons for seeking the Executive Director’s removal, but did so for informational purposes and specifically to ensure they were demonstrating alignment with the 2025 SGA. Because this was a personnel agenda item, the Executive Director elected to have the discussion occur in a public session. At the meeting, the County and CWDB discussed the County’s stated reasons for suggesting removal and noted their intent to proceed with removal following the meeting. (The CWDB did not host a motion/vote for this agenda item.)

Because the 2025 SGA had not been formally adopted by the CWDB, reliance on its provisions—and actions taken under its framework—resulted in the Executive Director’s removal being conducted outside the agreed upon language under the valid 2021 Shared Governance Agreement.

- **Relevant Policy/Requirement:**

- WIOA Section 107(d)(8)
Requires that the Local Workforce Development Board (LWDB) employ an Executive Director (or equivalent position) to carry out the duties assigned by the board. This provision establishes the LWDB’s authority over the Executive Director role and reinforces that oversight, supervision, and employment decisions rest with the LWDB unless otherwise delegated through an approved governance agreement.
- 20 CFR § 679.310 – Local Workforce Development Board Functions
Assigns the LWDB responsibility for governance, policy direction, and oversight of local workforce activities, including staffing necessary to carry out board functions.
- 20 CFR § 679.320 – Local Workforce Development Board Authority
Clarifies that the LWDB has authority over its staff and operations consistent with state and local governance structures, reinforcing that employment decisions must align with formally approved agreements and policies.

- [Workforce Arizona Council \(WAC\) – Local Governance Policy](#)
Workforce Arizona Council policy requires each Local Workforce Development Area to maintain a formally approved Shared Governance Agreement between the Chief Elected Official (CEO) and the LWDB. The SGA defines roles, responsibilities, reporting relationships, and authority over personnel, including the Executive Director.
- **Supporting Information:**
 - [2021 Shared Governance Agreement](#)
 - [2025 Shared Governance Agreement](#)
 - [October 22, 2025 CWDB Meeting Agenda](#)
 - [October 22, 2025 CWDB Meeting Recording and Transcription](#) (timestamp 1:39)
 - [October 22, 2025 Meeting Minutes](#)
- **Impact: This concern warrants monitoring to prevent a more significant impact to the system.**
Failure to remove the CWDB Executive Director in accordance with the valid 2021 Shared Governance Agreement presents significant governance and compliance risks under WIOA and Workforce Arizona Council policies. Specifically, reliance on an unapproved governance framework and the absence of formal CWDB action will bring about the following situations:
 - Invalidate or Call Into Question the Removal Action: As the Executive Director’s removal was not approved by the CWDB as required under the governing 2021 Shared Governance Agreement.
 - Undermine Board Authority and Oversight: By bypassing the governance processes established in the Shared Governance Agreement—through which the LWDB is assigned responsibility for oversight and participation in decisions affecting the Executive Director.
 - Create Misalignment with Workforce Arizona Council Governance Policy: Which requires local areas to operate under formally approved Shared Governance Agreements that clearly define personnel authority and reporting relationships.
 - Expose the CWDB and CEO to Compliance Findings or Corrective Action: Actions taken outside an approved and enforceable governance agreement may be viewed as exceeding delegated authority under state and federal requirements.
 - Disrupt Continuity and Stability of Operations: Unclear or conflicting authority over the Executive Director role may impair leadership continuity, operational effectiveness, and the CWDB’s ability to carry out WIOA-mandated functions.

Finding #5: Roles and Responsibilities-Lack of Clarity

Documentation and stakeholder input indicate a lack of consistent understanding and application of roles between the CEO and LWDB.

Risk:

- Misalignment with WIOA §107 shared governance structure;
- Operational inefficiencies;
- Increased likelihood of conflicting governance actions.

Description:

During the compliance review, it was identified that the Local Workforce Development Area (LWDA) lacks a clearly documented and communicated understanding of the roles and responsibilities of key stakeholders, including the Chief Elected Official (CEO), Local Workforce Development Board (LWDB) members, LWDB staff, and the fiscal agent. Existing governance documents, including the Shared Governance Agreement and bylaws, either do not fully define these roles or are not consistently applied, resulting in ambiguity regarding decision-making authority, oversight responsibilities, and operational accountability across the LWDA.

- **Relevant Policy/Requirement:**

- WIOA Section 107(b) and 107(d): Requires the LWDB and CEO to have clearly defined roles, responsibilities, and oversight authority to ensure effective governance and accountability of local workforce programs.
- 20 CFR § 679.310 and § 679.320: Establishes that LWDBs must maintain structured governance and operational authority consistent with federal, state, and local requirements.
- 20 CFR § 679.400(a) – Local Director: Assigns responsibility to the LWDB Executive Director for carrying out board functions and operational oversight.
- 20 CFR § 679.400(d) – Local Staff: Clarifies that LWDB staff execute responsibilities under the direction of the board and in alignment with governance policies.
- 20 CFR § 679.420 – CEO Fiscal Agent Designation: Defines the CEO's role in designating a fiscal agent and ensuring proper oversight of financial operations.
- Workforce Arizona Council (WAC) Local Governance Policy: Requires that governance documents clearly delineate roles and responsibilities of the CEO, LWDB members, staff, and fiscal agent to ensure transparency, accountability, and proper execution of board functions.

- **Supporting Information:**

- [2021 Shared Governance Agreement](#)
- [2025 Shared Governance Agreement](#)

- **Impact: The potential for escalation exists if corrective actions are not taken.**

Without a clear understanding of each stakeholder's roles and responsibilities:

- Board members, staff, and the CEO may unintentionally exceed or fail to exercise their authority.
- Oversight of WIOA program operations and fiscal responsibilities may be inconsistent or ineffective.
- Compliance with WIOA, Workforce Arizona Council policy, and state oversight expectations may be jeopardized.
- Decision-making, accountability, and continuity of operations within the LWDA may be impaired.

Conclusions

This review identified several governance and procedural concerns that may affect alignment with WIOA requirements and state policy. These concerns primarily relate to documentation, formal adoption of governing documents, and clarity of roles between the CEO and the LWDB.

While this report does not make a formal determination of noncompliance, the issues identified present **elevated risk** to:

- Local board certification and recertification processes;
- Transparency and accountability; and
- Effective implementation of WIOA governance requirements.

These matters may warrant further review, technical assistance, or monitoring by ADES, consistent with the Governor's oversight responsibilities under federal regulation.

Specifically, the review identified the following:

- The basis for the removal of the LWDB Chair and Executive Director was not fully documented or verifiable, limiting transparency and accountability.
- The 2025 Shared Governance Agreement was referenced in decision-making despite not being formally approved by the full CWDB, resulting in actions taken outside the authority of the governing 2021 agreement.
- The 2023 CWDB bylaws were reviewed but never formally approved in final form, creating uncertainty regarding which governance rules are operative.
- The removal of the CWDB Executive Director did not comply with the approved 2021 Shared Governance Agreement, leading to potential misalignment with established authority and oversight responsibilities.
- Roles and responsibilities of the CEO, LWDB members, LWDB staff, and the fiscal agent are not clearly documented or consistently applied, creating operational and compliance risks.

Collectively, these findings indicate that while some governance processes exist, compliance requirements under WIOA and WAC policy have not been fully met. The lack of formal approval, documentation, and clarity in roles and responsibilities presents risks to the LWDB's operational effectiveness, transparency, and alignment with statutory and policy obligations.

To strengthen compliance, it is recommended that the LWDB and CEO prioritize formal approval of governance documents, clearly define and communicate stakeholder roles, and ensure all board actions follow documented procedures in accordance with WIOA and WAC policy requirements.

Recommendations

Consistent with the State Workforce Development Board's role under 20 CFR Part 679 Subpart A, the following actions are recommended for consideration:

Governance Alignment

- Formal adoption and documentation of bylaws and governance agreements;
- Clarification of roles and responsibilities between the CEO and LWDB consistent with WIOA §107.

Documentation and Transparency

- Strengthening recordkeeping practices to support state-level verification;
- Ensuring governance actions are documented and publicly accessible where required.

Capacity and Training

- Consider governance training for board members and staff;
- Provide technical assistance to support alignment with WIOA and state policy.

State Coordination

- Referral to ADES for further review, monitoring, or determination, as appropriate;
- Continued coordination with WAC to support system improvement and consistency.

The following actionable steps are recommended:

- Formal Approval of Governance Documents
 - Action: Formally review, approve, and document the 2023 CWDB Bylaws and all future amendments to the Shared Governance Agreement to meet WIOA and Workforce Arizona Council (WAC) requirements. All actions must be formally approved, reflected in official minutes, and retained for state and federal monitoring.
 - Responsible Parties: CWDB, CEO
 - Reasonable Timeline: Within 90 days
- Clarification of Roles and Responsibilities
 - Action: Develop and formally adopt a comprehensive Shared Governance Agreement that clearly defines the authority, duties, and accountability of the Chief Elected Official (CEO), Local Workforce Development Board (LWDB) members, LWDB staff, Executive Director, and Fiscal Agent. The document must specify operational and oversight responsibilities, approval and decision-making authority, fiscal and programmatic oversight, and reporting relationships, and be aligned with WIOA and applicable state policy.
 - Responsible Parties: CWDB Executive Director, CEO, CWDB
 - Reasonable Timeline: Within 90 days
- Policy and Regulation Review
 - Action: Conduct a formal review of all governance policies, bylaws, and related agreements to confirm alignment with WIOA statutory requirements, 20 CFR Part 679, and Workforce Arizona Council (WAC) Local Governance Policy. Revise, update, or replace documents as necessary to eliminate ambiguities, resolve inconsistencies, and clearly reflect current governance, oversight, and decision-making requirements. All revisions must be formally approved and documented.
 - Responsible Parties: CWDB Executive Director, CWDB, CEO, WAC staff (technical assistance optional)
 - Reasonable Timeline: Within 90 days
- Staff and Board Training
 - Action: Provide recommended technical assistance and training for CWDB members, CEO staff, and CWDB staff covering WIOA statutory and regulatory requirements, Workforce Arizona Council (WAC) policies, governance and fiduciary responsibilities, Arizona Open Meeting Law, and formally approved

board procedures. Training must reinforce adherence to approved governing documents, role clarity, and transparent, compliant decision-making practices.

- Responsible Parties: CWDB Executive Director, CWDB staff, WAC staff (technical assistance)
- Reasonable Timeline: Within 90 days, with annual refresher training
- Enhanced Monitoring and Controls
 - Action: Implement formal internal monitoring and control procedures to verify that all board actions—including member appointments and removals, adoption and amendment of governance documents, and other official actions—are conducted in accordance with formally adopted policies, WIOA requirements, and Arizona Open Meeting Law. Establish and maintain a centralized recordkeeping system to document approvals, meeting actions, and compliance for state oversight and monitoring.
 - Responsible Parties: CWDB Executive Director, CWDB Staff, CEO
 - Reasonable Timeline: Ongoing; initial procedures to be implemented within 60 days
- Communication and Transparency Improvements
 - Action: Implement standardized communication and transparency practices to document all board actions, including meeting agendas, minutes, and approval of governance documents, and make such records publicly available in accordance with WIOA transparency (“sunshine”) requirements, 20 CFR Part 679, Workforce Arizona Council (WAC) policy, and applicable state open meeting laws.
 - Responsible Parties: CWDB Executive Director, CWDB Staff
 - Reasonable Timeline: Immediate and ongoing
- State Reporting and Compliance Verification
 - Action: Submit comprehensive documentation of all completed governance updates—including final recertification materials, staff and board training records, and finalized roles and responsibilities—to the Workforce Arizona Council (WAC) for review and verification of compliance with WIOA requirements, 20 CFR Part 679, and applicable WAC policies.
 - Responsible Parties: CWDB, CEO, CWDB Executive Director
 - Reasonable Timeline: Within 90 days

Next Steps:

Sustained compliance and effective LWDB operations require regular review and updating of governance documents, roles, and operational procedures.

If Coconino County is able to carry out the completion of these actions in the reasonable timeframe being recommended it will close the identified compliance gaps, reinforce CWDB governance structures, improve transparency, and mitigate the risk of corrective actions being taken by the Governor and ADES as oversight authorities

2026 Arizona WIOA Unified State Plan Modification
Executive Brief for Workforce Arizona Council Members

Executive takeaway. This document is not just a required federal filing. It is Arizona’s operating blueprint for how ARIZONA@WORK will align strategy, funding, partner roles, sector priorities, and performance expectations for PY 2026–2027. For the Council, approval means endorsing a more explicit accountability structure, a refreshed labor-market case for priority investments, and tighter expectations for integrated service delivery across Titles I–IV.

What the State Plan is and Why it Matters

WIOA requires each state to maintain an approved Unified or Combined State Plan in order to receive funding for the core workforce programs. Arizona is continuing as a Unified State Plan state, covering Title I: Adult, Dislocated Worker, and Youth Title II: Adult Education; Wagner-Peyser Employment Service under Title III; and Vocational Rehabilitation under Title IV. No Combined Plan partner programs are being added in this modification.

The state plan defines whom the system serves, prioritizes industries and occupations, aligns education, training, and placement strategies, and sets performance measures. It also establishes strategic and operational expectations for ARIZONA@WORK partners, local areas, and state agencies.

What changed in the 2026 Modification

The modification does not replace the entire four-year plan. It is a status update of the PY 2024–2027 State Plan based on current economic conditions, current implementation realities, and updated federal expectations.

The most important changes are below.

Modification area	What changed	Why it matters
Labor market and demographics	Statewide and regional analysis is refreshed using the latest OEO labor-market products and State Demographer outputs rather than earlier 2022–2024 framing.	Council decisions on sectors, policy priorities, and resource alignment are now tied to a more current evidence base—not to a post-pandemic snapshot that is already aging.
Sector priorities	In-demand industries are revalidated and priority narratives are updated; the plan adds an updated emphasis on Information Technology as a cross-cutting capability supporting multiple industries.	WAC should read this as a recalibration of sector strategy. The system is being asked to invest where demand is strongest while also treating digital/IT capability as an enabling function across multiple pathways.

America's Talent Strategy	The plan adds a Five-Pillar crosswalk linking strategies, investments, and deliverables to an auditable implementation structure.	This gives the Council a clearer line of sight between strategy and execution. Oversight can move from broad endorsement to checking whether actions, workgroups, and investments actually map to deliverables.
Operations across Titles I–IV	Program operations are updated around intake/referral processes, data sharing, performance management, one-stop integration, and sector partnership operations.	For WAC, this is the most important implementation change. It signals that the state expects better cross-program coordination and a more consistent 'No Wrong Door' customer experience.

What the Updated Economic Analysis Is Telling Us

The refreshed economic analysis is not contextual; it provides the evidentiary basis for the plan's emphasis on employer alignment, pathway design, and performance discipline. Arizona's economy is still growing, but the current environment is more complex than it was during the rapid post-pandemic recovery period that followed COVID.

Economic signal	Council interpretation
Unemployment and participation	The unemployment rate sat at 4.1% from March to July 2025, while labor-force participation eased to 61.4% from a post-pandemic high of 62.0%. That suggests the central challenge is not simply job creation; it is participation, attachment, and matching.
Population growth and migration	Arizona continues to grow, with strong net domestic migration and another half-million residents projected by 2030. This supports long-term labor demand but also means service capacity, training infrastructure, and local alignment matter more.
Aging population	The state is projected to get older, with growth in the 65–74 and 75+ cohorts and a shrinking share of 15–24-year-olds. This raises the importance of adult upskilling, retention, accessibility, and replacement pipelines.

<p>Core in-demand industries</p>	<p>The analysis validates six in-demand industries: construction, health care and social assistance, wholesale trade, mining/quarrying/oil and gas extraction, transportation and warehousing, and manufacturing. WAC should expect policies and investments to remain tightly linked to these sectors.</p>
<p>Occupation quality</p>	<p>The plan identifies 89 core in-demand occupations employing roughly 24.5% of Arizona workers, with an average wage of \$86,093 compared with \$65,740 statewide. That is the clearest evidence that the state is aiming at quality occupations, not just any openings.</p>

Important nuance: the plan gives Information Technology greater strategic emphasis as a cross-cutting capability, rather than a stand-alone in-demand industry, due to the underlying economic analysis derived from recent job losses and wage softness. For the workforce system, that means IT should be treated less as a standalone sector and more as a capability embedded across each of the six identified in-demand industries.

What the Plan Means Operationally for the Workforce System

From strategy to operating discipline. The plan is more explicit that strategy must show up in day-to-day operations. Intake, referral, data-sharing, one-stop integration, and sector partnership work are no longer treated as background mechanics; they are part of the implementation strategy itself.

A stronger 'No Wrong Door' expectation. The WAC's board functions section reinforces an integrated, customer-centered ARIZONA@WORK model. For Council members, this means approval of the plan is also an endorsement of a more seamless customer journey across Titles I-IV, not a continuation of siloed program behavior.

Target-population specificity. The plan reiterates that WIOA strategies must address individuals with barriers to employment, not just the general population. That matters because federal expectations and state credibility increasingly depend on showing who is being served, where gaps remain, and whether rural, tribal, youth, veteran, disability, justice-involved, and English-learner populations are actually benefiting.

Business engagement with sharper expectations. The modification keeps employers at the center of workforce design through sector partnerships, work-based learning, apprenticeships, and skills-based alignment. WAC's role is not simply to encourage employer participation, but to verify that employer engagement is shaping curricula, credentials, and pathway design in ways that lead to real hiring outcomes.

Performance as a governing tool. Updating Appendix 1 and documenting methodology matters because performance is the Council’s main instrument for distinguishing implementation progress from implementation rhetoric. The more auditable the structure becomes, the less the system can rely on anecdotes and the more it must rely on evidence.

Why the State Plan Modification Is Important Moving Forward

1. It is the formal basis for continued federal funding and state compliance across the core WIOA programs.
2. It is the State of Arizona’s approved statement of statewide workforce direction: what sectors, outcomes, and operating changes are prioritized for the State and workforce system partners.
3. It is the bridge between high-level economic-development ambitions and the practical mechanics of service delivery, especially around one-stop integration, referrals, and performance management.
4. It provides a framework for governance. The board functions language makes clear what is expected to provide strategic leadership, policy guidance, oversight, sector validation, resource alignment, and continuous improvement.
5. It provides the strategic backbone for local decisions. Local boards, agencies, and partners will read this document for signals about what the state expects, what it may fund, and what it intends to measure.

Public Comment in Overall Review of the Modification

The public comment process for the WIOA PY 2026–2027 Arizona State Plan Modification was conducted from March 30, 2026, through April 3, 2026. The Public comment process functions as an external quality review of whether the draft modification is sufficiently clear, regionally grounded, operationally credible, and aligned with how the ARIZONA@WORK system actually operates. The comments provided do not reject the overall direction of the modification; rather, they largely ask for sharper specificity, stronger implementation language, and clearer articulation of roles, expectations, and system identity. The State Plan Modification team has worked to address these comments in the modification where applicable and appropriate.

Public Comment Themes

Strategy-to-execution alignment. Commenters point to a gap between statewide priorities and what appears to be reaching employers and participants on the ground. They note that only 20.7% of business clients served through ARIZONA@WORK between PY 2022 and PY 2024 were in in-demand industries, and they flag uneven training alignment across key subject areas. The implication is that sector strategy, ETPL design, and training investments may still need tighter calibration to employer demand.

Local governance and operating authority. A major cluster of comments asks the state to be explicit that coordination across Titles I-IV does not mean shared operational control. Commenters recommend clarifying that Local Workforce Development Boards retain Title I-B authority, that local plans and MOU/IFA agreements govern local service design, and that the One-Stop Operator role is limited to coordination rather than supervision or program control. This matters because integration must strengthen not obscure statutory roles and local governance.

Regional relevance and transition planning. Several comments note that statewide sector designations do not always reflect local economic realities and should be paired with clearer regional differentiation. Yuma's agriculture and cross-border logistics economy was specifically raised, along with the need for stronger rural and tribal consideration. Commenters also ask for clearer transition strategies when industries such as Information Technology or Finance and Insurance lose formal in-demand status but remain economically consequential or highly relevant to other priority sectors.

System identity and partner completeness. A recurring theme is that the plan should more clearly recognize the full ARIZONA@WORK system beyond the core-program lens of a Unified State Plan. Commenters call for stronger recognition of required one-stop partners, clearer use of the ARIZONA@WORK brand across programs, and better integration of Title IV/Vocational Rehabilitation and other partner functions into business services, referrals, and frontline staff identity.

Language, modernization, and implementation detail. Several comments ask the state to tighten plan language so the final document reflects current conditions and operational reality. Examples include updating future-tense references to data modernization, clarifying Rapid Response roles and approval language, strengthening ETPL quality-control wording, clarifying apprenticeship and ITA references, spelling out abbreviations consistently, and making sure the plan's discussion of digital literacy and technology readiness is current enough for an AI-shaped labor market.

Conclusions. The public comment themes are directionally supportive of the modification, but they signal that the final package will be stronger by addressing where statewide alignment ends and local authority begins; translate sector priorities into measurable implementation expectations; and ensure the narrative fully reflects the breadth of the ARIZONA@WORK partner system. These are not cosmetic edits. They go directly to credibility, implementation discipline, and the Council's oversight role.

Key Questions for WAC Members to Consider Moving Forward

1. Are the updated sector priorities truly reflected in investments, work-based learning strategy, and credential validation—or only in narrative language?
2. Will the revised one-stop and referral expectations produce a visibly better customer experience across Titles I–IV, especially for people with barriers to employment?
3. How will the America’s Talent Strategy crosswalk be used in practice to track deliverables, assign ownership, and report progress to the Council?
4. Do the updated performance levels create a realistic but rigorous accountability standard, and how often will the Council receive useful data against those targets?
5. Where are the greatest risks to execution—capacity, data quality, partner alignment, rural/tribal access, supportive services, or employer follow-through—and what should the Council monitor most closely?

Conclusion. The 2026 modification demonstrates that Arizona is moving from a broad four-year vision into a more implementation-focused phase. The system is being asked to operate with fresher labor-market evidence, clearer sector logic, stronger cross-program integration, and more auditable accountability. In practical terms, this plan matters because it is where strategy, governance, and execution finally meet.

Overview

Under the Workforce Innovation and Opportunity Act (WIOA), the Governor of each State must submit a Unified or Combined State Plan to the Secretary of the U.S. Department of Labor that outlines a four-year strategy for the State's workforce development system. The publicly-funded workforce development system is a national network of Federal, State, regional, and local agencies and organizations that provide a range of employment, education, training, and related services and supports to help all job-seekers secure good jobs while providing businesses with the skilled workers they need to compete in the global economy. States must have approved Unified or Combined State Plans in place to receive funding for core programs. WIOA reforms planning requirements, previously governed by the Workforce Investment Act of 1998 (WIA), to foster better alignment of Federal investments in job training, to integrate service delivery across programs and improve efficiency in service delivery, and to ensure that the workforce system is job-driven and matches employers with skilled individuals. One of WIOA's principal areas of reform is to require States to plan across core programs and include this planning process in the Unified or Combined State Plans. This reform promotes a shared understanding of the workforce needs within each State and fosters development of more comprehensive and integrated approaches, such as career pathways and sector strategies, for addressing the needs of businesses and workers. Successful implementation of many of these approaches called for within WIOA requires robust relationships across programs. WIOA requires States and local areas to enhance coordination and partnerships with local entities and supportive service agencies for strengthened service delivery, including through Unified or Combined State Plans.

Options for Submitting a State Plan

A State has two options for submitting a State Plan— a Unified State Plan or a Combined State Plan. At a minimum, a State must submit a Unified State Plan that meets the requirements described in this document and outlines a four-year strategy for the core programs. The six core programs are—

- the Adult program (Title I of WIOA),
- the Dislocated Worker program (Title I),
- the Youth program (Title I),
- the Adult Education and Family Literacy Act program (Title II), and
- the Wagner-Peyser Act Employment Service program (authorized under the Wagner-Peyser Act, as amended by title III),
- the Vocational Rehabilitation program (authorized under Title I of the Rehabilitation Act of 1973, as amended by Title IV).

Alternatively, a State may submit a Combined State Plan that meets the requirements described in this document and outlines a four-year strategy for WIOA's core programs plus one or more of the Combined State Plan partner programs. When a State includes a Combined State Plan partner program in its Combined State Plan, it need not submit a separate plan or application for that particular program. If included, Combined State Plan partner programs are subject to the "common planning elements" (Sections II-IV of this document) where specified, as well as the program-specific requirements for that program where such planning requirements exist separately for the program. The Combined State Plan partner programs are—

- Career and technical education programs authorized under the Carl D. Perkins Career and Technical Education Act of 2006, as amended by the Strengthening Career and Technical Education for the 21st Century Act (Perkins V) (20 U.S.C. 2301 et seq.)
- Temporary Assistance for Needy Families program (42 U.S.C. 601 et seq.)
- Employment and Training programs under the Supplemental Nutrition Assistance Program (programs authorized under section 6(d)(4) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(d)(4)))
- Work programs authorized under section 6(o) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(o))
- Trade Adjustment Assistance for Workers programs (Activities authorized under chapter 2 of title II of the Trade Act of 1974 (19 U.S.C. 2271 et seq.))
- Jobs for Veterans State Grants Program (programs authorized under 38, U.S.C. 4100 et. seq.)
- Unemployment Insurance programs (programs authorized under State unemployment compensation laws in accordance with applicable Federal law)
- Senior Community Service Employment program (programs authorized under title V of the Older Americans Act of 1965 (42 U.S.C. 3056 et seq.))
- Employment and training activities carried out by the Department of Housing and Urban Development
- Community Services Block Grant (Employment and training activities carried out under the Community Services Block Grant Act (42 U.S.C. 9901 et seq.))¹

[1] States that elect to include employment and training activities carried out under the Community Services Block Grant (CSBG) Act (42 U.S.C. 9901 et seq.) under a Combined State Plan would submit all other required elements of a complete CSBG State Plan directly to the Federal agency that administers the program. Similarly, States that elect to include employment and training activities carried out by the Department of Housing and Urban Development that are included would submit all other required elements of a complete State Plan for those programs directly to the Federal agency that administers the program.

How State Plan Requirements Are Organized

The major content areas of the Unified or Combined State Plan include strategic and operational planning elements. WIOA separates the strategic and operational elements to facilitate cross-program strategic planning.

- The **Strategic Planning Elements** section includes analyses of the State's economic conditions, workforce characteristics, and workforce development activities. These analyses drive the required vision and goals for the State's workforce development system and alignment strategies for workforce development programs to support economic growth.
- The **Operational Planning Elements** section identifies the State's efforts to support the State's strategic vision and goals as identified in the Strategic Planning Elements section. This section ensures that the State has the necessary infrastructure, policies, and activities to meet its strategic goals, implement its alignment strategy, and support ongoing program development and coordination. Operational planning elements include:

- State Strategy Implementation,
- State Operating Systems and Policies,
- Assurances,
- Program-Specific Requirements for the Core Programs, and
- Program-Specific Requirements for the Combined State Plan partner programs. (These requirements are available in a separate supplemental document, Supplement to the Workforce Innovation and Opportunity Act (WIOA) Unified and Combined State Plan Requirements. The Departments are not seeking comments on these particular requirements).

When responding to Unified or Combined State Plan requirements, States must identify specific strategies for coordinating programs and services for target populations¹. States must develop strategies that look beyond strategies for the general population and develop approaches that also address the needs of target populations. Use of links to external websites and documents is permitted within the State Plan narrative submission, if such links remain active and adhere to Section 508 accessibility requirements.

Paperwork Reduction Act: The Paperwork Reduction Act of 1995 (PRA) provides that an agency may not conduct, and no person is required to respond to, a collection of information unless it displays a valid OMB control number. Public reporting burden for this information collection is estimated to be 86 hours per state; including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Responding to this collection is required to obtain or retain the Federal grant benefit. In addition, responses to this information collection are public, and the agencies offer no assurances of confidentiality. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the U.S. Department of Labor, Office of Workforce Investment, and reference OMB control number 1205-0522. Note: Please do not return the completed plan to this address.

I. WIOA State Plan Type and Executive Summary

A. WIOA State Plan Type

Arizona is submitting a Unified State Plan. This modification covers the required core programs: Adult, Dislocated Worker, and Youth (Title I); Wagner-Peyser Act Employment Service (Title III); Adult Education and Family Literacy Act (Title II); and Vocational Rehabilitation (Title IV).

Combined Plan Partner Program(s)

Indicate which Combined Plan partner program(s) the state is electing to include in the plan.

¹ Target populations include individuals with barriers to employment, as defined in WIOA Sec. 3, as well as veterans, unemployed workers, and youth.

Career and technical education programs authorized under the Carl D. Perkins Career and Technical Education Act of 2006, as amended by the Strengthening Career and Technical Education for the 21st Century Act (Perkins V) (20 U.S.C. 2301 et seq.)

No

Temporary Assistance for Needy Families program (42 U.S.C. 601 et seq.)

No

Employment and Training programs under the Supplemental Nutrition Assistance Program (programs authorized under section 6(d)(4) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(d)(4)))

No

Work programs authorized under section 6(o) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(o))

No

Trade Adjustment Assistance for Workers programs (activities authorized under chapter 2 of title II of the Trade Act of 1974 (19 U.S.C. 2271 et seq.))

No

Jobs for Veterans State Grants Program (programs authorized under 38, U.S.C. 4100 et. seq.)

No

Unemployment Insurance programs (programs authorized under State unemployment compensation laws in accordance with applicable Federal law)

No

Senior Community Service Employment program (programs authorized under title V of the Older Americans Act of 1965 (42 U.S.C. 3056 et seq.))

No

Employment and training activities carried out by the Department of Housing and Urban Development

No

Community Services Block Grant (Employment and training activities carried out under the Community Services Block Grant Act (42 U.S.C. 9901 et seq.))

No

B. Plan Introduction or Executive Summary

[Letter from Governor Hobbs](#)

[Letter from Superintendent Tom Horne](#)

Updated Plan Introduction

This section is pending final transmittal materials. Updated transmittal letters, including an updated cover letter on behalf of Governor Katie Hobbs and an updated letter from Superintendent Tom Horne, will be included as part of the Workforce Arizona Council review and approval process.

Arizona's public workforce system (ARIZONA@WORK) is proud to submit this two-year modification to the WIOA PY 2024–2027 Unified State Plan to update priorities, strategies, and operational commitments for Program Years (PY) 2026–2027. This modification reflects current labor market and demographic conditions, stakeholder input received during the modification engagement period, and updated performance expectations and reporting requirements. The intent is to ensure workforce investments remain aligned to employer demand, support economic mobility for jobseekers, and strengthen service integration and accountability across required partner programs.

Consistent with the State Plan's overarching vision—an Arizona for everyone—this modification continues to advance a customer-centric workforce system that supports opportunity across urban, rural, and tribal communities in Arizona. The original Unified State Plan emphasized broad partner engagement, including three regional sessions (Central, Northern, and Southern) and participation by more than 130 state and local workforce leaders; the PY 2026–2027 modification builds on that foundation to keep strategies implementable, measurable, and aligned with current conditions.

Summary of Key Changes Since the PY 2024–2027 Unified Plan

The PY 2026–2027 modification incorporates targeted updates in the following areas:

1. Updated labor market and demographic analysis

The plan refreshes statewide and regional analysis using the most current Arizona Office of Economic Opportunity labor market information products and State Demographer outputs, replacing prior framing based on 2022–2024 conditions.

2. Revalidation of in-demand industries and priority sectors

The modification re-validates in-demand industries and updates priority sector narratives to reflect current growth and hiring patterns, including an updated emphasis on Information Technology as a cross-cutting sector supporting multiple industries.

3. America's Talent Strategy alignment and auditability

The modification adds an America's Talent Strategy Five-Pillar crosswalk to align strategies, investments, and deliverables to an auditable implementation structure, strengthening accountability for execution and outcomes.

4. Operational updates across Titles I–IV

The plan updates program operations and coordination across the required programs to reflect strategy-aligned service delivery, including intake and referral processes, data sharing and performance management practices, one-stop integration, and an updated sector partnership operating model.

5. Performance updates and methodology

The updated expected performance levels for PY 2026 and PY 2027, including documentation of the ESE (Retention with the Same Employer) methodology, as applicable, [can be found on page 259](#).

6. Stakeholder engagement and public comment documentation

The modification documents engagement specific to this update cycle, including the public comment process, outreach to required stakeholders, Workforce Arizona Council review, and a response matrix summarizing input received and how comments were addressed. Arizona's workforce system intends to apply this feedback as part of ongoing continuous improvement over the next two years, including through refinements to system practices, service strategies, and cross-partner coordination. In addition to informing implementation of this modification, stakeholder feedback and public comment will continue to be considered alongside future WIOA reauthorization, updated federal guidance, and continued engagement with partners statewide as Arizona works to strengthen the workforce system throughout the lifecycle of this State Plan and carry forward lessons learned into the development of the next State Plan. A summary of the public comment process and the response matrix are provided in Appendix 4.

Measurable Goals for PY 2026-2027

Arizona's PY 2026–2027 Unified State Plan modification is grounded in a statewide, collaborative approach to workforce strategy, one that is designed to grow the economy and position Arizona for long-term prosperity so that every Arizonan has the opportunity to benefit from an affordable and thriving economy. This approach reflects an intentional alignment among workforce system partners to strengthen and enhance practices, build system effectiveness, increase transparency, and better coordinate resources and strategies in support of shared statewide outcomes.

This modification builds on Arizona's recent and ongoing investments to expand access to high-quality training tied directly to employer demand. Through the **Future 48 workforce accelerators**, Arizona is preparing thousands of residents for jobs that are central to the nation's economic and security priorities, including **semiconductors, clean energy, aerospace, and defense**. Complementing these efforts, the **BuilditAZ Apprenticeship initiative** is advancing a clear capacity-building objective: **doubling the number of apprentices in construction and the trades** to ensure Arizona can meet current and emerging infrastructure and industry needs across a 21st-century economy.

The modification also recognizes that workforce participation and economic mobility are increasingly dependent on enabling infrastructure, particularly broadband connectivity. Building the infrastructure and deploying the technology required to expand **high-speed internet access statewide** is critical to business competitiveness, healthcare delivery, and educational access. This is especially true in **rural and tribal communities**, where connectivity gaps can compound barriers to employment, training participation, and service access. Investments that expand broadband access paired with a stronger higher education system, improved access to child care, and affordability supports help ensure that Arizonans in every region have a fair opportunity to pursue training, connect to services, and secure sustainable employment that supports themselves and their families.

Consistent with **Governor Katie Hobbs'** vision to make Arizona the best place to live, work, and raise a family, this Unified State Plan modification reinforces a cohesive, cross-partner approach to workforce development. It calls on system partners to think systematically about how services are delivered across programs and geographies; assess whether services are reaching priority populations; identify and eliminate gaps that limit access, quality, and outcomes; and continuously improve performance for both businesses and jobseekers. The focus is practical and measurable: a more prepared, more responsive workforce for Arizona employers, and a more navigable, integrated service experience for individuals seeking employment and advancement.

This Unified State Plan modification is submitted to ensure Arizona's WIOA plan remains current, implementable, and performance-driven for PY 2026–2027, while continuing to advance integrated service delivery and measurable outcomes for employers, jobseekers, and communities statewide. See Appendix 1 for the Commonly Used Abbreviations.

II. Strategic Elements

The Unified or Combined State Plan must include a Strategic Planning Elements section that analyzes the State's current economic environment and identifies the State's overall vision for its workforce development system. The required elements in this section allow the State to develop data-driven goals for preparing an educated and skilled workforce and to identify successful strategies for aligning workforce development programs to support economic growth. Unless otherwise noted, all Strategic Planning Elements apply to Combined State Plan partner programs included in the plan as well as to core programs. Where requirements identify the term "populations", these must include individuals with barriers to employment as defined at WIOA Section 3. This includes displaced homemakers; low-income individuals; Indians, Alaska Natives, and Native Hawaiians; individuals with disabilities, including youth who are individuals with disabilities; older individuals; ex-offenders; homeless individuals, or homeless children and youths; youth who are in or have aged out of the foster care system; individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers; farmworkers (as defined at section 167(i) of WIOA and Training and Employment Guidance Letter No. 35-14); individuals within 2 years of exhausting lifetime eligibility under the Temporary Assistance for Needy Families program; single parents (including single pregnant women); and long-term unemployed individuals. Additional populations include veterans, unemployed workers, and youth, and others that the State may identify.

A. Economic, Workforce, and Workforce Development Activities Analysis

The Unified or Combined State Plan must include an analysis of the economic conditions, economic development strategies, and labor market in which the State's workforce system and programs will operate.

1. Economic and Workforce Analysis

A. Economic Analysis

The Unified or Combined State Plan must include an analysis of the economic conditions and trends in the State, including sub-State regions and any specific economic areas identified by the State. This must include—

i. Existing Demand Industry Sectors and Occupations

Provide an analysis of the industries and occupations for which there is existing demand.

ii. Emerging Demand Industry Sectors and Occupations

Provide an analysis of the industries and occupations for which demand is emerging.

iii. Employers' Employment Needs

With regard to the industry sectors and occupations identified in (A)(i) and (ii), provide an assessment of the employment needs of employers, including a description of the knowledge, skills, and abilities required, including credentials and licenses.

Overview

Arizona's economy consists of a wide range of industries offering opportunities for individuals seeking employment of all types. However, despite experiencing a period of large growth following the COVID 19 pandemic between 2021 and 2023, Arizona's economy has slowed since 2024.

- Arizona's seasonally adjusted unemployment rate has remained at 4.1% from March 2025 to July 2025. This rate signifies the current upper bound on a period of gradual rate increases from a record low unemployment rate of 3.3% in March 2024.
- In July 2025, Arizona's labor force participation rate (LFPR) was down to 61.4% from a post-pandemic high of 62.0% in August 2023. This decline occurred even as labor force levels increased 2.2% between those two periods.
- From 2024 to 2026, Arizona's total employment is projected to grow by 67,079 jobs (1.0% annually); from 2023 to 2033, Arizona's total employment is projected to grow by 486,348 jobs (1.3% annually).
- From 2019 to 2024, Arizona's population increased by an estimate of 539,610 people (1.5% annually); from 2025-2030, Arizona's population is projected to increase by more than 531,000 (1.3% annually).
- In 2023, Arizona's net domestic migration was estimated at 62,533 people—most of Arizona's in-migration came from California, followed by Texas and Washington.
- In 2023, about a quarter of Arizona's population was aged 25 to 44 years old.
- From 2022 to 2032, Arizona's population is projected to get older: the percentage of the population aged 65 to 74 is projected to increase to 11.0% from 10.5% and the percentage of the population aged 75+ is projected to increase to 10.3% from 7.8%. During that same period, the percentage of the population aged 15-24 years old is projected to decrease to 13.4% from 14.7%.

An in-demand industry, as defined under the Workforce Innovation and Opportunity Act (WIOA), is an industry sector that has a substantial current or potential impact on the state economy and contributes to the growth or stability of other supporting businesses. In CY 2025, the Workforce Arizona Council (WAC) staff developed recommendations for in-demand industries and occupations based on the latest

labor market data. These industry sectors were selected because they present significant sources of economic opportunity for both job seekers and employers. Existing and emerging industries were defined as industries with either a large and strong statewide presence or smaller but fast-growing workforce, respectively. In-demand industries were selected, in part, because they express healthy employment levels (including historic and projected levels) and average weekly wages. In addition to qualitative discussions, the following variables were considered for each industry: current employment level, projected percent employment change, historical and projected numeric employment change, average weekly wage, historical wage growth, employment location quotient, and wage location quotient.

From 2021 Q3 to 2024 Q3, in-demand industry employment grew by an average of 4.9% annually, while Arizona total private sector employment grew by 3.0%. In-demand industry employment growth is projected to outpace Arizona total employment growth through 2026, growing 1.8% annually. In comparison, Arizona total employment is projected to increase by 1.0% annually from 2024 to 2026. In-demand industries also provide competitive and quickly growing wages: three of the six in-demand industries offer higher wages in Arizona when compared to other geographies and all six industries recorded positive wage growth from 2021 Q3 to 2024 Q3. Table 1 and Table 2 display wage and employment characteristics among in-demand industries, respectively.

Table 1: In-Demand Industries – Average Wage

NAICS Code	Industry Title	Average Weekly Wage (2024 Q3)	Wage Location Quotient* (2024 Q3)	Average Weekly Wages Annual Percent Change (2021 Q3 - 2024 Q3)
23	Construction	\$1,474	1.0	6.9%
62	Health care and social assistance	\$1,265	1.1	2.9%
42	Wholesale trade	\$1,903	1.1	4.6%
21	Mining, quarrying, and oil and gas extraction	\$1,923	0.9	7.4%
48	Transportation and warehousing	\$1,140	1.0	4.6%
31	Manufacturing	\$1,793	1.2	2.5%

* A wage location quotient (LQ) allows for wages within one industry to be compared across different geographic areas. An industry with an above-average wage LQ (where LQ>1.0) is an indication that industry employees within the local area receive higher wages than employees working in the same industry elsewhere.

Table 2: In-Demand Industries – Individuals Employed

Industry Title	Employment Level (2024 Q3)	Employment Location Quotient* (2024 Q3)	Historical Employment Annual Percent Change (2021 Q3 - 2024 Q3)	Projected Employment Numeric Change (2024-2026)	Projected Employment Annual Percent Change (2024-2026)
Construction	226,266	1.3	7.9%	7,710	1.7%
Health care and social assistance	463,593	1.0	5.0%	27,123	2.8%

Wholesale trade	120,562	0.9	5.9%	3,228	1.3%
Mining, quarrying, and oil and gas extraction	14,739	1.2	7.0%	659	2.2%
Transportation and warehousing	137,997	1.0	2.7%	2,400	0.8%
Manufacturing	194,706	0.7	2.3%	979	0.3%

* An employment location quotient (LQ) allows for employment within one industry to be compared across different geographic areas. An industry with an above-average employment LQ (where LQ>1.0) is an indication that an industry employs more people in the local area than in other regions.

Source: Office of Economic Opportunity

Construction

The Construction industry has recorded steady and sustained employment growth following the dramatic declines that occurred during the COVID-19 Pandemic. From 2021 Q3 to 2024 Q3, the Construction industry recorded the largest employment increase of all the selected in-demand industries, growing by 7.9% annually and boasts the largest employment location quotient of the in-demand industries. Employment is projected to grow from 2024 to 2026 but at a lower rate of 1.6% annually. Additionally, the construction industry had the second largest annualized weekly wages percentage increase among the in-demand industries from 2021 Q3 to 2024 Q3 of 6.9%.

Health Care and Social Assistance

Health Care and Social Assistance is one of the largest industries in the state and has also recorded strong growth after the pandemic. From 2021 Q3 to 2024 Q3, employment in Health Care and Social Assistance grew 5.0% annually with approximately 27,123 jobs.. Among the in-demand industries, Healthcare and Social Assistance comprises the largest number of jobs with 463,593 jobs recorded in 2024 Q3. and is projected to gain the most jobs from 2024 to 2026 (27,123 jobs, 2.8% annual growth). While having the second lowest annualized weekly wage growth of 2.9% among the in-demand industries from 2021 Q3 to 2024 Q3, this industry recorded slightly higher than average weekly wages in 2024 Q3, with a wage location quotient of 1.1.

Wholesale Trade

Employment in Wholesale Trade grew 5.9% annually from 2021 Q3 to 2024 Q3 and is projected to grow from 2024 to 2026, but at a lower rate of 1.35 annually. Despite the positive growth, this industry recorded slightly below average employment in Arizona in 2024 Q3. Weekly wages also grew moderately compared to other in-demand industries with 4.6% annualized growth from 2021 Q3 and 2024 Q3, and the industry boasts slightly above average wages with a wage location quotient of 1.1 in 2024 Q3.

Mining, Quarrying, and Oil and Gas Extraction

Although Mining, Quarrying, and Oil and Gas Extraction makes up a smaller share of employment across the state and has the lowest employment level in 2024 Q3 compared to other in-demand industries, employment in this industry was above average compared to other regions in 2024 Q3, and the industry boasts high wages and strong employment growth and projections. Among in-demand industries, Mining, Quarrying, and Oil and Gas Extraction has the second highest employment location quotient of 1.2, and the second highest employment annualized percentage growth of 7.0% from 2021 Q3 to 2024

Q3. In terms of wages and compared to other in-demand industries, weekly wages grew the fastest from 2021 Q3 to 2024 Q3 (7.4% annually) and in 2024 Q1 this industry recorded the highest weekly wage of \$1,923 in 2024 Q3, despite a slightly below average wage location quotient of 0.9 in that same quarter.

Transportation and Warehousing

While recording sustained growth prior to the pandemic, Transportation and Warehousing growth has slowed in recent years. From 2010 to 2020, average annual employment in Transportation and Warehousing grew by around 5% annually. Recently, from 2021 Q3 to 2024 Q3, Transportation and Warehousing employment grew at an annual rate of 2.7%. This slower trend is expected to continue: the industry is projected to gain approximately 2,400 jobs from 2024 to 2026 (0.8% annually). Compared to other in-demand industries, wages have grown moderately within this industry at 4.6% annually from 2021 Q3 to 2024 Q3.

Manufacturing

Manufacturing in Arizona has made a recovery after years of decline in the early 2000s. Manufacturing employment peaked at 213,400 jobs in 1998 before steadily declining to 149,000 jobs in 2010. From 2010 to 2020, the Manufacturing industry grew by about 2% annually. Statewide Manufacturing employment growth has continued to speed up in recent years, growing by an annualized rate of 2.3% from 2021 Q3 to 2024 Q3, despite having the lowest employment location quotient among the in demand industries. Manufacturing employment is projected to grow from 2024 to 2026, but at a lower rate of 0.3%. Wages in this industry have grown 2.5% from 2021 Q3 to 2024 Q3 and the industry does boast above-average weekly wages: the average weekly wage was the third highest of the in-demand industries (\$1,793) and the 2024 Q 3 wage location quotient was one of the highest at 1.2.

CY 2023 In-Demand Industries No Longer Defined as In-Demand

Finance and Insurance

The Finance and Insurance industry has a strong presence within the Arizona economy, with 169,589 jobs estimated in 2024 Q3. However, despite having an above average wage location quotient in 2024 Q3, this industry has lost jobs from 2021 Q3 to 2024 Q3 (-1.7% annually). While employment is projected to grow from 2024 to 2026, that growth is projected at only 0.3% annually, or 957 jobs. Weekly wages in this industry have grown 3.1% annually from 2021 Q3 to 2024 Q3, but this industry recorded a below average wage location quotient of 0.8 in 2024 Q3.

Information Technology (IT)

Information Technology was previously identified as an emerging industry within Arizona. While Information Technology is not officially defined under the North American Industrial Classification System (NAICS), previous employment growth for specific high-tech subsectors was large enough that a portion of the larger Information sector had been targeted as an in-demand industry.

Despite earlier signs of projected employment growth after the pandemic, and an above average employment location quotient in 2024 Q3, Information Technology recorded substantial job losses (-19.6% annually) from 2021 Q3 to 2024 Q3. Job losses are also projected to continue in 2024 to 2026,

but at a lower rate (-0.4% annually). Additionally, wages in this industry fell from 2021 Q3 to 2024 Q3 (-0.3% annually) and the industry recorded a slightly below average wage location quotient in 2024 Q3.

Retail Trade

Retail trade is another industry with a large share of total employment in the state. In 2024 Q3, the employment level for Retail Trade was 340,942. In addition to large levels of employment, this industry also recorded above average wage and employment location quotients in 2024 Q3. However, weak historic employment, projected employment loss, and low wages were recorded for this industry. Employment grew only 0.3% annually from 2021 Q3 to 2024 Q3 and this industry is projected to lose jobs from 2024 to 2026 (-0.1% annually). Despite modest wage growth of 2.3% from 2021 Q3 to 2024 Q3, the estimated weekly wage in 2024 Q3 was \$862, lower than all of the in demand industries.

Future Ready Focused Sub-Industries

In addition to defining Arizona's in-demand industries, OEO has identified future ready sub-industries using grant funding from the Family and Worker's Fund Powering Climate & Infrastructure Careers Challenge (PCICC). These subindustries were identified using Arizona job posting data to pinpoint 6-digit SOC and NAICS codes with a higher relative contribution to the state's future sustainability. This classification system provides workforce system stakeholders with information on where to focus efforts if aiming to maximize sustainability in the state.

For a list of sub-industries within the In-Demand sectors identified as sustainable, please see Appendix 3 of this report.

In-Demand Occupations

The Workforce Arizona Council (WAC) identified 89 core in-demand occupations. The occupations selected were defined as those with large projected numeric employment change, significant percentage employment change, substantial annual job openings, and high hourly wages within the in-demand industries. Extra care was taken to select quality occupations accessible at every education level by using the Office of Economic Opportunity's (OEO) 5-star model which identifies the top occupations by education level. Projected employment change (percent and numeric), annual job openings, hourly wages, and the Occupational Information Network (ONET) score are ranked for each occupation and then averaged together with equal weighting. Occupations were rated with respect to their required educational attainment; hence, 5-star occupations can be found within all education levels. This helps to ensure an equitable treatment of each educational level when promoting high-value occupations.

In 2024, there were 783,801 individuals employed within in-demand occupations, roughly 24.5% percent of Arizona's total employment. From 2024 to 2026, employment in in-demand occupations is projected to grow 1.7% annually. The core in-demand occupations also provide above-average wages for employees. In 2024, the average wage for in-demand occupations was \$86,093, while average wages for all occupations was \$65,740.

A complete list of the 89 in-demand occupations selected by the WAC is available in Appendix 2.

Table 3: Core In-Demand Occupations – Employment & Wages

# of Occupations	2024 Average Wage	2024 Employment	Share of 2024 Total Employment	Projected Annual Growth Rate
89	\$86,093	783,801	24.5%	1.7%

Source: Office of Economic Opportunity

(iii) Employers’ Employment Needs. With regard to the industry sectors and occupations identified in (A)(i) and (ii), provide an assessment of the employment needs of employers, including a description of the knowledge, skills, and abilities required, including credentials and licenses.

Identifying future employment demands can ensure that individuals are investing time and energy into the right skill sets to meet the needs of employers. Table 4 identifies the most common knowledge, skills, and abilities required for employment within Arizona In-Demand occupations. This data is collected from the O*NET database, where it is assessed by occupational analysts; the Arizona OEO provides assessment for the selected in-demand occupations.

Table 4: In-Demand Occupations Top Required Knowledge, Skills, and Abilities

Knowledge	Skills	Abilities
Customer and Personal Service	Reading Comprehension	Oral Comprehension
Mechanical	Active Listening	Oral Expression
Building and Construction	Coordination	Problem Sensitivity
Medicine and Dentistry	Monitoring	Near Vision

Source: Arizona Economic Opportunity, O*NET

Certifications and licenses are often occupation-specific. All occupations, including Arizona’s In-Demand occupations, are on the CareerOneStop website.

- For Certifications: <https://www.careeronestop.org/Toolkit/Training/find-certifications.aspx>²
- For Licenses: <https://www.careeronestop.org/Toolkit/Training/find-licenses.aspx>³

Further, as artificial intelligence (AI) becomes more significant to the economy, OEO recognizes the importance of research on AI’s impact on the labor market. OEO has begun literature reviews of AI research and intends to undertake its own research on how AI is influencing the job market.

In addition to required knowledge, skills, and abilities, each in-demand occupation can be categorized by its minimum education requirement. Table 5 and Figure 1 display the count of in-demand occupations by minimum education requirements. 37 occupations require at least a high school diploma; the most common educational requirement among the in-demand occupations.

² <https://www.careeronestop.org/Toolkit/Training/find-certifications.aspx>

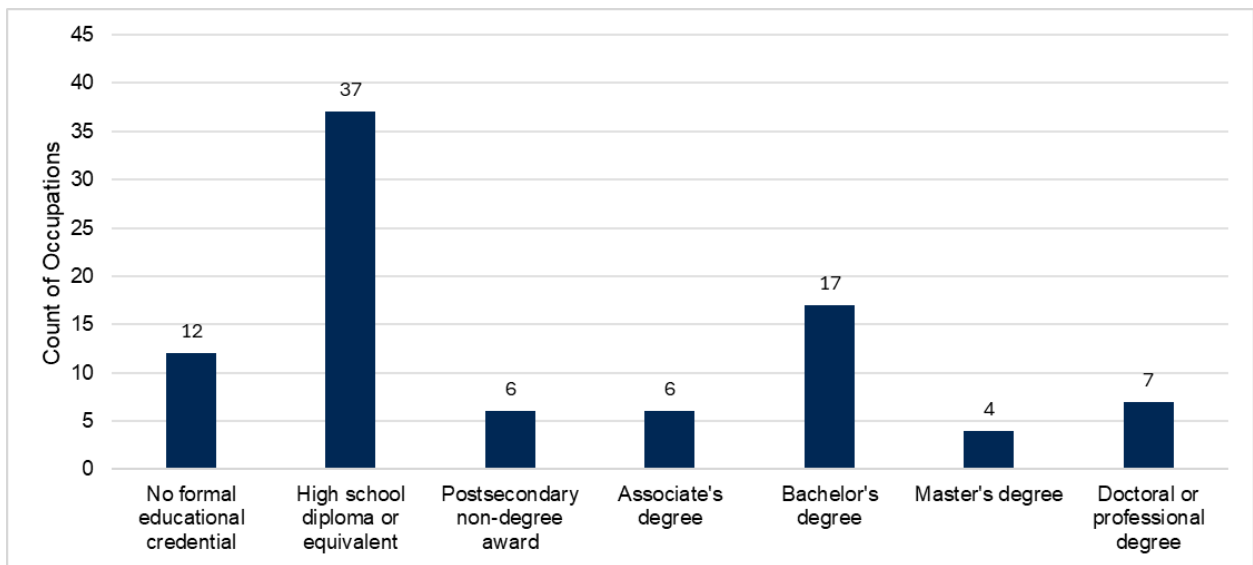
³ <https://www.careeronestop.org/Toolkit/Training/find-licenses.aspx>

Table 5: In-Demand Occupations – Count of Occupations by Education Requirement

Education Requirement	Count of Core In-Demand Occupations
No formal educational credential	12
High school diploma or equivalent	37
Postsecondary non-degree award	6
Associate's degree	6
Bachelor's degree	17
Master's degree	4
Doctoral or professional degree	7

Source: Office of Economic Opportunity

Figure 1: Core In-Demand Occupations – Count of Occupations by Education Requirement



Source: Office of Economic Opportunity

B. Workforce Analysis

The Unified or Combined State Plan must include an analysis of the current workforce in the State and within various state regions. Provide key analytical conclusions in aggregate as well as disaggregated among populations to identify potential disparities in employment and educational attainment and understand labor force conditions for items (i)-(iii) below. Populations analyzed must include individuals with barriers to employment described in the first paragraph of Section II. Analysis must include—

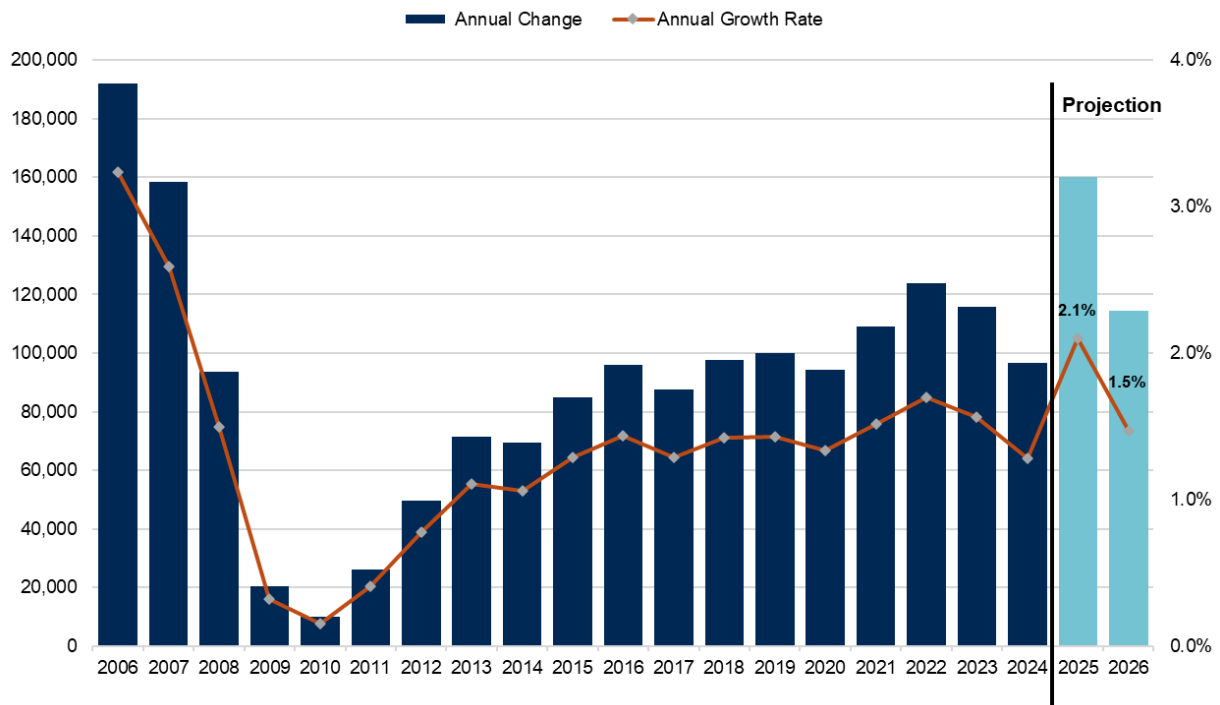
i. Employment and Unemployment

Provide an analysis of current employment and unemployment data, including labor force participation rates, and trends in the State.

Population

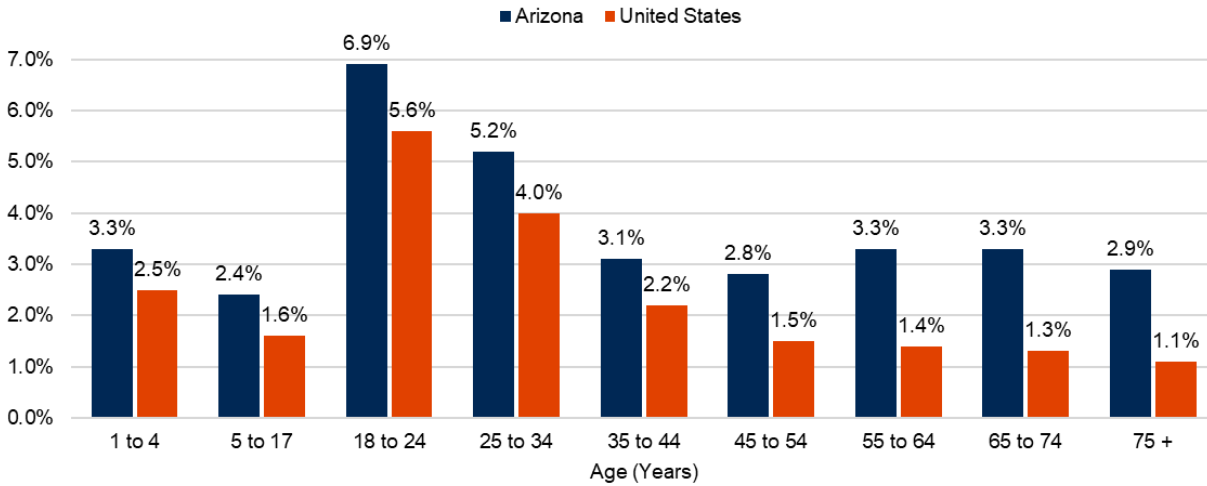
Arizona's population increased by 1.3% (96,590 individuals) in fiscal year 2024 (FY2024) (Figure 2). 91% of this growth is attributed to net migration to the state. Arizona's natural change (births minus deaths) accounted for 9% of this change. Over the next decade, total net migration is projected to remain the driving force of population change in Arizona, while natural change is projected to decrease. Figures 3 and 4 show the Census Bureau's breakdown of 2024 Arizona in-migration by Age and Education level.

Figure 2: Arizona's Population Growth and Growth Rates, 2006-2026



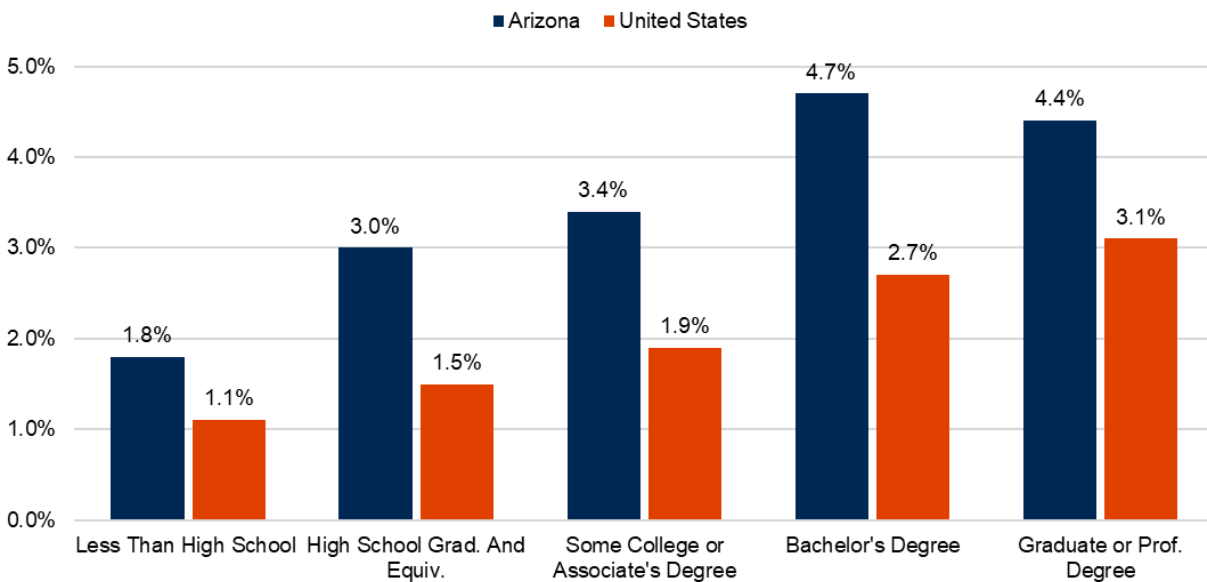
Source: Arizona Office of Economic Opportunity

Figure 3: 2023 Migration by Age Range, Moved From Different State



Source: U.S. Census Bureau, American Community Survey, 2023 5-Year Estimates, Table S0701; Arizona Office of Economic Opportunity

Figure 4: 2021 Migration by Education Level, Moved From Different State



Source: U.S. Census Bureau, American Community Survey, 2023 5-Year Estimates, Table S0701; Office of Economic Opportunity

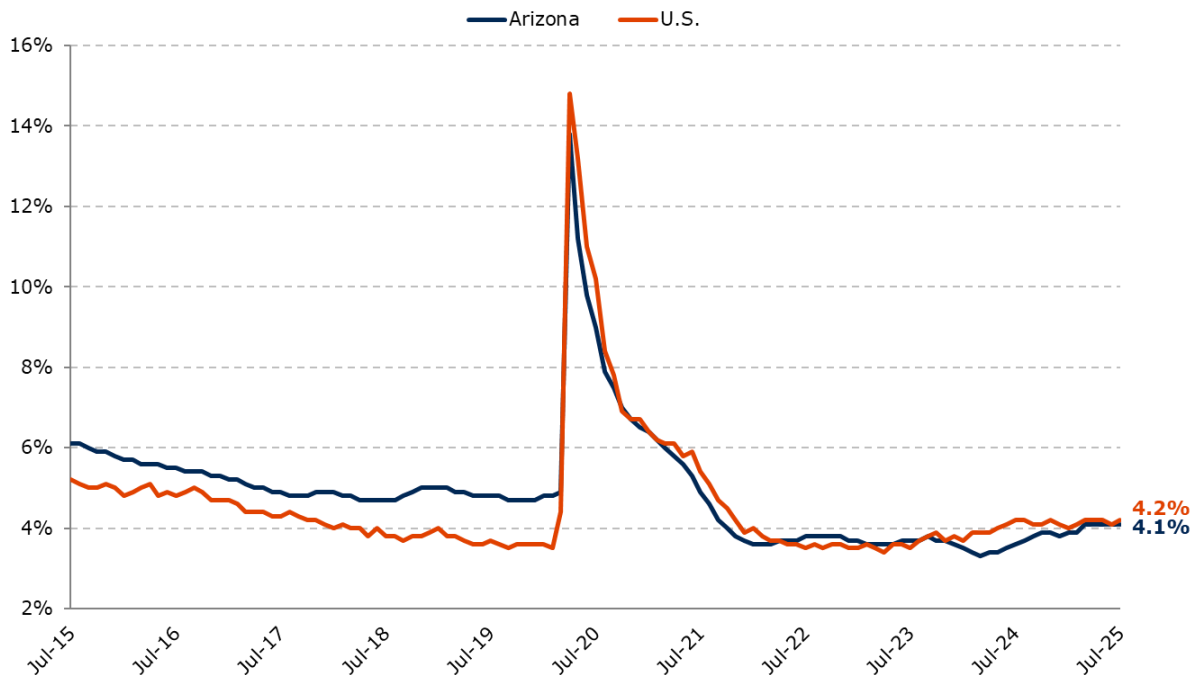
Arizona’s population growth rate has exceeded 1.0% every year after CY 2012 (Figure 2). Due to impacts from the Great Recession, 2009 and 2010 had particularly low population growth rates. The employment levels in Arizona declined during these years, and, as employment opportunity is a major driver of population increases, net migration decreased as well. As the state recovered, net migration began to increase. This population growth can, in turn, fuel additional economic growth through the infusion of new consumers demanding goods and services.

Unemployment

In March 2024, Arizona had an unemployment rate of 3.3%, the lowest statewide unemployment rate since 1976. This historic low fell at the tail end of a period of low unemployment that succeeded the COVID-19 induced economic downturn in February 2020 (see Figure 5). However, since March 2024, Arizona’s unemployment rate has gradually increased until March 2025, where unemployment steadied at 4.1% through July 2025. Prior to the pandemic (April 2008 to March 2020), the Arizona unemployment rate consistently trended above the U.S. unemployment rate. After the pandemic, Arizona and the U.S. had similar unemployment rates, with the prepandemic trend reversing in late 2023 through 2024. As the unemployment rate gradually increased in Arizona after March 2024 and into early 2025, the Arizona and U.S. unemployment rates were again comparable. Currently, Arizona’s unemployment rate still sits below pre-pandemic levels, while the national unemployment rate sits above the lowest pre-pandemic levels.

From 2010 to 2024, Arizona’s civilian noninstitutional population increased by 25.5% percent. During that same period, the civilian noninstitutional population in the United States grew by 13%. Consequently, a population increase in Arizona led to an increase in labor force levels, with the annual average labor force in 2024 being 23% larger than the annual average in 2010. These disparate trends are projected to continue into the next two decades: Arizona’s annual total population growth rate is projected to be almost four times as high as the nation’s rate through 2045 (1.1% and 0.3%, respectively).

Figure 5: Seasonally Adjusted Arizona & U.S. Unemployment Rate



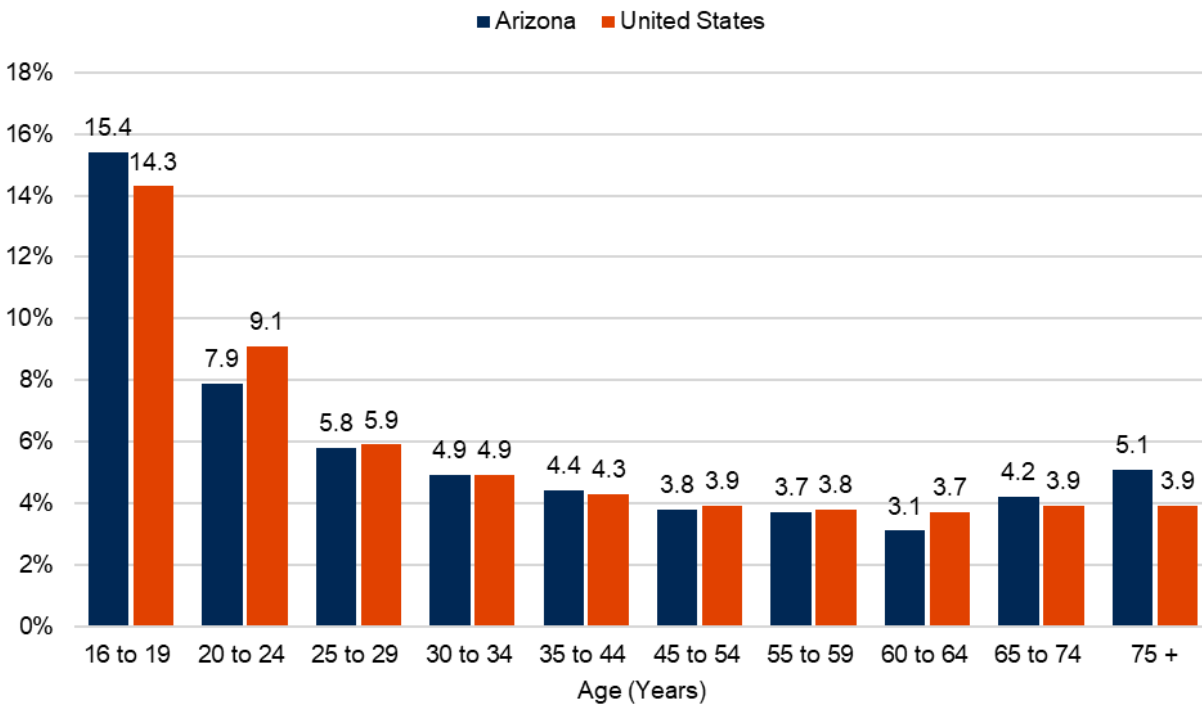
Source: Produced by the Arizona Office of Economic Opportunity in cooperation with the U.S. Dept. of Labor, BLS

In the years following the Great Recession, Arizona’s unemployment rate trended downward. Towards the end of the recovery period, 2017 through 2019, the Arizona unemployment rate began to stabilize

around 4.9%. This change in trend was largely due to an increase in labor force levels: Arizona labor force growth was among the fastest of all states during this period.

Unemployment rates can vary based on different demographic characteristics. Table 6 and Figure 6 display 2023 unemployment rates by age group for Arizona and the United States. Unemployment rates were lowest among individuals aged 60 to 64 in both the United States and Arizona. Conversely, in both the United States and Arizona, unemployment rates were highest for individuals aged 16 to 19. Historically, younger age groups have had higher unemployment rates when compared to older age groups. This gap in unemployment rates is partly due to the difference in the level of work experience and skills acquired by the two age groups, with individuals in younger age categories typically having less of each than individuals in older age categories.

Figure 6: 2023 Unemployment Rate by Age Group



Source: U.S. Census Bureau, American Community Survey, 2023 5-Year Estimates, Table S2301; Office of Economic Opportunity

Labor Force

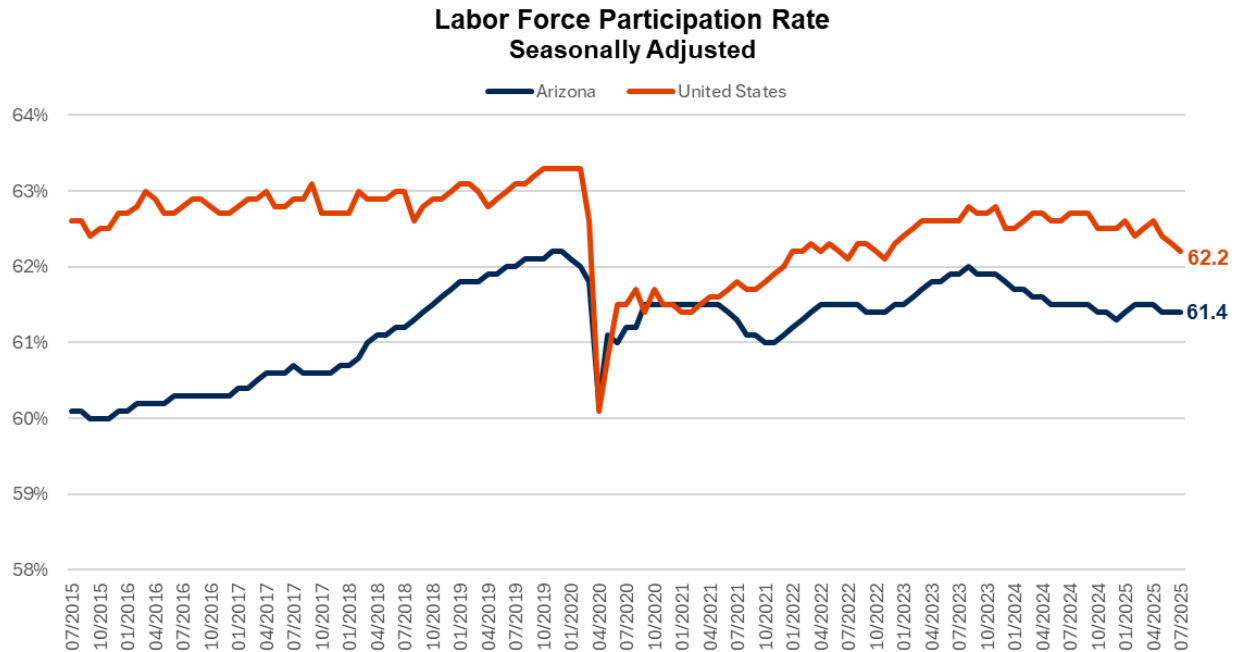
In July 2025, Arizona had a labor force participation rate⁴ (LFPR) of 61.4%.⁵ This rate follows a gradual decline in labor force participation from the post-pandemic high of 62.0% in August 2023. Despite the decline in LFPR in this time period, labor force levels have increased by 2.3% from August 2023 to July

⁴ The labor force participation rate (LFPR) is the labor force as a percent of the civilian noninstitutional population.

⁵ The civilian noninstitutional populations include persons 16 years of age and older residing in the 50 States and the District of Columbia who are not inmates of institutions (for example, penal and mental facilities, homes for the aged), and who are not on active duty in the Armed Forces.

2025. This equates to an increase of 86,902 individuals. Relative to the pre-pandemic labor force peak in January 2020, levels have risen by 315,742 individuals, marking 9.1% growth, as of July 2025.

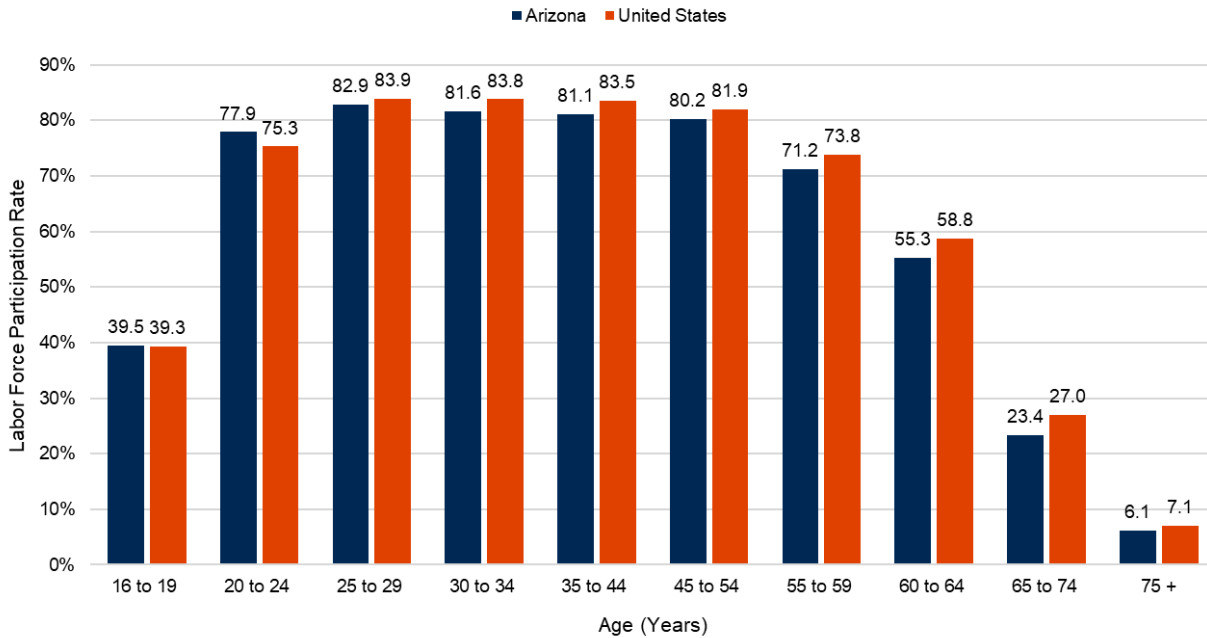
Figure 7: Labor Force Participation Rate



Source: Produced by the Arizona Office of Economic Opportunity in cooperation with the U.S. Dept. of Labor, BLS

Table 6 and Figure 8 display the 2023 U.S. and Arizona LFPR for ten distinct age categories. Among all age groups, the LFPR was highest among the 25- to 29-year-old age group. Except for individuals aged 16 to 24 years old, the LFPR trended higher nationally than statewide. There was a 3.6 percentage point difference between the LFPR among those 65 to 74 years old in Arizona and in the United States—this was the largest difference among all age groups.

Figure 8: 2023 Labor Force Participation Rate by Age Group



Source: U.S. Census Bureau, American Community Survey, 2023 5-Year Estimates, Table S2301; Office of Economic Opportunity

Table 6: Unemployment and Labor Force Participation Rate by Demographic Characteristics, 2023

Demographic	Arizona			United States			
	Unemployment Rate	Employment/Population Ratio	Labor Force Participation Rate	Unemployment Rate	Employment/Population Ratio	Labor Force Participation Rate	
Age	16 to 19 years	15.4%	33.2%	39.5%	14.3%	33.3%	39.3%
	20 to 24 years	7.9%	70.2%	77.9%	9.1%	66.9%	75.3%
	25 to 29 years	5.8%	77.1%	82.9%	5.9%	77.8%	83.9%
	30 to 34 years	4.9%	76.9%	81.6%	4.9%	78.8%	83.8%
	35 to 44 years	4.4%	77.0%	81.1%	4.3%	79.3%	83.5%
	45 to 54 years	3.8%	77.1%	80.2%	3.9%	78.5%	81.9%
	55 to 59 years	3.7%	68.6%	71.2%	3.8%	71.0%	73.8%
	60 to 64 years	3.1%	53.6%	55.3%	3.7%	56.7%	58.8%
	65 to 74 years	4.2%	22.4%	23.4%	3.9%	25.9%	27.0%
	75 years and over	5.1%	5.7%	6.1%	3.9%	6.9%	7.1%

Race and Hispanic or Latino Origin	White alone	4.6%	55.0%	58.1%	4.3%	59.2%	62.3%
	Black or African American alone	8.2%	61.7%	68.1%	8.7%	57.4%	63.5%
	American Indian and Alaska Native alone	10.3%	48.6%	54.3%	7.9%	56.0%	61.2%
	Asian alone	3.1%	64.6%	66.9%	4.3%	63.3%	66.5%
	Native Hawaiian and Other Pacific Islander alone	6.9%	61.1%	67.5%	7.2%	59.5%	65.7%
	Some other race alone	4.8%	61.6%	65.0%	6.2%	63.2%	67.8%
	Two or more races	6.1%	62.3%	66.7%	6.5%	62.8%	67.7%
	Hispanic or Latino origin (of any race)	5.5%	62.8%	66.8%	6.0%	63.6%	68.2%
	White alone, not Hispanic or Latino	4.4%	53.7%	56.6%	4.2%	58.8%	61.8%
Educational Attainment (Population 25 Years and Older)	Less than high school graduate	7.0%	56.5%	60.8%	7.6%	56.9%	61.6%
	High school graduate (includes equivalency)	5.8%	67.4%	71.9%	5.8%	67.9%	72.4%
	Some college or associate's degree	4.5%	73.4%	77.4%	4.6%	75.4%	79.8%
	Bachelor's degree or higher	2.7%	82.6%	85.3%	2.8%	84.5%	87.5%

Source: U.S. Census Bureau, American Community Survey, 2023 5-Year Estimates, Table S2301; Office of Economic Opportunity

Individuals with Barriers to Employment Target Populations

Veterans

In 2024, the Bureau of Labor Statistics estimated a total population of 472,000 veterans in Arizona with 215,000 in the labor force (45.4% of all veterans). Among Arizona veterans, the 2024 unemployment rate was 1.8%, lower than the nationwide rate of 3.0%. In 2023, the unemployment rate among Arizona veterans was 2.9%. The 2023 labor force participation rate (LFPR) for Arizona veterans was 48.5%, lower than the state's total LFPR of 63.9%. However, analyzing veterans solely in aggregate masks differences in labor force participation between different service group eras. Nationally, in 2024, 87.4% of veterans who served in WWII, Korea, and Vietnam were mostly retired and no longer in the civilian labor force. This service group represented 32.1% of all veterans in 2024.

Individuals with Disabilities

Nationally, the Bureau of Labor Statistics estimated that 22.7% of individuals with a disability were employed in 2024. Comparatively, 65.5% of individuals without a disability were employed nationally. The national LFPR among individuals with a disability was 24.5%, while the LFPR among individuals without a disability was 68.1%.

The 2024 national unemployment rate among individuals with disabilities was 7.5%, while the rate among people without a disability was 3.8%. This disparity is continued from previous years: the 2023 unemployment rates for individuals with and without a disability were 7.2% and 3.5%, respectively. This trend is also expressed at the state level. For 2023, the Census Bureau estimates that 26.5% of individuals with a disability and 64.0% of individuals without a disability in Arizona are employed.

In 2023, the Census Bureau estimates that 18.2% of Arizona residents with a disability and 10.5% of Arizona residents without a disability fall below the poverty level. At the national level, 20% of individuals with a disability and 9.9% of individuals without a disability fall below the poverty line.

Ex-Offenders

Individuals who were previously incarcerated often face challenges when seeking out employment opportunities and are less likely to be employed than those who have not been incarcerated.⁶ In Arizona, the incarcerated population is increasing at a faster rate than the general population. From 2000 to 2019, the residential population in Arizona increased by 38.9% while the prison population increased 61.1%. Additionally, in 2023, Arizona had a higher incarceration rate than the United States (446 people per thousand and 355 people per thousand, respectively).⁷

English Language Learners

Adults with low academic and/or low English language skills represent an additional group for which services are needed to help enter the workforce. According to the 2023 American Community Survey Five-Year Estimates, 25.7% of Arizonans speak a language other than English at home and 7.8% of people speak English “less than very well.”

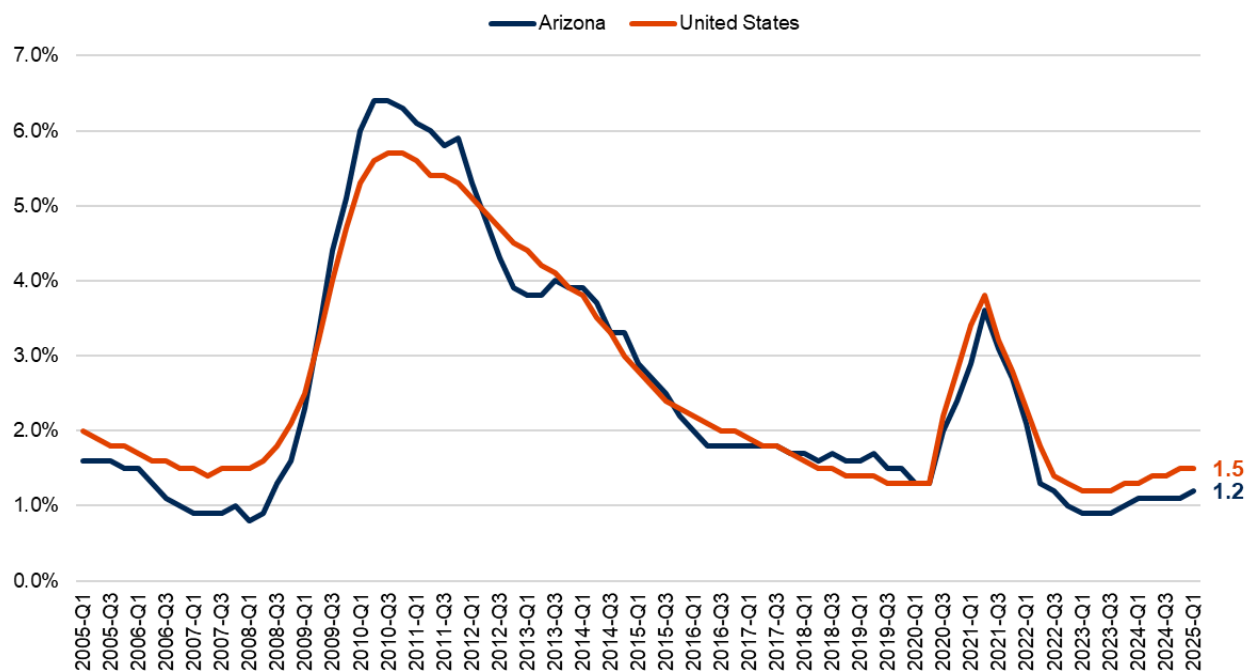
Long-Term Unemployed

In addition to the usual unemployment estimates, the Bureau of Labor Statistics tracks alternative measures of unemployment. One of these measures, U-1, tracks individuals who have been unemployed for 15 weeks or longer as a percent of the civilian labor force. After the pandemic, Arizona’s U-1 rates dipped and have remained lower than pre-pandemic (Q2 2008 to Q1 2020) rates, but have trended upward since late 2023. Despite these recent U-1 rate increases, the Arizona rate has trended below the national rate post-pandemic. In Q1 2025, the Arizona U-1 rate was estimated at 1.2% and the national rate was estimated at 1.5%.

Figure 9: Percent of Civilian Labor Force Unemployed 15 Weeks or Longer

⁶ Bureau of Labor Statistics, U.S. Department of Labor. The Economics Daily. *Employment of young men after arrest or incarceration*. <https://www.bls.gov/opub/ted/2019/employment-of-young-men-after-arrest-or-incarceration.htm> (visited September 19, 2025).

⁷ The Sentencing Project. (2023). *Detailed Data Tool*. <https://www.sentencingproject.org/research/detailed-state-data-tool/>



Source: U.S. Bureau of Labor Statistics; Arizona Office of Economic Opportunity

Low-Income Individuals

According to the American Community Survey 5-Year Estimates, 12.4% of the population falls below the poverty line in Arizona. Moreover, 5.9% of the population falls below 50 percent of the poverty level. Table 7 displays poverty level by select demographic characteristics.

Table 7: Percent of Population for Whom Poverty Status is Determined by Demographic, 2023

Demographic		Arizona		United States	
		Less than 50% of poverty line	Less than 100% of poverty line	Less than 50% of poverty line	Less than 100% of poverty line
Age	Under 18 years	8.1%	17.0%	7.6%	16.3%
	18 to 64 years	6.4%	12.1%	5.8%	11.6%
	65 years and over	4.1%	9.9%	3.8%	10.4%
Race and Hispanic or Latino Origin	White	5.2%	10.4%	4.7%	9.9%
	Black or African American	9.1%	17.6%	10.3%	21.3%
	American Indian and Alaska Native	15.0%	28.4%	10.5%	21.8%
	Asian	5.6%	10.5%	5.1%	9.9%
	Native Hawaiian and Other Pacific Islander	9.7%	14.7%	8.3%	17.2%
	Some other race	8.2%	16.8%	8.2%	18.2%

	Two or more races	6.9%	15.0%	6.7%	14.7%
	Hispanic or Latino origin (of any race)	7.7%	16.8%	7.5%	16.9%
	White alone, not Hispanic or Latino	4.8%	9.1%	4.4%	9.2%
Educational Attainment (Population 25 Years and Older)	Less than high school graduate	10.4%	23.5%	10.0%	24.0%
	High school graduate (includes equivalency)	6.8%	13.7%	6.3%	14.0%
	Some college or associate's degree	5.0%	10.0%	4.5%	9.6%
	Bachelor's degree or higher	2.8%	5.0%	2.3%	4.4%

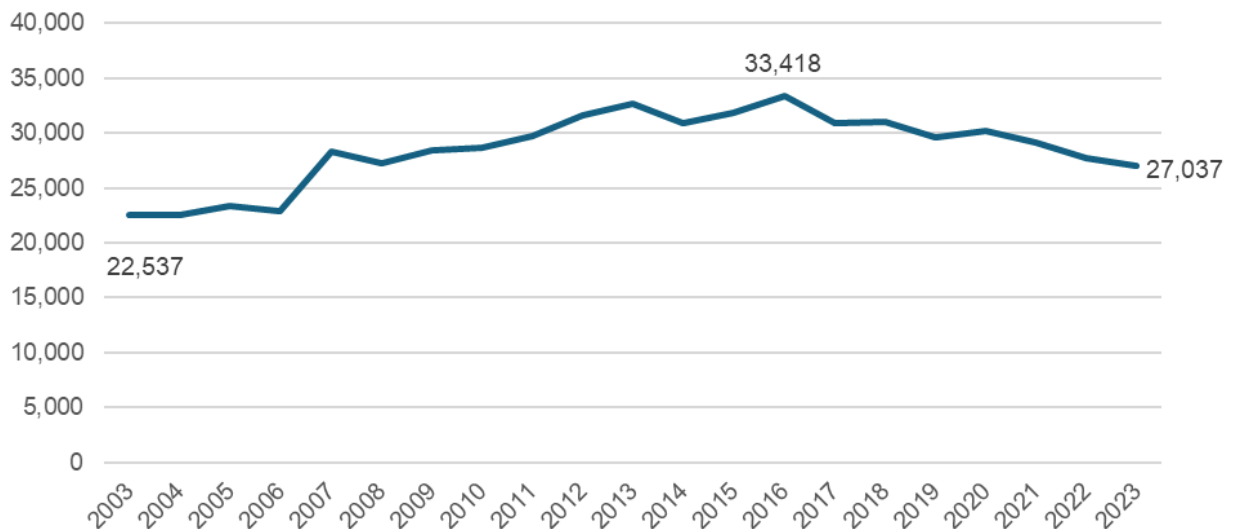
Source: U.S. Census Bureau, American Community Survey, 2023 5-Year Estimates, Table S1703
Office of Economic Opportunity

Farmworkers

Farm employment accounted for an average of 27,037 jobs in Arizona in 2023. In Arizona, farm employment has been trending downward since its peak in 2016 (33,418 farmworkers). In 2023, the largest number of farm jobs were in Maricopa County (9,666 jobs) and Yuma County (6,678 jobs).

Figure 10 illustrates the trend of total farm employment in Arizona over time, while Table 8 enumerates farm jobs by county for 2023.

Figure 10: Average Annual Arizona Farm Jobs, 2004-2023



Source: U.S. Bureau of Labor Statistics' Quarterly Census of Employment and Wages (QCEW) industry employment data; U.S. Census Bureau; Arizona Office of Economic Opportunity

Table 8: Average Annual Arizona Farm Employment by Local Workforce Area, 2023

Area	Number of Jobs
------	----------------

Arizona	27,037
City of Phoenix	1,874
Coconino County	167
Maricopa Workforce Area	7,792
Mohave and La Paz Counties	1,906
Northeastern Arizona	373
Pima County	954
Pinal County	3,544
Santa Cruz County	513
Southeastern Arizona	1,718
Yavapai County	920
Yuma County	6,678

Source: U.S. Bureau of Labor Statistics' Quarterly Census of Employment and Wages (QCEW) industry employment data; U.S. Census Bureau; Arizona Office of Economic Opportunity

Industry Employment

Arizona recorded nine straight years of employment growth from 2011 to 2019, growing by 531,338 jobs (2.5% annually). Comparatively, national employment grew by 1.7% annually over the same period. In recent years, Arizona total nonfarm employment growth has slowed slightly, growing by 2.2% annually from 2021 to 2025.

Employment growth has been widespread throughout most of Arizona's supersectors. Nine out of eleven Arizona super sectors recorded positive employment change from 2021 to 2025. Natural Resources and Mining (30.5%) recorded the strongest employment growth rate among Arizona super sectors, followed by Construction (24.5%), Leisure & Hospitality (19.9%), Private Education & Health Services (17.8%), and Other Services (15.4%). The two supersectors that recorded employment losses in this time period were Financial Activities (-2.3%) and Information (-1.2%).

Table 9: Annual Average Employment by Super-sector (Not Seasonally Adjusted)

Super-Sector	Arizona			United States
	Average Employment (2021)	Average Employment (2025)	Percent Change (2021-2025)	Percent Change (2021-2025)
Total Nonfarm Employment	2,970,700	3,239,100	9.0%	8.6%
Construction	179,292	223,257	24.5%	10.6%
Financial Activities	245,800	240,071	-2.3%	4.7%
Trade, Transportation & Utilities	582,769	612,086	5.0%	4.7%
Manufacturing	182,585	192,200	5.3%	3.5%
Private Education & Health Services	467,469	550,871	17.8%	14.8%
Professional & Business Services	448,862	457,600	1.9%	5.0%

Leisure & Hospitality	306,108	366,971	19.9%	20.0%
Natural Resources & Mining	11,985	15,643	30.5%	10.9%
Information	47,662	47,100	-1.2%	2.6%
Other Services	91,585	105,657	15.4%	10.5%
Government	406,600	427,643	5.2%	7.2%

Source: Produced by the Arizona Office of Economic Opportunity in cooperation with the U.S. Dept. of Labor, BLS

Employment Growth After the COVID-19 Pandemic and Recent Slowdown

In Arizona, from 2021 to 2023, average total nonfarm employment increased by 227,215 jobs (7.6%), the unemployment rate fell to a historic low of 3.3% in March 2024 and the LFPR approached pre-pandemic highs with a rate of 62% in August of 2023. However, from 2023 to 2025, average total nonfarm employment increased by just 41,185 jobs (1.3%); the unemployment rate climbed to 4.1% in March 2025 and has remained at that rate through July 2025; and the LFPR declined to 61.4% in June 2025.

From 2023 to 2025, ten of the eleven supersectors recorded lower employment growth than the rates from 2021 to 2023. Trade, Transportation, & Utilities; Manufacturing; Professional and Business Services; and Information recorded positive employment growth from 2021 to 2023, but recorded negative growth from 2023 to 2025. While all of Arizona's metropolitan statistical areas (MSAs) recorded positive employment growth from 2021 to 2023, from 2023 to 2025, Yuma MSA (-1.1%), Tucson MSA (-0.9%), and Sierra Vista-Douglas MSA (-0.8%) recorded employment losses, and Prescott-Prescott Valley MSA recorded no change in employment. Short term employment projections also show Arizona total employment growing by just 1.0% annually from 2024 to 2026.

This recent slowdown does not appear to be unique to Arizona, however. From 2021 to 2023, U.S. total nonfarm employment increased by 6.6%, the unemployment rate fell to a historic low of 3.4% in April 2023, and the LFPR increased to 62.8% in August 2023. From 2023 to 2025, U.S. total nonfarm employment grew by only 1.9%, unemployment rose to 4.2% in July 2025, and the LFPR fell to 62.2% in July 2025.

Sub-State Employment

A significant portion of the Arizona's employment is concentrated in two metropolitan statistical areas (MSAs):⁸ Phoenix-Mesa-Chandler MSA and Tucson MSA. In 2025, these two MSAs accounted for 87.8% of total nonfarm employment within the state.

Table 10 lists employment levels and growth for the seven Arizona MSAs and the United States. All seven Arizona MSAs recorded positive annual employment gains from 2021 to 2025. Flagstaff MSA recorded the largest employment percent change (11.6%; 7,363 jobs) from 2021 to 2025. Phoenix-Mesa-Chandler MSA recorded the second largest employment percent change (10.2%) and added the most employment gains, adding 226,460 jobs over the same period. Prescott MSA recorded the third highest employment percent change (6.9%), followed by both Lake Havasu City-Kingman MSA and Yuma MSA (5.7%).

Table 10: Annual Average Employment by Region (Not Seasonally Adjusted)

⁸ The general concept of a Metropolitan Statistical Area (MSA) is one of a large population nucleus, together with adjacent communities which have a high degree of economic and social integration with that nucleus.

Region	Average Employment (2021)	Average Employment (2025)	Numeric Change (2021-2025)	Percent Change (2021-2025)
United States	146,284,846	158,874,000	12,589,154	8.6%
Arizona	2,970,700	3,239,100	268,400	9.0%
Phoenix-Mesa-Chandler MSA	2,220,154	2,446,614	226,460	10.2%
Lake Havasu City-Kingman MSA	53,723	56,771	3,048	5.7%
Prescott MSA	66,823	71,414	4,591	6.9%
Yuma MSA	57,638	60,914	3,276	5.7%
Tucson MSA	381,523	396,657	15,134	4.0%
Flagstaff MSA	63,723	71,086	7,363	11.6%
Sierra Vista-Douglas MSA	33,777	34,357	580	1.7%

Source: Produced by the Arizona Office of Economic Opportunity in cooperation with the U.S. Dept. of Labor, BLS

Occupation Employment

Table 11 displays 2024 employment and wage estimates for 22 major occupation groups.⁹ The largest major occupational group in Arizona by employment was Office and Administrative Support (413,920 jobs) followed by Sales and Related Occupations (294,630 jobs), Food Preparation and Serving Related Occupations (290,590 jobs), and Transportation and Material Moving Occupations (266,750 jobs). Together, these four major occupation groups represent 39.6% of Arizona’s total 2024 employment.

The four largest occupation groups in Arizona were also the largest major occupation groups in the United States. The largest difference in major occupation group composition between Arizona and the United States was in Office and Administrative Support employment: Office and Administrative Support represented 12.9% of total Arizona jobs and 11.8% of total United States jobs. The second largest difference in major occupational composition occurred in Transportation and Material Moving Occupations, which represented 8.3% of total Arizona employment and 8.9% of total United States employment. In total, the median difference in occupational employment composition between Arizona and the United States was +0.1 percentage points.

The 2024 median hourly wage level for all occupations in Arizona was \$23.47, up from a median hourly wage of \$18.99 in 2021. This may in part be attributed to the fact that minimum wage increases in Arizona were tied to cost of living increases after 2020.¹⁰ The Consumer Price Index for All Urban Wage Earners and Clerical Workers increased 15% from August 2021 to August 2024.¹¹ The United States recorded a slightly higher median hourly wage: \$23.80 in 2024 and \$22.00 in 2021. In both Arizona and the United States, Management occupations had the highest median wages, paying \$50.24 per hour in

⁹ Occupation employment estimates group employment by the type of job an employee performs
¹⁰ *Fair Wages and Healthy Families Act*. Arizona Secretary of State. Retrieved September 19, 2025 from <https://apps.azsos.gov/election/2016/general/ballotmeasuretext/l-24-2016.pdf>
¹¹ U.S. Bureau of Labor Statistics, Consumer Price Index for All Urban Wage Earners and Clerical Workers: All Items in U.S. City Average [CWUR0000SA0], retrieved from FRED, Federal Reserve Bank of St. Louis; <https://fred.stlouisfed.org/series/CWUR0000SA0>, September 19, 2025

Arizona and \$58.70 in the United States. The lowest median wage in Arizona was \$16.47 in Farming, Fishing, and Forestry Occupations followed by \$16.99 in Food Preparation and Serving Related Occupations.

Table 11: 2024 Arizona & United States Occupational Employment & Hourly Wage Estimates

SOC Code*	Occupation Title	Arizona		United States	
		Median Hourly Wage (2024)	Share of Total Employment (2024)	Median Hourly Wage (2024)	Share of Total Employment (2024)
00-0000	Total, All Occupations	\$23.47	100.0%	\$23.80	100.0%
11-0000	Management Occupations	\$50.24	7.6%	\$58.70	7.1%
13-0000	Business and Financial Operations Occupations	\$36.67	7.0%	\$38.90	6.7%
15-0000	Computer and Mathematical Occupations	\$48.55	3.4%	\$50.89	3.4%
17-0000	Architecture and Engineering Occupations	\$46.95	1.7%	\$46.79	1.7%
19-0000	Life, Physical, and Social Science Occupations	\$36.18	0.7%	\$37.97	0.9%
21-0000	Community and Social Service Occupations	\$24.96	1.5%	\$27.66	1.7%
23-0000	Legal Occupations	\$47.56	0.7%	\$48.07	0.8%
25-0000	Educational Instruction and Library Occupations	\$24.08	4.9%	\$28.47	5.8%
27-0000	Arts, Design, Entertainment, Sports, and Media Occupations	\$24.50	1.1%	\$28.91	1.4%
29-0000	Healthcare Practitioners and Technical Occupations	\$42.19	6.1%	\$39.95	6.2%
31-0000	Healthcare Support Occupations	\$18.12	4.3%	\$17.87	4.8%
33-0000	Protective Service Occupations	\$24.49	2.7%	\$24.32	2.4%
35-0000	Food Preparation and Serving Related Occupations	\$16.99	9.1%	\$16.41	8.8%
37-0000	Building and Grounds Cleaning and Maintenance Occupations	\$17.69	2.9%	\$17.69	2.9%
39-0000	Personal Care and Service Occupations	\$17.15	2.0%	\$16.88	2.0%
41-0000	Sales and Related Occupations	\$18.04	9.2%	\$18.01	8.7%
43-0000	Office and Administrative Support Occupations	\$22.22	12.9%	\$22.27	11.8%
45-0000	Farming, Fishing, and Forestry Occupations	\$16.47	0.3%	\$17.67	0.3%
47-0000	Construction and Extraction Occupations	\$27.34	5.3%	\$28.06	4.1%
49-0000	Installation, Maintenance, and Repair Occupations	\$25.51	4.4%	\$27.99	3.9%
51-0000	Production Occupations	\$22.51	4.0%	\$22.09	5.7%
53-0000	Transportation and Material Moving Occupations	\$20.48	8.3%	\$20.55	8.9%

**The Standard Occupational Classification (SOC) system is a federal statistical standard used by federal and state agencies to classify workers into occupational categories for the purpose of collecting, calculating, or disseminating data.*

Source: U.S. Bureau of Labor Statistics' Current Employment Statistics (CES) and Quarterly Census of Employment and Wages (QCEW) industry employment, and Occupational Employment Statistics (OEWS) data

ii. Labor Market Trends

Provide an analysis of key labor market trends, including across existing industries and occupations.

Short-Term Industry Employment Projections

Table 12: 2024-2026 Arizona Industry Projections

Industry	Estimated Employment (2024)	Projected Employment (2026)	Projected Numeric Growth (2024-2026)	Annual Percentage Growth (2024-2026)
Total Employment	3,485,625	3,552,704	67,079	1.0%
Construction	227,376	235,086	7,710	1.7%
Education and Health Services	710,499	741,167	30,668	2.1%
Financial Activities	229,068	230,391	1,323	0.3%
Government	166,892	169,368	2,476	0.7%
Information	50,910	50,280	-630	-0.6%
Leisure and Hospitality	392,525	398,321	5,796	0.7%
Manufacturing	195,501	196,480	979	0.3%
Natural Resources and Mining	48,471	48,249	-222	-0.2%
Other Services	110,211	111,793	1,582	0.7%
Professional And Business Services	464,254	464,277	23	0.0%
Trade, Transportation and Utilities	629,986	635,658	5,672	0.4%

Source: Produced by the Arizona Office of Economic Opportunity in cooperation with the U.S. Dept. of Labor, BLS

Table 12 displays the most recent short-term industry employment projections. Between 2024 and 2026, Arizona total employment is projected to increase by 67,079 jobs (1.0% annually). During this same projection period, Information and Natural Resources and Mining are expected to record job losses of 630 jobs (-0.6% annually) and 222 jobs (-0.2%), respectively. The largest numeric growth is expected to occur in Education and Health Services (30,688 jobs), followed by Construction (7,710 jobs); Leisure and Hospitality (5,796 jobs); and Trade, Transportation and Utilities (5,672 jobs). The fastest growing industry is projected to be Education and Health Services (2.1% annually), followed by Construction (1.7% annually); then Government, Leisure and Hospitality, and Other Services, all of which are projected to grow 0.7% annually.

Table 13 displays short-term employment projections by local area. From 2024 through 2026, employment is projected to grow throughout all seven Arizona metro areas. Arizona total employment is

projected to grow 1.0 percent annually. The largest numeric employment gain among Arizona counties is projected to occur for Maricopa County (55,897 jobs). The projected fastest growing counties in this time frame are Pinal County (1.2% annually), Maricopa County (1.1% annually), and Yavapai County (0.8% annually).

Table 13: State and Sub-State Employment Projections

Area	Estimated Employment (2024)	Projected Employment (2026)	Projected Numeric Growth (2024-2026)	Annual Percentage Growth (2024-2026)
Arizona	3,485,625	3,552,704	67,079	1.0%
Balance of Maricopa	1,406,955	1,442,379	35,424	1.3%
City of Phoenix	1,119,832	1,140,305	20,473	0.9%
Coconino County	74,120	75,012	892	0.6%
Mohave and La Paz Counties	70,924	71,988	1,064	0.7%
Northeastern Arizona ¹	67,536	67,846	310	0.2%
Pima County	428,692	432,638	3,946	0.5%
Pinal County	83,274	85,222	1,948	1.2%
Santa Cruz County	15,417	15,451	34	0.1%
Southeastern Arizona ²	58,890	59,344	454	0.4%
Yavapai County	80,490	81,810	1,320	0.8%
Yuma County	79,076	80,188	1,112	0.7%

¹Northeastern Arizona is comprised of Navajo, Apache, and Gila Counties

²Southeastern Arizona is comprised of Graham, Greenlee, and Cochise Counties

Source: Produced by the Arizona Office of Economic Opportunity in cooperation with the U.S. Dept. of Labor, BLS

Short-Term Occupation Employment Projections

Table 14 displays short-term employment projections by occupation. From 2024 to 2026, 21 of the 22 major occupational groups are projected to record job gains. The only losses are projected to occur within Farming, Fishing, and Forestry Occupations (-603 jobs, -2.9%). Healthcare Support Occupations is projected to record the largest numeric employment gain (11,022 jobs), followed by Healthcare Support Occupations (8,337 jobs), Management Occupations (7,592 jobs), and Construction and Extraction Occupations (7,095 jobs). The largest employment percentage growth is projected to occur within Healthcare Support Occupations (5.7%), followed by Healthcare Practitioners and Technical Occupations (5.3%).

Table 14: Arizona Occupational Projections

SOC Code*	Occupation Title	Estimated Employment (2024)	Projected Employment (2026)	Numeric Change (2024-2026)	Percent Change (2024-2026)
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00-0000	Total, All Occupations	3,485,625	3,552,704	67,079	1.9%
11-0000	Management Occupations	300,367	307,959	7,592	2.5%
13-0000	Business and Financial Operations Occupations	234,075	237,968	3,893	1.7%
15-0000	Computer and Mathematical Occupations	115,512	117,477	1,965	1.7%
17-0000	Architecture and Engineering Occupations	56,983	57,762	779	1.4%
19-0000	Life, Physical, and Social Science Occupations	25,232	25,832	600	2.4%
21-0000	Community and Social Service Occupations	50,256	52,420	2,164	4.3%
23-0000	Legal Occupations	24,184	24,350	166	0.7%
25-0000	Educational Instruction and Library Occupations	150,143	152,942	2,799	1.9%
27-0000	Arts, Design, Entertainment, Sports, and Media Occupations	58,272	59,668	1,396	2.4%
29-0000	Healthcare Practitioners and Technical Occupations	209,869	220,891	11,022	5.3%
31-0000	Healthcare Support Occupations	147,637	155,974	8,337	5.7%
33-0000	Protective Service Occupations	73,088	73,767	679	0.9%
35-0000	Food Preparation and Serving Related Occupations	300,974	304,892	3,918	1.3%
37-1000	Supervisors of Building and Grounds Cleaning and Maintenance Workers	9,539	9,802	263	2.8%
39-0000	Personal Care and Service Occupations	92,740	95,792	3,052	3.3%
41-0000	Sales and Related Occupations	314,063	314,694	631	0.2%
43-0000	Office and Administrative Support Occupations	444,329	445,697	1,368	0.3%
45-0000	Farming, Fishing, and Forestry Occupations	20,959	20,356	-603	-2.9%
47-0000	Construction and Extraction Occupations	195,967	203,062	7,095	3.6%
49-0000	Installation, Maintenance, and Repair Occupations	145,599	148,401	2,802	1.9%
51-0000	Production Occupations	129,527	130,190	663	0.5%
53-0000	Transportation and Material Moving Occupations	283,795	288,692	4,897	1.7%

**The Standard Occupational Classification (SOC) system is a federal statistical standard used by federal and state agencies to classify workers into occupational categories for the purpose of collecting, calculating, or disseminating data.*

Source: Produced by the Arizona Office of Economic Opportunity in cooperation with the U.S. Dept. of Labor, BLS

iii. Education and Skill Levels of the Workforce

Provide an analysis of the educational and skill levels of the workforce.

(i) Employment and Unemployment. *Provide an analysis of current employment and unemployment data, including labor force participation rates, and trends in the State.*

Table 15 shows the educational attainment of Arizona’s total population. Arizona has a higher rate of individuals with no high school diploma, with associate degrees, and with some college, no degree than does the nation. Arizonan’s with some college, no degree represent the highest share while nationally, the highest share have a high school diploma or equivalent.

Table 15: Educational Attainment of Arizonans Age 25 and Older Compared to U.S.

Educational Level Attained*	Arizona		United States	
	Population Estimate (2023)	Percent	Population Estimate (2023)	Percent
Less than 9th grade	232,566	4.7%	10,732,389	4.7%
9th to 12th grade, no diploma	311,962	6.3%	13,497,828	5.9%
High school graduate (includes equivalency)	1,171,693	23.5%	59,836,489	26.2%
Some college, no degree	1,187,823	23.8%	44,354,396	19.4%
Associate's degree	459,127	9.2%	20,059,257	8.8%
Bachelor's degree	999,535	20.0%	48,591,540	21.3%
Graduate or professional degree	627,927	12.6%	31,362,762	13.7%

*Population estimates include all individuals age 25 and older including those not in the labor force

Source: U.S. Census Bureau 2023 American Community Survey, 5-Year Estimates Table S1501

Tables 16 and 17 show broad educational attainment levels by age group and race or Latino/ Hispanic origin for the state, respectively. Among individuals aged 25 years and older, those between 25 to 34 years old recorded the highest rate of graduating high school or higher. Those aged 35 to 44 years old recorded the highest rate of possessing a bachelor’s degree or higher.

Table 16: Educational Attainment of Arizonans by Age, 2023

Age	High School Graduate or Higher		Bachelor's Degree or Higher	
	Population Estimate	Percent	Population Estimate	Percent
25 to 34 years	909,497	91.1%	320,750	32.1%
35 to 44 years	807,756	88.5%	319,985	35.1%
45 to 64 years	1,519,340	87.9%	552,199	31.9%
65 years and older	1,209,512	89.6%	434,528	32.2%

Source: U.S. Census Bureau 2023 American Community Survey, 5-Year Estimates Table S1501

Table 17: Educational Attainment of Arizonans by Race and Hispanic or Latino Origin, 2023

Race and Hispanic or Latino Origin	High School Graduate or Higher		Bachelor's Degree or Higher	
	Population Estimate	Percent	Population Estimate	Percent
White alone	3,157,002	93.3%	1,233,683	36.5%

White alone, not Hispanic or Latino	2,857,431	95.4%	1,165,733	38.9%
Black alone	196,017	91.2%	62,757	29.2%
American Indian or Alaska Native alone	146,077	80.1%	23,383	12.8%
Asian alone	162,480	90.1%	107,074	59.4%
Native Hawaiian and Other Pacific Islander alone	8,619	87.8%	2,250	22.9%
Some other race alone	267,115	72.0%	52,392	14.1%
Two or more races	508,795	78.5%	145,923	22.5%
Hispanic or Latino Origin	951,991	74.3%	211,778	16.5%

Source: U.S. Census Bureau 2023 American Community Survey, 5-Year Estimates Table S1501

Skills Gaps

Table 18, Table 19, and Table 20 categorize 2024 and 2026 occupational employment by their respective education, job experience, and on-the-job training requirements¹² to help identify current and forecasted needs.

Occupations requiring low levels of education represent a large portion of Arizona jobs. In 2024, occupations requiring neither a formal educational credential nor a high school diploma made up 60.9% of employment (Table 18)—a similar proportion of 60.6% is projected through 2026. A slightly greater number of occupations in Arizona require a bachelor's degree than those requiring no formal educational credential. From 2024 to 2026, the distribution of educational requirements is expected to remain stable. The greatest projected change is a 0.2 percentage point decrease in the employment share requiring no formal educational credential in 2026; no other requirement level is expected to shift by more than 0.1 percentage points.

Table 18: 2024-2026 Arizona Employment by Occupation Minimum Educational Requirements

Minimum Educational Requirement	Estimated Employment Level (2024)	Estimated Share of Total Employment (2024)	Projected Employment Level (2026)	Projected Share of Total Employment (2026)
No formal educational credential	803,556	23.1%	813,028	22.9%
High school diploma or equivalent	1,312,711	37.8%	1,334,439	37.7%
Some college, no degree	80,584	2.3%	81,047	2.3%
Postsecondary non-degree award	216,864	6.2%	223,663	6.3%
Associate's degree	69,130	2.0%	70,978	2.0%
Bachelor's degree	841,132	24.2%	861,529	24.3%
Master's degree	71,977	2.1%	75,538	2.1%
Doctoral or professional degree	79,783	2.3%	82,442	2.3%

Source: Produced by the Arizona Office of Economic Opportunity in cooperation with the U.S. Dept. of Labor, BLS

¹² BLS uses a system to assign categories for entry-level education, work experience in a related occupation, and typical on-the-job training to each occupation. Categories do not necessarily identify the exact level of education, job experience or on-the-job training an individual employed in that occupation has. For more information regarding education, job experience and on-the-job assignments visit: http://www.bls.gov/emp/ep_education_tech.htm.

Over eighty percent of occupations do not require prior work experience for job seekers to be competitive. In 2024, 17.7% of Arizona workers were employed in occupations that required at least some work experience (Table 19). Work experience is an important attribute for occupations that require employee oversight, such as managers, supervisors, or administrators. This trend is consistent across all educational attainment levels that require work experience.

Table 19: 2024-2026 Arizona Employment by Occupation Job Experience

Job Experience	Estimated Employment Level (2024)	Estimated Share of Total Employment (2024)	Projected Employment Level (2026)	Projected Share of Total Employment (2026)
None	2,860,241	82.3%	2,913,733	82.2%
Less than 5 years	382,907	11.0%	391,534	11.1%
5 years or more	232,589	6.7%	237,397	6.7%

Source: Produced by the Arizona Office of Economic Opportunity in cooperation with the U.S. Dept. of Labor, BLS

Table 20 identifies on-the-job training requirements for Arizona occupations. Unlike work experience requirements, most occupations require at least some on-the-job training. In 2024, over 36.3% jobs provided no on-the-job training, while 60.4% of jobs required short-, moderate-, or long-term on-the-job training. Occupations requiring an internship, residency, or apprenticeship represented 3.3% of jobs in 2024.

Table 20: Arizona Employment by Occupation On-the-Job Training

On-the-Job Training	Estimated Employment Level (2024)	Estimated Share of Total Employment (2024)	Projected Employment Level (2026)	Projected Share of Total Employment (2026)
None	1,263,307	36.3%	1,296,053	36.6%
Internship/residency	48,182	1.4%	50,540	1.4%
Apprenticeship	64,868	1.9%	67,163	1.9%
Short-term on-the-job training	1,376,992	39.6%	1,394,889	39.4%
Moderate-term on-the-job training	612,667	17.6%	621,882	17.6%
Long-term on-the-job training	109,721	3.2%	112,137	3.2%

Source: Produced by the Arizona Office of Economic Opportunity in cooperation with the U.S. Dept. of Labor, BLS

C. Comparison of Economic and Workforce Analytical Conclusion. Describe areas of opportunity for meeting hiring, education, and skills needs identified in the economy compared to the assets available in the labor force in the state.

In the years immediately after the COVID 19 pandemic, Arizona recorded substantial employment gains and the state’s unemployment rate fell to record lows. More recently, since 2023, employment growth has been less substantial and, since March 2024, the unemployment rate has climbed before steadying

at 4.1% through July 2025. Additionally, Arizona's total employment is projected to increase just 1.0% annually from 2024 to 2026.

Despite this recent slowdown, in-demand industries are projected to continue to offer economic opportunities for Arizona's workforce. In-demand industries outpace total employment growth, growing 1.8% annually. This aligns with comparisons of historical employment growth between in-demand industries and total private employment, albeit with a lower percentage change difference. From Q3 2021 to Q3 2024, in demand industry employment grew by an average of 4.9% annually, while Arizona total private sector employment grew by 3.0%.

About a third of Arizona's population 25 years and older attained only a high school diploma or do not have an educational credential, representing a large target group to encourage employment in the in-demand industries and occupations (See Table 15 above). Such targeted efforts can include enrollment in WIOA Title I-B occupational training programs, with a specific focus on High Impact Training (HIT) programs within this industry. For more information on HIT programs, see the OEO website at <https://oio.az.gov/workforce-evaluation>.

2. Workforce Development, Education and Training Activities Analysis

The Unified or Combined State Plan must include an analysis of the workforce development activities, including education and training in the State, to address the education and skill needs of the workforce, as identified in (a)(1)(B)(iii) above, and the employment needs of employers, as identified in (a)(1)(A)(iii) above. This must include an analysis of—

A. The State's Workforce Development Activities. Provide an analysis of the State's workforce development activities, including education and training activities of the core programs, Combined State Plan partner programs included in this plan, and required ⁶ and optional one-stop delivery system partners.

To bridge the gap between the education and skills of the workforce and the employment needs of the employers, as well as address job seekers' barriers to employment, ARIZONA@WORK implements workforce development activities for participants in its core programs. The ARIZONA@WORK system is the statewide workforce development network and one-stop delivery system that bridges partnerships across state agencies, local organizations, and community-based programs dedicated to creating a skilled and adaptable workforce pipeline that meets the current and future needs of employers and the state's economy.

WIOA Participant Definition

In the context of WIOA Title I Adult, Title I DW, Title II, and Title III programs, a participant refers to an individual whose receipt of services extends beyond those specified in 20 CFR § 677.150(a)(3) (or 34 CFR § 463.150(a)(3), as applicable). This occurs after fulfilling all relevant programmatic requirements, including eligibility determination.

Within the Title I Youth Program, a participant is defined as an individual who has fulfilled all pertinent program criteria for service provision. This includes eligibility determination, completion of an objective assessment, development of an Individual Service Strategy (ISS), and the receipt of one of the 14 WIOA Youth Program elements outlined in sec. 129(c)(2) of WIOA.

As for the Title IV VR Programs, a participant is an individual deemed eligible for VR services after applying, having an approved and signed Individualized Plan for Employment (IPE), and initiating the receipt of services under the IPE.

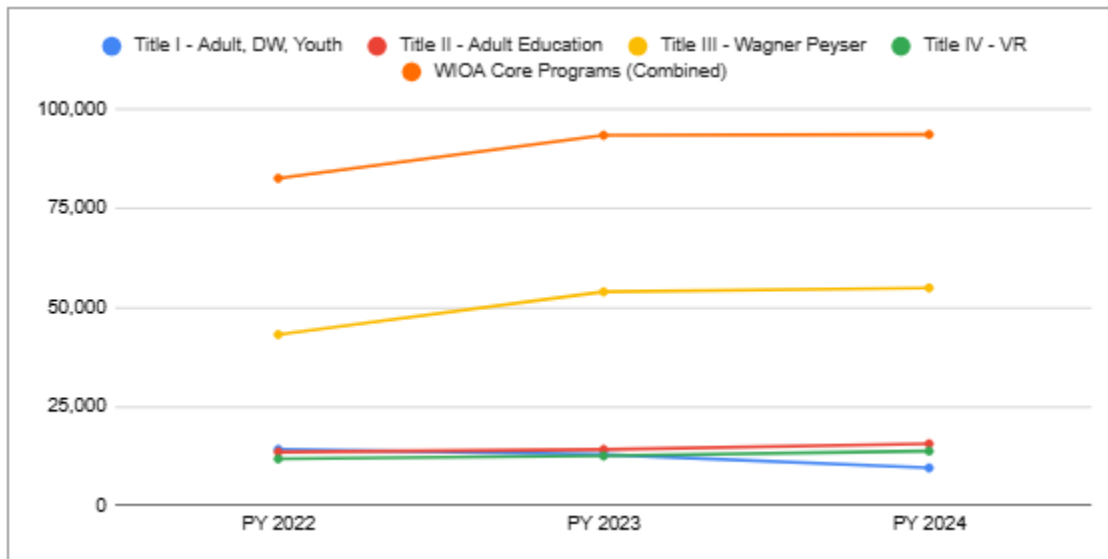
WIOA Exiter Definition

As delineated for performance calculations, an exit signifies the point at which a participant, benefiting from services through any program, satisfies the following conditions:

- For the adult, DW, and youth programs as sanctioned by WIOA Title I, the Adult Education and Family Literacy Act (AEFLA) Program under WIOA Title II, and the ES Program under the Wagner-Peyser Act (amended by WIOA Title III), the exit date corresponds to the last day of service.
- For the VR Program under Title I of the Rehabilitation Act of 1973 (amended by WIOA Title IV – VR Program):
 - Closure of the participant's service record in accordance with 34 CFR 361.56 is warranted when the participant achieves an employment outcome.
 - Closure of the participant's service record occurs if the individual fails to achieve an employment outcome or is determined ineligible after receiving services in accordance with 34 CFR 361.43.

Figure 11 below summarizes the participant counts for Core Partner Programs across PY 2022, 2023, and 2024 and is followed by Figure 12 which reflects exiter counts for the same years. Both demonstrate the number of WIOA participants impacted across all four core partner programs.

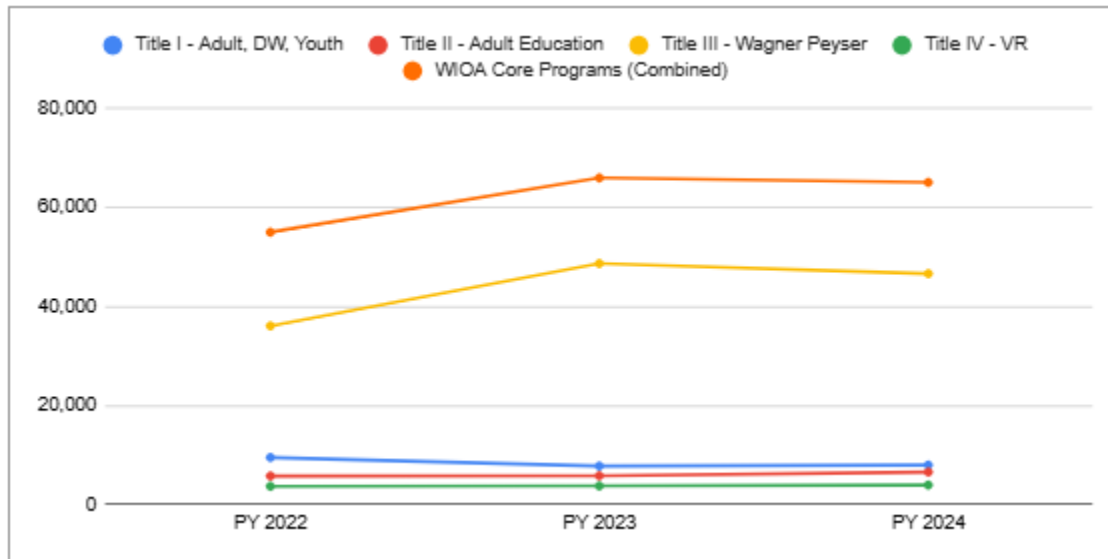
Figure 11: WIOA Participant Counts



PY	Title I - Adult	Title I - DW	Title I - Youth	Title I - Adult, DW, Youth	Title II - Adult Education	Title III - Wagner Peyser	Title IV - VR	WIOA Core Programs (Combined)
PY 2022	9,191	1,072	3,906	14,169	13,517	43,178	11,777	82,641

PY	Title I - Adult	Title I - DW	Title I - Youth	Title I - Adult, DW, Youth	Title II - Adult Education	Title III - Wagner Peyser	Title IV - VR	WIOA Core Programs (Combined)
PY 2023	8,121	1,030	3,707	12,858	14,146	53,977	12,517	93,498
PY 2024	5,661	759	3,062	9,482	15,573	54,936	13,741	93,732

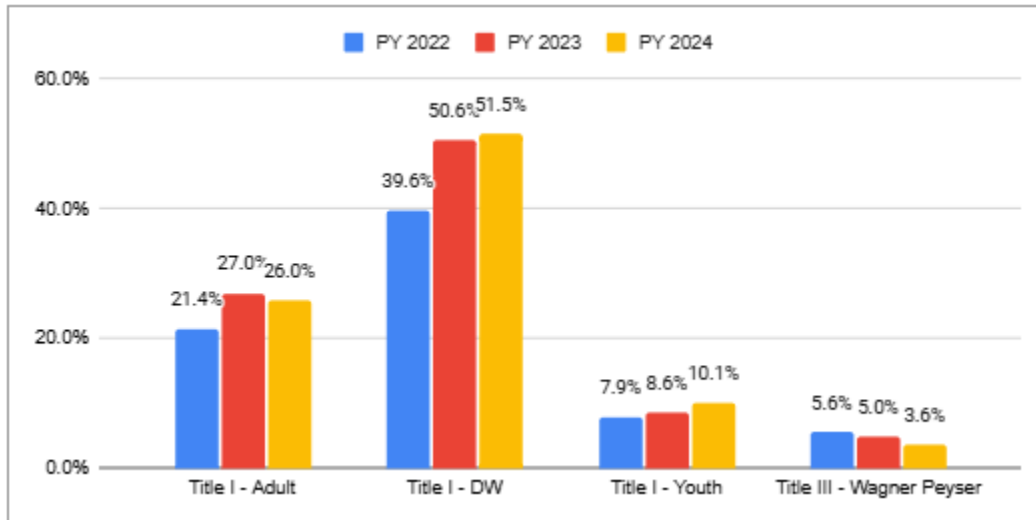
Figure12: WIOA Exiter Counts



PY	Title I - Adult	Title I - DW	Title I - Youth	Title I - Adult, DW, Youth	Title II - Adult Education	Title III - Wagner Peyser	Title IV - VR	WIOA Core Programs (Combined)
PY 2022	6,516	728	2,254	9,498	5,754	36,085	3,679	55,016
PY 2023	4,873	642	2,246	7,761	5,804	48,688	3,736	65,989
PY 2024	5,305	601	2,048	7,954	6,561	46,649	3,922	65,086

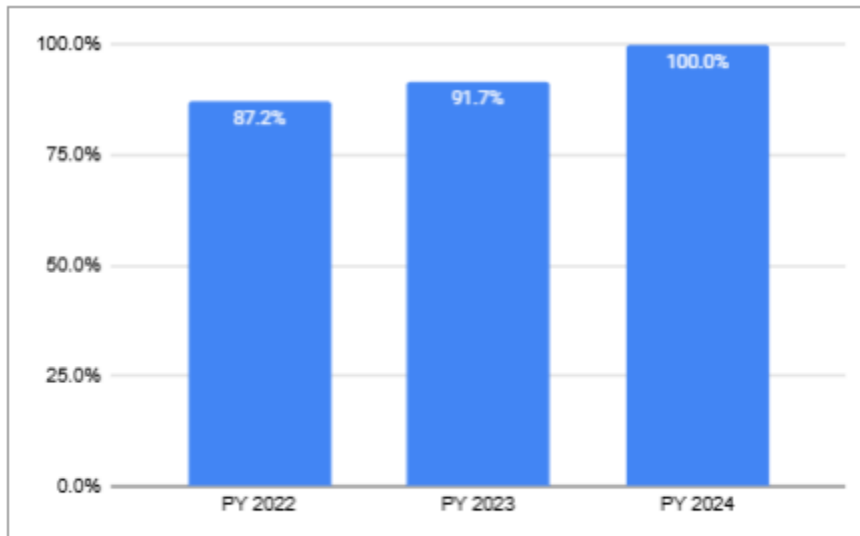
State-level coordination across partner programs is led by both state agencies and the efforts for developing the Unified Plan have set a strong foundation for future cross planning focused on strengthening ARIZONA@WORK. The co-location of programs, inclusion of stakeholders in the WIOA state planning process, as well as regular monthly meetings which include ARIZONA@WORK partners, increases the State’s ability to leverage resources and coordinate as a system. Figures 13 and 14 below highlight the State’s current co-enrollment counts which demonstrate the baseline off which the ARIZONA@WORK system will continue to increase in coordination efforts.

Figure 13: Title I and Title III Co-Enrollment



The rates of co-enrollment in Figure 13 are determined by the percentage of program participants who were enrolled in at least one of the other Title I or III programs during participation. Among these core partner programs, DW participants were the most likely, and **Wagner-Peyser Employment Service** participants the least likely, to be co-enrolled in another program.

Figure 14: Co-Enrollment between TAA Participants and Title I DW Program Participants



Program Year	TAA Co-enrolled DW	TAA Total Enrollment
PY 2022	34	39
PY 2023	11	12
PY 2024	6	6

Co-enrollment requirements between the TAA and Title I DW Programs are outlined in the statutory and regulatory language for each program. Figure 14 demonstrates the **continued** efforts in Arizona to meet requirements and offer eligible individuals the benefits that come with co-enrollment between these programs.

Services to Individuals

The ARIZONA@WORK system provides services for adults, DW, and youth; individuals with disabilities; English language learners and adult education students; Veterans; and other priority populations (as defined in WIOA). Workforce services provided to qualifying individuals are targeted at ensuring that WIOA participants attain meaningful employment by providing services such as:

- Outreach, intake and orientation to information and other services available through the ARIZONA@WORK one-stop system and through local providers of adult education services;
- Determination of services an individual is eligible to receive, including through co-enrollment with other program areas;
- A workforce development support and advocacy agency, Jobpath Inc. Student Support Services in Pima and Pinal Counties, collaborated with community colleges and job-training facilities to empower under-represented adults in pursuing vocational degrees and certificates, particularly in IT, industrial trades, and healthcare for high-wage, in-demand careers;
- Assistance developing an individualized employment plan;
- Initial assessment of skill levels as conducted by each program (e.g., VR participants receive additional psychological or medical evaluation to ascertain a diagnosis, vocational testing to assess aptitudes and skills, and assessment to determine assistive technology needs);
- Provision of information on potential employment options based on labor market information including: (i) nontraditional employment options and In-Demand industry sectors and occupations; (ii) Job vacancy listings in labor market areas; (iii) Information on job skills necessary to obtain the vacant jobs listed; and (iv) Achievable employment goals based on the knowledge, skills, abilities, capabilities, and interests of the individual;
- Provision of performance information and program cost information on eligible providers of training; Information regarding how the LWDA is performing on local performance accountability measures, as well as any additional performance information related to the local workforce area;
- ARIZONA@WORK system and local providers of adult education;
- Access to IET Programs through adult education providers;
- Group and/or individual career counseling and mentoring;
- Career planning;
- Case management;
- Short-term pre-vocational services;
- Financial literacy services;
- Out-of-area job search assistance and relocation assistance;
- Availability of supportive services or other programs providing assistance;
- Referrals to job openings and/or other services; and
- Follow up services.

A core piece of services to individuals is the education and training provided to qualified individuals. This may include support in participating in:

- Work-based learning (on-the-job training, apprenticeships, incumbent worker training, customized training, etc.);

- Work Experience (e.g., internships, pre-apprenticeships, etc.);
- Training to obtain In-Demand Occupations with industry recognized credentials, including through IET Programs;
- Adult education courses (literacy instruction in language arts, mathematics, civics, English language acquisition, workforce preparation, IET Programs, etc.); and
- CTE.

Title I-B Youth Program supports youth to obtain employment in career pathways or enrollment in postsecondary education or Registered Apprenticeships, during participation and after exit through follow-up services. The program provides services to youth with barriers to employment, with a targeted focus on supporting the educational and career success of out-of-school youth. The program ensures the availability for all eligible youth, the 14 elements required in WIOA and provides, as appropriate:

- Tutoring, study skills training, instruction, and dropout prevention;
- Alternative secondary school services or dropout recovery services;
- Paid and unpaid work experience;
- Occupational skills training;
- Education offered concurrently with workforce preparation and training for a specific occupation;
- Leadership development opportunities;
- Supportive services;
- Adult mentoring;
- Follow-up services;
- Comprehensive guidance and counseling;
- Financial literacy education;
- Entrepreneurial skills training;
- Services that provide labor market and employment information; and
- Postsecondary preparation and transition activities.

Recently the Office of Economic Opportunity, in collaboration with the Workforce Arizona Council, Department of Economic Security, and LWDBs, launched several evaluation projects to assess the success of the Title I training programs. More thorough analysis can be found on the OEO website here: <https://o eo .az.gov/workforce-evaluation> . A summary of some of the key findings can be found below.

Highlights from the WIOA Title I-B: Adult, Dislocated Worker, Youth Training Analysis

Training Outcomes

Table 21 displays all Title I-B WIOA training program exiters along with credential rate and measurable skill gain from program year 2023 by barrier to employment. Low-income individuals account for the largest share of exiters. Table 22 displays employment and wage outcomes for Title I-B program exiters by Adult, Dislocated, and Youth programs .

Table 21: Title I-B Training Program Exiters by Barrier to Employment, 2023

	Title I: Adult, Dislocated, Youth		
Barrier	Program Exiters	Credential Rate	Measurable Skill Gain
Disability	201	67.8%	70.6%
Displaced Homemaker	62	56.3%	64.4%
English Language Learner	533	66.4%	67.9%
Exhausting TANF	33	44.0%	63.3%
Foster Care Youth	60	17.1%	50.7%
Homeless	557	64.9%	67.1%
Justice Involved	1,475	65.6%	69.4%
Long Term Unemp.	2,452	55.8%	65.1%
Low Income	5,836	58.0%	66.5%
Low Literacy	1,512	40.5%	63.6%
Single Parent	1,411	60.4%	65.2%

Note: Measures were calculated using data from Title I Training Program Participants during WIOA defined Program Year 2023
Source: The Arizona Office of Economic Opportunity

Table 22: Title I-B Training Program Outcomes, 2023

	Title I		
	Adult	Dislocated	Youth
Employment 2nd Quarter After Exit	72%	76%	69%
Employment 4th Quarter After Exit	63%	71%	67%
Wages 2nd Quarter After Exit	\$9,571	\$10,007	\$6,980

Note: Measures were calculated using data from Title I Training Program Participants during WIOA defined Program Year 2023.
Source: The Arizona Office of Economic Opportunity

Research on effective services for CY2022 Title I participants showed that completing at least one training resulted in generally higher employment and wage outcomes than those who did not complete training. Two quarters after exiting, completers earned \$1,293 more and had an employment rate that was about 10 percentage points higher than individuals who did not complete a training. Four quarters after exiting, completers earned \$1,558 more and had an employment rate that was 9 percentage points higher than individuals who did not complete a training. Services that typically saw improvements in employment and wage outcomes included Occupational Training Skills Training, On the Job Training, Registered Apprenticeship, and Youth Occupational Skills Training. More specific comprehensive research on High Impact Training Programs (HIT) for Title I Adult participants can be found later in this report.

The Arizona Office of Economic Opportunity (OEO) conducted a study that evaluated completion dynamics and post-training outcomes by demographic, barriers-to-employment, and program characteristics of Title I-B Adult program completers and non-completers enrolled from 2016 Q3 to 2024 Q1 using the Integrated Data System (IDS). Temporary Assistance for Needy Families (TANF) recipients and individuals with disabilities were found to have the lowest completion rates among barrier groups, with 70% and 75% completion rates, respectively. English-language learners achieved the highest completion rates of 85%. For more information about the results of this analysis, visit the Office of Economic Opportunity website.¹³

Program Effectiveness

Figure 11 displays a breakdown of an analysis by the OEO of Title I-B Adult program participants who exited between 2020 Q2 and 2023 Q1. In addition to enter, exit, and completion levels, Figure 11 displays the number of those participants who did or did not complete a High Impact Training (HIT) program. HIT programs were determined from analyzing post-training employment and wage outcomes of these Title I-B Adult program participants. These programs were found to be more effective in achieving employment and wage outcomes for participants than non-HIT programs.

The current hypothesis from this analysis is that by increasing HIT enrollment, post-training outcomes can be improved overall. This is highlighted by higher performance outcomes HIT programs have produced historically, as displayed in Table 22. As of the initial research publication in December 2024, about 45% of programs with 5 or more enrolled on the Eligible Training Provider List (ETPL) in the three year period were HIT programs, but only 19% of program participants completed HIT programs. This indicates opportunity for greater alignment between participant and HIT programs.

Figure 11: Title I-B Adult Program Participants Breakdown (Q2 2020 - Q1 2023 Exiters)

¹³ <https://oao.az.gov/workforce-evaluation>



Source: Arizona Office of Economic Opportunity

Table 22: HIT vs Non-HIT Performance Outcomes (Q2 2020 - Q1 2023 Exiters)

Performance Measure	HIT	Non-HIT
Employment 2nd Quarter After Exit	85.6%	75.2%
Employment 4th Quarter After Exit	84.8%	68.8%
Wages 2nd Quarter After Exit	\$10,833	\$9,394

Source: Arizona Office of Economic Opportunity

While HIT programs were found to provide better post-training outcomes among program completers, program completion in general leads to better wage and employment outcomes compared to non-completion. In the same study referenced previously in the *Training Outcomes by Barrier to Employment* section of Title I-B Adult program completers and non-completers enrolled from 2016 Q3 to 2024 Q1, the OEO found that five years after exit, completers earned a mean quarterly wage of \$10,620 versus \$8,494 for non-completers, a 25% premium. Completers who entered the program unemployed posted the fastest wage growth, nearly double that of unemployed non-completers. Completers for 5 years after exit were shown to have higher cumulative employment probability.¹⁴

In an effort to provide insight into which training subjects lead participants into employment in related industries, the OEO conducted another study utilizing the Integrated Data System (IDS) and analyzed data from 17,080 Adult Program participants who exited a Title I-B Adult occupational skills training program between 2018 Q3 and 2024 Q2. The finding showed that the training subjects with the largest alignment rate were Security and Protective Services; Transportation and Materials Moving; and Business Management, Marketing, and Related Support Services with 94.4%, 90.1%, and 84.4% of program completers finding employment in related industries, respectively. The training subject with

¹⁴ Office of Economic Opportunity website: <https://oeo.az.gov/workforce-evaluation>

lowest industry employment alignment rate was Personal and Culinary Services, with 45.2% of completers finding employment in related industries. Table 23 below displays employment alignment information for employment 2nd quarter after exit across training subjects. For more information about the results of this analysis visit the Office of Economic Opportunity website.

Table 23: Title I-B Adult Employment Alignment by Training Subject

Training Subject Type	Completers Employed	Number of Completers Employed in Related Industries	Employment Alignment
Security and Protective Services	89	84	94.4%
Transportation and Materials Moving	2,643	2,381	90.1%
Business, Management, Marketing, and Related Support Services	327	276	84.4%
Computer and Information Sciences and Support Services	297	244	82.2%
Health Professions and Related Clinical Sciences	2,506	1,871	74.7%
Agriculture, Agriculture Operations, and Related Sciences	30	20	66.7%
Mechanic and Repair Technologies	88	54	61.4%
Engineering Technologies/Technicians	105	55	52.4%
Construction Trades	81	41	50.6%
Personal and Culinary Services	221	100	45.2%
Other Subject Types	94	55	58.2%
Total	6,481	5,181	79.9%

Source: Arizona Office of Economic Opportunity

To support employment in in-demand industries, the findings in Table 23 encourage potential initiatives to increase enrollment and completion of Transportation and Materials Moving and Health Professions and Related Clinical Sciences programs, as those programs have high employment alignment with the Transportation and Warehousing and Health Care and Social Assistance industries, respectively.

Title II

The ADE administers WIOA Title II funding to sub-grantees through its Adult Education Services Division in order to provide services in each of the LWDAs. A competitive grant application process is conducted approximately every four years, ensuring that all local workforce areas have Title II providers delivering high quality services. Title II providers deliver services in literacy education, including adult basic education, English acquisition, numeracy, digital skills, workplace preparedness, and Integrated Education and Training (IET). Under A.R.S. §15-252(B), the ADE only provides services to adults who are

citizens, legal residents, or are lawfully present in the United States of America. The ADE also houses the Career and Technical Education (CTE) Program which is not included in this Unified State Plan but does present continued opportunities for deepening state-level coordination.

The most recent grant competition was held in PY 2023-2024 there are 21 Title II providers, consisting of nine community colleges, five local education agencies (school districts), four community-based organizations, and three county governments:

- Arizona Center for Youth Resources;
- Adult Literacy Plus of Southwest Arizona;
- Arizona Western College Adult Education Services;
- Central Arizona College Adult Education Program;
- Coconino Community College - Adult Basic Education for College and Careers;
- Cochise College Adult Education;
- East Valley Institute of Technology;
- Friendly House Adult Education Program;
- Gilbert Adult Learning Program;
- Gila County Adult Education Program;
- Literacy Volunteers of Maricopa County, Inc.;
- Maricopa County Adult Probation Dept. Education;
- Mohave Community College Adult Education;
- Mesa Adult Education Program;
- Northland Pioneer College - College and Career Preparation;
- Pima Community College - Adult Basic Education for College & Career;
- Queen Creek Adult Education Program;
- Rio Salado College Adult Education Program;
- Santa Cruz County Continuing Education;
- South Yuma County Adult Education Consortium; and
- Yavapai College Adult Basic Education.

Title IV offers a specific set of job readiness services, Pre-Employment Transition Services (Pre-ETS), to all students with documented disabilities who are between the ages of 14 and 22 and enrolled in an educational program. These services are intended to help students with disabilities prepare for future employment; are short in duration; and include job exploration, work-based learning experiences, counseling on postsecondary training opportunities, work readiness training, and instruction in self-advocacy.

The workforce development activities and initiatives highlighted below demonstrate the summarized efforts of ARIZONA@WORK system stakeholders.

Eligible Training Provider List (ETPL)

The ETPL is a **training** resource to be used by participants in the Adult, DW, and **Youth** Programs. The ETPL includes approved Training Providers who are eligible to receive WIOA Title I-B funds to train eligible adults and DWs, In-School Youth, and Out-of-School Youth Program participants, including those

who have barriers and/or require VR services. The ETPL provides training program description, training program cost information, credential information, labor market information, and performance information to inform consumer choice.

A training program must be listed on the ETPL for WIOA Title I-B Funds to be used to pay for the training **through an individual training account**. To meet the skill and educational development needs of eligible participants, the Eligible Training Provider (ETP) Programs align with the sector strategies and respective local plans that are focused on In-Demand occupations and result in a recognized credential. ADES and the LWDBs share the responsibility of managing the statewide ETPL including approving programs for initial and continued eligibility. The ADES State ETPL Coordinator approves training providers after ensuring the providers meet the state training provider eligibility requirements listed in the WIOA and State ETPL policy. The State and LWDB ETPL Coordinators review each training program individually to determine if the training programs meet state and local ETPL requirements, respectively, including initial performance data standards, and resulting in a federally or locally recognized credential.

Programs that are approved at the local level are reviewed for accuracy and completeness by the State ETPL Coordinator prior to final approval for inclusion on the statewide ETPL, for a one-year initial eligibility period. The LWDB reviews the training provider's program performance for continued eligibility based on the performance accountability measures using data on all WIOA Title I-B and non-WIOA Title I-B participants who participated in the training program during the performance period. Programs are then reviewed every two years for continued eligibility. Initial Programs are those in the first year of approval.

Employment Service (ES) Complaint System

ES and Employment-Related Law Complaint System sets forth the regulations governing the Complaint System for the Wagner-Peyser Act ES at the State and Federal levels. The Complaint System handles:

- Complaints against an employer about the specific job to which the applicant was referred through the ES system; and;
- Accepts, refers, and tracks complaints involving employment-related laws against any employer regardless of whether in the ES system.

This includes responsibility to attempt informal resolutions at the local level of wage related complaints.

In October of 2022 Arizona opened an online access point¹⁵ for filing complaints as another means to support individuals throughout a career journey. State agencies must ensure information pertaining to the use of the Complaint System is publicized at each one-stop center. Complaints may be accepted in any one-stop center, or by a SWA, or elsewhere by outreach staff. The addition of online access has provided a direct referral source for partner agencies. Prior to the complaint system being available online an average of 30 complaints were received, since implementing online access, the average has increased to 300 per month. Informal resolution on wage complaints average recovered to date for **2025**

¹⁵ [File an Employment Service/Related Law Complaint: https://des.az.gov/services/employment/employment-service-related-law-complaint/file-complaint](https://des.az.gov/services/employment/employment-service-related-law-complaint/file-complaint)

is \$296,247.

Job Center Assistive Technology Needs Assessment

The VR Program within ADES partners with ARIZONA@WORK job centers to offer expertise and assistance to: identify a contact at the center that can assist both staff and the public with Assistive Technology accessibility questions; assess current assistive technology and accessibility needs, provide recommendations for equipment/services; and provide training resources to job center staff regarding how to assist an individual in accessing the assistive technology. VR partners with external providers to offer disability awareness workshops, assistive technology equipment recommendations, training, and resource development to all VR and ARIZONA@WORK staff. VR also assisted with the development of a shared resource document that helps local area operators ensure basic programmatic accessibility in each job center location.

Rapid Response (RR)

ADES administers RR at the State level, while LWDA's also receive funding for RR **planning, coordination, and execution at the local level.**

In PY 2024, Arizona recorded 50 plant closing and/or mass layoff notices, in accordance with the Worker Adjustment and Retraining Notification (WARN) Act. The closings and layoffs in the notices affected 6,440 workers. Arizona also recorded 39 "non-WARN" notices, affecting 3,777 workers. In total, 15 industries were impacted. ARIZONA@WORK adopted statewide and regional/local area approaches to respond to and mitigate the impact of these events on workers and businesses.

ARIZONA@WORK supported 63 coordinated Rapid Response events statewide, and provided reemployment and training opportunities, career services, resources, and other community services to the affected workers. Staff from various ARIZONA@WORK programs provided direct services to the affected workers, including the following: initial AJC system intake and registration; employment services that include initial assessment of skills and service needs; job search assistance; career planning; customized resume assistance; eligibility determination for training services; referrals to other ARIZONA@WORK services, including through the Adult, Dislocated Worker, Youth, and JVSG programs; and access to Unemployment Insurance (UI) benefit information.

Reentry Program

The Reentry Program, a partnership between ADES and the Arizona Department of Corrections Rehabilitation & Reentry (ADCRR), assists inmates and individuals on parole overcome barriers to employment and achieve success within their communities after release from prison through job readiness skills and finding sustainable employment. Reentry services are delivered in a Prison Based or Community Based model and include ES such as interview skills, resume assistance, soft skills development, job preparation, access to background-friendly employers, job fairs, and one-on-one assistance. Prison Based Reentry Services include Second Chance Centers (SCC) and Resource Employment and Development (RED). Within the SCC is an eight-week program of ES provided to inmates in **four Arizona State Prison Complexes: currently in Perryville (Goodyear), Lewis - Stiner (Buckeye), Manzanita (Tucson), and Phoenix West.** The program runs Monday through Friday, six hours

per day program and is co-facilitated by an Arizona State Prison trained inmate Recovery Support Specialist, ADES staff in partnership with key organizations, and businesses. The classes are held in-person and virtually through an internet supported Google Meet platform. RED is a virtual internet based web conference hosted by ADES staff that runs Monday through Friday, four hours per day (morning and afternoon sessions). This 30-day pre-release ES Program includes but is not limited to work ethic and money management. Community Based Reentry Services, specific to ADCRR participants, include ES through parole and probation offices and residential **reentry centers**. ADES staff are co-located at community locations such as **Native Health and New Freedom** to provide ES to justice involved individuals in Arizona's two most populous counties, Maricopa and Pima. ADES provides virtual services to the remaining counties through the referral system with ADCRR.

The Reentry Program expanded in PY 2022 when ADES was awarded the U.S. DOL's Partners for Reentry Opportunities in Workforce Development (PROWD) grant to work in partnership with the Bureau of Prisons (BOP). Building upon the existing prison-based and community based service delivery model, PROWD's multi-pronged goal is to improve employment outcomes of returning citizens, public safety of the community, and increasing capacity of justice and workforce system partnerships. In administering PROWD, ADES partners with community organizations and **medium-** and low-security federal correctional institutions to provide coordinated services across three stages: during incarceration in federal prisons, during time spent in residential reentry centers, and after release into the community. The PROWD grant began October 1, 2023 and the period of performance ends September 30, 2027.

Career Readiness Program for Incarcerated Youth

ADES provides reentry services to youth incarcerated in the Arizona Department of Juvenile Corrections (ADJC) at Adobe Mountain School. Youth participating in the ADJC Adobe Mountain School Program are introduced to the world of work by ARIZONA@WORK representatives and local employers. For many of the youth, this is the first time they are learning workforce basics including how to identify career goals, what steps are required to obtain a career, how to write a resume, apply and interview for a job and much more. Guest speakers educate the youth about workforce opportunities including paid registered apprenticeship programs, training opportunities, and post-release educational and employment support. Through this program, Juvenile Corrections staff have become credentialed certifiers for the National Retail Federation's "Retail Industry Fundamentals." The retail credential is a tool designed to improve participant's hard and soft workforce skills culminating with a scored certificate that they can present to potential employers demonstrating mastery of employability skills and work environments. In 2023, NRF added, "Warehousing, Inventory and Logistics" curriculum access to the youth at Adobe Mountain School.

VR Your Career: Tools for Success

This **five**-module program helps clients learn and practice the skills they need to **prepare for and** seek employment. Participants completing the program, or nearing completion, are connected with an in-house VR Employment **Outreach** Specialist to begin looking for work.

Services to Employers

Employers are central to the ARIZONA@WORK system, driving economic growth and ensuring a career-ready workforce. Arizona's business services model is focused on consulting with business leaders and providing value-added services and solutions to meet the business' recruitment, training, and retention needs. This is accomplished by ARIZONA@WORK Business Services Teams (BST) from across the state **representing workforce programs**, who aim to work collaboratively and strategically as workforce system partners to support statewide and local strategies and goals.

The ARIZONA@WORK BSTs **leverage Labor Market Information tools** to help determine what jobs are in demand in an LWDA, the types of training and credentials that individuals need to be qualified for these positions, development of career pathways, and identification of sector strategies, leading to a job-driven workforce system. When these collaborative environments are developed, strengthened, and aligned, they lead to enhanced services and job matching effectiveness. When employers become more familiar with the services, their interest in providing opportunities for job seekers expands into participation in work based training models, such as on-the-job training, customized training, and apprenticeship opportunities.

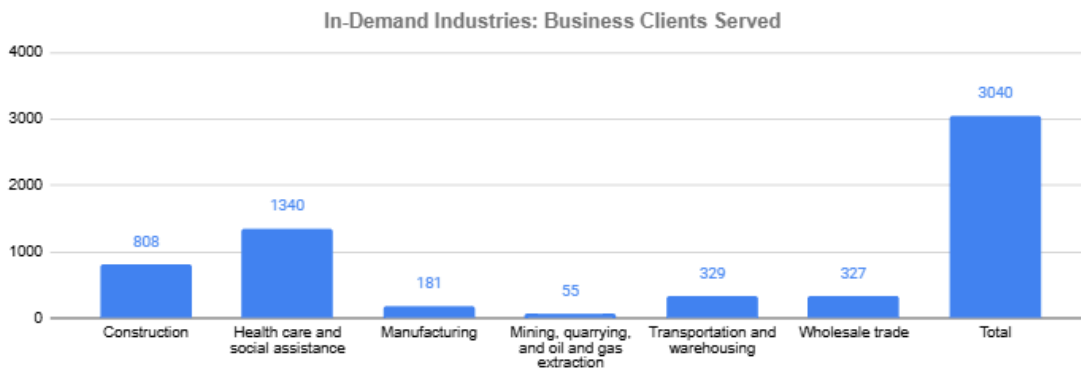
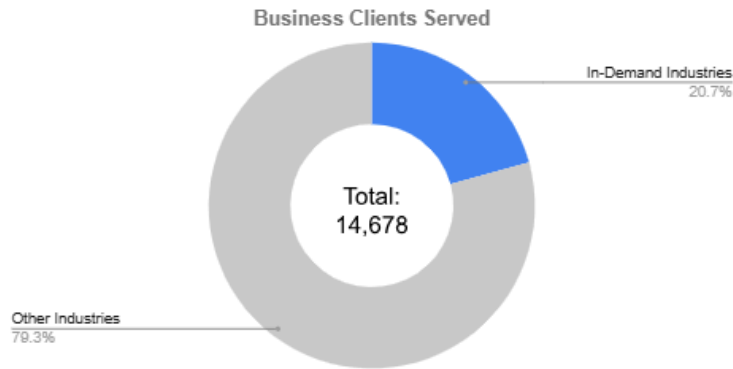
BSTs provide a wide array of services to employers, including:

- Contacting the employer to inquire about the requirements of potential applicants;
- Conducting on-site meetings with employers to assess their needs and develop a strategy;
- Validating and proactively addressing the growing demand from independently registered businesses, ensuring efficient support. Verifying and effectively responding to the increased demand from self-registered businesses;
- Developing comprehensive job announcements that clearly illustrate needed qualifications, educational, and experience requirements;
- Plan, support, promote, and manage the logistics of customized recruitment events to meet employer demand;
- Applicant screening to match job seekers who meet specific skill requirements;
- Connecting employers to career and training services such as On-the-Job Training Programs, Incumbent Worker Training programs, Customized Training programs, industry and sector strategies, and career pathways initiatives;
- Promoting Apprenticeship opportunities and provide assistance to become a registered apprenticeship program;
- Providing current and tailored labor market Information based on industry trends;
- Promoting the benefits of hiring Veterans, individuals with disabilities, and other priority groups;
- Educating employers on workforce solutions such as the WOTC, Federal Bonding, and candidate pool availability;
- Coordinating lay-off aversion strategies with businesses;
- Supporting businesses and affected workers through RR activities;
- Coordinating meetings, providing training, conduct orientations;
- Scheduling interviews at job centers;
- Consistent communication and follow up with employers to facilitate the relationship building and cultivation process;

- Supporting the navigation of business services provided by ARIZONA@WORK and other entities;
- Establishing work-based learning models;
- Utilizing IET Programs to fill identified vacancies;
- Participating in sector partnerships and industry led projects; and
- Support the WAC in developing workforce strategies that provide direct employer support.

The figures below highlight Business Services impact throughout the state:

Figure 15: Business Clients in In-Demand Industries, PYs 2022 - 2024



Source: WIOA Annual Effectiveness Serving Employers (Tableau)

Achieve60AZ

The Arizona Coalition for Career Readiness (ACCR) supports Achieve60AZ, which aims to help 60 percent of Arizona adults attain a postsecondary degree by 2030. ACCR includes Arizona Business and Education Coalition, Junior Achievement of Arizona, Center for the Future of Arizona, Valley of the Sun United Way, and Pipeline AZ. The coalition aims to scale the use of MyFutureAZ, a virtual platform that provides Arizona K-12 students the opportunity to connect their personal interests with possible career paths as they move to graduation. Students are provided resources and support to take the next steps in their journey to becoming career ready in their field of choice.

Arizona Advanced Technology Network (AATN)

The AATN has been in operation since 2019 and is a partnership through Maricopa Community College, Central Arizona College, and Pima Community College to develop a unified, industry recognized curriculum specifically designed to teach the skills needed for high-paying, high-tech advanced

manufacturing jobs. The OEO is engaged in discussions with the participating Community Colleges to rebrand the project and infuse it with additional marketing dollars for potential expansion.

Arizona Western College Broadband Project

The Arizona Western College Broadband Project is a \$300,000 project that implements a broadband fiber optics training program at Arizona Western College, with a focus on related in-demand jobs in Yuma County. The program includes Fiber Optic Certification tuition assistance, paid work-based training, job placement assistance, and supportive services. The project serves local employers such as Arizona Public Service, Spectrum, ALLO Fiber Internet, Century Line and others.

BuilditAZ Apprenticeship Initiative

The BuilditAZ Apprenticeship Initiative¹⁶ complements and underscores the aim to help develop a highly skilled workforce for employers and make quality employment available to workers and job seekers. Arizona is a national model for innovative and successful workforce development programs. Our collaborative approach brings together government, education, and industry to develop comprehensive, award-winning, and scalable solutions. BuilditAZ Apprenticeship Initiative represents Arizona's latest workforce advancement, connecting workers with the skills and know-how needed for jobs in the state's construction and trades industry with the goal of doubling the number of construction and trade registered apprentices. All of this work is aimed towards meeting the building needs of our growing 21st-century economy, from housing to semiconductor fabs to broadband and electric vehicle infrastructure.

The BuilditAZ Apprenticeship initiative aims to double the number of construction and trades registered apprentices by 2026. As of the latest available data, there are 4,071 apprentices actively participating in a construction and trades registered apprenticeship program in Arizona. Additional BuilditAZ initiative goals include:

- Increased access to effective pre-apprenticeship programs that directly enroll in registered apprenticeship programs, creating pathways in the trades, especially for women and other underrepresented learners;
- Updated registered programs' rules and regulations to reflect current market trends and best practices;
- Creation of an apprenticeship grants office to secure funding that expands apprenticeship programs, and directs agencies for the first time to actively apply for federal apprenticeship funds;
- Increase funding and development of strategies for meeting increasing green economy workforce demands and filling green jobs, for projects such as electric vehicle charging stations and solar panel installation; and
- Increased number of adults in Arizona with an industry recognized credential, contributing towards meeting the state's attainment goal, Achieve60AZ (60 percent education attainment by 2030).

¹⁶ <https://arizonaatwork.com/sites/default/files/2023-08/BuilditAZ-Apprenticeship-Initiative.pdf>

To achieve these goals, the initiative organized a workgroup of over 40 volunteers from various sectors, including Industry, Education, Government, Trades, and Non-Profit Community Organizations, all operating under the leadership of the WAC. This workgroup is divided into five subgroups, each tasked with developing specific goals and strategies in key areas related to apprenticeship expansion.

These key areas typically included:

- Marketing and Outreach;
- Policy and Governance;
- Employer Engagement;
- Career Pathways; and
- Grants and Funding Opportunities.

DRIVE 48 Workforce Training Center

The “Drive 48” training center, located on the Central Arizona College Signal Peak campus in Pinal County, is a 13,000 square-foot training center that will equip future manufacturing technicians with the skills needed for high-tech jobs. Launched in 2021, the training center continues to train thousands of students each year, many of which have been hired by Lucid Motors a business that has embarked on a massive expansion of its facility in Casa Grande, Arizona, adding 2.85 million square feet to support more production, establish production, and create approximately 6,000 direct jobs with an economic impact of more than \$100 million by 2030. The training center was established through a unique collaboration between government, academia, and industry – one that can be scaled throughout the state. Using robots and other advanced technology, these students will gain hands-on experience in areas such as:

- Programming;
- Maintenance;
- Parts assembly; and
- Safety training.

ElevateEdAZ

OEO and ACA are funding a \$5,000,000 project for the Phoenix Chamber Foundation to expand its ElevateEdAZ Program. The program prepares individuals for college and career through stronger alignment between education, business and the community. ElevateEdAZ is focused on increasing the number of students completing high-quality education to workforce learning pathways that align with the needs of the industry. This includes working with school partners to support students in completing industry recognized credentials, attaining early post-secondary credit and participating in work-based learning experiences such as internships and job shadowing. In addition, ElevateEdAZ supports educator professional development by partnering to provide externship experiences for teachers and counselors.

Future48 Advanced Manufacturing Marketing Campaign

In partnership with Ideas Collide, a full service marketing agency, Future48 utilizes \$300,000 to change perceptions in the advanced manufacturing trades industry as a Science, Technology, Engineering and Math (STEM) based career pathway in order to capture a diverse and emerging workforce. The campaign will create a wide variety of digital, print, and other forms of media that will guide interested individuals to a website for additional information on advanced manufacturing.

Jobpath Inc. Student Support Services

Jobpath Inc. received \$210,000 to support the success of 547 low-income students pursuing short-term degrees or credentials throughout southeastern Arizona. Job Path Inc. is a workforce development support and advocacy agency that provides Student Support Services in Pima and Pinal Counties, collaborating with community colleges and job-training facilities to empower under-represented adults in pursuing vocational degrees and certificates, particularly in IT, industrial trades, and healthcare for high-wage, in-demand careers. JobPath provides wraparound case management and financial support for students thereby removing barriers to success by helping students with both school and non-school related expenses.

Maricopa County Community College District (MCCCD) Semiconductor Technician Quick Start Program

MCCCD received \$2.5 million to develop a training program for semiconductor manufacturing technician jobs. The short-term training program is a collaboration with semiconductor companies in the area and is intended to qualify individuals for an exciting new career and full-time employment as semiconductor manufacturing technicians. Developed and implemented at Mesa Community College to assist the manufacturing industry by increasing the availability of a qualified and eligible workforce who are certified in manufacturing to increase the awareness of these efforts among employers, potential students, future talent pipeline and other potential partners. The project concluded in June 2023, yielding 557 graduates.

SciTech EcoSystem Hubs Project

Arizona SciTech received \$142,000 to forge a network of regional STEM communities of practice or “hubs” in the State. The hubs allow individuals in their regions to connect and engage local educational, civic, and community institutions; people and assets; ARIZONA@WORK; other regional workforce organizations; and employers.

The network of hubs will ensure that workforce efforts reach youth and untapped, underserved populations (e.g., minorities, rural residents, veterans, etc.) to catalyze a diverse pipeline of skilled, knowledgeable Arizonans entering the workforce. Hub members will also connect as a statewide community of practice to share best practices, build partnerships, and develop communication strategies to increase impact.

Training Accelerator Facilities

The creation of a statewide network of advanced manufacturing workforce training facilities that train job seekers in immediate and relevant occupational and professional skills providing career pathways into high-quality, in-demand jobs that offer upward mobility while also filling employers’ critical workforce needs. Workforce Accelerators have been announced in Yuma County with Arizona Western College and Mohave County with Mohave Community College. A third Accelerator in Maricopa County with Maricopa Community College is forthcoming.

West-MEC’s Energy and Manufacturing Systems Program

West-MEC, received \$580,000 to create two new high school CTE programs in the semiconductor and electric vehicle technology industries. West-MEC’s Energy and Manufacturing Systems Program explores

the fields of mechanical systems, electrical systems, electronics, instrumentation & controls, energy production systems. Managed in close partnership with APS, Palo Verde Generating Station, and Estrella Mountain Community College, this two-year program includes core curriculum topics such as Solar, Nuclear, Wind, Construction Math, Basic Rigging, Construction Drawings, and Hand and Power Tools. The program's scope also includes topics intended for students aiming for a career as an industrial maintenance mechanic and industrial maintenance E&I technician, such as process mathematics, HP steam systems, heat exchangers, conductors and cables, hand bending, and conductor terminations and splices. The majority of the funds will be used to purchase equipment, supplies and materials at three different campuses in the West Valley.

WIOA Governor's Discretionary Fund

In the last quarter of PY 2022, the Governor's office requested grant applications for innovative workforce development pilot programs that engage individuals from communities with consistently high rates of unemployment and poverty. Approximately \$4,000,000 would be awarded, with a maximum annual award of \$500,000 per grantee, which is renewable for a combined term of three years. Applications from Arizona entities that include 501(c)(3) organizations; Arizona local, county, and state government entities; Arizona Tribal Nations and communities; Arizona public and charter school districts; Arizona institutions of higher learning (universities, community colleges, and trade schools); and any partnership of the above-listed organizations were accepted.

To increase participant accessibility and eliminate barriers to success, proposed programs are required to provide wraparound services during program enrollment and at least six to twelve months post-graduation. Examples of wraparound services include but are not limited to the following:

- Mentoring
- Trauma-informed care
- Personal employment counseling
- Employment readiness
- Childcare
- Transportation support
- Nutrition assistance
- Transitional housing

Furthermore, programs should strive to implement programming in the communities they seek to serve and will need to demonstrate existing partnerships with the public workforce development system, education and human services systems and private establishments.

B. The Strengths and Weaknesses of Workforce Development Activities. Provide an analysis of the strengths and weaknesses of the workforce development activities identified in (A), directly above.

As highlighted above, the ARIZONA@WORK system provides a wide-range of services to the state's jobseekers and businesses. The system acts as a linchpin, facilitating intricate connections between individual skills and market demands, which requires an analysis of the strengths and weaknesses the system encounters in delivering services to shared customers.

The workforce system boasts an impressive array of strengths, providing widespread access to services through strategically located Comprehensive One-Stop offices, ARIZONA@WORK Job Centers, to ensure convenience for all stakeholders involved. The emphasis on a "no wrong door" philosophy underscores a comprehensive approach that prioritizes the unique needs of individuals. The system's adaptability shines through its swift pivot to virtual and online services during the challenges posed by the COVID-19 pandemic. Furthermore, innovative educational instruction models, robust referral systems, and strong relationships with employers showcase the system's commitment to evolution and excellence.

The workforce system in the described context exhibits several strengths:

- **Access to Services:** The workforce system ensures widespread access to services through Comprehensive One-Stop offices strategically located in specific local areas. This facilitates convenient access for both employers and job seekers. Notably, these services are provided at no cost to employers and job seekers, making them easily accessible to a broad range of individuals.
- **Appropriate Matching and High Success:** The ARIZONA@WORK system's effectiveness is enhanced by its ability to appropriately match individuals with the right programs and services. This tailored approach contributes to high success rates for participants.
- **Virtual and Online Services:** The system successfully adapted to the challenges posed by the COVID-19 pandemic by pivoting to virtual and online services. This adaptability showcases resilience and a commitment to providing continuous support in changing circumstances.
- **Innovative Educational Instruction:** The workforce system has embraced new models of educational instruction, including virtual and hi-flex approaches. This innovation ensures that participants receive training in ways that align with evolving educational trends and preferences.
- **Title II Providers:** The state boasts a considerable number of Title II providers, indicating a robust infrastructure for adult education and literacy programs across the state.
- **Agile Community College Training Partners:** Community colleges within the central region exhibit agility in responding to employer needs. This flexibility enhances the system's ability to align training programs with industry requirements.
- **Title III Participation Growth:** Over a three-year period, there has been a significant increase in Title III participation, demonstrating the effectiveness and appeal of the services provided.
- **Passionate Staff:** A notable strength is the passion of the workforce system's staff. Their dedication contributes to a positive and supportive environment for job seekers and employers alike.
- **Robust Referral System:** Specific local areas in particular regions benefit from a collaborative robust referral system, streamlining the process of connecting individuals with the most relevant services.
- **Strong Employer Relationships:** In specific local areas, the workforce system has cultivated robust relationships with employers. This connection is crucial for understanding and meeting the needs of the job market.
- **Co-Enrollment Growth:** Over a three-year period, there has been an increase in co-enrollment among the Adult and DW programs, indicating a collaborative and integrated approach to serving diverse needs.

- **Transparency and Collaboration with the State:** The workforce system has established transparent communication across the State, fostering collaboration and preventing duplication of efforts. This ensures a cohesive and efficient approach to workforce development.
- **Apprenticeship Leadership:** The state's leadership in apprenticeships, especially in Maricopa County, positions it as a trailblazer in fostering practical skill development and industry partnerships.
- **State Characteristics and Prospecting:** The workforce system leverages the size of the state, recognizing and addressing similarities between larger and smaller communities. This inclusive approach ensures that services are tailored to the diverse needs of the population.
- **Cross-Border Collaboration:** In Yuma County, coordination with the Mexican workforce highlights the system's ability to engage in cross-border collaboration, acknowledging and incorporating the unique dynamics of the labor market.
- **Adaptation to Changing Youth Expectations:** The workforce system acknowledges and navigates the changing expectations of work among younger generations, adapting its strategies to effectively engage and support the evolving workforce.
- **AI Integration and Preparedness:** Recognizing the impact of artificial intelligence, the workforce system is proactive in preparing for changes in the job market. This includes acknowledging the emergence of new jobs and anticipating future developments in the workforce landscape.

However, the narrative is not without its complexities. The workforce system has identified weaknesses that demand attention for its sustained effectiveness, including improving the identification of eligible individuals from priority populations, including DWs and displaced homemakers. Addressing this challenge will significantly improve outcome data and prioritize strategic interventions to address this critical aspect of workforce support. Additionally, the need to address the basic needs of individuals and challenges with interconnected referral systems point to areas where improvements are imperative. **Equal access** in the context of workforce development was also identified as a continued area of improvement, including location-based disparities, rigid diploma or high school equivalency mandates, constraints imposed by the lower living standard income level, youth guidelines, and variable co-enrollment performance outcomes. Language proficiency, basic skills assessments, and intake processes further contribute to inequities, particularly for individuals with disabilities. ARIZONA@WORK services exhibit uneven reach, with schools sometimes utilizing job fairs as incentives. Unfortunately, this approach inadvertently erects barriers for youth who are in dire need of these services. Additionally, outdated career pathways hinder equal opportunities, and there is a lack of priority of service for individuals aged 55 and above. Furthermore, data sharing barriers impede the development of targeted strategies to address these weaknesses in the pursuit of equitable access to workforce opportunities.

The low co-enrollment of youth, regional disparities, and shortages in educators and training providers reveal gaps that impact the system's ability to cater to the state's diverse geography and demographics, specifically for the State's rural and tribal communities including the unique industry needs of such areas. Furthermore, recognizing the unique challenges faced by veteran communities identifies the pressing need to bring supportive services directly to these populations. The workforce system must proactively explore innovative solutions to better address the dynamics encountered by veterans to

ensure effective and tailored support for this valued demographic. Internal staff training deficiencies, limited capacity for English Language Learners (ELL) clients, and decreasing funding underscore the need for strategic planning and resource allocation.

It is of critical importance to address these weaknesses through a comprehensive and coordinated effort across the ARIZONA@WORK system. Streamlining referral systems to build off of local area best practices, enhancing outreach, improving staff training, and adapting hiring policies are crucial steps. The workforce system must also address the evolving needs of the labor market, such as the aging workforce trend and regional economic disparities. By acknowledging both strengths and weaknesses, the goal is to foster a constructive dialogue that not only celebrates achievements but also identifies opportunities for growth. This approach aims to contribute to the ongoing refinement of the workforce system, ensuring its resilience and efficacy in navigating the dynamic landscape of the labor market.

The workforce system faces several weaknesses that pose challenges to its effectiveness in meeting the diverse needs of job seekers and employers. The ARIZONA@WORK system aims to address these within the Unified Plan:

- **Inadequate Matching and Low Success:** Although many times this is a strength of our workforce system, when resources and stakeholders fail to collaborate, the system struggles with the challenge of inadequately aligning individuals with suitable programs and services, leading to suboptimal success rates. This highlights the imperative for enhanced coordination and integration to address this weakness effectively.
- **Addressing Underlying Basic Needs:** The system sometimes fails to address underlying issues, such as basic needs (e.g., food, shelter), before expecting job seekers to commit to training programs. This can hinder the success of individuals who face immediate challenges beyond employment.
- **Referral System Challenges:** The presence of too many different referral systems among local areas complicates the process and may lead to inefficiencies. Additionally, direct referrals to all core partners do not consistently occur in all local areas, highlighting a need for streamlined and consistent referral processes.
- **Low Youth Co-Enrollment:** The co-enrollment of youth in the system is reported as being low, indicating a potential gap in engaging and supporting young job seekers effectively.
- **Regional Disparities in In-Demand Sectors:** Statewide In-Demand Sectors are not universally applicable to all local areas, signaling a need for more localized strategies to address specific regional industry demands.
- **Educator and Training Provider Shortages:** There is a lack of educators to train participants, and some programs struggle to maintain consistent operation due to a shortage of training providers, especially in rural areas.
- **Internal Staff Training Deficiencies:** Insufficient internal staff training and knowledge about the services provided by core and required partner programs, impact the effectiveness of service delivery.

- **Limited Capacity for ELL Clients:** The workforce system lacks the capacity to effectively serve low or zero-level English as a Second Language (ESL) clients, posing a barrier to participation for a specific demographic.
- **Inadequate Marketing and Outreach:** Minimal efforts in outreach and awareness, hinder the system's ability to reach and engage its target audience effectively.
- **Decreasing Funding:** The ongoing decrease in funding poses a significant challenge, limiting the system's capacity to innovate and meet growing demands effectively.
- **Employer Engagement Opportunities:** The engagement of employers with the workforce system could be improved, suggesting the need for enhanced strategies to foster collaboration and partnerships.
- **Duplication and Competition Among Partners:** There is evidence of duplication of efforts and competition among partners. This hampers a cohesive and collaborative approach to workforce development.
- **Measurement Inconsistencies Among Partners:** Core and required partner programs measure success in different ways, making it challenging to assess the overall effectiveness of the system. Standardized metrics may be needed for more accurate evaluation.
- **Limited Connectivity for Core Partners:** Many core partners are unaware of how to connect to various projects and initiatives, indicating a need for improved communication and coordination.
- **Policy Deficiency during Turnover:** The lack of distinctive policy that upholds operational guidance during turnover within the state or local areas can lead to inconsistencies and disruptions in service delivery.
- **Outdated Career Path Lattices:** The use of antiquated career path lattices and recommendations for in-demand and entry-level jobs may hinder the system's ability to guide participants effectively in their career pathways.
- **Soft Skills Training Needs:** There is a reported lack of soft skills among job seekers, underscoring the importance of more efficient and timely soft skills training programs.
- **Aging Workforce Trend:** Arizona's older workforce is on track to age out soon, necessitating strategic planning to address the potential impact on the labor market.
- **Regional Disparities in Large Employer Attraction:** While large employers are moving to Arizona, there is a concentration in the Phoenix area, indicating a need to address regional disparities and promote economic development in northern and southern regions.

C. State Workforce Development Capacity Provide an analysis of the capacity of State entities to provide the workforce development activities identified in (A), above.

To implement WIOA requirements and strategies to meet the goals of this Plan, ARIZONA@WORK needs to identify its capacity of the teams making up the ARIZONA@WORK system. Below is a summary of the State and LWDB team's efforts to support Arizona's workforce system.

Local Workforce Development Boards

The 12 LWDBs in Arizona serve as strategic conveners to promote and broker effective

relationships between the Chief Local Elected Officials and economic, education, and workforce partners throughout the LWDA. The LWDBs are responsible for developing strategies to continuously improve and strengthen the workforce development system in their local areas. This includes, but is not limited to, assessing the capacity of the ARIZONA@WORK one-stop and other local partners who together implement WIOA services in the LWDA. LWDBs conduct an assessment and describe the ARIZONA@WORK workforce development activities in their local plans. Local plans were developed in 2023 which included clarification on the local capacity to implement workforce development activities and support state strategies. These plans can be found on each local area's ARIZONA@WORK website page.

ARIZONA@WORK Business Services

Who is Served: The ARIZONA@WORK BSTs play a crucial role in fostering collaboration with various stakeholders within the workforce system, particularly those dedicated to economic development. Through strategic partnerships, these teams create a dynamic synergy that enhances the overall workforce ecosystem. By working closely with economic development entities, they facilitate a seamless exchange of information and resources, allowing employers to gain a comprehensive understanding of available workforce services. This collaboration enables businesses to access a pool of skilled workers more effectively, fostering a mutually beneficial relationship where the right talents are matched with suitable employment opportunities. The concerted efforts of ARIZONA@WORK partners exemplify a holistic approach to workforce development, driving economic growth and prosperity in the region. For the data below, employer penetration rate are Arizona employers using program services and employer retention rate is the percentage of ARIZONA@WORK participants retaining employment.

Performance Metrics:

Program Description: At the State level within the ADES, which includes the LVERs, Reentry and VR employer coordinators, and the State RR Coordinator, collaboration with LWDA business service teams continue to provide seamless engagement with employers and a large assortment of opportunities for Arizona job seekers. This cohesive business services model allows Arizona to fully leverage engagement with employers across the State and advocate for and connect businesses to a diversified candidate pipeline across ARIZONA@WORK Programs.

Title I: Adult, DWs and Youth

Who is Served: LWDBs provide Title I-B services, through contracts or grants, to eligible adults, DWs, and youth (aged 14 to 24). In the Title I-B Adult Program, which serves individuals 18 years and older, top priority for the receipt of individualized career and training services is given to covered persons¹⁷ who are receiving public assistance, low income, or basic skills deficient. The next priority is non-covered persons who are receiving public assistance, low income, or basic skills deficient. The Title I-B DW Program serves individuals, including those who have been laid off through no fault of their own, displaced homemakers, and others identified in section 3(15) of WIOA¹⁸. The Title I-B Youth services are provided to youth, 14 to 24 years of age, with one or more documented barriers or conditions identified

¹⁷ A covered person is a veteran or eligible spouse, as defined in 38 U.S.C. 4215(a). See also section III(b)(7)(A) of the State Plan.

¹⁸ WIOA <https://www.govinfo.gov/content/pkg/PLAW-113publ128/pdf/PLAW-113publ128.pdf>

in section 129(a) of WIOA, such as being a homeless individual, etc. At least 75% of applicable funding must be used to serve out-of-school youth.

Performance Metrics:

Program Description: Services assist individuals, particularly those with barriers to employment, to increase access to employment, retention, earnings, and attainment of recognized postsecondary credentials.

Title II, Adult Education:

Who is Served: Students who are 16 years of age or older, not enrolled or required to be enrolled in secondary school under A.R.S. § 15-802, are basic skills deficient, lack a secondary school diploma or its equivalent, or are English language learners. Additionally, adult education students must meet the eligibility requirements in A.R.S. § 15-232(b) of being lawfully present in the United States.

Performance Metrics:

Program Description: This program provides adult basic and secondary education and English language acquisition services throughout the state, assisting adults in gaining the knowledge and skills necessary for employment and economic self-sufficiency. Program activities include pathways to the high school equivalency diploma, civic engagement, workforce preparation, and transition to postsecondary education/training through career pathways.

Title III: Wagner-Peyser Program:

Who is Served: The Title III Wagner-Peyser program, also known as ES, provides basic and individualized career services to job seekers and job development services to Arizona employers. Veterans and covered persons receive priority of service.

Performance Metrics:

Program Description: ES seeks to improve the functioning of Arizona's labor markets by bringing together individuals seeking employment with employers seeking workers. ES, a core partner in the ARIZONA@WORK system, co-locates in job centers and/or in a virtual capacity with other network partners across the state and aligns performance accountability indicators with other federal workforce programs. Basic services include skill assessment, labor market information, referrals to support service programs and job search and placement assistance. Individualized services include career and vocational counseling.

Title IV: VR

Who is Served: The VR Program provides rehabilitation and ES to individuals with disabilities. Students with documented disabilities in the state of Arizona who are between the ages of 14 to 22 and enrolled in an education program are also able to receive a limited set of work preparation services to prepare for future employment. To be eligible for the full range of VR services, individuals must have a documented disability, the disability must present a barrier to competitive and integrated employment, and the individual must require VR services in order to achieve competitive and integrated employment.

Performance Metrics:

Program Description: The VR Program provides services and supports to assist individuals with disabilities to obtain, maintain, regain, or advance in competitive and integrated employment. VR services are individualized and adapted to meet each eligible individual's specific vocational goal and disability-related needs. Examples of services available through the VR program include assessments for determining eligibility and rehabilitation needs, vocational guidance and counseling, job development and retention, vocational/educational training, mobility training, adjustment to disability training, and rehabilitation technology.

The ARIZONA@WORK Public Information Office (PIO) provides the following services:

- Communication: assist LWDAs with communication efforts including, material templates, content and design, promotion assistance of events and workshops, and website usage. Materials promote ARIZONA@WORK services and events to act as reference points for customers and staff, such as flyers, banners, pamphlets, posters, postcards, etc. Digital materials include videos, newsletters, social media posts, infographics, charts, and articles promoting ARIZONA@WORK programs and successes.
- Internal and external communication: critical messages are provided to the internal network to disseminate important updates, events, and news.
- Branding: includes efforts such as the ARIZONA@WORK Style Guide to meet WIOA and State policy requirements to ensure brand consistency throughout the state. PIO distributes any updated branding materials to LWDAs.
- Social Media and Data: serving as the bridge to connect ARIZONA@WORK with the public. ARIZONA@WORK Public Information Officers (PIOs) manage the network's social media presence and assist the LWDAs with their local social media accounts. PIO will also strategize social campaigns with LWDAs in attempts to promote ARIZONA@WORK services.
- ARIZONA@WORK website: manage the general website content and delegate
- responsibilities to LWDAs to maintain area-specific content. PIO is available to assist LWDAs with web projects, updates, and upgrades. ARIZONA@WORK Facebook accounts reach thousands of people across the state each week.

ETPL

Who is served: The ETPL is a resource to be used by participants in the Adult, DW, and Out-of-School Youth Programs as mandated by WIOA Title I-B.

Program Description: The ETPL includes approved Training Providers who are eligible to receive WIOA Title I-B funds to train eligible adults and DWs, In-School Youth, and Out-of-School Youth Program participants, including those who have barriers and/or require VR services. The ETPL provides training program description, training program cost information, credential information, labor market information, and performance information to inform consumer choice. A training program must be listed on the ETPL for WIOA Title I-B Funds to be used to pay for the training.

To meet the skill and educational development needs of eligible participants, the ETP Programs align with the sector strategies and respective local plans that are focused on In-Demand occupations and result in a recognized credential. ADES and the LWDBs share the responsibility of managing the statewide ETPL including approving programs for initial and continued eligibility. The ADES State ETPL Coordinator approves training providers after ensuring the providers meet the state training provider eligibility requirements listed in the WIOA and State ETPL policy. The State and LWDB ETPL Coordinators review each training program individually to determine if the training programs meet state and local ETPL requirements, respectively, including initial performance data standards, and resulting in a federally or locally recognized credential. Arizona uses the training program's credential attainment rate as the performance factor for initial eligibility. Programs that are approved at the local level are reviewed for accuracy and completeness by the State ETPL Coordinator prior to final approval for inclusion on the statewide ETPL, for a one-year initial eligibility period. The LWDB reviews the training provider's program performance for continued eligibility based on the performance accountability measures using data on all WIOA Title I-B and non-WIOA Title I-B participants who participated in the training program during the performance period. Arizona requires that one or more of the WIOA indicators of performance for all students is provided by the training provider: employment 2nd and 4th quarter after exit, median earnings 2nd Quarter after exit, or credential attainment for the last four Quarters. Programs are then reviewed every two years for continued eligibility. Initial Programs are those in the first year of approval.

MSFW Programs: MSFWs are vital to Arizona's agricultural production, especially during the peak harvest months. The MSFW Program delivers ES to migrant and seasonal farmworkers and English Language Learners (ELL) to help them achieve economic self-sufficiency and improved living and working conditions.

The SCSEP: also known as the Mature Worker Program, was authorized by the Older Americans Act in 1965 to assist low-income, unemployed individuals aged 55 years or older find employment. The program matches eligible mature adults with community service and work-based job training opportunities to help build skills and experience that lead to permanent employment and greater independence.

Preference is given to minorities, limited English speaking individuals and American Indians, as well as individuals with the greatest economic and special employment needs.

Participants in the program receive supervised training in a community service assignment, either at a non-profit or governmental agency (often referred to as a host agency) for an average of 20 hours per week. They are compensated at the higher of the federal, state or local minimum wage.

While in training, participants receive an assessment to determine individual needs for training, supportive services and their potential for unsubsidized employment. Other job-related training consists of developing and/or upgrading existing employment skills, limited educational opportunities and job search skills and counseling.

CTE Programs at the postsecondary level authorized under the Carl D. Perkins Act: This Law supports the development of career and technical skills among students in secondary and postsecondary education. Perkins IV aims to improve academic outcomes and preparedness for higher education or the labor market among students enrolled in CTE Programs, previously known as vocational education programs.

TAA: TAA provides job training and employment opportunities to those who have lost their jobs as a result of foreign trade or outsourcing to other countries. The TAA program helps trade-affected workers return to suitable employment as quickly as possible.

Jobs for Veterans State Grants: The JVSG Program has dedicated staff who provide individualized career and training-related services to veterans and eligible persons with significant barriers to employment. They provide case management to remove these barriers to help veterans become job-ready and find gainful employment.

Second Chance Act: Provides employment assistance, housing, substance abuse treatment, family programming, mentoring, victim's support and other related services that help reduce recidivism.

TANF: Cash Assistance helps families meet their basic needs for well-being and safety and serves as their path to self-sufficiency. The Cash Assistance program provides temporary cash benefits and supportive services to the neediest of Arizona's children and their families.

b. State Strategic Vision and Goals

The Unified or Combined State Plan must include the State's strategic vision and goals for developing its workforce and meeting employer needs in order to support economic growth and economic self-sufficiency. This must include—

1. Vision

Describe the State's strategic vision for its workforce development system.

An Arizona for Everyone

Arizona is pleased to submit its 2024-2027 Unified State Plan under the Workforce Innovation and Opportunity Act (WIOA). Arizona's plan builds upon Governor Hobbs' vision of a just, prosperous, and resilient Arizona that provides opportunities for any Arizonan who wants to succeed across urban, rural, and tribal communities.

Building a future with long-term prosperity is incumbent on implementing ideas that are thoughtfully and collaboratively developed through stakeholder participation and planning. This Unified State Plan is a roadmap built from engagement with economic, educational, and workforce partners throughout the state aimed at strengthening the workforce system to help employers hire and retain skilled workers and help Arizonans, including youth and those with significant barriers to employment, enter into high-quality jobs and careers. When more businesses are able to grow, they make Arizona more competitive and attractive to workers. When more Arizonans are able to afford school supplies, medications, and child care, as well as given the opportunity for training needed for a good-paying job,

they become part of a healthier and more dependable workforce. Recognizing that continuous engagement of WIOA workforce stakeholders is critical to ensuring that the ARIZONA@WORK system is a customer-centric workforce model, three regional (Central, Northern, and Southern) sessions were facilitated to engage stakeholders in the state plan development process. Over 130 state and local leaders of the workforce system engaged in the review of the state's current economic conditions, workforce attributes, and workforce development outcomes which lead to the finalization of the aforementioned WIOA State Plan goals and strategies.

2. Goals

Describe the goals for achieving this vision based on the analysis in (a) above of the State's economic conditions, workforce, and workforce development activities. This must include—

(A) Goals for preparing an educated and skilled workforce, including preparing youth and individuals with barriers to employment and other populations.⁹

(B) Goals for meeting the skilled workforce needs of employers.

Aligned with the Workforce Innovation and Opportunity Act (WIOA) and the principles of America's Talent Strategy, Arizona will advance a demand-driven, skills-based workforce system that expands economic opportunity, strengthens talent pipelines, and ensures employers have access to a highly skilled workforce. These goals are informed by the State's economic and workforce analysis, including continued population growth, shifting demographics, and sustained demand across key industries such as healthcare, construction, manufacturing, and transportation and warehousing. The modification continues to operationalize the Unified State Plan's four goals as follows:

- Goal 1: Promote a Customer-Driven Workforce System Approach
- Goal 2: Foster Business Engagement
- Goal 3: Invest in Opportunity and Growth
- Goal 4: Prepare Arizona's Youth for Workforce Success

(A) Preparing an Educated and Skilled Workforce

Arizona will strengthen its workforce by aligning education, training, and workforce development systems to the needs of in-demand industries and occupations. The State will advance career pathways that emphasize skills acquisition, industry-recognized credentials, and multiple entry and exit points, enabling individuals to access and progress along high-quality career trajectories. Efforts will focus on increasing credential attainment and measurable skill gains, particularly in occupations that offer strong wages and long-term growth.

Recognizing disparities in labor market outcomes, Arizona will prioritize strategies that improve access and outcomes for youth and individuals with barriers to employment, including individuals with disabilities, veterans, justice-involved individuals, English language learners, and low-income populations. This includes expanding work-based learning opportunities such as pre-apprenticeships and apprenticeships, as well as providing supportive services that reduce barriers to participation and employment.

In addition, Arizona will strengthen foundational and durable skills—including digital literacy, communication, and problem-solving—aligned with employer-identified needs across in-demand occupations. The State will also ensure equitable access to workforce services across all regions, including rural and underserved communities, to support broad participation in the labor market.

(B) Meeting the Skilled Workforce Needs of Employers

Arizona will align workforce development efforts with the evolving needs of employers by prioritizing investments in high-growth, high-wage industries identified in the State’s economic analysis . The State will strengthen sector partnerships to ensure employers play a central role in defining workforce needs, informing training strategies, and validating skill requirements.

To better connect talent with opportunity, Arizona will expand work-based learning opportunities, including apprenticeships, internships, and on-the-job training, enabling employers to directly engage in developing their future workforce. The State will also promote skills-based hiring practices, reducing unnecessary degree requirements and expanding access to qualified talent.

Through the ARIZONA@WORK system, Arizona will enhance coordination among workforce, education, and economic development partners to deliver responsive, business-centered services. Additionally, the State will support the upskilling and reskilling of workers to help employers remain competitive in the face of economic and technological change, including the growing impact of automation and artificial intelligence.

Arizona will continue to leverage data-driven decision-making, utilizing real-time labor market information to ensure workforce strategies remain aligned with current and projected economic conditions.

Together, these goals position Arizona to implement a coordinated, inclusive, and employer-driven workforce system that expands access to opportunity, addresses skill gaps, and supports sustained economic growth.

3. Performance Goals

Using the tables provided within each Core Program section, include the State's expected levels of performance relating to the performance accountability measures based on primary indicators of performance described in section 116(b)(2)(A) of WIOA. (This Strategic Planning element only applies to core programs.)

The Adult, Dislocated Worker, Youth, Adult Education and Family Literacy Act and Vocational Rehabilitation programs will have sufficient data available to make reasonable determinations of expected levels of performance for the following indicators for PYs 2026 and 2027:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit);
- Credential Attainment Rate; and
- Measurable Skill Gains.

The Wagner-Peyser Act Employment Service program will have sufficient data available to make a reasonable determination of expected levels of performance for the following indicators for PYs 2026 and 2027:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit); and
- Median Earnings (Second Quarter after Exit).

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

The Departments determined that the Effectiveness in Serving Employers (ESE) indicator will be measured as a shared outcome across all six core programs within each State to ensure a holistic approach to serving employers. The approach to measuring ESE was defined in the Workforce Innovation and Opportunity Act Effectiveness in Serving Employers Performance Indicator final rule (89 FR 13814 (Feb. 23, 2024)) (Final Rule). This final rule took effect March 25, 2024, and defined the ESE primary indicator of performance, as required by WIOA section 116(b)(2), as Retention with the Same Employer.

For the PYs 2026-2027 plan modifications, the Departments used the transition authority under section 503(a) of WIOA to designate the ESE primary indicator of performance as a “baseline” indicator. A “baseline” indicator is one for which states do not propose an expected level of performance and do not come to agreement with the Departments on negotiated levels of performance because sufficient data are not available to establish such performance levels. As a result, “baseline” indicators are not used in the end of the year adjustment of performance levels and are not used to determine failure to meet adjusted levels of performance for purposes of sanctions.

The Departments designated indicators as “baseline” based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance. Include the State's expected levels of performance for the primary indicators of performance described in section 116(b)(2)(A) of WIOA. Each state must then update its plan modification to include the agreed-upon negotiated levels of performance before the Departments approve the plan modification

4. Assessment

Describe how the State will assess the overall effectiveness of the workforce development system in the State in relation to the strategic vision and goals stated above in sections (b)(1), (2), and (3) and how it will use the results of this assessment, which may include evaluation findings, and other feedback to make continuous or quality improvements.

Arizona will assess the overall effectiveness of its workforce development system in alignment with the State's strategic vision and goals outlined in Sections (b)(1)–(3), including improving skill attainment, advancing equitable access for individuals with barriers to employment, and meeting the workforce needs of employers.

To evaluate progress toward these goals, the State will implement a comprehensive, data-driven assessment framework that incorporates both federal and state performance measures. Primary indicators of performance under the Workforce Innovation and Opportunity Act (WIOA)—including employment in the second and fourth quarters after exit, median earnings, credential attainment, measurable skill gains, and effectiveness in serving employers—will serve as key benchmarks. These indicators will be supplemented by state-defined metrics aligned with priority industries, sector strategies, and customer outcomes.

At the State level, the Workforce Arizona Council (WAC), in coordination with the Arizona Department of Economic Security (ADES), the Arizona Department of Education (ADE), and core partners, will lead a structured “check and adjust” process to assess system performance. This process will utilize real-time data dashboards, agency scorecards, and tiered performance measures across the ARIZONA@WORK system to monitor progress, identify trends, and prioritize areas for improvement. Regular review cycles with the WAC and its committees will ensure ongoing oversight, accountability, and alignment with strategic priorities.

To support deeper analysis, the Arizona Office of Economic Opportunity (OEO) will convene workgroups and stakeholders, as needed, to review performance data, conduct program and policy evaluations, and develop recommendations for system improvement. These efforts will include targeted evaluation of key initiatives such as the Eligible Training Provider List (ETPL), career pathway development, and apprenticeship expansion to ensure alignment with industry needs.

Arizona will also incorporate customer and stakeholder feedback into its assessment process. Input from job seekers, employers, local workforce areas, and partner programs will be collected through surveys, engagement sessions, and formal evaluations and will be used to inform service design, improve program quality, and enhance customer experience.

To drive continuous improvement, Arizona will apply the Arizona Management System (AMS), a statewide Lean-based framework that emphasizes results-driven management, root cause analysis, and iterative problem-solving. State and local teams will use AMS to regularly review performance data, identify gaps, and implement corrective actions to improve service delivery, efficiency, and outcomes.

Additionally, the State will utilize the Statistical Adjustment Model (SAM), in accordance with 20 CFR § 677.170(c), to assess local area performance for Title I and Title II programs. These results will inform technical assistance, capacity-building efforts, and corrective actions to strengthen local performance and contribute to statewide success.

WIOA core partners will convene at least annually to review progress toward the goals and strategies outlined in this Unified Plan. These convenings will support cross-program alignment, strengthen service integration, and identify policy and operational improvements.

Through this approach—integrating performance data, evaluation findings, and stakeholder feedback—Arizona will ensure continuous improvement of its workforce system and sustained alignment with the needs of job seekers and employers.

c. State Strategy

The Unified or Combined State Plan must include the State's strategies to achieve its strategic vision and goals. These strategies must take into account the State's economic, workforce, and workforce development, education and training activities and analysis provided in Section (a) above. Include discussion of specific strategies to address the needs of populations provided in Section (a).

1. Describe the strategies the State will implement, including industry or sector partnerships related to in-demand industry sectors and occupations and career pathways, as required by WIOA section 101(d)(3)(B), (D). "Career pathway" is defined at WIOA section 3(7) and includes registered apprenticeship. "In-demand industry sector or occupation" is defined at WIOA section 3(23)

2. Describe the strategies the State will use to align the core programs, any Combined State Plan partner programs included in this Plan, required and optional one-stop partner programs, and any other resources available to the State to achieve fully integrated customer services consistent with the strategic vision and goals described above. Also describe strategies to strengthen workforce development activities in regard to weaknesses identified in section II(a)(2).

Sector Partnerships, In-Demand Industries, and Career Pathways

Arizona implements a coordinated set of strategies aligned with WIOA sections 101(d)(3)(B) and (D) to strengthen sector partnerships, expand career pathways, and ensure workforce development activities are responsive to in-demand industry sectors and occupations. These strategies are informed by labor market analysis and stakeholder engagement and are designed to meet the needs of both employers and job seekers, including individuals with barriers to employment.

To support sector partnerships and career pathways, Arizona will implement the following strategies:

Sector Partnerships & Business Engagement

- **2.1:** Build partnerships across businesses, education, and training providers to develop career pathways and create work-based training opportunities aligned to in-demand industries.
- **2.2:** Promote a business-services model that links business growth with and advocates for quality jobs that support economic stability and mobility.
- **2.3:** Strengthen workforce system teams by investing in tools and skill-building that improves talent sourcing and matching for businesses.
- **2.4:** Convene the business community to expand employment opportunities for individuals with barriers to employment and strengthen employer engagement.

Career Pathways & Work-Based Learning

- **1.1:** Enhance accessible work-based learning opportunities, including on-the-job training and Registered Apprenticeships, to prepare participants for in-demand occupations.
- **4.4:** Develop work-based learning opportunities for youth through partnerships with employers.
- **4.1:** Create a robust system of career exploration and preparation through partnerships with Career and Technical Education (CTE) programs and pre-apprenticeship models.

Skills Development Aligned to Industry Demand

- **1.2:** Develop and implement digital literacy education and training programs to equip individuals with essential workforce skills.
- **4.2:** Identify strategies for in-school youth and connect them to training opportunities in high-growth industries.
- **4.3:** Identify strategies for out-of-school youth, including partnerships with Title II to support high school equivalency attainment and transition into training aligned with career pathways.

Arizona prioritizes sector partnerships in in-demand industries identified through economic and labor market data, including healthcare, construction and trades, advanced manufacturing, semiconductors, information technology, and transportation and logistics. These partnerships are driven by the ARIZONA@WORK system in collaboration with employers, industry associations, workforce development boards, education and training providers, and community-based organizations to ensure workforce strategies are aligned with current and projected industry needs.

Career pathways serve as the foundation of Arizona’s workforce strategy and are designed in accordance with WIOA section 3(7). These pathways align education, training, and workforce services with employer demand and include multiple entry and exit points, industry-recognized credentials, and work-based learning opportunities, including Registered Apprenticeships. Career pathways are structured to support skill progression, employment, and advancement, particularly for priority populations.

To operationalize sector strategies and career pathways, Arizona will:

- Expand work-based learning opportunities, including on-the-job training, incumbent worker training, internships, pre-apprenticeships, and Registered Apprenticeships, to provide participants with hands-on experience in in-demand occupations.
- Strengthen sector partnerships by engaging employers as key partners in defining skill needs, shaping training programs, and validating credentials.
- Increase access to Registered Apprenticeships, including non-traditional and emerging industry programs, to expand career pathway opportunities and address workforce shortages.
- Promote career exploration and navigation, ensuring participants are connected to education and training opportunities that lead to high-quality employment.
- Advance equitable access to career pathways, particularly for individuals with barriers to employment, by integrating supportive services and reducing barriers to participation.

Arizona has demonstrated significant progress in expanding Registered Apprenticeship Programs (RAPs) as a key career pathway strategy. Program Year 2024 saw continued growth in apprenticeship participation, with more than 4,400 new apprentices registered and 72 new programs established, particularly in construction and trades-related occupations. These efforts support major economic development initiatives, including infrastructure and advanced manufacturing projects, and contribute to the State’s broader workforce goals.

In addition, initiatives such as the BuilditAZ Apprenticeship Initiative are expanding pre-apprenticeship and apprenticeship opportunities, increasing access for underrepresented populations, and strengthening workforce pipelines in high-demand industries. Arizona continues to align apprenticeship

expansion with emerging sectors, including semiconductors, advanced manufacturing, and green economy jobs, ensuring the workforce system remains responsive to evolving economic needs.

Alignment of Core Programs and Integrated Service Delivery

Arizona implements a comprehensive set of strategies to align WIOA core programs, Combined State Plan partner programs, required and optional one-stop partner programs, and other state resources to deliver fully integrated, customer-centered services. These strategies support the State’s strategic vision and goals and address system weaknesses identified in Section II(a)(2), including improving data sharing, service coordination, and access to services.

Integrated Service Delivery & Customer-Centered Access

- 1.3: Refine the customer experience across ARIZONA@WORK system partners to ensure streamlined access to training, education, employment, and supportive services.
- 1.4: Strengthen coordination and outreach across the ARIZONA@WORK system to increase public awareness and access to services.
- 4.5: Strengthen outreach to youth, families, and schools to improve awareness and access to workforce system services and career pathways.

System Alignment & Partnerships

- 3.1: Strengthen strategic partnerships across state agencies, workforce system partners, and community-based organizations to improve coordination and accelerate employment outcomes.

Resource Alignment & Funding Strategies

- 3.2: Braid federal, state, local, and private funding streams to maximize the impact of WIOA and other investments and better serve job seekers and employers.

Data Sharing, Performance, and Continuous Improvement

- 3.3: Facilitate data sharing, reporting, and performance analysis across WIOA partners to improve system performance and address identified weaknesses in data integration.

Capacity Building & Technical Assistance

- 3.4: Implement a statewide technical assistance model to support workforce system staff, promote best practices, and ensure consistent, high-quality service delivery across programs.

Central to Arizona’s approach is the ARIZONA@WORK system, which operates under a “No Wrong Door” model to ensure that all customers—job seekers and employers—can access the full range of workforce services regardless of their point of entry. To strengthen integrated service delivery, Arizona will:

- Enhance cross-program coordination and service integration by ensuring staff across core and partner programs are trained to understand and connect customers to the full array of available services, including education, training, and supportive services.
- Implement and improve referral systems and co-enrollment strategies to facilitate seamless access to services across programs and improve customer outcomes.

- Streamline intake and case management processes to reduce duplication and improve the customer experience.
- Expand access to services through in-person and virtual platforms, ensuring equitable access for individuals in rural and underserved communities.

To address identified weaknesses in data sharing and system integration, Arizona will strengthen its data infrastructure by:

- Facilitating data sharing agreements across partner programs to improve coordination, case management, and performance tracking.
- Modernizing workforce and partner program data systems, including Unemployment Insurance (UI), Vocational Rehabilitation (VR), and workforce program platforms.
- Conducting cross-program data reviews and performance analysis to inform decision-making and improve service delivery.

Arizona will also strengthen partnerships across state agencies and community-based organizations to improve service alignment and expand access to resources. These partnerships will support the delivery of supportive services, including childcare, transportation, assistive technology, and other critical resources that enable individuals to participate in and complete workforce programs.

To maximize the impact of available resources, Arizona will braid federal, state, local, and private funding streams, including investments from the Bipartisan Infrastructure Law (BIL) and other federal initiatives. These efforts will support workforce development in high-demand sectors and ensure that training programs are aligned with emerging economic opportunities.

Additionally, Arizona will implement a statewide technical assistance model to support continuous improvement across the workforce system. This model will provide training, guidance, and best practice sharing to workforce staff and partners, ensuring consistent, high-quality service delivery across all regions.

Ongoing collaboration and communication across ARIZONA@WORK system partners—including regular meetings, joint planning efforts, and coordinated outreach—will further strengthen system alignment. These efforts include shared branding, coordinated public awareness campaigns, and the use of digital platforms to improve access to information and services.

Through these strategies, Arizona will deliver a fully integrated, customer-centered workforce system that improves access to services, enhances coordination across programs, and strengthens outcomes for job seekers and employers.

III. Operational Planning Elements

The Unified or Combined State Plan must include an Operational Planning Elements section that supports the State’s strategy and the system-wide vision described in Section II(c) above. Unless otherwise noted, all Operational Planning Elements apply to Combined State Plan partner programs included in the plan as well as to core programs. This section must include—

a. State Strategy Implementation

The Unified or Combined State Plan must include—

1. State Board Functions

Describe how the State board will implement its functions under section 101(d) of WIOA (i.e., provide a description of Board operational structures and decision making processes to ensure such functions are carried out).

The Arizona State Workforce Development Board, Workforce Arizona Council, provides strategic leadership, policy guidance, and oversight of the ARIZONA@WORK workforce system in alignment with WIOA Section 101(d). The Board ensures workforce programs meet employer demand, support career pathways, and serve individuals with barriers to employment.

1. Policy Development and Strategic Planning

The Council develops and approves policies and strategies to strengthen sector partnerships, expand career pathways, and align workforce programs with in-demand industries such as healthcare, advanced manufacturing, construction/trades, IT, semiconductors, and transportation/logistics. Decision-making occurs through the Executive Committee proposal review and recommendations to the full Council for approval.

2. Oversight of WIOA Core and Partner Programs

The Council ensures integrated, customer-centered service delivery across WIOA core and partner programs, using the ARIZONA@WORK “No Wrong Door” model. It monitors system performance, guides continuous improvement, and ensures equitable access to education, training, and supportive services. Decisions are informed by data-driven performance reports and program audits.

3. Sector Partnerships and Business Engagement

The Council promotes employer engagement to identify skill needs, validate credentials, and support work-based learning opportunities. Sector partnership initiatives are reviewed by the Executive Committee and approved by the Council to ensure alignment with current and projected industry demand.

4. Career Pathways and Work-Based Learning

The Council oversees the development of career pathways integrating education, training, credentials, and work-based learning (including apprenticeships and pre-apprenticeships). Youth and adult programs are designed to align with high-growth industries and expand equitable access. Proposals are evaluated for alignment with labor market data and system capacity.

5. Resource Alignment and Funding Oversight

The Council maximizes the impact of federal, state, local, and private funds, including BIL investments, to support workforce initiatives. It oversees technical assistance, resource allocation, and coordination across programs, ensuring efficient and effective service delivery.

6. Capacity Building, Communication, and Continuous Improvement

The Council ensures statewide staff training, technical assistance, and best practice sharing. It promotes public awareness, coordinated outreach, and system integration. Continuous improvement is guided by quarterly performance reviews, data analysis, workgroup engagement and strategic planning.

Through structured workgroup engagement, data-informed decision-making, and strong employer engagement, the Workforce Arizona Council operationalizes WIOA Section 101(d) functions. Its work ensures a fully integrated, equitable, and employer-driven workforce system that supports both economic growth and workforce success.

2. Implementation of State Strategy

A. Core Program Activities to Implement the State's Strategy

Describe the activities the entities carrying out the respective core programs will fund to implement the State's strategies. Also, describe how such activities will be aligned across the core programs and Combined State Plan partner programs included in this plan and among the entities administering the programs, including using co-enrollment and other strategies, as appropriate.

The following information outlines the State's strategies for the next four years, including implementation activities and initiatives proposed for each strategy. These strategies were derived from the four state goals, informed by the DOL priorities outlined in TEG 04-23, the WAC's Strategic Plan, and small-group insights collected across the three WIOA State Plan development Sessions held throughout November and December 2023.

The agencies overseeing the Core Programs, ADE and ADES, will fund activities to implement this Unified Plan's strategies. The strategies will include developing accessible work-based learning opportunities, implementing digital literacy programs, providing training across Partner Program workforce staff to increase coordination and co-enrollment, input on WIOA assessment plans and progress measures, and participation in WAC committees, as appropriate. In addition to these efforts, each core program under WIOA has a common set of performance indicators and is represented on the Governor's WAC, which sets the strategic direction for ARIZONA@WORK.

ADE and ADES together administer nine education and employment programs: CTE, CSBG, JVSG, MSFW, SCSEP, Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T), TANF Jobs, TAA, and UI; which increases the State's ability to leverage resources and coordinate as a system. Likewise, the State Office of Apprenticeship is housed in ADES and staff participate in statewide and local activities with the Council and LWDBs to align apprenticeship information and opportunities for businesses and individuals. DERS, a division within ADES, supports ARIZONA@WORK and administers the following:

- WIOA Core Partner Programs: providing funding to the LWDBs for Adult, DW, and Youth workforce training activities authorized under WIOA Title I;
- Wagner-Peyser Act ES under Title III; and
- and VR under Title IV.

ADES collaborates with the ADE, which administers adult education and literacy activities under Title II of WIOA to support coordination of services for individuals participating in programs overseen by both agencies. As an ARIZONA@WORK partner, ADE supports local Title II providers through its Adult Education Services office. Activities include working to ensure local program directors understand their roles in the one-stop system, as well as how support services available through partners can provide benefit to Title II participants. Recently, increased efforts have been made to ensure cost sharing and utilizing workforce set-aside funds to support the ARIZONA@WORK system.

The 12 LWDBs, with the required ARIZONA@WORK core partners and other local partners, will coordinate efforts to align with the State's strategies. The LWDBs set local strategy, aligned with the state's strategy, and through their local plans and IFA/MOU, will describe their coordination efforts to streamline processes and capitalize on all resources to best serve ARIZONA@WORK customers. Many of the local partners **and core partners** are co-located within the ARIZONA@WORK Job Centers, such as **Title IV**, TANF Jobs, the RESEA Program, and JVSG Program staff, to facilitate increased communication and continuous improvement activities. ARIZONA@WORK supports job seekers and workers with training activities, job search, and job placement assistance through these core partners. Arizona employers are supported with recruitment assistance by connecting them to a skilled workforce.

The coordination across all ARIZONA@WORK partners will entail regular meetings to share best practices, regional planning to implement the strategies, and statewide convenings to strengthen workforce development approaches connected to this Unified Plan. The strategies will be measured and data reviews facilitated throughout the life of the Unified State Plan to continue improvement for the goals of the ARIZONA@WORK system. Examples of strategies identified in support of system-level coordination include, but are not limited to:

- **1.1:** Enhance accessible work-based learning opportunities to equip participants with the skills and knowledge necessary for in-demand industries and occupations.
- **1.2:** Develop and implement digital literacy education and training programs that provide individuals, including priority populations, with the necessary digital skills for the workforce.
- **1.3:** Refine the customer experience across ARIZONA@WORK system partners to ensure streamlined access to training, education, employment opportunities and supportive services that help to reduce barriers.
- **1.4:** Strengthen coordination and outreach across the ARIZONA@WORK system to increase public awareness and access to services.

B. Alignment with Activities Outside the Plan

Describe how the activities identified in (A) will be aligned with programs and activities provided by required one-stop partners and other optional one-stop partners and activities provided under employment, training (including Registered Apprenticeships), education (including career and technical education), human services and other programs not covered by the plan, as appropriate, assuring coordination of, and avoiding duplication among these activities.

Collaboration is essential to ARIZONA@WORK's implementation of WIOA and entails the continuous engagement with a range of state, local, and community-based organizations serving shared customers. The success of workforce initiatives rely on seamless coordination among diverse stakeholders. Alignment is important for a collaborative approach that prevents siloed efforts and promotes a comprehensive and effective strategy.

Specific strategy implementation with core and required partner programs and alignment with activities outside the Unified State Plan includes:

- **2.1:** Build partnerships across businesses, education and training providers to develop career pathways and create work-based training opportunities to develop requisite workforce skills.
- **3.1:** Strengthen strategic partnerships across key state level agencies, workforce system partner programs, and community-based organizations to expand coordination across programs to accelerate quality employment for priority populations.
- **3.2:** Braid federal, state, local, and private funding streams to maximize the impact of WIOA funds to meet the unique needs of local areas, job seekers, and employers.
- **4.1:** Create a robust system, including partnerships with Career and Technical Education Districts (CTEDs) and pre-apprenticeship models, for career exploration intended to build upon professional skills, workplace foundational academic skills, and career interests.
- **4.4:** Strengthen outreach to youth, their families, and school staff to provide information about the ARIZONA@WORK system, including supportive services and opportunities for meaningful employment and career pathways.

The 12 LWDBs within the ARIZONA@WORK system, required, and other local partners (e.g., Job Corps, Youth Build, the U.S. Department of Housing and Urban Development [HUD] employment and training providers, and CTE providers), will coordinate implementation to align with the State's strategies. The LWDBs set local strategy, aligned with the state's strategy, in their local plans, and coordinate with other local partners not included in this Workforce Plan, such as Low-Income Home Energy Assistance Program, Adult and Juvenile Correction agencies, local libraries, and city/town governments. Through the MOU, LWDBs describe their coordination efforts with partners in the local area to streamline processes and capitalize on all resources to best serve ARIZONA@WORK customers. Many of the required local partners are either co-located within the ARIZONA@WORK Job Centers, or partner through virtual collaboration, to facilitate increased communication and continuous improvement activities.

Additionally, the AAO plays a pivotal role serving as a key entity that actively engages with government agencies, educational institutions, community-based organizations, and employers to foster interconnected efforts within the workforce system. The AAO is just one of the essential players that are supporting the specific strategies of the Unified Plan. Registered Apprenticeship is linked with activities under WIOA by fostering a synergistic approach to workforce development. Registered Apprenticeship aligns with its objectives of enhancing employment opportunities, workforce skills, and economic development.

WIOA activities, such as skill assessments, career counseling, and job placement services, complement the structured training and on-the-job learning provided by Registered Apprenticeship programs. This alignment ensures that apprentices gain valuable skills and seamlessly transition into meaningful employment. Moreover, WIOA funding mechanisms can support Registered Apprenticeship initiatives, providing financial assistance for related technical instruction, supportive services, and other program-related expenses. Partnership with a Registered Apprenticeship enhances the effectiveness of any program, establishing a strong framework for individuals to gain sought-after skills and for employers to tap into a skilled workforce.

The AAO will continue collaborating with one-stop partners and educating them on effectively serving employers' workforce needs by supporting its employees through Registered Apprenticeship. Through ongoing engagement with one-stop partners, the AAO will share insights on leveraging WIOA resources to enhance employer support initiatives. The collaborative effort seeks to establish a seamless connection between employers, apprentices, and the resources available through WIOA, fostering an environment conducive to sustained employment and increased apprenticeship opportunities. By equipping one-stop partners with the knowledge and tools to effectively support employers, the Registered Apprenticeship team aims to contribute to the growth and success of apprenticeship programs while addressing workforce needs.

C. Coordination, Alignment and Provision of Services to Individuals

Describe how the entities carrying out the respective core programs, Combined State Plan partner programs included in this plan, and required and optional one-stop partner programs will coordinate activities and resources to provide comprehensive, high-quality, customer-centered services, including supportive services (e.g. transportation), to individuals, including those populations identified in section II(a)(1)(B), and individuals in remote areas. The activities described shall conform to the statutory requirements of each program.

Over the next four years, ARIZONA@WORK partners will engage in efforts to ensure job seekers, specifically those priority populations that are unemployed or face barriers to employment, receive streamlined access to services across the workforce system agencies with which they might interact. As reinforced throughout this Unified Plan, priority populations include:

- Displaced homemakers;
- Eligible MSFWs;
- Ex-offenders;
- Homeless individuals;
- Individuals facing substantial cultural barriers;
- Individuals with disabilities, including youth with disabilities;
- Individuals within two years of exhausting lifetime eligibility under Part A of the Social Security Act;
- Individuals who are English language learners;
- Individuals who are unemployed, including the long-term unemployed;
- Individuals who have low levels of literacy;

- Individuals without a high school diploma;
- Low income individuals, including TANF and SNAP recipients;
- Native Americans, Alaskan Natives, and Native Hawaiians;
- Older individuals;
- Single parents (including single pregnant women and non-custodial parents);
- Veterans; and
- Youth who are in, or have aged out of, the Foster Care system.

WIOA Partners will continue to meet monthly via the ARIZONA@WORK meetings to discuss implementation and alignment efforts, address the progress and opportunities for improvement, elevate training opportunities for staff, and discuss resource sharing. The strategies identified below are a collection of those designed to ensure the coordination, alignment, and provision of services to individuals:

- **1.2:** Develop and implement digital literacy education and training programs that provide individuals, including priority populations, with the necessary digital skills for the workforce.
- **1.3:** Refine the customer experience across ARIZONA@WORK system partners to ensure streamlined access to training, education, employment opportunities and supportive services that help to reduce barriers.
- **3.1:** Strengthen strategic partnerships across key state level agencies, workforce system partner programs, and community-based organizations to expand coordination across programs to accelerate quality employment for priority populations.
- **4.2:** Identify both in-school and out-of-school youth and develop opportunities to attract them to the workforce system through training programs in high growth industries.

As described in section III(b)(7) of the State Plan, the ARIZONA@WORK system facilitates and will continue to enhance coordination of services, including through referrals to Disabled Veterans Outreach Program (DVOP) staff to provide individualized career services to veterans and eligible persons with significant barriers to employment.

To fully address the wide range of barriers that eligible WIOA participants may face, a Title I Supportive Services policy was created and made available on the ADES website at: Section 400 - Supportive Services. The policy allows for LWDBs to define supportive services available in their local areas that are designed to maximize flexibility to meet the needs of the individuals served in their local communities, subject to the requirements of the Act, regulations, and the state policy. The policy includes a list of common items which may be available as a supportive service, but the policy is clear that LWDBs are not limited to items on this list. To provide services to participants in rural areas, in addition to transportation assistance, the policy also encourages LWDBs to develop policies which allow for reimbursement for cellular or internet service needed to create or maintain a wireless connection for distance learning, searching for employment, and job retention, as well as the purchase of software needed for various activities. The Title I Supportive Services policy was updated in August 2023 after guidance was issued by DOL that encouraged state and local supportive services policies to include the provision of food at a reasonable cost to assist or enable participants to participate in allowable program activities and to reach the participants' employment and training goals.

In the implementation of the State Strategy, coordination, alignment, and provision of services to individuals play a pivotal role. Various efforts across different titles contribute to the enhancement of customer-centered services. Below are key initiatives and actions undertaken in this regard:

- ADE - Adult Education Services (AES) supports local Title II providers in continually strengthening cost-sharing agreements to ensure Title II participants have full access to and benefit from supportive services available through partners. This includes focus on co-enrollment through supporting efforts to implement referral systems.
- Enhance co-enrollments from partner and internal programs to improve on customers experience to accelerate quality employment. By focusing on streamlining processes, consistency, better collaboration, and having a feedback loop, this will create innovation and personalization of an enhanced and cohesive customer-driven experience.
- LWDA's have developed and implemented referral platforms that provide a smooth transition for clients and staff between ARIZONA@WORK services and programs. This helps to provide a "closed loop system" in which all partner programs are able to track the progress and outcome of a customer. This enables a positive impact on ensuring no customer's needs are unmet and data is more accessible and accurate.
- Title III implements a state-wide technical assistance training and facilitates best-practice dissemination across ARIZONA@WORK system stakeholders to strengthen data sharing, reporting, promoting hiring events, outcomes and program updates to all WIOA partners across the state.
- Partnership with Arizona Department of Veterans Services (ADVS) to improve our outreach capabilities and provide Toolkit Assistance to all veterans that qualify across the state. The Arizona Department of Veterans' Services has partnered with ARIZONA@WORK and the Arizona Housing Coalition to provide veterans with the Veteran Toolkit, which funds expenses associated with beginning employment.
- The Re-entry program has leveraged technology and developed a QR code for Parole Officers in the field to expedite referrals of clients who are being paroled to receive ES and other support as they reenter the workforce. From the QR code, the Parole Officer can fill out the brief questionnaire with the client. The answers are generated to a spreadsheet that is maintained on a daily basis by a designated Employment Counselor in their area.
- Enhance the job seekers/employers experience across all ARIZONA@WORK Job Centers to ensure effective access to workforce system programs and supportive services in order to tackle barriers to employment. This will assist in providing a full range of assistance to job seekers in ARIZONA@WORK Job Centers or in a remote setting.
- Title IV efforts focus on programmatic accessibility considerations, including the availability of Assistive Technology and Disability Awareness Training at ARIZONA@WORK job centers. Assistive technology and disability awareness training are essential components in ensuring inclusive and accessible services, empowering individuals with disabilities and fostering a supportive environment within the workforce system. Educational workshops, site evaluations, and training services are provided to enhance staff competencies in disability awareness and assistive technology use, ensuring inclusive and accessible services for individuals with disabilities, including:

- Episodic Disabilities;
 - Augmentative & Alternative Communication;
 - Blind & Visually Impaired;
 - Combined Vision & Hearing Loss;
 - Deaf & Hard of Hearing;
 - AT & Accommodations;
 - Disability & Civil Rights;
 - Cognitive Disabilities; and
 - Motor Disabilities & Ergonomics.
- Strengthen participation on all RR to employers by leveraging all WIOA partners to provide programmatic services to the employers and job seekers. Increasing resources, by extending the reach of shared knowledge and innovation will foster synergy, and collaboration, mutually benefitting all involved parties.
 - Strengthen partnerships across all 12 LWDA's agencies, workforce system partner programs, and community-based organizations to expand coordination in efforts to accelerate employment outcomes for employers and job seekers. Business Service Representatives and Title IV Employment Outreach Team members will collaborate with our LWDA's to identify the needs of employers and work with local training providers to create training programs to meet those needs.
 - Strengthen employer relationships by reevaluating and improving tools and methods of service. The advertisement of these improvements will increase employer retention and encourage new employer participation. In addition, increasing outreach strategies for ARIZONA@WORK, such as utilizing social media outlets and SendGrid emailing will be implemented to reach more job seekers. In return, the desired outcome will be to fill more vacancies and help Arizonans return to the workforce.

D. Coordination, Alignment and Provision of Services to Employers

Describe how the entities carrying out the respective core programs, any Combined State Plan partner program included in this plan, required and optional one-stop partner programs will coordinate activities and resources to provide comprehensive, high-quality services to employers to meet their current and projected workforce needs and to achieve the goals of industry or sector partners in the state. The activities described shall conform to the statutory requirements of each program.

Arizona's businesses are a primary driver for and consumer of the State's workforce system as they are the most direct beneficiary of a skilled pipeline of workers. All ARIZONA@WORK system partners proactively engage businesses in the development of services, to ensure workforce solutions meet quality criteria and are responsive to employer needs. In addition to working with businesses to innovate new workforce solutions, the State's workforce system must also ensure businesses are benefiting from the wide array of existing professional development, support services, and incumbent worker resources available through ARIZONA@WORK Job Centers.

Arizona will coordinate activities and resources to provide comprehensive, high-quality services to employers that are built from prior in-demand industry and sector partnerships established by OEO and led by LWDBs in local identification of in-demand industries and engage ARIZONA@WORK partner to:

- Identify best practices to focus its sector partnerships in Arizona's In-Demand industries;
- Coordinate efforts with businesses using State and local workforce development board members and ARIZONA@WORK business service teams **and Title IV Employment Outreach team**;
- Engage economic development partners through the ACA and LWDBs' networks, and state and local economic government and associations;
- Identify educational partners to develop relevant curricula (such as CTE and ETPs); and
- Work with partners, such as Local First Arizona Foundation's Rural Development Council, to discover and support business needs in Arizona's rural and tribal areas.

Through these efforts, Arizona intends to expand the talent pipeline in the ARIZONA@WORK system to meet the identified industry needs through focused sector partnerships for In-Demand industries. Strategies within this Unified Plan in support of these efforts include:

- **1.1:** Enhance accessible work-based learning opportunities to equip participants with the skills and knowledge necessary for in-demand industries and occupations.
- **2.1:** Build partnerships across businesses, education and training providers to develop career pathways and create work-based training opportunities to develop requisite workforce skills.
- **2.2:** Promote a business-services model that links business growth with, and advocates for, quality jobs that support workers' economic stability and mobility.
- **2.3:** Strengthen workforce system teams by investing in tools and skill building that improves talent sourcing and matching for businesses.
- **2.4:** Convene the business community to explore and realize the employment opportunities for individuals with barriers to employment by highlighting the workforce system's supportive services for prioritized populations.

Arizona will explore strategies for service integration, where appropriate, and continue to strengthen coordination of services as described below:

- **Title III Wagner-Peyser ES** helps employers hire the skilled workers they need to grow their businesses. ES collaborates with partner programs, **including Title IV VR's Employer Outreach Specialists**, and works closely with LWDA BSTs to coordinate services to employers throughout the ARIZONA@WORK system, promote cross-functional projects, and use shared expertise to help Arizona's employers obtain needed assistance.
- **AAO works with LWDBs to promote RAPs as an industry-driven, high-quality career pathway, which provides employers a steady pipeline of skilled workers.**
- Arizona's RR promotes economic recovery and vitality by developing an ongoing, comprehensive approach to identifying, planning for, and responding to layoffs and dislocations; and preventing or minimizing their impacts on workers, businesses, and communities. RR works to ensure resources are available to proactively support employers and mitigate potential closures and layoffs, as applicable. Such activities include working with ARIZONA@WORK Business Services on the early identification of employers at risk of closures and layoffs, assessment of the needs of

and options for at-risk employers, and the delivery of services to address these needs. Employers are also made aware of programs designed to prevent layoffs such as the Shared Work program which provides an alternative for employers faced with a reduction in force by allowing businesses to divide available work or hours among affected employees in lieu of layoffs. The program allows the employees to receive a portion of UI benefits while working reduced hours.

E. Partner Engagement with Educational Institutions and other Education and Training Providers.

Describe how the State's Strategies will engage the State's community colleges, adult education providers, area career and technical education schools, providers on the State's eligible training provider list, and other education and training providers, as partners in the workforce development system to create a job-driven education and training system. WIOA section 102(b)(2)(B)(iv). Include how the State's strategies will enable the State to leverage other Federal, State, and local investments to enhance access to workforce development programs at these institutions.

Educational institutions are critical partners to the success of the ARIZONA@WORK system's capacity to create a job-driven education and training system. These institutions collaborate with businesses to meet their need for a qualified workforce and support employed and unemployed individuals to obtain training and credentials. The Unified Plan emphasizes several strategies contingent on the engagement of the state's community colleges, CTE providers, and other education partners, including those listed on the ETPL, in the design and implementation of workforce development programs, including:

- **1.1:** Enhance accessible work-based learning opportunities to equip participants with the skills and knowledge necessary for in-demand industries and occupations.
- **1.2:** Develop and implement digital literacy education and training programs that provide individuals, including priority populations, with the necessary digital skills for the workforce.
- **2.1:** Build partnerships across businesses, education and training providers to develop career pathways and create work-based training opportunities to develop requisite workforce skills.
- **4.2:** Identify both in-school and out-of-school youth and develop opportunities to attract them to the workforce system through training programs in high growth industries.
- **4.3:** Develop work based learning opportunities for youth through partnerships with employers.

The aim of these strategies is to ensure a job-driven education and training system. This system is to engage WIOA participants in career pathways and aims to increase career-ready skills attainment through activities such as career exploration, **Your Career workshops**, and industry recognized credential attainment. By implementing a framework for supporting statewide models for identified career pathways, all individuals, regardless of education, skills level, or program enrollment, will have a point of entry for the career path based on their specific career needs. For example, students enrolled in adult literacy classes or individuals who are justice-involved and re-entering the workforce will be able to identify where they are on a pathway of interest, what additional skills, training, and/or postsecondary credentials (including registered apprenticeships) are needed and receive support from the ARIZONA@WORK system to identify support and resources (e.g., transportation, training) to meet their goals.

The pathways will utilize labor market information to ensure sustainable careers. They will engage partners, including eligible training partners, other educational institutions, and businesses, to develop the pathways. Arizona will coordinate across all core and required partner programs (e.g., TANF Jobs, SNAP E&T) to share the developed career pathways, aligning them as a system. This collaboration aims to assist all customers in reaching their potential. An increased availability of, and accessibility to, training programs and services, especially those from underserved populations, including rural, tribal, and low-income communities, will help to ensure that the workforce meets business needs and that individuals secure family-sustaining employment.

Title II is critical to the success of these strategies as its services are provided through grant-funded adult education programs, which include community colleges, school districts, county education offices, and community-based organizations. ADE conducted a grant competition in PY 2022 during which additional education entities, including CTEDs will be encouraged to apply for Title II funding. Currently funded Title II providers based in community colleges work closely with their CTE departments to provide training opportunities through IET to help participants identify desired career pathways and earn one or more stackable industry recognized credentials.

To meet the skill and educational development needs of eligible participants, the ETPL Programs align with the sector strategies and respective local plans that are focused on In-Demand occupations and result in certification or accreditation. ADES and the LWDBs share the responsibility of managing the statewide ETPL including approving programs for initial and continued eligibility. The ADES State ETPL Manager approves training providers after ensuring the providers meet the state training provider eligibility requirements listed in the WIOA and State ETPL policy. The State and LWDB ETPL Coordinators review each training program individually to determine if the training programs meet state and local ETPL requirements, respectively, including initial performance data standards, and resulting in a federally or locally recognized credential.

At application for initial eligibility, providers must identify the credential that may be obtained by participants upon successful completion. Programs that are approved at the local level are reviewed for accuracy and completeness by the State ETPL Coordinator prior to final approval for inclusion on the statewide ETPL, for a one-year initial eligibility period. The LWDB reviews the training provider's program performance for continued eligibility based on the performance accountability measures using data on all WIOA Title I-B and non-WIOA Title I-B participants who participated in the training program during the performance period. Arizona requires that one or more of the WIOA indicators of performance for all students is provided by the training provider: employment 2nd and 4th quarter after exit, median earnings 2nd Quarter after exit, or credential attainment for the last four Quarters. Programs are reviewed **initially after one year and then** every two years for continued eligibility.

F. Improving Access to Postsecondary Credentials

Describe how the State's strategies will improve access to activities leading to recognized postsecondary credentials, including Registered Apprenticeship certificates. This includes credentials that are industry-recognized certificates, licenses or certifications, and that are portable and stackable.

The focus of the State's strategies is for the ARIZONA@WORK system to produce a pipeline of qualified workers, including those who have earned recognized postsecondary credentials. Recognized postsecondary credentials include educational diplomas and certificates, educational degrees, such as an associate's (2-year) or bachelor's (4-year) degree; registered apprenticeship industry recognized certificates; occupational licenses; and other industry or association recognized certificates including personnel certifications. A job seeker with recognized postsecondary credentials demonstrate and have documented skills, fill the employer's need for skilled positions, aid in creating talent pipelines, and compete in and strengthen the state and national economy. By increasing the number of skilled workers with recognized postsecondary credentials, businesses will be encouraged to expand and relocate to Arizona. Employed and unemployed individuals can benefit from recognized postsecondary credentials, experiencing improved labor market outcomes, higher earnings, greater job mobility, and increased job security.

The ARIZONA@WORK system will engage business partners to identify the knowledge, skills, and abilities needed for occupations in In-Demand occupations, including required postsecondary credentials, and opportunities for participation in registered apprenticeships. Through implementation of a framework for statewide models, the ARIZONA@WORK system will also identify career and training pathways in specific industries and occupations. Arizona strives to develop career pathways that allow individuals to enter and exit the pathway at any level and identify the appropriate credential to allow for portability and stacking of training, and credentials as an important component of the career pathway development. The strategies outlined below are geared toward improving access to postsecondary credentials and aim to reinforce industry partnerships that increase the number of WIOA participants enrolled in Registered Apprenticeship programs, including non-traditional programs that expand the talent pool, reaching underrepresented groups, while improving equitable service delivery.

- **1.1:** Enhance accessible work-based learning opportunities to equip participants with the skills and knowledge necessary for in-demand industries and occupations.
- **4.1:** Create a robust system, including partnerships with CTEDs and pre-apprenticeship models, for career exploration intended to build upon professional skills, workplace foundational academic skills, and career interests
- **4.2:** Identify both in-school and out-of-school youth and develop opportunities to attract them to the workforce system through training programs in high growth industries.
- **4.3:** Develop work based learning opportunities for youth through partnerships with employers.

The Registered Apprenticeship Program (RAP) fosters sustainable employment and skills development and is a critical element to many of the strategies listed above RAP facilitates hands-on experiential learning and relevant theoretical knowledge acquisition through mentorship. Applicants, as with any employment opportunity, express interest by applying for specific apprenticeship programs, and upon acceptance, formalize their engagement through indenture. Structured onboarding and mentor-guided on-the-job training characterize the apprenticeship journey. Related Technical Instruction (RTI) is a key component, delivered through accredited institutions to supplement the On-the-Job Learning (OJL). Wage progression corresponds to program advancement. All successful program completions result in the acquisition of a nationally recognized industry credential. In some apprenticeship programs, RTI

received may be credited by postsecondary institutions and allow individuals to translate them into associates or bachelors degrees, contributing to workforce development and the cultivation of skilled professionals in diverse sectors.

Registered Apprenticeship Programs (RAPs) may opt in to the ETPL. The ETPL team is working with the Arizona Apprenticeship Office to identify any barriers or misconceptions that prevent RAPs from opting into the ETPL to increase the number of RAPs on the ETPL. ETPL designation enables registered apprentices to qualify for funding to offset expenses associated with their related technical instruction. This financial support covers the purchase of essential resources such as books, tools, and materials, thereby facilitating a more accessible and comprehensive learning experience for individuals engaged in apprenticeship programs. The LWDBs encourage participants by providing an orientation on ARIZONA@WORK programs and resources that are available which include the ETPL. The LWDBs engage the participants with work readiness and soft skill classes and require each participant to research at least three providers that meet the participants individual needs prior to selecting a program on the ETPL. This supports the participants and allows them to make an informed consumer choice when selecting a provider or training program.

G. Coordinating with Economic Development Strategies

Describe how the activities identified in (A) will be coordinated with economic development entities, strategies, and activities in the State.

Economic development agencies play a crucial role in fostering economic growth, job creation, and overall prosperity within Arizona. Effective coordination between these agencies and state strategies is essential to maximize their impact and ensure a cohesive approach to development. Aligning the objectives of economic development agencies with the broader goals outlined in this Unified Plan is a fundamental principle for effective and coordinated development efforts. The ARIZONA@WORK system will identify relevant economic development entities in the state, including government agencies, local authorities, business chambers, and community organizations in order to coordinate activities identified, leading to a more effective, structured, comprehensive, and integrated approach to economic development for the following strategies:

Strategies

- **1.4:** Strengthen coordination and outreach across the ARIZONA@WORK system to increase public awareness and access to services.
- **2.1:** Build partnerships across businesses, education and training providers to develop career pathways and create work-based training opportunities to develop requisite workforce skills.
- **2.2:** Promote a business-services model that links business with, and advocates for, quality jobs that support workers' economic stability and mobility.
- **2.3:** Strengthen workforce system teams by investing in tools and skill building that improve client management, talent sourcing, and matching for businesses.

- **2.4:** Convene the business community to explore and realize the employment opportunities for individuals with barriers to employment by highlighting the workforce system’s supportive services for prioritized populations.
- **3.1:** Strengthen strategic partnerships across key state level agencies, workforce system partner programs, and community-based organizations to expand coordination across programs to accelerate quality employment for priority populations.
- **3.2:** Braid federal, state, local, and private funding streams to maximize the impact of WIOA funds to meet the unique needs of local areas, job seekers, and employers.

The OEO has engaged with community partners, economic development agencies, local workforce development boards, and educational institutions to convene statewide workforce investments that will foster business engagement and invest in opportunity and growth for Arizona. **During PY25, Arizona’s Rural Health Transformation Program includes several areas of focus, emphasizing access to care, provider resiliency, and strategic investments in priority health initiatives. The largest investment area in the state’s Rural Health Transformation Program is in workforce.**

Strategies : Sector Partnerships & Business Engagement

- **2.1:** Build partnerships across businesses, education, and training providers to develop career pathways and create work-based training opportunities aligned to in-demand industries.
- **2.2:** Promote a business-services model that links business growth with and advocates for quality jobs that support economic stability and mobility.
- **2.3:** Strengthen workforce system teams by investing in tools and skill-building that improves talent sourcing and matching for businesses.
- **2.4:** Convene the business community to expand employment opportunities for individuals with barriers to employment and strengthen employer engagement.

b. State Operating Systems and Policies

The Unified or Combined State Plan must include a description of the State operating systems and policies that will support the implementation of the State strategy described in section II **Strategic Elements**. This includes—

1. The State operating systems that will support coordinated implementation of State strategies (e.g., labor market information systems, data systems, communication systems, case management systems, job banks, etc.).

Arizona is committed to modernizing its workforce operating systems to support the coordinated implementation of the strategies outlined within this Unified Plan. Currently ARIZONA@WORK partners use separate data systems that will gradually be integrated through modernization efforts. While ADES and ADE can report on each individual WIOA program to the respective federal oversight agencies, Arizona does not currently have an integrated system that is accessible to all partner programs. Addressing these data coordination gaps and the continued emphasis on the utilization of data-informed insights across partner programs will support each achieving all strategies of this Unified Plan.

Title II, Adult Education and Literacy, uses LiteracyPro System Inc's LACES system, branded as the Arizona Adult Education Data Management System (AAEDMS). It is a cloud-based educational data management system that meets all National Reporting System (NRS) requirements for data and participant tracking of attendance, assessments, and outcomes. It includes the features below to support data collection and reporting processes:

- Adherence to all ADE data governance and privacy concerns;
- For authorized users, provides real-time online access to scores, demographic information, and performance data at the state, local program, classroom, and student levels;
- The ability to provide multiple levels of access, including view-only users;
- The ability to produce standard and recurring federal, state and agency reports as directed by ADE and aligned with NRS reporting requirements;
- The ability to provide custom and ad hoc reports as directed by ADE;
- The ability to download raw data and reports as PDF or CSV files for ADE to create custom reports as needed;
- The ability to collect social security numbers (SSN) securely and privately and assign a unique personal ID for each student separate from the SSN;
- The ability to create a record for High School Equivalency diplomas and transcripts for students on the College Credit Pathway and HSE Plus Career Readiness Pathway;
- Detailed auditing logs and validation systems to ensure accurate data reporting;
- Data matching of secondary diploma receipt to the educational database;
- Data matching of employment data for federal outcome reporting measures; and
- Local adult education providers enter program and participant data according to policy and have full access to their own data and reports for program improvement purposes. State staff can access all data at both the statewide and provider level to assist in desk monitoring efforts and to inform professional development needs across the State.

Title I-B and Title III Programs utilize the Arizona Job Connection (AJC) as the system of record for case management, WIOA performance indicator collection, information management, and DOL reporting. (AJC is also the data system of record for the following WIOA required partners: JVSG, MSFW, and TAA.) America's Job Link Alliance (AJLA), the AJC vendor, provides data in the Participant Individual Record Layout (PIRL) format to upload to DOL's Workforce Integrated Performance System (WIPS) for the Title I-B and Title III programs. To ensure data integrity, ADES reviews local area performance quarterly, utilizing the data that is uploaded to WIPS. ADES works with LWDB staff to ensure their service providers review WIOA performance data, improve program operations, and ensure data accuracy. ADES has an integrated, cross-functional help desk that supports the following programs and their clients statewide:

- Adult, DW, and Youth;
- Wagner-Peyser ES;
- VR;
- UI Benefits;
- UI Tax and Wage (Employers);
- Jobs for Veterans State Grant;
- Migrant and Seasonal Farmworker Program;

- TAA Program;
- SNAP E&T;
- TANF Jobs Program;
- RESEA Program;
- Reentry Program; and
- PROWD Grant Program.

Title IV launched inFormed, a modernized case management system, on July 1, 2025. inFormed includes case management, fiscal and contract management, and federal reporting modules. A role-based security approach is utilized within inFormed to allow appropriate access to data across all modules and users. inFormed is built on mobile-first technology, meets WCAG 2.0, W3C, Level A and Level AA success criteria to conform with 508 accessibility standards and ensure user access and operability with third party assistive technology software. The new case management system uses data driven design elements to produce guided workflows, eliminate duplicative entry, and reduce manual efforts to create and maintain reports. The inFormed application integrates with DocuSign via API to enable secure electronic signature capabilities directly within the application workflow.

Efforts to expand the functionality and reporting capabilities of AJC and InFormed for Titles I, III and IV to allow data-driven decisions based on data by region/LWDAs and improve cross-program reporting is critical to strengthening the data sharing capacity of the ARIZONA@WORK system. This is currently underway with the AJC data team's expansion of tableau reports accessible to all partners. As a best practice, and to support the use of the AJC system, monthly workgroup meetings, consisting of State administrators, LWDB representatives, and provider staff, are facilitated to review and prioritize enhancement requests from AJC users prior to submitting to America's Job Link Alliance (AJLA). Additionally, in June 2023, ADES and the AJC vendor implemented DocuSign to enable clients to sign their Terms of Agreement electronically. In January 2026, 53 percent of job seekers used DocuSign to sign their Terms of Agreement.

Arizona's labor market information systems will also support the strategies in this Plan, including the identification of and changes to In-Demand industries and occupations, sector partnerships, transferable skills, and career pathways throughout the life of this plan. Labor market data is communicated through regular communication systems, such as monthly data updates across the state, and a variety of Tableau tools on the OEO website. In addition, statewide and regional labor market information is available to businesses, job seekers, and ARIZONA@WORK staff through the improved ARIZONA@WORK website, additionally providing easy access for all individuals engaged in implementing state strategies.

Workforce and education evaluation will additionally be executed on the Integrated Data System (IDS), a statewide longitudinal database which links administrative data for statistical analysis. This IDS serves as a tool to measure the impact of government programs and interventions. Current initiatives utilizing the IDS include an evaluation of predictive features for ARIZONA@WORK adult education programs, designed to identify areas driving the greatest impact on wage outcomes. The IDS will additionally support an industry of employment analysis, focused on evaluating employment following participants' completion of workforce development programs, providing insights into whether the training will lead

participants into high-impact areas of employment. By leveraging the IDS, stakeholders can gain a more comprehensive understanding of how state agencies intersect with and influence the lives of Arizonans, thereby enabling targeted enhancement of initiatives aimed at improving economic outcomes.

2. The State policies that will support the implementation of the State's strategies (for example, co-enrollment policies and universal intake processes where appropriate). In addition, provide the State's guidelines for State-administered one-stop partner programs' contributions to a one-stop delivery system and any additional guidance for one-stop partner contributions.

State policies are dedicated to fostering service delivery alignment and promoting business creation and growth. A commitment to continuous improvement underlies our approach, with policies regularly reviewed and revised to ensure seamless implementation of the strategies within this Unified Plan which are centered on customer needs and market demands.

For easy access, WAC Policies can be found on the ARIZONA@WORK website's policies/reports webpage and are applicable to all Core Partner programs. Likewise, WIOA Title I-B programmatic policies are available on the DES WIOA Title I-B Policies and Procedures webpage.

Noteworthy updates to our administrative state policies include:

- Local Governance (Revised 2023):
 - Articulates the State's vision and purpose for Local Workforce Development Boards (LWDBs).
 - Provides guidance on LWDB appointment and certification, delineates roles, responsibilities, and authority of Chief Elected Officials (CEOs) and LWDBs.
 - Outlines the LWDA designation process.
- One-Stop Delivery System (Revised 2023):
 - This policy offers LWDBs and ARIZONA@WORK partners a vision and structure for administering the Job Center Service Delivery system.
- One-Stop Operator and Service Provider Selection (Revised 2023):
 - Provides LWDBs and partners with guidance on roles and responsibilities of the One-Stop Operator and career service providers.
 - Outlines the selection processes required under WIOA.
- ARIZONA@WORK Job Center MOU and Infrastructure Costs (Revised 2023):
 - Defines the purpose and criteria for MOU development, including infrastructure costs.
 - Addresses steps if agreement on infrastructure cost sharing is not reached.
- LWDA IFA Guidance (Revised 2023):
 - Addresses gaps observed during the 2017 IFA execution.
 - Highlights mandated partners, defines infrastructure costs, identifies acceptable cost allocation bases, and ensures proportionate cost-sharing.
- One-Stop Certification (Revised 2023):

- Establishes statewide criteria and procedures for LWDBs to certify ARIZONA@WORK Job Centers.
- Adheres to WIOA requirements and outlines tools to aid in the certification process.
- WIOA Statewide Monitoring Policy (Revised 2023):
 - Establishes monitoring processes to ensure compliance with WIOA law and regulations.
 - Aids in continuous improvement of the workforce system.
- Conflict of Interest (Revised 2023):
 - Establishes guidelines for conflict of interest, firewalls, and internal controls required under WIOA for LWDBs and entities with multiple roles in the ARIZONA@WORK system.
- **ETPL Policy (Revised 2026)**
 To align training provider standards with Workforce Pell requirements the following revisions were made to the policy
 - **Quality Safeguards**
 - **Minimum Operational History Requirement for Training Providers**
 - **Recognized Credential Within Six Months of Completion**
 - **Stackable Credential Requirement**
 - **Continued Eligibility**
 - **Demonstrated Compliance with the interim provisions**
- **Data Validation Policy (Revised 2023)**
 - **Data validation policy is a series of internal controls or quality assurance techniques established to verify the accuracy, validity, and reliability of data.**
- Support Services (Revised 2023)
 - Allows for Local Workforce Development Boards (LWDBs) to define supportive services available in their local areas that are designed to maximize flexibility to meet the needs of the individuals served in their local communities, subject to the requirements of the Act, regulations, and the state policy.
 - Includes a list of common items which may be available as a supportive service, but the policy is clear that LWDBs are not limited to items on this list.
 - Encourages LWDBs to develop policies which allow for reimbursement for cellular or internet service needed to create or maintain a wireless connection for distance learning, searching for employment, and job retention, as well as the purchase of software needed for various activities.
 - Updated in 2023 after guidance was issued by DOL that encouraged state and local supportive services policies to include the provision of food at a reasonable cost to assist or enable participants to participate in allowable program activities and to reach the participants' employment and training goals.
- RR Policy (Revised 2022 and 2024)

- Clarifies the roles of the State and Local RR teams to emphasize the partnership between the State and LWDBs and provide LWDBs access to RR funds to quickly meet the needs of the community.
- Youth Policy (Revised 2024)
 - Revised to streamline the youth eligibility determination process and to provide flexibilities as allowed pursuant to TEGL 9-22.
- ARIZONA@WORK Brand Style Guide Policy (November 2024)
 - Provides the information and direction, required under WIOA, regarding how Arizona's workforce system stakeholders must use the ARIZONA@WORK brand.
- Funding Allocation Policy for WIOA Title IB Adult, DW and Youth Programs (March 2025)
 - WIOA requires the Governor, with assistance from the state board (WIOA Sec. 101(d)(9)), to develop allocation formulas for the distribution of funds for employment and training activities to local areas as permitted under WIOA Sec. 128(b)(3) and 133(b)(3).
 - This policy provides guidelines by which Workforce Innovation and Opportunity Act (WIOA) formula grants shall be established and modified.
- Co-enrollment (Revised 2021):
 - The Title I Adult and DW Policy on Program Registration, Eligibility, Enrollment and Tracking instructs Title I service providers to co-enroll participants with other workforce partners and work closely to address the needs of co-enrolled customers and ensure services are made available to eligible individuals who are referred by partner programs based on priority of service criteria.
 - Encourages automatic registration for ES when applying for UI compensation.
 - Promotes co-enrollment with core ARIZONA@WORK partner programs, ensuring non-duplicative services and shared outcomes.

The WAC, through its Executive Committee and **Workgroup Engagement**, will explore best practices within and outside the system, ensuring continuous improvement. Additionally, ADE and ADES will oversee policy implementation for core programs to align with Workforce Plan strategies. The WAC is committed to providing ongoing technical assistance and interpretation, fostering innovation, and staying connected with state and local entities' implementation efforts.

3. State Program and State Board Overview

A. State Agency Organization

Describe the organization and delivery systems at the State and local levels for the programs covered in the plan, including the organizational structure. Include an organizational chart.

Arizona's integrated one-stop workforce development system, branded ARIZONA@WORK, is comprehensive, accessible, and provides services to businesses, workers, and job seekers. The

ARIZONA@WORK system is charged with enhancing the range and quality of workforce development services available to businesses and job seekers through a coordinated approach among education, businesses, public agencies, and community-based organizations.

The Core Partner Programs of the ARIZONA@WORK system are administered across two state level agencies: Arizona Department of Economic Security (ADES) and Arizona Department of Education (ADE).

ADES serves as the state's human services agency, administering a range of programs that promote enhanced safety and well-being for Arizonans by focusing on three primary goals: strengthening individuals and families, increasing self-sufficiency, and developing the capacity of communities. The ADES Director is appointed by Arizona's Governor, overseeing and setting the strategic direction for the agency with a mission to strengthen individuals, families, and communities for a better quality of life. To fulfill this mission, ADES collaborates with community partners statewide to expand its reach to vulnerable populations and connect them with resources and support while they work towards greater independence and self-sufficiency. ADES offers the following programs: Community Services Block Grant (CSBG); SNAP; TANF; support to individuals with Intellectual/Developmental Disabilities; Child Care Assistance; Child Support; and Refugee Resettlement.

ADES also serves as the State Workforce Agency and is designated as the administrative and fiscal agency for WIOA Title I funds. It oversees the administrative and fiscal activities of the 12 LWDBs that implement ARIZONA@WORK services throughout the State. Within ADES is DERS, whose mission is to strengthen Arizona communities by bridging and minimizing gaps to employment and independence. Led by an Assistant Director, DERS administers the following WIOA core programs:

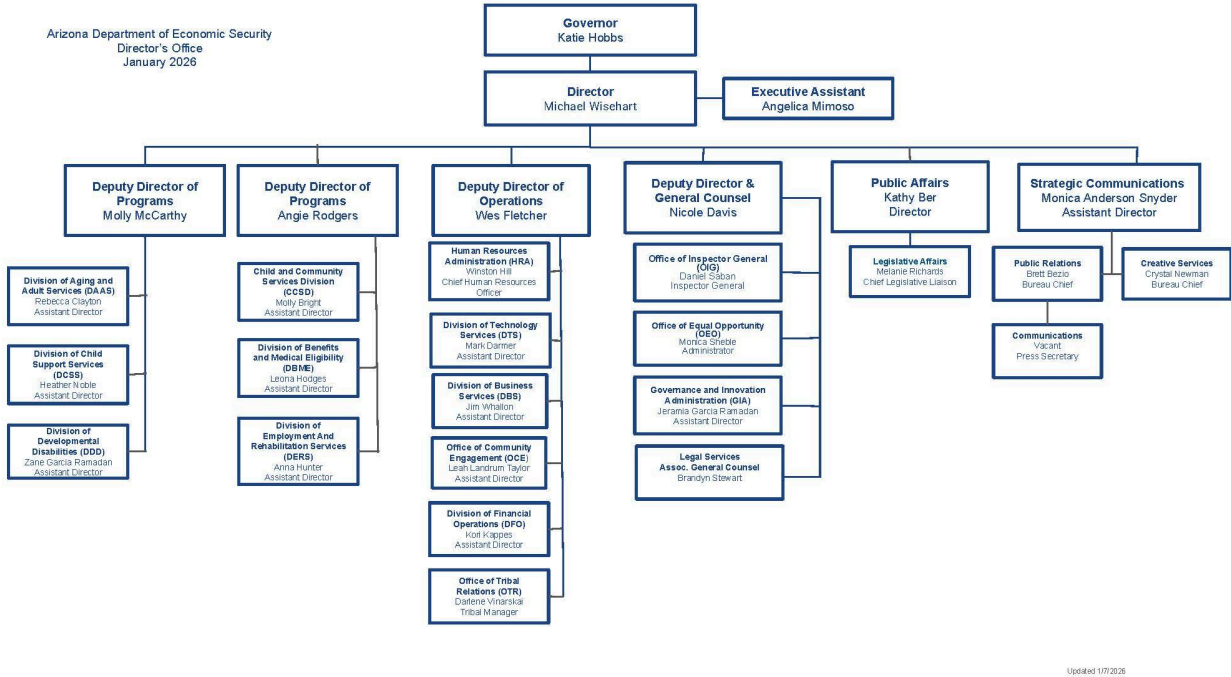
- Adult, DW, and Youth programs, authorized under WIOA Title I through contracts with 12 LWDBs;
- Wagner-Peyser Act ES, authorized under Title III; and
- VR, authorized under Title IV.

The Division coordinates the efforts of the state's ARIZONA@WORK Job Centers, which provide comprehensive services to both jobseekers and businesses. Additionally, DERS maintains the Eligible Training Provider List (ETPL) for the system, ensures ongoing viable Rapid Response (RR) activity, delivers technical assistance and training focused on the implementation of WIOA, and administers the following workforce programs:

- Arizona Apprenticeship Office (AAO);
- Foreign Labor Certification (FLC)
- Job for Veterans State Grants (JVSG);
- Reentry Program;
- Migrant and Seasonal Farmworker (MSFW) Program;
- Reemployment Services and Eligibility Assessment (RESEA)
- Senior Community Service Employment Program (SCSEP);
- Supplemental Nutrition Assistance Program (SNAP) Career Advancement Network (Arizona's Employment and Training Program);
- Trade Adjustment Assistance (TAA);

- Temporary Assistance for Needy Families (TANF) Jobs
- Unemployment Insurance (UI);
- Work Opportunity Tax Credit (WOTC); and
- Federal Bonding.

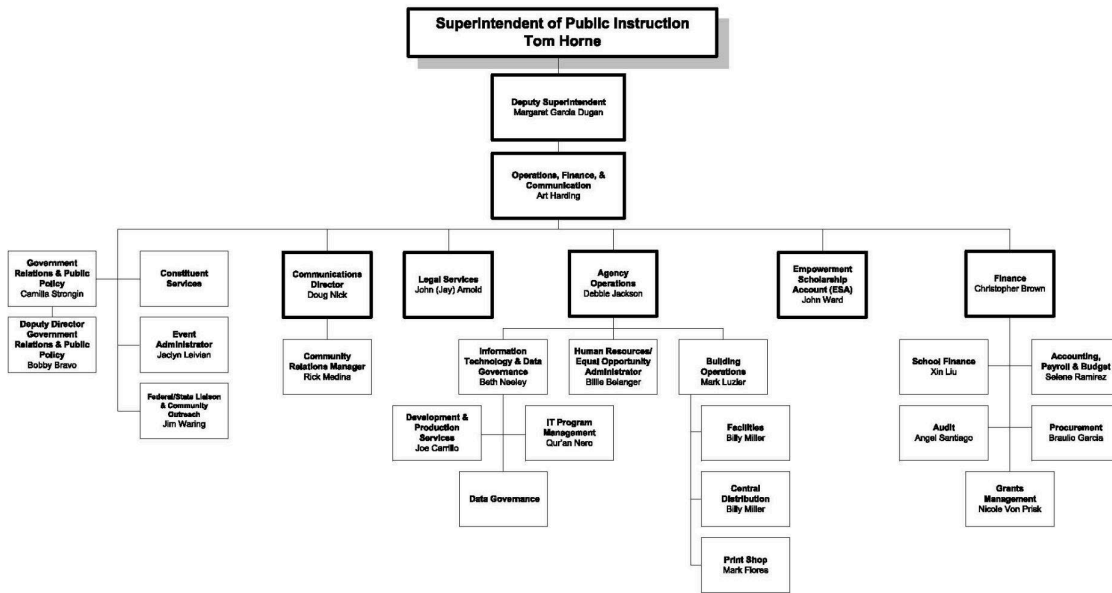
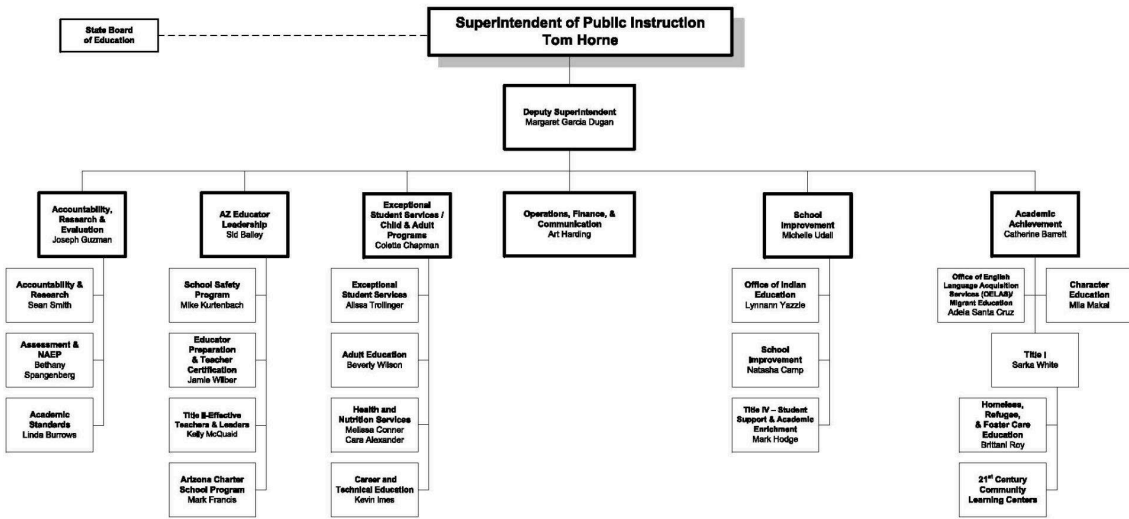
ADES organizational charts can be found below:



The ADE administers adult education and literacy activities under Title II of WIOA to support the coordination of services for individuals participating in programs overseen by both agencies. The ADE is led by the Superintendent of Public Instruction, an elected position. Within ADE, Adult Education Services is positioned in the division of Exceptional Student Services: Child and Adult Programs, overseen by an Associate Superintendent. The State Director of Adult Education holds the agency title of Deputy Associate Superintendent. Direct services to Title II participants are performed by grant-funded adult education programs throughout the state, with the state office providing operational and professional development support and monitoring for compliance with grant requirements and state and federal laws, including WIOA.

Additionally, CTE, a required partner administered through a separate business unit in the ADE division of Exceptional Student Services: Child and Adult Programs. CTE provides students with the academic and technical skills, and the knowledge and training necessary to reach career goals.

ADE organizational charts can be found below:

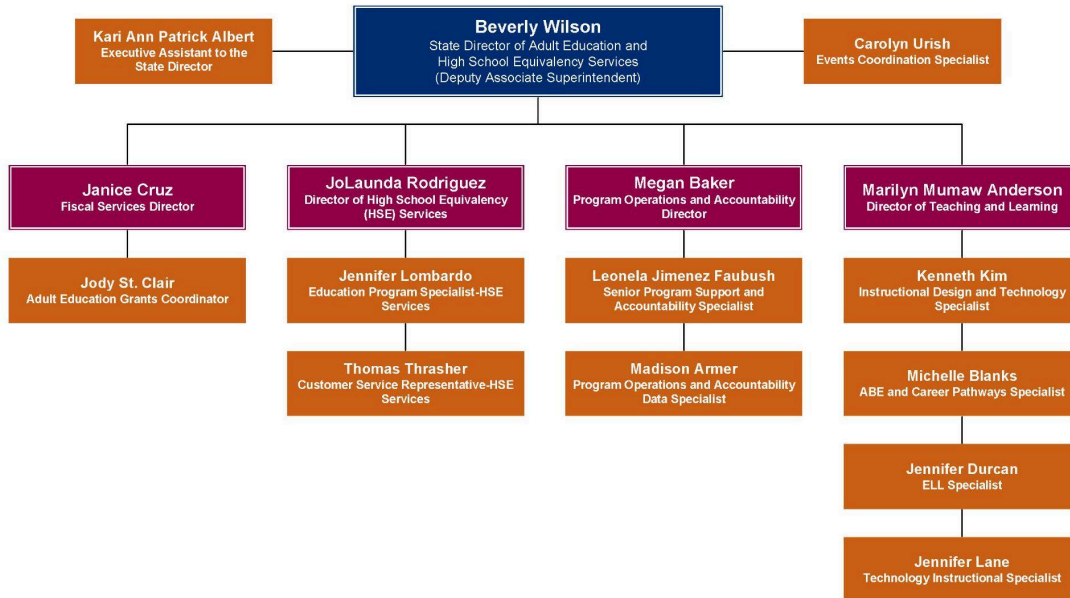




**ARIZONA DEPARTMENT OF
EDUCATION**

Tom Horne, Superintendent of Public Instruction

Adult Education and High School Equivalency Services



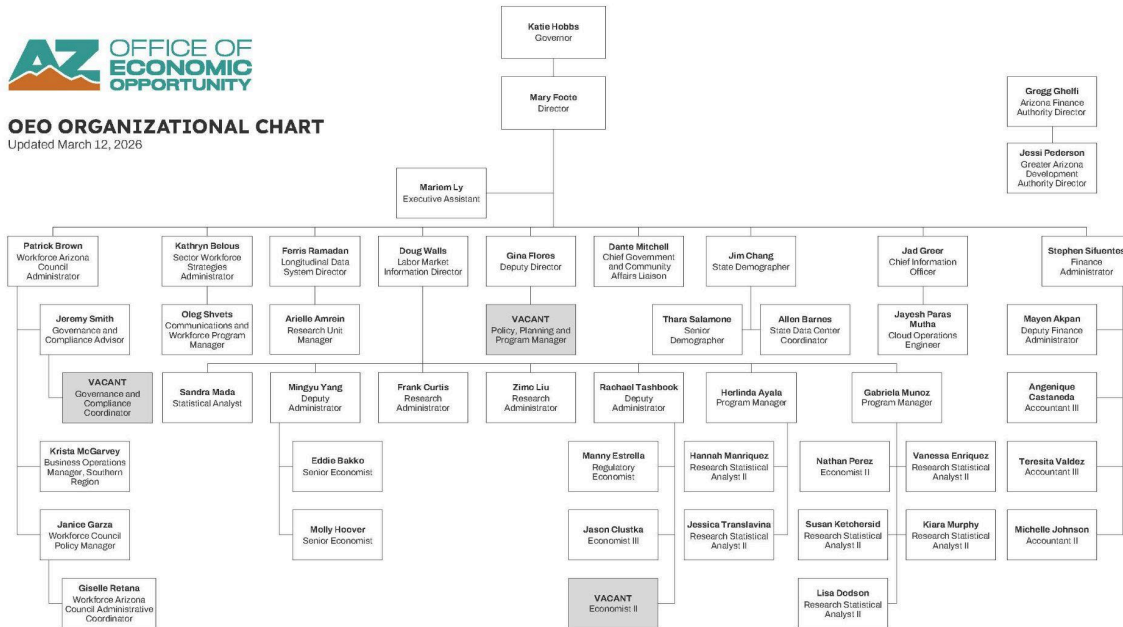
Each core program under WIOA has a common set of performance indicators and is represented on the Governor’s WAC, which sets the strategic direction for ARIZONA@WORK.

Arizona’s structure additionally includes the OEO which functions as the primary coordinator for workforce planning in the state. It offers staffing assistance to the WAC, oversees the state’s workforce data evaluation system, conducts economic and demographic research and analysis, including constitutionally mandated population estimates. The OEO is also responsible for generating employment and unemployment estimates, and it plays a crucial role in developing labor market information to inform the state’s workforce strategy.

OEO organizational charts can be found below:



OEO ORGANIZATIONAL CHART
Updated March 12, 2026



B. State Board

Provide a description of the State Board activities that will assist State Board members and staff in carrying out State Board functions effectively. Also, provide a membership roster for the State Board consistent with 20 CFR 679.110-120, including members’ organizational affiliations and position titles.

Revised Section

The Workforce Arizona Council (WAC or the Council) serves as the statewide strategic convener and policy leader for Arizona’s workforce system under the Workforce Innovation and Opportunity Act (WIOA). In this role, the Council helps shape statewide workforce priorities, guide policy development, and strengthen alignment across partners to support Arizona’s economic growth and long-term competitiveness. Grounded in collaboration, accountability, **equal access**, and continuous improvement, the Council works to advance a workforce system that is resilient, responsive, and inclusive.

The State Plan reflects the State of Arizona’s commitment to cultivating a workforce system that meets the needs of workers, employers, and communities. This section outlines key components of the plan, including the roles and responsibilities of the Council, local workforce development boards (LWDBs), job center certification, and other critical activities carried out in alignment with WIOA requirements.

WAC Activities:

Policy Development and Oversight:

- **Strategic Alignment:** The Council takes a lead role in developing policies that strategically align with federal and state workforce development goals. This involves continuous assessment of economic trends, labor market demands, and emerging opportunities.

- **Implementation Oversight:** The council ensures policies are effectively implemented at the local level. This includes providing guidance to local workforce development boards (LWDBs) on how to interpret and apply policies in a manner that maximizes impact.

LWDB Oversight:

- **Performance Monitoring:** The Council continuously monitors and evaluates the performance of LWDBs to ensure they adhere to WIOA regulations. Metrics such as job placement rates, training completion, and participant satisfaction are considered in this evaluation process.
- **Technical Assistance:** The council provides ongoing technical assistance to LWDBs, offering support in areas such as program design, performance improvement, and the effective use of WIOA funds.

Job Center Certification:

- **Criteria Establishment:** The Council establishes comprehensive criteria and procedures for certifying job centers within the state. These criteria encompass service quality, accessibility, and the ability to address the diverse needs of job seekers and employers.
- **Regular Assessments:** The council conducts assessments of certified job centers every two years to ensure they maintain high standards. This involves virtual and on-site visits, feedback sessions, and performance evaluations.

Local Plan Approval:

- **Thorough Review:** The Council rigorously reviews local workforce development plans submitted by LWDBs. This involves a comprehensive analysis of the proposed strategies, activities, and budget allocations outlined in each plan.
- **Feedback and Improvement:** The council provides detailed feedback to LWDBs, with an emphasis on enhancing the quality and effectiveness of local plans. This iterative process ensures alignment with statewide goals.

Strategic Planning:

- **Economic Alignment:** The Council engages in strategic planning activities that closely align workforce development efforts with state and regional economic priorities. This includes identifying and capitalizing on growth sectors, addressing skills gaps, and anticipating future workforce needs.
- **Stakeholder Collaboration:** The council collaborates closely with key stakeholders, including businesses, educational institutions, and community organizations, to gather insights, build partnerships, and create a shared vision for the workforce system.

Resource Allocation:

- **Transparent Process:** The Council actively participates in the transparent allocation of WIOA funds, ensuring that resources are distributed to programs and services that align with workforce development goals.

- **Equitable Distribution:** The Council works to ensure the equitable distribution of resources among local areas, considering factors such as population density, economic challenges, and the unique needs of different regions.

Performance Measurement and Evaluation:

- **Metric Establishment:** The Council establishes robust performance metrics to assess the effectiveness of workforce development programs. These metrics include key performance indicators such as employment outcomes, skills attainment, and participant satisfaction.
- **Continuous Evaluation:** The Council conducts regular evaluations to gauge the impact of programs and services, allowing for continuous improvement and adjustment of strategies based on performance data.

Stakeholder Engagement:

- **Collaborative Initiatives:** The Council fosters and sustains collaboration with a diverse array of stakeholders, including employers, educational institutions, community organizations, and advocacy groups.
- **Input Gathering:** The Council actively seeks input from stakeholders to inform decision-making. Regular **Workgroup Engagement** is utilized to gather insights, ensuring that the workforce development system remains responsive to the needs of the community.

In each of these activities, the WAC plays a pivotal role in guiding, overseeing, and enhancing the workforce development system within the state of Arizona.

WAC Membership Roster

The WAC board roster effectively aligns with the mandates of WIOA sec. 101(b)(1) by incorporating diverse and representative members with expertise in key areas such as workforce development, economic development, and education. The composition of the board reflects a commitment to inclusivity, ensuring that various stakeholders, including elected officials, employers, community-based organizations, and educational institutions are represented. Additionally, the board's structure demonstrates a strategic approach to addressing the workforce challenges outlined in WIOA, fostering collaboration and leveraging the unique strengths of each member to enhance the overall effectiveness of workforce development initiatives in the State. This membership roster adheres to the guidelines outlined in 20 CFR 679.110-120, ensuring diverse representation from key sectors contributing to the workforce development ecosystem within the state of Arizona.

As of **March 2026**, the WAC membership is as follows:

The Governor; Meeting the requirements of WIOA sec. 101(b)(1)

Name	Affiliation	Title
Governor Katie Hobbs	State of Arizona	Governor of Arizona

State Legislature; Meeting the requirements of WIOA sec. 101(b)(2)

Name	Affiliation	Title
Vacant	AZ State Senate	State Senate Member
Representative Justin Wilmeth	AZ House of Representatives	State Representative

Representatives of Business; Majority meeting the requirements of WIOA sec. 101(b)(3)(i)

Name	Affiliation	Title
Mark Gaspers Board Chair	Boeing	Director, Government Operations
Michelle Bolton Vice Chair	Banner Health	Senior Director of Government Relations
Skylie Estep Second Vice Chair	South32	Director, HR
Alexander (Alex) Horvath	Tucson Medical Center	Senior Vice President, Chief Human Resources Officer
Alisa Wren	Freeport McMoRan	Senior Talent Acquisition Manager
Chet Samuelson	BOK Financial	President
Danny Seiden	Arizona Chamber of Commerce & Industry	President & CEO
Jenna Rowell	Local First Arizona	Director of Rural Development
Jim Corning	Novakinetics Aerosystems	President
John Walters	Trucordia	Market Leader - Arizona
Karla Moran	Salt River Project	Senior Project Manager
Michael Cruz	Lucid Motors	Senior Manager of State Public Policy
Rose Castanares	TSMC	President
Scott Holman	Amkor Technology	VP, Human Resources
Zenji Reynolds	Southwest Shoulder, Elbow & Hand Center	CEO
Vacant	Vacant	Vacant

Name	Affiliation	Title
Vacant	Vacant	Vacant
Vacant	Vacant	Vacant

Representatives of the Workforce; No less than 20% meeting the requirements of WIOA sec. 101(b)(3)(ii)

Name	Affiliation	Title
Bill Ruiz	Western States Regional Council of Carpenters	Representative, Western States Regional Council of Carpenters
Debra Margraf	National Electrical Contractors Association	Executive Director
Dennis Anthony	State Apprenticeship Council	Chairman
Josh DeSpain	IBEW Local 570	Business Manager
Shawn Hutchinson	Phoenix Electrical JATC	Training Director
Thomas Winkel	Arizona Coalition for Military Families	Director

Balance of Membership; Meeting the requirements of WIOA sec. 101(b)(3)(iii)

Name	Affiliation	Title
Michael Wisehart	Core Program - Title I and III (ADES)	DES Director
Beverly Wilson	Core Program - Title II (ADE)	State Director, Adult Education
Kristen Mackey	Core Program - Title IV (Rehabilitation Services Administration)	Program Administrator
Sandra Watson	Arizona Commerce Authority	President and CEO
Mayor Regina Romero	Pima County	Mayor
Jackie Elliott, Ed.D.	Central Arizona College	President and CEO
Jeff McClure	Pinal County	Pinal County Supervisor

4. Assessment and Evaluation of Programs and One-Stop Program Partners

A. Assessment of Core and One-Stop Program Partner Programs.

Describe how the core programs will be assessed each year based on State performance accountability measures described in section 116(b) of WIOA. Describe how other one-stop delivery system partner program services and Combined State Plan partner programs included in the plan will be assessed each year. This State assessment must include the quality, effectiveness, and improvement of programs broken down by local area or provider. Such state assessments should take into account local and regional planning goals.

The Council will assess the ARIZONA@WORK system for accountability through the federal and identified state performance measures. The federal measures are displayed (by quarter and annually) publicly on the ARIZONA@WORK website statewide and by LWDA, in addition to including available labor market information by LWDA.

ADE and ADES use their respective data systems to regularly assess their respective programs based on performance measures.

Within PY 2026-2027, ADE intends to initiate a data-sharing agreement with the Office of Economic Opportunity (OEO) to provide Title II adult education data to the Integrated Data System (IDS) and receive access to the system.

- Title II adopted a new data management system, Genius LACES in January 2026 through the vendor, LiteracyPro Systems Inc. This system is designed specifically for adult education to collect and report performance data from adult education providers to the National Reporting System (NRS).
- NRS, the accountability system for the Federally funded adult education programs, authorized by Section 212 of WIOA is used by ADE Title II. The system tracks adult education program participation and aggregate participant demographic data, methodologies for collecting performance data, and program reporting procedures, and the WIOA primary indicators of performance of employment rate in the second quarter after exit, employment rate in the fourth quarter after exit, median earnings in the second quarter after exit, credential attainment rate, measurable skill gains, and effectiveness in serving employers.

ADE implements a risk assessment annually to monitor potential risk factors of sub-grantee compliance with the contract. Results of the risk assessment are reviewed and to identify sub-grantees that may require comprehensive monitoring. ADE evaluates sub-grantees for programmatic and fiscal compliance with federal and state requirements, monthly data submissions to the ADE data management system and technical assistance to ensure adherence to all requirements of the contract. ADE examines Federal reporting Tables and other required data reports at both the sub-grantee level and statewide aggregate level, analyzing data sets for consistency across employment outcomes, age eligibility, and other required demographic indicators. Each sub-grantee's contract is reviewed for coordination with ARIZONA@WORK partners and alignment to the priorities and strategies identified within the applicable Local Workforce development Board (LWDB) plan.

ADES uses its data systems of record to review federal performance data on a quarterly and annual basis. In addition, ADES uses monthly scorecards at the Division and Administration level with lead measures of the processes impacting the federal performance measures. The scorecards indicate the status of the measures using a red, yellow, and green notation based on targets set to focus on continuous improvement. When a measure does not meet its target, a team works together to identify the root cause(s) of the problem and implements countermeasures to move the metric back to meeting the target. The scorecards are discussed monthly at Administration and Division leadership meetings. Implementation of the AMS has also supported more frequent reviews of lead measures at regional and local levels through focused team meetings and will continue through expansion of the AMS during the next Workforce Planning cycle.

ADES meets monthly with program and support units to assess monitoring and performance results to identify trends and needed technical assistance for the LWDBs and their service providers.

Arizona uses a Local Area Statistical Adjustment Model (SAM) to establish predicted and adjusted levels of performance, based on pre- and post-PY datasets for the Title I core programs. For PYs 2022 and 2023, the State's formal assessment of local area Title I core program performance was consistent with the assessment of the State by the U.S. DOL, as outlined in [Training and Employment Notice \(TEN\) 04-23¹⁹](#) and [04-24²⁰](#), respectively. LWDBs were not assessed individually for the core programs under Title II, III, and IV, which are administered by the ADES and ADE at the State level.

In accordance with 20 CFR 677.220, the following individual indicators were assessed for each of the Title I core programs for PYs 2022 and 2023:

- Employment Rate 2nd Quarter after Exit: The percentage of program participants who are in unsubsidized employment (or postsecondary education for Youth program participants) during the second quarter after exit from the program
- Median Earnings 2nd Quarter after Exit: The median earnings of program participants who are in unsubsidized employment during the second quarter after exit from the program;
- [Employment Rate 4th Quarter after Exit: The percentage of program participants who are in unsubsidized employment \(or postsecondary education for Youth program participants\) during the fourth quarter after exit from the program](#)
- [Credential Attainment: The percentage of those participants enrolled in an education or training program \(excluding those in OJT and customized training\) who attained a recognized postsecondary credential or a secondary school diploma, or its recognized equivalent, during participation in or within one year after exit from the program.](#)

The results of this formal assessment informed the 2023 LWDB recertification process, specifically in accordance with the criterion from section 107(c)(2)(B) of WIOA, "The extent to which the local board has ensured that local area activities have enabled the local area to meet performance accountability measures." All LWDBs met or exceeded the required standards relating to WIOA performance accountability measures and were recertified in this cycle.

¹⁹ <https://www.dol.gov/agencies/eta/advisories/ten-04-23>

²⁰ <https://www.dol.gov/agencies/eta/advisories/ten-04-24>

In addition to this formal assessment, the following indicators for which SAM adjustments were not applied were also assessed, relative to the LWDB's negotiated levels of performance:

1. Employment Rate 4th Quarter after Exit: The percentage of program participants who are in unsubsidized employment (or postsecondary education for Youth program participants) during the fourth quarter after exit from the program
2. Credential Attainment: The percentage of those participants enrolled in an education or training program (excluding those in OJT and customized training) who attained a recognized postsecondary credential or a secondary school diploma, or its recognized equivalent, during participation in or within one year after exit from the program.
3. **Measurable Skill Gains Rate**: The percentage of participants who are in an education or training program that leads to a recognized postsecondary credential or employment and who are achieving documented academic, technical, occupational, or other forms of progress, towards such a credential or employment.

For PYs 2022 and 2023, no local area failed to achieve the adjusted or negotiated level of performance for the same indicator in consecutive years.

Assessment of One-Stop Partner Programs

LWDAs, through their LWDBs and CEOs, will assess and evaluate the local ARIZONA@WORK system at Board and committee meetings overseeing implementation of the local plans, and monitoring federal and locally set performance measures. Each LWDB has representation from Title II, III, and IV to incorporate individual program process assessment with that of the ARIZONA@WORK system as a whole.

The ARIZONA@WORK Job Center Certification process, including the assessment tools, ensure that job centers have access to all program partners through one of the following methods: A program staff member is physically present at the site, a staff member from a different partner program is physically present and appropriately cross-trained to provide information to customers about the partner program, or use a direct linkage by phone or through real-time web-based communication to a program staff member who provides meaningful information or services to customers within a reasonable time.

LWDBs will assess ARIZONA@WORK Job Centers using the job center certification tool every two years and implement a continuous improvement plan to include the LWDB's assessment of how well the ARIZONA@WORK Job Centers support the achievement of the negotiated levels of performance. LWDBs are charged with regular oversight of continuous improvement through tracking and improving measures.

Title II local adult education providers are assessed by ADE through a comprehensive monitoring process that includes monthly desk monitoring of student-level data entered into the data management system, data analysis, narrative reports and onsite monitoring visits. Title II providers are required to provide access to Title II services via the one-stop system and are also assessed on the number of students co-enrolled in partner programs. Data showing Title II enrollment, attendance and MSG outcomes are shared with the LWDAs quarterly.

Title IV utilizes a series of standard weekly and monthly reports, ad hoc reports, and quarterly dashboard information from the federal Department of Education to analyze data, assess progress, and implement corrective measures as necessary. To improve accuracy and efficiency of 911 reporting, data from the program's case management system is routinely compared to a set of desired edit checks via the Data Analytics and Report Edit-Checker (DARE). This automated process reduces manual edit checks prior to submission of quarterly reports. DARE is also used to identify trends across the state and reported data can be analyzed by caseload, office, region, or supervisor.

B. Previous Assessment Results

For each four-year state plan and state plan modification, provide the results of assessments of the effectiveness of the core programs and other one-stop partner programs and Combined State Plan partner programs included in the Unified or Combined State plan during the preceding 2-year period (i.e. the 2-year period of the plan modification cycle), in accordance with methods described in 4(A). Describe how the State is adapting its strategies based on these assessments.

During the first two years of the Plan, assessment of PY 2023 and PY 2024 federal and state performance measures were tracked and reviewed as discussed in Section(4)(A).

Strategies to achieve the State's vision and goals, identified in section II.c of this plan, will be informed by performance assessment results. Two specific strategies for which assessment results will provide crucial insights are Strategy 3.3 (Facilitate data sharing, reporting, and performance analysis across WIOA partners to improve workforce system performance and outcomes.) and 3.4 (Implement a state-wide technical assistance model to deliver training and facilitate best-practice sharing as aligned to the training needs of workforce system staff.) Assessment results will be utilized to:

- Identify areas of performance improvement needs,
- Provide regular updates to state and local partners on trends in performance data,
- Deliver technical assistance to state and local partners on performance accountability measurement and reporting, and
- Review internal policies and procedures to ensure data quality and accuracy in reporting.

Assessment of the effectiveness of core programs and other one-stop partner programs will also contribute to the strategies identified in the Workforce Arizona Council's 2023-2027 Strategic Plan. For example, one goal identified in the Strategic Plan is the enhancement of work-based learning opportunities and achievement of favorable outcomes for participants, equipping them with the skills and knowledge necessary for in-demand industries and occupations. To achieve this goal, the Plan identifies a strategy of ensuring that training providers on the ETPL are aligned with industry standards and meet the needs of local employers, preparing students with the skills and knowledge necessary for success. Tools developed by OEO utilize statistically-adjusted performance data to identify high-performing training providers and programs and offer valuable insights to the Council, local WDBs, and other partners in the workforce development system.

Tables 25 - 32 display negotiated, adjusted, and actual levels of performance for the WIOA Core Programs (PY21 and PY22). In addition, they contain columns with metrics indicating the "% Met of

Negotiated Performance Level” (Actual Performance Level / Negotiated Performance Level), and “% Met of Adjusted Performance Level” (Actual Performance Level / Adjusted Performance Level), where applicable. These metrics assist in measuring program effectiveness and identifying success for each indicator, regardless of whether they were formally assessed by the Departments of Labor and Education.

Title I - Adult, Dislocated Worker, and Youth Programs

Table 25: Title I PY 2023 (July 1, 2023 through June 30, 2024)

Reported Information	Funding Category	Negotiated Performance Level	Adjusted Performance Level	Actual Performance Level	% Met of Negotiated Performance Level	% Met of Adjusted Performance Level
Employment 2nd Quarter after Exit	Adult	69.9%	79.9%	72.7%	104.0%	90.9%
Employment 4th Quarter after Exit	Adult	67.5%	77.2%	69.1%	102.4%	89.5%
Median earnings in the 2nd Quarter after Exit	Adult	\$6,785	\$8,653	\$8,573	126.4%	110.6%
Credential attainment rate	Adult	78.0%	74.3%	72.6%	93.1%	97.7%
Measurable Skill Gains Rate	Adult	65.0%	Not available	74.4%	114.5%	Not available
Employment 2nd Quarter after Exit	DW	78.0%	81.2%	78.6%	100.8%	96.7%
Employment 4th Quarter after Exit	DW	75.0%	79.2%	73.8%	98.4%	93.1%
Median earnings in the 2nd Quarter after Exit	DW	\$8,646	\$9,796	\$10,127	117.1%	103.3%
Credential	DW	74.5%	67.5%	70.7%	94.9%	104.7%

Reported Information	Funding Category	Negotiated Performance Level	Adjusted Performance Level	Actual Performance Level	% Met of Negotiated Performance Level	% Met of Adjusted Performance Level
attainment rate						
Measurable Skill Gains Rate	DW	69.0%	Not available	78.6%	113.9%	Not available
Employment 2nd Quarter after Exit	Youth	74.0%	82.7%	74.0%	100.0%	89.4%
Employment 4th Quarter after Exit	Youth	70.0%	79.5%	74.4%	106.3%	93.6%
Median earnings in the 2nd Quarter after Exit	Youth	\$5,044	\$5,780	\$6,970	138.2%	120.5%
Credential attainment rate	Youth	61.0%	68.2%	63.3%	103.8%	92.8%
Measurable Skill Gains Rate	Youth	62.0%	Not available	67.6%	109.0%	Not available

Table 26: Title I PY 2024 (July 1, 2024 through June 30, 2025)

Reported Information	Funding Category	Negotiated Performance Level	Adjusted Performance Level	Actual Performance Level	% Met of Negotiated Performance Level	% Met of Adjusted Performance Level
Employment 2nd Quarter after Exit	Adult	72.9%	72.7%	71.7%	98.4%	98.6%
Employment 4th Quarter after Exit	Adult	68.5%	68.8%	67.7%	98.8%	98.3%
Median earnings in the 2nd	Adult	\$9,100	\$9,334	\$9,192	101.0%	98.4%

Reported Information	Funding Category	Negotiated Performance Level	Adjusted Performance Level	Actual Performance Level	% Met of Negotiated Performance Level	% Met of Adjusted Performance Level
Quarter after Exit						
Credential attainment rate	Adult	73.0%	75.4%	72.6%	99.5%	96.2%
Measurable Skill Gains Rate	Adult	74.0%	76.1%	74.6%	100.8%	98.0%
Employment 2nd Quarter after Exit	DW	77.5%	75.2%	81.5%	105.2%	108.3%
Employment 4th Quarter after Exit	DW	73.5%	70.0%	75.8%	103.1%	108.3%
Median earnings in the 2nd Quarter after Exit	DW	\$9,600	\$9,860	\$9,923	103.4%	100.6%
Credential attainment rate	DW	74.0%	81.9%	72.5%	98.0%	88.5%
Measurable Skill Gains Rate	DW	75.0%	79.1%	82.2%	109.6%	103.8%
Employment/ Education 2nd Quarter after Exit	Youth	75.0%	77.1%	77.2%	102.9%	100.1%
Employment/ Education 4th Quarter after Exit	Youth	73.0%	74.7%	74.5%	102.1%	99.7%
Median earnings in the 2nd Quarter after	Youth	\$6,188	\$6,463	\$7,349	118.8%	113.7%

Reported Information	Funding Category	Negotiated Performance Level	Adjusted Performance Level	Actual Performance Level	% Met of Negotiated Performance Level	% Met of Adjusted Performance Level
Exit						
Credential attainment rate	Youth	61.0%	65.6%	58.7%	96.2%	89.4%
Measurable Skill Gains Rate	Youth	65.0%	75.3%	69.6%	107.1%	92.4%

Title II - Adult Education and Literacy

Table 27: Title II Adult Education and Literacy PY 2023 (July 1, 2023 through June 30, 2024)

Reported Information	Negotiated Performance Level	Adjusted Performance Level	Actual Performance Level	% Met of Negotiated Performance Level	% Met of Adjusted Performance Level
Employment 2nd Quarter after Exit	52.0%	n/a	41.9%	80.6%	n/a
Employment 4th Quarter after Exit	31.0%	n/a	43.4%	140.0%	n/a
Median earnings in the 2nd Quarter after Exit	\$6,650	n/a	\$8,295	124.7%	n/a
Credential attainment rate	30.0%	n/a	18.4%	61.4%	n/a
Measurable Skill Gains Rate	43.0%	n/a	47.9%	111.4%	n/a

Table 28: Title II Adult Education and Literacy PY 2024 (July 1, 2024 through June 30, 2025)

Reported Information	Negotiated Performance Level	Adjusted Performance Level	Actual Performance Level	% Met of Negotiated Performance Level	% Met of Adjusted Performance Level
Employment 2nd Quarter after Exit	50.0%	40.2%	40.9%	80.6%	101.6%
Employment 4th Quarter after Exit	50.0%	n/a	41.2%	82.4%	n/a
Median earnings in the 2nd Quarter after Exit	\$8,600	n/a	\$9,130	106.2%	n/a
Credential attainment rate	26.0%	n/a	25.4%	97.7%	n/a
Measurable Skill Gains Rate	43.0%	46.7%	53.6%	124.7%	114.7%

Title III - Employment Service

Table 29: Title III ES PY 2023 (July 1, 2023 through June 30, 2024)

Reported Information	Negotiated Performance Level	Adjusted Performance Level	Actual Performance Level	% Met of Negotiated Performance Level	% Met of Adjusted Performance Level
Employment 2nd Quarter after Exit	68.0%	74.9%	60.3%	88.7%	80.5%
Employment 4th Quarter after Exit	63.0%	69.5%	59.2%	94.0%	85.2%
Median earnings in the 2nd Quarter after Exit	\$5,900	\$8,480	\$8,398	142.3%	99.0%

Table 30: Title III ES PY 2024 (July 1, 2024 through June 30, 2025)

Reported Information	Negotiated Performance Level	Adjusted Performance Level	Actual Performance Level	% Met of Negotiated Performance Level	% Met of Adjusted Performance Level
Employment 2nd Quarter after Exit	63.0%	64.3%	62.7%	99.5%	97.4%
Employment 4th Quarter after Exit	57.8%	62.0%	58.1%	100.5%	93.6%
Median earnings in the 2nd Quarter after Exit	\$8,175	\$8,601	\$8,750	107.0%	101.7%

Title IV - Vocational Rehabilitation Services**Table 31: Title IV VR PY 2023 (July 1, 2023 through June 30, 2024)**

Reported Information	Negotiated Performance Level	Adjusted Performance Level	Actual Performance Level	% Met of Negotiated Performance Level	% Met of Adjusted Performance Level
Employment 2nd Quarter after Exit	36.0%	43.7%	53%	147.2%	121.2%
Employment 4th Quarter after Exit	37.5%	43.3%	49.6%	132.2%	114.5%
Median earnings in the 2nd Quarter after Exit	\$3,960	\$5,220	\$4,706	118.8%	90.2%
Credential attainment rate	23.0%	34.4%	24.7%	107.3%	71.8%
Measurable Skill Gains Rate	n/a	n/a	n/a	n/a	n/a

Table 32: Title IV VR PY 2024 (July 1, 2024 through June 30, 2025)

Reported Information	Negotiated Performance Level	Adjusted Performance Level	Actual Performance Level	% Met of Negotiated Performance Level	% Met of Adjusted Performance Level
Employment 2nd Quarter after Exit	49.0%	50.1%	49.0%	100%	97.7%
Employment 4th Quarter after Exit	42.7%	47.0%	47.2%	110.5%	100.3%
Median earnings in the 2nd Quarter after Exit	\$5,200	\$5,776	\$5,103	98.1%	88.3%
Credential attainment rate	30.0%	23.1%	28.4%	94.6%	123.1%
Measurable Skill Gains Rate	37.0%	46.0%	27.4%	74.0%	59.6%

C. Evaluation

Describe how the State will conduct evaluations and research projects of activities carried out in the State under WIOA core programs; how such projects will be coordinated with, and designed in conjunction with, State and local boards and with State agencies responsible for the administration of all respective core programs; and, further, how the projects will be coordinated with the evaluations provided for by the Secretary of Labor and the Secretary of Education under WIOA (WIOA Section 116(e)).

Recognizing that program research and evaluation are key components to the strengthening of the ARIZONA@WORK system, Arizona’s WIOA Partners are committed to working with appropriate organizations to design and coordinate projects that inform system improvements that can improve the capacity to meet shared customer needs. This includes exploring additional Research and Evaluation projects to support those strategies outlined in this Unified Plan connected to refining the customer experience across ARIZONA@WORK system partners and that state’s job centers (e.g. 1.3 and 1.4).

Currently the state of Arizona is developing a training program evaluation model to help determine the effectiveness of workforce training programs provided by ETPs within the Title I Adult program. It attempts to assist workforce policy makers adopt training program strategies that align with the goals of the ARIZONA@WORK system: promoting resources that lead participants to meaningful employment with livable wages. The study identified training programs that resulted in participant employment and

wage outcomes that exceeded, met or underperformed expectations given the unique participant population that they served. The study also identified training subjects that resulted in participant employment and wage outcomes that exceeded, met or underperformed employment and wage outcomes of participants who did not start or did not complete a training program. This was done to illustrate the differences in effectiveness of the varying training program subjects, regardless of the provider of the training. The analysis will help state and local area policy makers develop procedures and allocate resources to support training programs that consistently produce participant employment and wage outcomes that exceed expectations. In addition, it will help job seekers make more informed decisions when choosing a training program. Currently, OEO has developed and tested the model that predicts employment and wage outcomes for participants who completed a training program. OEO has also developed and tested the model that estimates the employment and wage effects of the different training subjects offered by ARIZONA@WORK training providers. OEO is working on communicating the methodology and results of the study to local workforce directors, board members and ETPL coordinators to determine what type of analysis will benefit the ARIZONA@WORK system most. Three tools will be created in fiscal year 2024 to assist job seekers, job seeker staff, or workforce board members understand and utilize the analysis.

5. Distribution of Funds for Core Programs

Describe the methods and factors the State will use in distributing funds under the core programs in accordance with the provisions authorizing such distributions.

A. For Title I Programs

Provide a description of the written policies that establish the State's methods and factors used to distribute funds to local areas for—

i. Youth Activities in Accordance with WIOA Section 128(b)(2) or (b)(3)

In March 2025, the WAC revised and approved the Funding Allocations Policy, which defines the approach Arizona uses for equitably allocating WIOA resources across the State's 12 local workforce areas for WIOA Adult, DW, and Youth Programs.

The WAC follows US DOL guidelines to determine the State, regional, and local economic issues to focus on for WIOA funding. The OEO staff will annually calculate the options for WIOA Adult, DW, and Youth funding and apply the formula for the factors selected based on the identified economic issues for each LWDA.

All LWDBs will receive their annual WIOA formula funding for the Adult and DW Programs in two separate allotments. A portion of the funds will be distributed on or after July 1st, with the remainder of the funds to be distributed on or after October 1st, pending approval of the US DOL's fiscal year budget. The October allocations for the Adult and DW programs are subject to change should the U.S. DOL's approved budget modify the formula allocations.

Funding allocations for each LWDA are posted on the [ADES Website](#)²¹ as an Alert. Funds allocated by a State to a LWDB under WIOA sections 128(b) and 133(b), for any PY are available for expenditure only during that PY and the succeeding PY.

- For Youth and Adult Programs, 85 percent of the funding is directly allocated to the LWDAs; and
- For the DW Program, 60 percent is directly allocated to the LWDAs and 25 percent is held for statewide RR and other allowable activities.

Allocation Formula

The state follows WIOA sections 128 and 133 in the development of allocation formulas for the distribution of funds for employment and training activities in the Adults, Dislocated Worker, and Youth programs.

1. Adult and Youth programs use the discretionary formulas, in which:
 - a. A minimum of 70 percent of the funds are allocated based on each local area's relative share of each data factor listed below:
 - i. Relative number of unemployed individuals in Areas of Substantial Unemployment in each local area
 - ii. Relative excess number of unemployed individuals in each local area
 - iii. Relative number of disadvantaged adults/youth
 - b. Up to 30 percent may be allocated on the basis of a formula that incorporates additional factors related to:
 - i. Excess poverty in urban, rural, and suburban areas, and
 - ii. Excess unemployment above the State average in urban, rural, and suburban local areas.
2. The Dislocated Worker program uses the Governor prescribed formula which uses the following factors:
 - a. Insured unemployment data;
 - b. Unemployment concentrations;
 - c. Declining industries data;
 - d. Plant closing and mass layoff data;
 - e. Farmer-rancher economic hardship data; and
 - f. Long-term unemployment data.
 - g. Arizona assigns zero weight to plant closing, mass layoff data, and farmer-rancher economic hardship data.
3. Twenty-five percent of the total WIOA DW funding at the beginning of each year is reserved for Rapid Response activities.

For both the Youth and the Adult allocations, a hold harmless provision is applied, which states that a LWDA cannot receive less than 90 percent of its relative share based on the average relative share of the total LWDA's allocation from the previous two funding years. Arizona takes an average of the last two years' funding to level out sizable fluctuations that can happen in funding from year to year.

²¹ <https://des.az.gov/WIOATitle1FundsAllocation>

With the State’s written approval, a LWDB may transfer up to 100 percent of a PY allocation for adult employment and training activities, and up to 100 percent of a PY allocation for DW employment and training activities between the two programs. LWDBs may not transfer funds to or from the youth program. Allowable funding for local administration is limited to 10 percent of the allocation for each program.

Statewide Administration/Allowable Statewide Activities

WIOA permits the State to hold up to 15 percent of each program’s funding, prior to allocation to the LWDBs. Of the 15 percent, the State can use up to 5 percent for allowable administrative costs; the remaining 10 percent is set aside for required and other allowable statewide activities.²²

ii. Adult and Training Activities in Accordance with WIOA Section 133(b)(2) or (b)(3)

In September 2023, the WAC developed and approved the Funding Allocations Policy for Local Workforce Development Boards (LWDBs), local subrecipients and fiscal agents, ADES staff, Arizona OEO staff, WIOA Title Operators, WIOA Title I Program manager(s), WIOA fiscal agents, and the State Workforce Board (“Council”).

This policy defines the approach Arizona uses for equitably allocating WIOA resources across the State’s 12 local workforce areas for WIOA Adult, DW, and Youth Programs.

The WAC follows US DOL guidelines to determine the State, regional, and local economic issues to focus on for WIOA funding. The OEO staff will annually calculate the options for WIOA Adult, DW, and Youth funding and apply the formula for the factors selected based on the identified economic issues for each LWDB.

All LWDBs will receive their annual WIOA formula funding for the Adult and DW Programs in two separate allotments. A portion of the funds will be distributed on or after July 1st, with the remainder of the funds to be distributed on or after October 1st, pending approval of the US DOL’s fiscal year budget. The October allocations for the Adult and DW programs are subject to change should the U.S. DOL’s approved budget modify the formula allocations.

Allocation Formula

The state follows WIOA sections 128 and 133 in the development of allocation formulas for the distribution of funds for employment and training activities for adults and youth workforce investment activities. The state utilizes the:

1. Adult and Youth discretionary formulas:
 - a. 70 percent of the funds according to the allocation formula
 - i. Relative number of unemployed individuals in Areas of Substantial Unemployment in each local area
 - ii. Relative excess number of unemployed individuals in each local area
 - iii. Relative number of disadvantaged adults/youth
 - b. 30 percent on the basis of a formula that incorporates additional factors related to:

²² <https://des.az.gov/WIOATitle1FundsAllocation>

- i. Excess poverty in urban, rural, and suburban areas, and
 - ii. Excess unemployment above the State average in urban, rural, and suburban local areas.
2. Governor prescribed formula for DW Programs which involves a percentage of the following factors:
 - a. Insured unemployment data;
 - b. Unemployment concentrations;
 - c. Declining industries data;
 - d. Plant closing and mass layoff data;
 - e. Farmer-rancher economic hardship data; and
 - f. Long-term unemployment data.

Arizona assigns zero weight to plant closing and mass layoff data; and farmer-rancher economic hardship data.

1. RR Funding:
 - a. 25 percent of the total WIOA DW funding at the beginning of each year.
 - b. The Council shall vote annually whether to hold RR funding at the State level or return some or all of the funding to the LWDBs. The Council has the authority to determine the percentages for disbursement.

Funds allocated by a State to a LWDB under WIOA sections 128(b) and 133(b), for any PY are available for expenditure only during that PY and the succeeding PY.

- For Youth and Adult Programs, 85 percent of the funding is directly allocated to the LWDA; and
- For the DW Program, 60 percent is directly allocated to the LWDA and 25 percent is held for statewide RR and other allowable activities.

For both the Youth and the Adult allocations, a hold harmless provision is applied, which states that a LWDA cannot receive less than 90 percent of its relative share based on the average relative share of the total LWDA's allocation from the previous two funding years. Arizona takes an average of the last two years' funding to level out sizable fluctuations that can happen in funding from year to year.

Of the 25 percent held for statewide RR, predetermined amounts of first year RR funding is directly allocated to the LWDA to meet the 80 percent obligation threshold for the DW Program. The remaining funding is held first for additional RR requests from local area partners, second for the statewide RR team, and third for other allowable activities after the first year of the period of performance. Should a LWDA require funding in addition to the predetermined amount, they may submit their request for review and approval by the State RR Coordinator and the Fiscal Compliance Manager.

Funds which are not expended by a LWDB in the two-year period must be returned to the State. WIOA Title I funding must be expended using the first-in, first-out accounting method. In accordance with WIOA sections 128(c) and 133(c), LWDBs must ensure that a minimum of 80 percent of each of their WIOA formula funding allocations are obligated by June 30th of the PY the funds were awarded. LWDBs with obligations below the required 80 percent threshold are subject to the recapture of funds.

Allowable funding for transitional jobs is limited to ten percent of the combined allocations for the Adult and DW Programs. LWDBs may reserve up to 20 percent of the combined allocations for the Adult and DW Programs to fund allowable incumbent worker training.

Per WIOA section 129(c)(4), LWDBs must spend a minimum of 20 percent of their Youth funds on paid and unpaid work experiences as defined in WIOA section 129(c)(2)(C).

With the State's written approval, a LWDB may transfer up to 100 percent of a PY allocation for adult employment and training activities, and up to 100 percent of a PY allocation for DW employment and training activities between the two programs. LWDBs may not transfer funds to or from the youth program. Allowable funding for local administration is limited to 10 percent of the allocation for each program.

Statewide Administration/Allowable Statewide Activities

WIOA permits the State to hold up to 15 percent of each program's funding, prior to allocation to the LWDBs. Of the 15 percent, the State can use up to 5 percent for allowable administrative costs; the remaining 10 percent is set aside for required and other allowable statewide activities.

In July 2023, ADES established a new process to obligate funding to the LWDBs, in which the funding allocations for each LWDB are shared externally as an Alert and posted on the ADES Website²³. This process was implemented in order to overcome the lengthy and cumbersome contract amendment process and ensure expediency in distributing the funding. The previous process to obligate funding to the LWDBs took approximately two months for the contract amendment to be executed. The Alerts process significantly reduces this timeframe by allocating the funding to the LWDBs within a matter of days.

iii. Dislocated Worker Employment and Training Activities in Accordance with WIOA Section 133(b)(2) and Based on Data and Weights Assigned

In September 2023, the WAC developed and approved the Funding Allocations Policy for Local Workforce Development Boards (LWDBs), local subrecipients and fiscal agents, ADES staff, Arizona OEO staff, WIOA Title Operators, WIOA Title I Program manager(s), WIOA fiscal agents, and the State Workforce Board ("Council").

This policy defines the approach Arizona uses for equitably allocating WIOA resources across the State's 12 local workforce areas for WIOA Adult, DW, and Youth Programs.

The WAC follows US DOL guidelines to determine the State, regional, and local economic issues to focus on for WIOA funding. The OEO staff will annually calculate the options for WIOA Adult, DW, and Youth funding and apply the formula for the factors selected based on the identified economic issues for each LWDB.

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Allocation Formula

The state follows WIOA sections 128 and 133 in the development of allocation formulas for the distribution of funds for employment and training activities for adults and youth workforce investment activities. The state utilizes the:

1. Adult and Youth discretionary formulas:
 - a. 70 percent of the funds according to the allocation formula
 - i. Relative number of unemployed individuals in Areas of Substantial Unemployment in each local area
 - ii. Relative excess number of unemployed individuals in each local area
 - iii. Relative number of disadvantaged adults/youth
 - b. 30 percent on the basis of a formula that incorporates additional factors related to:
 - i. Excess poverty in urban, rural, and suburban areas, and
 - ii. Excess unemployment above the State average in urban, rural, and suburban local areas.
2. Governor prescribed formula for DW Programs which involves a percentage of the following factors:
 - a. Insured unemployment data;
 - b. Unemployment concentrations;
 - c. Declining industries data;
 - d. Plant closing and mass layoff data;
 - e. Farmer-rancher economic hardship data; and
 - f. Long-term unemployment data.

Arizona assigns zero weight to plant closing and mass layoff data; and farmer-rancher economic hardship data.

1. RR Funding:
 - a. 25 percent of the total WIOA DW funding at the beginning of each year.
 - b. The Council shall vote annually whether to hold RR funding at the State level or return some or all of the funding to the LWDBs. The Council has the authority to determine the percentages for disbursement.

Funds allocated by a State to a LWDB under WIOA sections 128(b) and 133(b), for any PY are available for expenditure only during that PY and the succeeding PY.

- For Youth and Adult Programs, 85 percent of the funding is directly allocated to the LWDBs; and
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For both the Youth and the Adult allocations, a hold harmless provision is applied, which states that a LWDA cannot receive less than 90 percent of its relative share based on the average relative share of the total LWDA's allocation from the previous two funding years. Arizona takes an average of the last two years' funding to level out sizable fluctuations that can happen in funding from year to year.

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Funds which are not expended by a LWDB in the two-year period must be returned to the State. WIOA Title I funding must be expended using the first-in, first-out accounting method. In accordance with WIOA sections 128(c) and 133(c), LWDBs must ensure that a minimum of 80 percent of each of their WIOA formula funding allocations are obligated by June 30th of the PY the funds were awarded. LWDBs with obligations below the required 80 percent threshold are subject to the recapture of funds.

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With the State's written approval, a LWDB may transfer up to 100 percent of a PY allocation for adult employment and training activities, and up to 100 percent of a PY allocation for DW employment and training activities between the two programs. LWDBs may not transfer funds to or from the youth program. Allowable funding for local administration is limited to 10 percent of the allocation for each program.

Statewide Administration/Allowable Statewide Activities

WIOA permits the State to hold up to 15 percent of each program's funding, prior to allocation to the LWDAs. Of the 15 percent, the State can use up to 5 percent for allowable administrative costs; the remaining 10 percent is set aside for required and other allowable statewide activities.

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²⁴ <https://des.az.gov/WIOATitle1FundsAllocation>

process significantly reduces this timeframe by allocating the funding to the LWDA's within a matter of days.

B. For Title II

i. Describe the methods and factors the eligible agency will use to distribute title II funds.

Authorization and Funding

The Arizona Department of Education is soliciting grant applications for the 2024-2028 Arizona Adult Education Grant Awards. Providers from entities eligible to receive Workforce Innovation and Opportunity Act (WIOA) Title II funds are encouraged to apply.

All funding is pending availability of projected Federal and State grant allocations and the Arizona State Board of Education (AZ SBE) approval.

Federal – Per Workforce Innovation & Opportunity Act (WIOA), signed into law on July 22, 2014, states must coordinate workforce development services across agencies as follows:

- Title I- Adult, Dislocated Worker, and Youth Programs
- Title II- Adult Education and Literacy Program (AEFLA)
- Title III- Wagner-Peyser Employment Service
- Title IV- Vocational Rehabilitation Program

State - Arizona Revised Statutes, §15-232 and §15-234

Arizona state law (A.R.S. §§ 15–232, 15–234) establishes adult education as a division within the Arizona Department of Education (ADE). ADE Adult Education Services (AES) serves as the administrative entity for WIOA Title II-AEFLA, for the purpose of establishing and maintaining adult education programs to provide adult education services, as prescribed by Federal and State laws.

Successful applicants shall provide a minimum of 25% local match, as cash and/or in-kind contributions, for the approved total grant funding allocation (State requirement). The required 25% local match may not come from:

- Federal funds, from any source.
- Earned income, such as fees collected.

Arizona Adult Education 2024-2028 Grant Application Guidance Document

100% of earned income generated by this grant award must be used for adult education services as outlined in this grant, WIOA, and A.R.S. §§15-232, 15-234.

Direct and Equitable Access

The Arizona Department of Education is committed to conducting a competitive grant process that ensures direct and equitable access to all eligible applicants for Arizona Adult Education grant contracts. Information regarding the RFGA and process is available broadly to potential applicants via the ADE-AES public website. The application timeline can be found below. The RFGA process is designed to ensure that organizations, who have not previously received Arizona Adult Education grant funds, are provided a fair and equitable opportunity to address the requirements of this application. All

applicants will be evaluated using the same criteria and process in accordance with federal and state requirements.

Purpose of Adult Education

ADE-AES is committed to providing effective and high-quality adult education services in each local workforce area that provides Arizonans with the knowledge, skills, and abilities required for employment, next level careers, and post-secondary education and training to:

1. Assist adults to become literate and obtain the knowledge and skills needed for employment and economic self-sufficiency.
2. Assist adults who are parents or family members to obtain the education and skills that:
 - a. are necessary to becoming full partners in the educational development of their children; and
 - b. lead to sustainable improvements in the economic opportunities for their family.
3. Assist adults in the attainment of an Arizona High School Equivalency (HSE) Diploma and in the transition to postsecondary education and training through career pathways.
4. Assist immigrants and other individuals who are English language learners to
 - a. improve reading, writing, speaking, and comprehension skills in English;
 - b. improve mathematics skills; and
 - c. acquire an understanding of the American system of government, individual freedoms, and the responsibilities of citizenship.

Target Population (Eligible Individuals)

Grant funds awarded to local providers under this grant contract are to be used to establish and operate programs that provide adult education and literacy services to learners aligned to the statutory definition of an “eligible individual” as defined in WIOA and state statute. An “eligible individual” means an individual who:

- Has attained 16 years of age.
- Is not enrolled or required to be enrolled in secondary school under Arizona State Law (A.R.S. § 15-802).
- Meets Arizona eligibility requirements under A.R.S. § 15-232(B); AND
 - Is basic skills deficient OR
 - Does not have a secondary school diploma or its recognized equivalent and has not achieved an equivalent level of education, OR
 - Is an English language learner.

Allowable Activities

Funding made available to Arizona under WIOA Title II-Section 222(a)(1) and awarded to local providers under this grant contract are to be used to establish and operate adult education programs to provide the following educational services and activities:

Adult Basic Education (ABE) instruction is provided for eligible individuals with Educational Functioning Levels (EFLs) ABE 1-4. Instruction is aligned to the Arizona Adult Education Content Standards and includes concurrent Workforce Preparation activities (as described below) that leads

to ASE instruction and the attainment of a secondary diploma or HSE Diploma and transition to postsecondary education/training and/or employment.

Adult Secondary Education (ASE) instruction is provided for eligible individuals with Educational Functioning Levels (EFLs) ABE 5-6. Instruction is aligned to the Arizona Adult Education Content Standards and includes concurrent Workforce Preparation activities (as described below) that leads to the attainment of a secondary diploma or HSE Diploma and transition to postsecondary education/training and/or employment.

Secondary Diploma or a High School Equivalency (HSE) Diploma activities leading to a diploma to Include:

- Counseling with an adult learner to determine which of the three pathways would be the most appropriate.
 - GED Testing Pathway
 - AZ College Credit Pathway
 - AZ High School Equivalency PLUS Career Readiness Pathway
 - ABE and/or ASE instruction
 - Other activities involved in assisting an adult learner to earn a diploma and transition to postsecondary education/training and/or employment.

English for Speakers of Other Languages (ESOL) is English language instruction for eligible English Language Learners (ELLs) to achieve proficiency in reading, writing, speaking, and comprehension that leads to attainment of a secondary diploma or HSE diploma, and transition to postsecondary/training, or employment. The ESOL instruction must: 1) align to the Arizona Adult Education English Language Proficiency Standards, 2) offer college/career counseling services, and include 3) Integrated English Literacy and Civics Education (IELCE) activities (as described below).

Integrated English Literacy and Civics Education (IELCE) are educational services provided to English Language Learners to achieve proficiency in the English language and acquire the basic and more advanced skills needed to function effectively as parents, workers, and citizens. Services must include instruction in literacy and English language acquisition, and instruction on the rights and responsibilities of citizenship and civic participation, aligned to the Arizona Adult Education Literacy through Social Studies Standards. Services may include workforce preparation and workforce training.

Workforce Preparation is instruction, provided concurrently with ABE, ASE, or ESOL/IELCE activities, and is designed to help eligible individuals acquire a combination of basic academic skills, critical thinking skills, digital literacy skills, and employability skills. Participation in workforce preparation activities must lead to the development of competencies to apply resources and information, work with others, and understand systems to successfully transition to and complete postsecondary education/training and employment.

Integrated Education and Training (IET) is a service approach to providing adult education and literacy activities concurrently and contextually with workforce preparation activities and workforce training for a specific occupation or occupational cluster for the purpose of educational and career advancement. Required IET components are: 1) adult education and literacy, 2) workforce preparation activities, and 3) workforce training. Instruction is based on occupationally relevant resources and materials for the purpose of educational and career advancement. Participation is intended for eligible individuals at all skill levels, including adults with low academic skills.

Integrated English Literacy and Civics Education PLUS Training (IELCE + T; WIOA Section 243[c]) combines the IELCE components of English language and literacy instruction, civics education, and workforce preparation activities and training. IELCE + T is designed to prepare adults who are English language learners for placement in unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency; and integrate with the local workforce development system and its functions to carry out the activities of the program. Students enrolled in IELCE+T services will receive language acquisition instruction (as described in the ESOL/IELCE section) and job training (as described the IET section) concurrently, rather than sequentially. Please note that the provision of services for English language learners not including the incorporation of IET must be provided using funds awarded under Section 231.

Programs for Corrections Education and Other Institutionalized Individuals (Section 225). Up to 20% of funding made available to Arizona under WIOA Title II Section 222(a)(1) may be used to fund programs for corrections education and other institutionalized individuals as described in WIOA Title II Section 225. ADE will award funds under Section 225 using the same process and timeline as described in this grant application. Priority will be given to programs serving individuals who are likely to be released from the correctional institution within five years. Applicants applying to provide services under WIOA Title II Section 225 must include this information in the submitted application (Part II) and responses to narrative questions must address the provision of services to incarcerated individuals.

WIOA Title II Performance Requirements

WIOA Title II (29 USC §3141) states that programs receiving WIOA Title II funding will be measured for effectiveness and student achievement in the following areas:

1. Measurable Skill Gains (MSGs) rate
2. Educational Functioning Level (EFL) Gain by
 - a. Moving from one EFL to a higher EFL as measured on an NRS-approved initial assessment and one or more progress assessments.
 - b. Exiting the program and entering postsecondary education and/or training programs in the same program year.
3. Earning a secondary diploma or high school equivalency diploma.
4. Earning secondary or postsecondary credits while enrolled in an IET program.
5. Meeting employer-indicated milestones while enrolled in a workplace literacy program.
6. Passing an occupational exam.
7. Credential attainment.

8. Employment rate.
9. Median earnings.

The above performance accountability measures are used by the Department of Education-Office of Career, Technical, and Adult Education (OCTAE) to assess Arizona's effectiveness in achieving positive outcomes for learners. In addition, ADE-AES uses these performance requirements to assess the performance of individual WIOA Arizona Title II funded programs.

OCTAE uses past performance, as measured by the above performance measures, and continuous improvement requirements to negotiate performance accountability targets with ADE-AES on an annual basis. Funded applicants will be responsible for the same established performance measures throughout the grant contract period.

Program Accountability and Data Measures of Performance

The National Reporting System (NRS) is the accountability system for the federally funded, state-administered adult education program. ADE-AES utilizes a secure, web-based Adult Education Data Management System (AAEDMS) that funded programs are required to use. AAEDMS collects student demographic, participation, and outcome measures, including performance results as identified in the National Reporting System (NRS) for the following measures:

- Percentage of program participants who achieve Measurable Skill Gains (MSG) through one of the performance areas listed above.
- Percentage of program participants in unsubsidized employment during the second quarter after exit from the program.
- Percentage of program participants in unsubsidized employment during the fourth quarter after exit from the program.
- Median earnings of program participants in unsubsidized employment during the second quarter after exit from the program.
- Percentage of program participants who receive a secondary school diploma or high school equivalency diploma during participation or within one year after exit; receipt of secondary diploma is only counted if the participant also enters postsecondary education or training, or employment within one year after exit.
- Percentage of program participants who receive a recognized postsecondary credential during participation or within one year after exit.

2024-2028 Arizona WIOA Title II Adult Education Grant Terms and Conditions

Grant Award Process and Cycle

Eligible local providers are awarded funding through this competitive Request for Grant Application (RFGA) process via multi-year grant contracts. The four-year grant contract cycle for this competition will be:

- Year One - July 1, 2024 through June 30, 2025
- Year Two - July 1, 2025 through June 30, 2026
- Year Three - July 1, 2026 through June 30, 2027

- Year Four - July 1, 2027 through June 30, 2028

Funding Availability and Considerations Information - Determined by Census and Demographic Data for each County/Local Workforce Area

A. WIOA Title II Service Area Local Workforce Areas

There are twelve Local Workforce Areas in Arizona. Eleven of the twelve workforce areas are geographically-based, and the twelfth workforce area is the Arizona Tribal Nation. Available funding for Title II providers are assistance distributed across the local workforce areas based on the factors identified in Section B.

B. Estimated Total Assistance Available Under Section 231

The Estimated Total Assistance under Section 231 for each WIOA Title II Service Area was determined by demographic data and a needs analysis pertaining to the target populations of adult learners.

Factors used to determine this estimation include:

- number of people in the target population
- educational attainment levels
- English language needs
- geographic density of each region (i.e., service delivery in rural, less dense regions may be more expensive)

C. Estimated Funding by Allowable Activity Under Section 231

The Estimated Funding Breakdown by Allowable Activity for each Local Workforce Area was determined by demographic data pertaining to the need for services. ABE/ASE and ESOL/IELCE funding estimates are based on data from the U.S. Census pertaining to the number of adults in the area who lack a secondary diploma compared to the number who speak English less than very well. The funding for Integrated Education and Training (IET) and IELCE components are awarded to Title II programs that meet the IET requirements as described in WIOA Final Rules §463.35 – §463.38 for participants in both ABE/ASE and ESOL/IELCE programs.

ii. Describe how the eligible agency will ensure direct and equitable access to all eligible providers to apply and compete for funds and how the eligible agency will ensure that it is using the same grant or contract announcement and application procedure for all eligible providers.

ADE is committed to conducting a competitive RFGA process that ensures direct and equitable access to all eligible providers competing for Title II grant contracts. Information regarding the application and process will be made available broadly via a public website and through email to a comprehensive email list of adult education entities throughout the state. An adequate amount of time to complete the application will be allowed, based on best practices as determined by ADE's grants management department. Submission of applications will be done using the Grants Management Enterprise System, a manner that allows equitable access to all individuals, including those with disabilities.

Award amounts will be determined by area demographic and needs analyses to ensure that addressing the purpose of WIOA is the basis for funding decisions. All eligible applicants go through the same

application and review process and have direct and equitable access to apply and compete for Title II grants contracts, including WIOA Sections 225 (Corrections), 231 (Grants).

General Education Provisions Act (GEPA) Statement: Each applicant requesting funds is required to include a description of the steps taken to ensure equitable access to, and participation in, its federally assisted program for students, teachers, and other program beneficiaries with special needs. Section 427 GEPA highlights six types of barriers that can impede equitable access or participation: gender, race, national origin, color, disability, or age. Based on local circumstances, applicants determine whether these or other barriers may prevent participation in the program or activities, and the steps to be taken to overcome identified barriers must be included in the application.

C. Vocational Rehabilitation Program

In the case of a State that, under section 101(a)(2)(A)(i) of the Rehabilitation Act designates a State agency to administer the part of the Vocational Rehabilitation (VR) services portion of the Unified or Combined State Plan under which VR services are provided for individuals who are blind, describe the process and the factors used by the State to determine the distribution of funds among the two VR agencies in the State.

Not applicable.

6. Program Data

A. Data Alignment and Integration

Describe the plans of the lead State agencies with responsibility for the administration of the core programs, along with the State Board, to align and integrate available workforce and education data systems for the core programs, unemployment insurance programs, and education through postsecondary education, and to the extent possible, the Combined State Plan partner programs included in this plan. The description of the State's plan for integrating data systems should include the State's goals for achieving integration and any progress to date. Describe data-collection and reporting processes used for all programs and activities, including the State's process to collect and report data on co-enrollment, and for those present in the one-stop centers.

i. Describe the State's plans to make the management information systems for the core programs interoperable to maximize the efficient exchange of common data elements to support assessment and evaluation

The ARIZONA@WORK system, will continue efforts through cross-functional teams to identify technological tools for linking datasets in order to maximize efficiency and the exchange of information to support assessment and evaluation in support of the strategies outlined in the Unified Plan (e.g. 1.3, 2.3, and 3.3) Arizona will research innovative solutions used by other States to expand and integrate its information systems used within the ARIZONA@WORK system. In addition, technological solutions identified and/or implemented by LWDBs will provide insight into successful data integration strategies that can be implemented across ARIZONA@WORK partner programs. Arizona aims to improve, across

the core and other partner programs, the ability to exchange common data elements and expand data reporting and analysis to enable data-driven decisions that support continuous improvement through regular assessment and evaluation. Arizona currently is able to track participation in Title I, III, JVSG, UI, and TAA through one data system, and will seek solutions to track additional program customers. ADE has also developed a process through the MOU/IFA process to track Title II students referred for adult education and literacy services, which is being rolled out throughout the State.

The State continues to identify and implement system modernization projects that provide the ARIZONA@WORK ecosystem an interoperable experience, resulting in expedited and enhanced delivery of services to Arizona job seekers and employers. ADES has deployed a system modernization initiative for the UI Benefits Program, replacing the decades-old system with new technology to improve system functionality and overall client experience. The UI Benefits project “go live” was launched in September 2025. The solution procured is a software as a service product from Geographic Solutions. The UI benefits project has been deployed simultaneously with a system modernization initiative for the Rehabilitation Services Administration (RSA) programs including VR, Older Individuals who are Blind, and Business Enterprise Program. The new RSA system will increase the program’s ability to provide timely and quality services to clients and vendors, including improved data reporting and analytics. The RSA project “go live” is scheduled for Fall 2024. The solution procured is a Software as a Service product from CMSuite.

While the UI Benefits and RSA modernization projects are the current priority, we intend to advance two remaining significant modernization projects involving Unemployment Insurance Tax (UI Tax) and a Workforce Technology System, modernizing components that build efficiency and eliminate duplicative work amongst system partners resulting in an integrated approach. Arizona is poised to implement an agile system to move the State to a modernized process and system to meet the needs of ARIZONA@WORK and results in a better client experience overall.

In the fall of 2023, ADES hired a senior advisor as the product manager for the ARIZONA@WORK Workforce modernization project. ADES and the OEO (representing the WAC) together, visited all 12 LWDAs, representatives of the Titles II, III and IV core partner programs, and the other ADES workforce programs to learn about customer journeys, how success is measured, future system and data desires, and the biggest current roadblocks.

The next steps in the Workforce Modernization project will include the continued gathering of information from the entire ARIZONA@WORK ecosystem, including Finance and Budget, Human Resources, IT, Quality Assurance, and Policy units. The identification of the latest technological tools used by HR professionals, local area partners, other state agencies, and other States who have modernized their workforce systems will help to develop and implement a plan that establishes the requirements and qualities of an agile system. All of the research and data gathering currently underway will ensure we can move quickly to establish the foundational elements and timeline for the implementation of a complete Workforce System modernization project.

ii. Describe the State's plans to integrate data systems to facilitate streamlined intake and service delivery to track participation across all programs included in this plan

Arizona will work with state and local partners to improve processes for individuals using the ARIZONA@WORK system through national research, identifying grant options, and capitalizing on the successful strategies from LWDBs to streamline intake and service delivery and allow cross-program tracking. Local plans and MOUs developed by LWDBs with ARIZONA@WORK partners will facilitate collaboration across the local system and provide the structure for a seamless delivery of service provision for ARIZONA@WORK customers.

iii. Explain how the State board will assist the governor in aligning technology and data systems across required one-stop partner programs (including design and implementation of common intake, data collection, etc.) and how such alignment will improve service delivery to individuals, including unemployed individuals

The WAC continues to collaborate and participate in efforts to address technology and data system alignment and streamlining services to individuals. The WAC is on the Workforce IT Modernization Advisory Committee and leads the identification of workforce development technology requirements through the National Governors Association Workforce Innovation Network Grant. In partnership with ADES, the WAC is currently working on a technology modernization initiative that involves gathering input from ARIZONA@WORK partners to identify technology needs and support effective intake and service provision. This initiative will be a phased approach and will encompass UI, Workforce Systems, and Unemployment Tax.

Pursuant to A.R.S. § 41-5303 and § 41-5404, the OEO is overseeing the development and operations of the Integrated Data System (IDS). The IDS links administrative data from educational institutions and workforce programs for statistical purposes. By combining data between state agencies, the IDS can be leveraged to measure the impact of government programs and interventions. The system allows stakeholders to gain a more comprehensive understanding of how state agencies intersect with and influence the lives of Arizonans, enabling the enhancement initiatives aimed at improving economic outcomes. The IDS currently contains and links records between two community college districts, and four state government systems.

iv. Describe the State's data systems and procedures to produce the reports required under section 116, performance accountability system. (WIOA section 116(d)(2)).

Arizona's core programs ensure the performance accountability systems meet WIOA requirements while continuously seeking opportunities for improved processes to better improve performance outcomes for the customers served.

Titles I and III:

Uses AJC, hosted by AJLA, to support a consortium of state workforce agencies. The AJC system manages all aspects of case management, data recording, and performance reporting for Titles I and III. AJLA Technical Support creates a PIRL file used for the Quarterly (ETA-9173) and Annual (ETA-9169) Reports.

The file is compiled and reported through the WIPS to the U.S. DOL Employment and Training Administration (U.S. DOL/ETA). Using the WIPS ensures both the accuracy and uniformity of the reported data in compliance with U.S. DOL/ETA reporting requirements. To ensure data completeness and integrity, the ADES Workforce IT Section/Workforce Development Unit works with the LWDBs and its service providers to correct data that is missing or causing an error when the WIPS process identifies data errors during the submission of the PIRL file.

ADES evaluates its performance through:

- Quarterly review of fiscal data;
- Monthly review of lead measures on scorecards, implementing problem solving when measures do not meet targets which can be discussed during monthly ARIZONA@WORK meetings as needed; and
- Regular quality assurance meetings where data from fiscal, programmatic, and Equal Opportunity (EO) monitoring is reviewed to identify trends for targeted technical assistance.

Title II:

Uses the **LiteracyPro System Incs's LACES system**, branded as the Arizona Adult Education Data Management System (AAEDMS), to enter student demographic, performance, class, and postexit data as required for Federal reporting. AAEDMS is a secure, **cloud**-based data management system that collects required data, including performance results as identified in the NRS. Along with entering student demographic data, AAEDMS tracks student progress and generates federal reports for Title II.

ADE's adult education providers are evaluated on fiscal, instructional, and programmatic areas to identify areas of strength as well as those in need of improvement as part of the performance accountability system. The model incorporates the following factors:

- A cyclical system for risk assessment and monitoring;
- Monthly desk-monitoring, including data analysis and areas in need of technical assistance; and
- Evidence of high-quality, data-driven and research-based instruction that is aligned to content standards and professional learning standards, and that incorporates the standards for both digital literacy and transferable employability skills.

Title IV:

Title IV transitioned to inFormed, a modernized case management system, on July 1, 2025. Informed offers case, fiscal, and contract management, as well as enhanced data validation and reporting modules. Data unit staff have access to case management system tables and data fields, which are used to compile and validate data for the RSA-911, WIOA Annual (ETA-9169), and a variety of other reports used by management and field staff to regularly monitor case activity, compliance with federal timelines, expenditures, and performance measures.

B. Assessment of Participants' Post-program Success

Describe how lead State agencies will use the workforce development system to assess the progress of participants who are exiting from core programs in entering, persisting in, and completing postsecondary

education, or entering or remaining in employment. States may choose to set additional indicators of performance.

Arizona uses the Federal performance measures required in WIOA as its statewide measures. For all core partner programs, Arizona assesses participants' post-program employment outcomes through collection of wage data from UI or other sources. For Titles I, II, and IV, credential attainment during and after exit is also assessed. For youth participants, success may be measured by placement in postsecondary education after exit.

These measures are publicly available on the ARIZONA@WORK Workforce Performance Dashboard and will be used by the Council, core programs, and LWDBs to assess participant progress and identify areas needing technical assistance. The dashboard provides a statewide and local area view of the effectiveness of workforce training programs using federal performance measures. The dashboard consolidates data on local labor market conditions, economic indicators, and local workforce system performance.

Using the current data systems of the core programs and identifying opportunities to improve reporting and expansion of the data systems through this Plan's strategies, Arizona will seek to decrease duplication and/or extraneous data gathering to better assess the progress of participants engaged in the ARIZONA@WORK system. Case management at the local level includes the delivery of follow-up services, varying in scope across core partners. These services can help to maintain post-program connection with the participant, addressing needs as they arise and offering support to help ensure successful outcomes.

To gather feedback on the impact to customers, Arizona conducts customer satisfaction surveys to capture business and job seekers experience and discover successes and challenges providing opportunities for sharing best practices and improvement. Local adult education providers also conduct follow-up surveys on exited participants that did not provide a social security number at intake.

In addition, assessing the current data sharing agreements to identify opportunities to expand data sharing will improve the ability of the State to coordinate and track across programs and minimize duplication of efforts for both customers and ARIZONA@WORK staff. Arizona currently has a data sharing agreement with ADE (Title II) to support data sharing between the agencies allowing employment results of Title II participants to be tracked.

Title II collects post-exit employment data primarily through the UI data match in cooperation with ADES and with the National Student Clearinghouse, with over 80 percent of Title II participants agreeing to this method. For those participants who do not agree to data match or do not have Social Security numbers, funded adult education providers must conduct surveys by phone with as many exited participants as possible.

Title IV obtains the majority of post-exit employment data through state UI data match. Additional sources of wage data include Equifax (out-of-state wages) and client report. Prior to July 2025, post-exit wages were manually entered into the case management system every quarter. Title IV's new case

management system interfaces with Einstein and Equifax to obtain and record post-exit employment wages for each case in which data is available, significantly reducing the need for manual entry by staff. Client reports continue to be utilized for self-employment wages. Title IV is currently pursuing a contract and data sharing agreement with the National Student Clearinghouse in order to improve reporting of post-exit enrollment and credential attainment in future program years.

C. Use of Unemployment Insurance (UI) Wage Record Data

Explain how the State will meet the requirements to utilize quarterly UI wage records for performance accountability, evaluations, and as a source for workforce and labor market information, consistent with Federal and State law. (This Operational Planning element applies to core programs.)

All core programs conduct quarterly and annual data matches with ADES' UI system, the State Wage Interchange System (SWIS) to calculate the employment-based performance measures for WIOA-required quarterly and annual reports. These wages are also applied to the other partner programs tracked in AJC, including JVSG and TAA. ADE also conducts an annual data match with the National Student Clearinghouse to capture entry into postsecondary outcomes for exited participants.

In 2019, Arizona completed the new SWIS agreement with DOL, identifying ADE (Title II) and VR (Title IV) as Performance Accountability and Customer Information Agencies (PACIAs), along with the current PACIA for Titles I and III, ensuring all four of the core programs can access interstate wage information for WIOA performance reporting.

D. Privacy Safeguards

Describe the privacy safeguards incorporated in the State's workforce development system, including safeguards required by section 444 of the General Education Provisions Act (20 U.S.C. 1232g) and other applicable Federal laws.

Arizona has privacy safeguards in place to protect confidential information contained in its workforce development systems, which includes safeguards required by section 444 of the General Education Provisions Act and other applicable state and federal laws. These safeguards include State and local requirements, such as:

- Annual security training for individuals accessing confidential **personally identifiable** information;
- Personal confidentiality statements/user affirmation agreements to be signed by individuals accessing **personally identifiable** information;
- Maintaining medical documentation needed for eligibility determinations in a separate from the files of eligible applicants, registrants, and participants, and;
- Local confidentiality policies and procedures;
- **Compliance with data sharing agreements between agencies; and**
- **Implementing other controls such as role-based access, encryption (data at rest/in transit), audit logs, and/or multi-factor authentication.**

Privacy safeguards are monitored as part of the State’s monitoring system, as set out for the specific core or partner program. Arizona seeks to maintain the privacy and confidentiality of all information for customers of WIOA, with a heightened focus on protecting social security information, according to federal laws and regulations (and state laws), including the following:

- 29 U.S. Code § 2935 (reports, recordkeeping, and investigations);
- 29 U.S. Code § 2871(f)(3) (confidentiality);
- 20 CFR § Part 603 (Unemployment Compensation);
- 42 U.S. Code § 503 (UI operations);
- 20 CFR § 617.57(b) (Trade Act);
- 29 U.S. Code § 491 –2(a)(2) (Wagner–Peysner Act);
- The Privacy Act (5 U.S. Code § 552);
- The Family Educational Rights and Privacy Act (20 U.S. Code § 1232g) (Title II and other programs in receipt of educational records);
- 34 CFR § 361.38 (VR);
- 20 CFR § 683.220 (internal control requirements for WIOA Title I and Title III); and
- 2 CFR § 200.303 (internal controls for Federal awards).

7. Priority of Service for Veterans.

A. Describe how the State will implement the priority of service provisions for covered persons in accordance with the requirements of the Jobs for Veterans Act, codified at section 4215 of 38 U.S.C., which applies to all employment and training programs funded in whole or in part by the Department of Labor.

In accordance with 20 CFR § 1010²⁵, veterans and eligible spouses, also referred to as “covered persons,” will continue to receive priority for DOL-funded ARIZONA@WORK programs or services for workforce preparation, development, or delivery. For the purpose of applying priority of service, a “veteran” means a person who served at least one day in the active military, naval, or air service, and who was discharged or released under conditions other than dishonorable, as specified in 38 U.S.C. 101(2)²⁶. Active service includes full-time duty within the National Guard or Reserve, outside of full-time duty for training purposes. An “eligible spouse” refers to any of the following:

- The spouse of any veteran who died of a service-connected disability;
- The spouse of any member of the Armed Forces serving on active duty who is listed, at the time application, for a total of more than 90 days as missing in action, captured in the line of duty, or forcibly detained;
- The spouse of any veteran who has a total disability resulting from a service-connected disability, as evaluated by the Department of Veterans Affairs; or
- The spouse of any veteran who died while a total disability, as described above, was in existence.

²⁵ <https://www.ecfr.gov/current/title-20/chapter-IX/part-1010/subpart-A/section-1010.110>

²⁶ <https://www.ecfr.gov/current/title-38/chapter-I/part-3/subpart-A/subject-group-ECFRf5fe31f49d4f511>

Priority of service for covered persons means that program-eligible covered persons are entitled to take precedence over non-covered persons in obtaining services 20 CFR § 1010.200[b)]²⁷. Arizona has established the following policies that provide the framework for complying with priority of service requirements:

- **WIOA Title I-B Veterans' Priority of Service Policy**²⁸ – outlines the priority levels for Title I-B programs and takes into account the coordination between the Adult Program statutory priority and the priority of service for covered persons. It also requires local areas to describe priority of service implementation in their local area plans and to develop pertinent policies for their areas.
- **Employment Service Policy Manual**²⁹ - highlights the requirement to apply priority of service for covered persons in Employment Service activities.
- **Senior Community Service Employment Program Policy Manual**³⁰—identifies being a covered person as a characteristic that entitles a program-eligible individual to priority in participation — among other priority characteristics, such as being 65 years or older, having a disability, or being an English-language learner. The policy further expands on the SCSEP order of priority as follows:
 - First priority: covered persons who possess at least one of the other priority characteristics
 - Second: covered persons who do not possess any other priority characteristics
 - Third: non-covered persons who possess at least one of the other priority characteristics

The ARIZONA@WORK system has established and will continue to refine processes that align with State policies and facilitate the effective implementation of priority of service. The following are current and planned activities that identify covered persons at the point of entry; notify them of their entitlement to priority of service; and provide information on employment, training, and placement services for which they are entitled to receive priority:

- ARIZONA@WORK job center staff at physical locations or virtual offices identify covered persons at the point of entry by directly inquiring of their status. An individual who self-identifies as a covered person is asked to voluntarily complete the Veterans' Priority of Service Assessment Form (ESA-1193A) [43], which establishes an individual's status as a veteran or an eligible spouse.
- Each ARIZONA@WORK job center is required to display, and staff are to provide to covered persons, the Veterans Priority of Service flyer (ESA-1184A). The flyer describes priority of service and applicable employment and training services available through ARIZONA@WORK.
- Priority of service information is made available on the State workforce agency website, and job seekers registering in the management information system Arizona Job Connection (AJC) are identified as covered persons via the registration questionnaire.

²⁷ <https://www.ecfr.gov/current/title-20/chapter-IX/part-1010/subpart-B/section-1010.200>

²⁸ https://des.az.gov/sites/default/files/media/wioa_veternas_priority_of_service_policy_section_1100.pdf?time=1774042304862

²⁹ <https://des.az.gov/sites/default/files/media/ES-Chapter-2-Policy-Manual.pdf?time=1774042506263>

³⁰ <https://des.az.gov/sites/default/files/media/SCSEP-Permanent-Policy-Manual.pdf?time=1774042711818>

B. Describe how the State will monitor priority of service provisions for veterans.

ADES annually monitors the LWDB's service providers to ensure priority of service requirements are being implemented in accordance with WIOA and State policy and procedures. Monitoring activities include desk reviews of files, review of AJC case information and the LWDB's policy. At the end of a monitoring review, a monitoring report is completed and sent to the LWDB within ten business days from the desk review to include findings and observations, and a response to the findings is due within 20 business days from receipt. Cross-functional **quarterly** meetings are held to review monitoring activities and identify needed areas for technical assistance.

C. Describe the triage and referral process for eligible veterans and other populations determined eligible to receive services from the Jobs for Veterans State Grants (JVSG) program's Disabled Veterans' Outreach Program (DVOP) specialist/Consolidated Position.

ARIZONA@WORK staff who interact with job seekers at the point of entry, both physical and virtual, facilitate the voluntary completion of the **Veteran's Assessment Tool (ESA-1193A)**³¹ for those who self-identify as a veteran or eligible spouse. In addition to establishing an individual's status as a veteran or an eligible spouse, the form allows covered persons to identify and attest to the presence of significant barriers to employment.

Significant barriers to employment, as described in **Veterans' Program Letter (VPL) 5-24**³², render covered persons eligible for DVOP specialist services. Point-of-entry staff refer covered persons with significant barriers to employment as well as other eligible individuals identified in **VPL 5-24** to DVOP specialists.

DVOP specialists provide individualized career services to eligible persons with significant barriers to employment and, as appropriate, make referrals to programs within the ARIZONA@WORK system, and beyond, for other career, supportive, and training services. DVOP specialists provide further priority for their targeted services to special disabled and disabled veterans who are economically or educationally disadvantaged.

While the **Veterans' Assessment Tool** facilitates the identification and referral of individuals eligible to receive DVOP services, any ARIZONA@WORK Title I-B or Title III staff may provide services to covered persons with significant barriers to employment, and other eligible persons, when:

- DVOP staff are not available; or
- The job seekers opt not to receive services from DVOP staff.

Training and learning opportunities are made available to ARIZONA@WORK staff to enhance the implementation of covered persons' triage and referral to DVOP services -- as well as promote understanding of various program services and general referral among ARIZONA@WORK partners. Such opportunities include one-stop operator meetings, where various program information and services are highlighted; pre-recorded, self-paced computer-based courses and virtual instructor-led training on WIOA and the State's workforce development system.

³¹ Veteran's Assessment Tool (ESA-1193A) <https://des.az.gov/sites/default/files/dl/ESA-1193A.pdf>

³² Veterans' Program Letter 5-24
<https://www.dol.gov/sites/dolgov/files/VETS/files/VPL-05-24-JVSG-Staff-Roles-and-Responsibilities-WIOA-Services-to-Veterans.pdf>

8. Addressing the Accessibility of the One-Stop Delivery System for Individuals with Disabilities

Describe how the one-stop delivery system (including one-stop center operators and the one-stop delivery system partners), will comply with section 188 of WIOA (if applicable) and applicable provisions of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) regarding the physical and programmatic accessibility of facilities, programs, services, technology, and materials for individuals with disabilities. This also must include a description of compliance through providing staff training and support for addressing the needs of individuals with disabilities. Describe the State's one-stop center certification policy, particularly the accessibility criteria.

The following publicly posted State policies describe the requirements for ensuring compliance with section 188 of WIOA and provisions of Americans with Disabilities Act (ADA), including required physical and programmatic access to individuals with disabilities, the annual assessment of physical and programmatic accessibility at all ARIZONA@WORK Job Centers in the LWDA, and the ARIZONA@WORK Job Center certification requirements:

- WIOA Local Board Governance Policy;
- Certification of ARIZONA@WORK Job Center Policy;
- ARIZONA@WORK Job Center Structure of One Stop Delivery System Policy; and
- Equal Opportunity and Nondiscrimination Policy.

LWDBs assess ARIZONA@WORK comprehensive, affiliate, and specialized centers annually for programmatic and physical accessibility. The assessment includes (i) physical accessibility measures to ensure facilities are designed, constructed, or altered so they are accessible and usable to all individuals, including those with disabilities; (ii) programmatic accessibility measures to ensure access to programs, services, and activities during regular business days; and (iii) measures to ensure equal opportunity for individuals with disabilities defined in Section 188 of WIOA.

The State-level Equal Opportunity (EO) officer conducts an annual compliance monitoring process of each of its ARIZONA@WORK Job Centers (comprehensive, affiliate, and specialized), which consists of an on-site review to ensure that programmatic services are accessible for individuals with disabilities. This review includes an assessment of the assistive technology equipment available to ensure programmatic accessibility for individuals with vision, hearing, and physical limitations. If assistive technology equipment is not available, guidance and resources are provided to the site and an observation is made with a suggestion to have assistive technology equipment available in the future and a plan to get the equipment is required. The EO officer sends the LWDB representative "finding letters" with required actions to correct any compliance findings. The LWDBs are responsible for ensuring compliance with physical and programmatic accessibility in the ARIZONA@WORK Job Centers through implementation and oversight of State and local policies. For PY 2024, the State-level Equal Opportunity (EO) officer completed the most recent on-site review of all ARIZONA@WORK Job Centers (comprehensive, affiliate, and specialized) in November 2025.

Each LWDA identifies a local/tribal EO officer to ensure equal opportunity and nondiscrimination in the administration and operation of programs, activities, and services within the ARIZONA@WORK system.

The State-level EO officer provides annual training, **most recently completed the first quarter of 2026**, to the local/tribal EO officers, to facilitate appropriate provision of services to persons with disabilities. Local/tribal EO officers provide training and support to local area ARIZONA@WORK staff, service providers, and local partners to support addressing the needs of individuals with disabilities.

The Nondiscrimination Plan for 2025-2026 may be accessed through <https://des.az.gov/sites/default/files/media/OEO-1030A.pdf>.

9. Addressing the Accessibility of the One-Stop Delivery System for Individuals who are English Language Learners

Describe how the one-stop delivery system (including one-stop center operators and the one-stop delivery system partners) will ensure that each one-stop center is able to meet the needs of English language learners, such as through established procedures, staff training, resources, and other materials. Describe how English language learners will be made aware of the opportunity to enroll and/or co-enroll in all the core programs for which they are eligible.

ADE, ADES, and the LWDBs have policies and procedures to ensure individuals with limited English proficiency (LEP) have meaningful access to ARIZONA@WORK services. In accordance with 29 CFR § 38.9 and the State of Arizona Nondiscrimination Plan (NDP), the procedures include the development and implementation of processes that use and provide upon request Language Line services, interpreters, or translators, so individuals with LEP receive equitable communication of information as English-speaking individuals.

Title II adult education providers funded in each of the local workforce areas and administered by ADE, provide English Language instruction to assist eligible participants to: (i) achieve proficiency in reading, writing, speaking and listening; (ii) attain a secondary diploma or its equivalent as needed; and (iii) transition to postsecondary education/training, or employment.

The State-level EO officer reviews for approval of LWDB policy and procedures during the annual monitoring. ADE and ADES policy and procedures are in compliance with 29 CFR § 38.9.

Support is required for languages spoken by a significant number or portion of the population seeking services through ARIZONA@WORK. LWDB service providers must translate vital information in written materials into these languages and make the translations readily available in hard copy, upon request, or electronically such as on a website. The vital information these materials contain can be provided to LEP participants by oral interpretation or summarization. For other languages not spoken as frequently in the area, information will be supplied as the need arises or upon request. The NDP requires either the local EO officer or the State-level EO officer to conduct, at minimum, annual ARIZONA@WORK staff training. Generally, the State-level EO officer facilitates the training via an annual Technical Assistance Conference, which ensures all EO officers are up-to-date on the changes or new procedures available to them.

The LWDA EO officer is responsible for ensuring that ARIZONA@WORK staff are aware of the requirements to assist a client in filing a discrimination complaint and that it is done properly. LWDA's

further ensure that job seekers and participants with LEP are effectively informed about and/or able to participate in the program or activity by, providing workshops in Spanish, referring customers to English as a Second Language (ESL) classes through Title II programs or in the community, or instruction in Vocational English as a Second Language.

IV. Coordination with State Plan Programs

Describe the methods used for joint planning and coordination among the core programs, and with the required one-stop partner programs and other programs and activities included in the Unified or Combined State Plan.

Planning and coordination for the development of this Unified Plan began in May 2023 with the dissemination of a WIOA Stakeholder survey to collect input from Arizona's stakeholders, including representatives across the State Workforce Development Board, partner state agencies, LWDAs, and community-based partners on the state's future vision, mission, and the types of goals that should inform opportunities for new strategies. The survey was disseminated to approximately 230 potential respondents and closed in June 2023 with an average response rate of 44 percent.

Results were analyzed and summarized into a report that was shared with ARIZONA@WORK system stakeholders. The report captured a summary of responses collected across survey participants and highlighted respondent demographics pertinent to the voices captured. The information supported drawing WIOA State Plan narrative inputs and established a foundation for continued stakeholder engagement in the continued development of state plan elements.

Following the close of the State Plan survey, a total of three virtual sessions were facilitated in early September 2023 to engage stakeholders in the review of survey data and to contribute to the finalization of this Unified Plan's Vision and Mission. Over 130 stakeholders participated in these sessions, working together in small groups to review, edit, and refine the Vision and Mission. The collaborative statements that resulted were posted on the ARIZONA@WORK website for public comment from October 16 - 30, 2023 and results reviewed by ADES staff to confirm finalization.

To support the data-informed development of the goals and strategies outlined in this Unified Plan, three regional sessions were held across the state (Central, Northern, and Southern Arizona) to engage ARIZONA@WORK system stakeholders in the review of the state's economic and workforce conditions; the review of the state's workforce development activities; and assess performance data across the system and among priority populations. Over 130 state and local leaders of the workforce system participated in these sessions ~~and a list of participating organizations is found in Appendix 3.~~

Throughout the state plan development process, updates were regularly provided at each WAC Executive Committee and full Council meetings to ensure state leadership was informed of progress and alignment to the WAC's strategic plan. The Unified Plan was also posted for public comment from January 16-30, 2024. A total of three public comment submissions were received which totaled in 89 stakeholder inputs. All public comment submissions were reviewed, responded to, and used to inform needed edits. **It was**

then presented to the WAC during its February Executive Committee and full Council meetings as part of the state board's approval process.

Add Addendum - DRAFT

2026 State Plan Modification

The State of Arizona began planning and coordination activities for the development of the 2026 Unified State Plan Modification in November 2025, prior to the issuance of Training and Employment Guidance Letter (TEGL) 07-25 in March 2026. During this initial period, the State convened an interagency planning team consisting of representatives from the core WIOA title programs and relevant agency partners responsible for implementation of workforce system strategies and services. This early coordination was undertaken to prepare for the required two-year modification and to support timely and aligned updates across partner programs.

Prior to the release of TEGL 07-25, the State used available federal guidance, including applicable TEGs and the strategic framework reflected in America's Talent Strategy, to inform preliminary planning efforts. These efforts included identifying anticipated areas for revision, collecting programmatic and performance data, developing content outlines, and establishing an initial drafting framework for plan modifications. This early planning process supported cross-program alignment and provided a foundation for efficient coordination once federal modification guidance was issued.

The Workforce Arizona Council (WAC) was informed throughout the development process and received updates regarding the modification timeline, planning approach, and key milestones. These updates supported the Council's role in providing strategic oversight and ensuring alignment across Arizona's workforce development system.

Upon receipt of TEGL 07-25, the State distributed the guidance to title administrators and agency partners for review and incorporated the federal requirements into the modification process. State partners coordinated to assess the required revisions, confirm timelines, and determine a strategy for updating the Unified State Plan in accordance with federal guidance. Arizona subsequently requested and received approval for a waiver extending the submission deadline for the Unified State Plan Modification to April 30, 2026.

The State's modification timeline included the following major milestones:

- February 2, 2026 – Governor's designee letter/email submitted
- March 6, 2026 – Full draft compiled
- March 12, 2026 – Workforce Arizona Council Full Council update
- March 23–April 3, 2026 – Public comment period completed and responses finalized
- April 9, 2026 – Workforce Arizona Council Executive Committee update
- April 16, 2026 – Workforce Arizona Council Special Meeting; final approval completed
- April 30, 2026 – Submission to the State Plan Portal

Public comment on the draft PY 2026–2027 Unified State Plan Modification was solicited through an online comment matrix posted on the ARIZONA@WORK website during the public comment period of

March 23, 2026, through April 3, 2026. The draft modification was made available through electronic means and in a manner intended to support public accessibility, including access by individuals with disabilities. This process provided representatives of Local Workforce Development Boards and chief elected officials, businesses, labor organizations, institutions of higher education, entities responsible for administering the core programs, required one-stop partners, community-based organizations, organizations serving individuals with barriers to employment, other stakeholders, and members of the general public with an opportunity to review the draft and submit comments for consideration. Comments received through the public comment process were reviewed by State staff and agency partners, and revisions were incorporated into the final document, as appropriate, to address stakeholder feedback, improve clarity, and strengthen alignment across programs. The Workforce Arizona Council was provided an opportunity to review and comment on the modification as part of the State’s approval process. A summary of comments received and the State’s responses is included in Appendix 4.

V. Common Assurances (For All Core Programs)

The Unified or Combined State Plan must include assurances that:

ASSURANCE	
X	1. The State has established a policy identifying circumstances that may present a conflict of interest for a State Board or local board member, or the entity or class of officials that the member represents, and procedures to resolve such conflicts;
X	2. The State has established a policy to provide to the public (including individuals with disabilities) access to meetings of State Boards and local boards, and information regarding activities of State Boards and local boards, such as data on board membership and minutes;
X	3. The lead State agencies with optimal policy-making authority and responsibility for the administration of core programs reviewed and commented on the appropriate operational planning elements of the Unified or Combined State Plan, and approved the elements as serving the needs of the populations served by such programs;
X	4. (a) The State obtained input into the development of the Unified or Combined State Plan and provided an opportunity for comment on the plan by representatives of local boards and chief elected officials, businesses, labor organizations, institutions of higher education, the entities responsible for planning or administering the core programs, required one-stop partners and the other Combined Plan programs (if included in the State Plan), other primary stakeholders, including other organizations that provide services to individuals with barriers to employment, and the general public, and that the Unified or Combined State Plan is available and accessible to the general public; (b) The State provided an opportunity for review and comment on the plan by the State Board, including State agency official(s) for the Unemployment Insurance Agency if such official(s) is a member of the State Board;

X	5. The State has established, in accordance with WIOA section 116(j), fiscal control and fund accounting procedures that may be necessary to ensure the proper disbursement of, and accounting for, funds paid to the State through allotments made for the core programs to carry out workforce development activities;
X	6. The State has taken appropriate action to secure compliance with uniform administrative requirements in this Act, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the uniform administrative requirements under WIOA section 184(a)(3);
X	7. The State has taken the appropriate action to be in compliance with WIOA section 188, Nondiscrimination, as applicable;
X	8. The Federal funds received to carry out a core program will not be expended for any purpose other than for activities authorized with respect to such funds under that core program;
X	9. The State will pay an appropriate share (as defined by the State board) of the costs of carrying out section 116, from funds made available through each of the core programs;
X	10. The State has a one-stop certification policy that ensures the physical and programmatic accessibility of all one-stop centers with the Americans with Disabilities Act of 1990 (ADA);
X	11. Service providers have a referral process in place for directing Veterans with Significant Barriers to Employment (SBE) to DVOP services, when appropriate; and
X	12. Priority of service for veterans and eligible spouses is provided in accordance with 38 USC 4215 in all workforce preparation, development or delivery of programs or services funded directly, in whole or in part, by the Department of Labor.

VI. Program-Specific Requirements for Core Programs

The State must address all program-specific requirements in this section for the WIOA core programs regardless of whether the State submits either a Unified or Combined State Plan.

Program-specific Requirements for Adult, Dislocated Worker, and Youth Activities under Title I-B

The Unified or Combined State Plan must include the following with respect to activities carried out under subtitle B—

a. General Requirements

1. Regions and Local Workforce Development Areas

A. Identify the regions and the local workforce development areas designated in the State

Arizona's Governor designated twelve LWDAs, which also serve as its regions:

- ARIZONA@WORK Coconino County
- ARIZONA@WORK Maricopa County
- ARIZONA@WORK Mohave and La Paz Counties
- ARIZONA@WORK **Arizona Tribal Workforce Development Area** (13 Tribes)
 - Cocopah Indian Tribe
 - Gila River Indian Community
 - Salt River Pima-Maricopa Indian Community
 - Hopi Tribe
 - Quechan Indian Tribe
 - Colorado River Indian Tribes
 - Fort Mojave Indian Tribe
 - Hualapai Tribe, San Carlos Apache Tribe
 - Tohono O'odham Nation
 - Yavapai-Apache Nation
 - White Mountain Apache Tribe
 - Pascua Yaqui Tribe
- ARIZONA@WORK Northeastern Arizona (Navajo, Apache, and Gila counties)
- ARIZONA@WORK City of Phoenix
- ARIZONA@WORK Pima County
- ARIZONA@WORK Pinal County
- ARIZONA@WORK Santa Cruz County
- ARIZONA@WORK Southeastern Arizona (Graham, Greenlee, and Cochise counties)
- ARIZONA@WORK Yavapai County
- ARIZONA@WORK Yuma County

All LWDA's serve the geographical region designated for the area, but do not provide services on the Navajo Nation, which receives separate WIOA funding from DOL, or tribal land of the 13 tribes of the **Arizona Tribal Workforce Development Areas**. Individuals may apply for services at any ARIZONA@WORK Job Center in Arizona.

B. Describe the process and policy used for designating local areas, including procedures for determining whether the local area met the criteria for “performed successfully” and “sustained fiscal integrity” in accordance with 106(b)(2) and (3) of WIOA. Describe the process used for identifying regions and planning regions under section 106(a) of WIOA. This must include a description of how the State consulted with the local boards and chief elected officials in identifying the regions

WIOA requires that existing federally recognized workforce areas are designated during the first two PYs of WIOA, which is referred to as Initial Designation, and again after the first two PYs, which is referred to as Subsequent Designation. Local Areas within Arizona have been previously designated within this

timeframe. Units of local government that desire to become a new local workforce area should follow the New Area designation³³ requirements outlined below.

WIOA Designation For New Areas:

Any unit of general local government may request designation as a LWDA under WIOA. In Arizona, new local area designations will only become effective on July 1st of the next PY. In order for designation to be approved for the start of the next PY, the following steps and timeline must be met.

A statement of intent to request designation must be submitted to the WAC. The full request for designation as a LWDA (“local area”) must include the following components and steps:

1. Submit the request in writing to the WAC.
2. This request must clearly state the circumstances for the request of designation.
3. The request must also address and explain how the following criteria are met:
 - a. Consistency with natural labor market areas;
 - b. Consistency with regional economic development areas;
 - c. Existence of education and training providers, such as institutions of higher education and CTE schools in the area;
 - d. Submission of a service delivery plan that includes a description of resources that would be available to the area to provide services;
 - e. Coordination of multiple resources within areas that are based on labor markets and natural travel patterns of local residents;
 - f. Local support of the implementation strategies to provide quality services to employers and individuals by county commissioners, municipal elected officials including mayors and/or city council members where appropriate, and business or community leaders within the area as demonstrated by letters of support or a vote of support by a city council or other applicable board;
 - g. Local ownership, exhibited by strong involvement of local elected officials and community leaders on the Local Workforce Development Board, Local capacity to manage funds, provide oversight of programs, and provide for the proper stewardship of public funds;
 - h. Evidence that the area, in the two PYs for which data is available prior to the request, met or exceeded the adjusted levels of performance for primary indicators of performance and was not subject to the sanctions process resulting from missing the same measure two years in a row, if applicable; and
 - i. Assurance that during the two PYs prior to the request, the United States Secretary of Labor, or the State in place of the Secretary, has not made a formal determination that the grant recipient or administrative entity for the local area has mis-expended funds due to willful disregard, gross negligence, or failure to comply with accepted standards of administration, if applicable.

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<https://arizonaatwork.com/sites/default/files/2023-09/14%20Designation%20of%20Local%20Workforce%20Development%20Areas.pdf>

4. The request must address how the proposed new area designation will impact those other workforce areas from which it is withdrawing. It should be understood by any county, city or combination of such seeking designation, that the new area will only secure the formula allocated funds for each WIOA funding stream based on the formula factors as defined by WIOA.
5. If opposition to the request is voiced by municipalities or counties within the area seeking designation, then the requesting county, city or combination of such will address their request at a public hearing. If a hearing is necessary, it will be held within 45 calendar days of receipt of the request.
6. The WAC will take the request and comments from the public hearing and make a recommendation to the full WAC within 25 calendar days of the public hearing.
7. The WAC will submit its recommendation to the Governor within five (5) business days of the Council vote.
8. The final decision rests with the Governor and shall be made prior to May 29th, four weeks prior to the beginning of the fiscal and PY (July 1st).

Procedures for determining whether the local area met the criteria for “performed successfully.”

To meet the criteria for “performed successfully,” local areas must meet agreed upon adjusted levels of performance for two consecutive PYs, using a consistent definition for performance failure applied to states by DOL which is as follows:

1. If any single individual indicator score falls below 50 percent;
2. If any overall local Title I program score falls below 90 percent for that single core program; and
3. In any overall local Title I indicator score falls below 90 percent for that single measure.

For these three calculations, the results will not be rounded.

Procedures for determining whether the local area met the criteria for “sustained fiscal integrity”

To meet the criteria for “sustained fiscal integrity,” local areas must comply with all fiscal requirements with WIOA, the uniform guidance, and other federal regulations. This is evaluated through fiscal annual onsite monitors for each local area, annual risk assessments, and the evaluation of the Single Audit Report conducted on an annual basis for any entity spending more than \$750,000 of federal funds. Corrective Action is immediately required for any internal controls or fiscal integrity failure found during any of the required monitors, audits, or risk assessments.

C. Provide the appeals process and policy referred to in section 106(b)(5) of WIOA relating to designation of local areas

Appeals Process:

An area(s) seeking to be designated as a new LWDA that has had its request denied may appeal the decision to the WAC³⁴ through the following:

³⁴

<https://arizonaatwork.com/sites/default/files/2023-09/14%20Designation%20of%20Local%20Workforce%20Development%20Areas.pdf>

1. An appeal must be in writing and filed with the Council within 14 business days after notification of the decision.
2. The appeal must contain a specific statement of the grounds upon which the appeal is sought.
3. The WAC will have 60 business days to review the appeal and make a recommendation to the Governor.
4. The final decision rests with the Governor.
5. If the decision of the appeal reverses the decision, it will become effective July 1st of the following year.
6. If a decision on the appeal is not rendered in a timely manner or if the appeal does not result in designation, the entity may request review by the Secretary of Labor, under the procedures set forth at 20 § CFR 667.640(a).

D. Provide the appeals process and policy referred to in section 121(h)(2)(E) of WIOA relating to determinations for infrastructure funding

In accordance with Section 121(h)(2)(E) of the WIOA and 20 CFR § 678.750, the Council has established an appeals process for ARIZONA@WORK partners to address determinations related to infrastructure funding.

In the event that core partners are unable to reach an agreement on infrastructure funding, the process established by the Governor will be employed. If an ARIZONA@WORK partner wishes to appeal the Governor's determination concerning the allocation of funds for one-stop infrastructure costs, they may do so by submitting a written appeal to the Council within 30 days of the Governor's decision.

The grounds for appeal are limited to situations where the Governor's determination is believed to be inconsistent with proportionate share requirements (as outlined in 678.735(a)), the cost contribution limitations (678.735(b)), or the cost contribution caps (678.735(c)). The appealing entity must provide a clear explanation of why they believe the determination is contrary to the provisions of WIOA Section 121(h)(2)(E). No other reasons for appeal will be entertained.

The Council is committed to promptly addressing these appeals and will consider and respond in writing within 30 days.

It's important to note that the ARIZONA@WORK Job Center MOU and Infrastructure Costs Policy, which includes the details of the infrastructure funding appeal process, can be found in Sections II and V of the document. This policy was revised and approved by the WAC in February 2023.

2. Statewide Activities

A. Provide State policies or guidance for the statewide workforce development system and for use of State funds for workforce investment activities.

The Workforce Arizona Council develops, implements, and maintains the state policy and guidance for the statewide workforce development system. Each WAC policy ensures the Governor's guidance is established and available as required under WIOA (add citation). The statewide policies on Local

Governance, implementation of the ARIZONA@WORK Job Centers and one-stop delivery system, monitoring requirements, conflict of interest, and local area recertification are publicly posted [online](#) and outline the requirements for the statewide workforce development system.

Additionally, the policies developed under the governing authority for programmatic and fiscal requirements are developed, implemented, and maintained by the Arizona Department of Economic Security, a WIOA grant recipient, designated workforce development agency with oversight of program and fiscal compliance, and the entity for the State Rapid Response Unit. Arizona's fiscal and programmatic policies for Title I are publicly posted [online](#) and outline the requirements for implementing and using WIOA funding for Title I-B, RR, and ETPL.

At this time, the WAC is developing policy on the use of State funds for workforce investment activities that will replace existing practices. The policy is expected to address recaptured funding from all sources that revert to State funds, as well as the initial 15% of reserve funds from each Title I-B program at the beginning of each program year, for the Governor to carry out state workforce investment activities

B. Describe how the State intends to use Governor's set aside funding for mandatory and discretionary activities, including how the State will conduct evaluations of Title I Adult, Dislocated Worker, and Youth activities.

During Program Years 2024 and 2025 (PY24–PY25), the State of Arizona, through the Department of Economic Security in partnership with the Office of Economic Opportunity, utilized the Governor's set-aside funding to implement strategic workforce initiatives aligned with Arizona's Talent Strategy. These investments supported industry-driven workforce development, strengthened education and workforce alignment, expanded access to services for priority populations, and advanced system innovation and continuous improvement under WIOA Title I Adult, Dislocated Worker, and Youth programs.

To support industry-driven workforce development, the State funded sector-based initiatives aligned with high-growth industries. Key examples include the Arizona Western College Broadband Project, which provides Fiber Optic Certification training and work-based learning opportunities in broadband occupations, and the Maricopa County Community College District Semiconductor Technician Quick Start Program, which delivers short-term training aligned with semiconductor manufacturing jobs. The Future48 Advanced Manufacturing Marketing Campaign further supports this pillar by promoting awareness of advanced manufacturing careers and attracting a diverse pipeline of talent into STEM-related fields.

To strengthen education and workforce alignment, the State invested in initiatives that connect K–12, postsecondary education, and industry. The ElevateEdAZ program expands career pathways by supporting industry-recognized credentials, early postsecondary credit, and work-based learning opportunities such as internships and job shadowing. Additionally, Career and Technical Education (CTE) investments through West-MEC support the development of training programs in semiconductor and electric vehicle technologies, strengthening the long-term talent pipeline.

To advance workforce access and opportunity, Governor's set-aside funding supported targeted investments in priority populations. Through the Governor's Office of Youth, Faith and Family (GOYFF), approximately \$5.9 million was awarded to 16 organizations serving individuals across urban, rural, and tribal communities, including justice-involved individuals, disconnected youth, veterans, and individuals with disabilities. Additional initiatives, such as Jobpath Inc. Student Support Services and the SciTech Ecosystem Hubs Project, expanded access to education, training, and regional workforce networks for underserved populations.

To promote system innovation and continuous improvement, the State used Governor's set-aside funding to support research and evaluation activities in accordance with WIOA Section 116(e). OEO leads the evaluation of Title I Adult, Dislocated Worker, and Youth programs, focusing on employment and wage outcomes. The evaluation applies two methodologies: training subject effect, which assesses outcomes by field of study, and training program effect, which compares the effectiveness of training providers. These efforts are supported by the State's Integrated Data System and ongoing performance monitoring, enabling data-driven decision-making across the workforce system.

Outcomes of these investments include improved identification of high-performing training programs and providers, stronger alignment between workforce investments and industry demand, expanded access to services for priority populations, and increased use of data to inform policy and funding decisions. These efforts have also supported increased participation in work-based learning, credential attainment, and the development of career pathways aligned with Arizona's key industries.

This work is ongoing. The State will continue to use the Governor's set-aside funding for the remaining two years to support initiatives that promote effective business strategies, facilitate economic growth for all Arizonans, and evaluate the quality and effectiveness of WIOA Title I Adult, Dislocated Worker, and Youth programs, including future evaluation of system performance and customer experience in coordination with the Workforce Arizona Council, the Department of Economic Security, the Arizona Department of Education, and local workforce boards.

C. Describe how the State will utilize Rapid Response funds to respond to layoffs and plant closings and coordinate services to quickly aid companies and their affected workers. States also should describe any layoff aversion strategies they have implemented to address at risk companies and workers.

Arizona's RR activities include making resources available to proactively support employers and workers to avert closures and layoffs or mitigate their effect through working with ARIZONA@WORK business services on the early identification of employers at risk of closures and layoffs; assessment of the needs of and options for at-risk employers and the delivery of services to address these needs; continuing engagement, partnership, and relationship-building activities with businesses in the community; and connecting employers and workers to work-based learning.

RR funds enable required and allowable activities described in the publicly posted WIOA policy, Chapter 2, Section 900. State-level RR activities are managed by the State RR coordinator. The coordinator is responsible for the oversight of statewide activities, including entering into the state system of record

any advance notices of plant closings and layoffs under the WARN Act; extending the notification and coordinating services with the appropriate partners and stakeholders; and actively assisting in the coordination and service delivery of RR.

Layoff Aversion

RR includes supporting layoff aversion activities. This support includes confidential consulting services to businesses to develop an Individualized action plan to access local capital, remain in the County, avoid laying off employees, and ultimately prevent business closure. The program connects businesses with relevant partners who can help them overcome their challenges.

Work-based learning activities, such as incumbent worker training, on-the-job training, and customized training, are among the strategies to help businesses avoid layoffs and/or minimize the impact of layoffs on workers. Partners meet with employers to establish open communication to help determine what jobs are in demand in the local area, the types of training and credentials that individuals need to be qualified for these positions, the development of career pathways, and the identification of sector strategies, leading to a job-driven workforce system. When these collaborative environments are developed, strengthened, and aligned, they enhance services and matching effectiveness. When employers become more familiar with the services, their interest in providing opportunities for job seekers expands into participation in work-based learning models, such as on-the-job training, customized training, and apprenticeship opportunities. Employers are also made aware of programs designed to prevent layoffs, such as the Shared Work Program. [The Shared Work Program provides](#) an alternative for employers faced with a reduction in force [and allows](#) businesses to divide available work or hours among affected employees in lieu of layoffs. The program allows the employees to receive a portion of UI benefits while working reduced hours.

D. Describe the State policies and procedures to provide Rapid Responses in cases of natural disasters including coordination with FEMA and other entities.

The WIOA RR Policy ([revised October 2024](#)) includes coordination with FEMA and other entities in cases of natural disasters. In addition, the revised policy describes the responsibilities of the State RR Program.

RR serves businesses and workers during layoffs and dislocations, including mass job dislocations resulting from natural disasters, in accordance with 20 CFR 682.302(c). The services include reemployment resources and assistance to affected individuals through coordination and collaboration with core partners and community partners to bring affected individuals services for temporary needs such as rental/housing, utilities, and nutrition assistance.

The State RR team monitors the potential occurrence of natural disasters, including the most common ones in the state, fire and flood, to anticipate and prepare for necessary RR services. In the event of a disaster, ADES and the RR team would coordinate or work to establish a temporary/transition center (RR Policy 907.01) for community resources and services, including reemployment services, WIOA training opportunities, and UI. In response to natural disasters where entities such as FEMA bring in or lead support services to the community, the State RR coordinator and other appropriate ADES and local area representatives will work with those entities to coordinate and support local area efforts.

E. Describe how the State provides early intervention (e.g., Rapid Response) and ensures the provision of appropriate career services to worker groups on whose behalf a Trade Adjustment Assistance (TAA) petition has been filed. (Section 134(a)(2)(A) and TAA Section 221(a)(2)(A) .)

This description must include how the State disseminates benefit information to provide workers in the groups identified in the TAA petitions with an accurate understanding of the provision of TAA benefits and services in such a way that they are transparent to the dislocated worker applying for them (Trade Act Sec. 221(a)(2)(A) and Sec. 225; Governor-Secretary Agreement). Describe how the State will use funds that have been reserved for Rapid Response to provide services for every worker group that files a TAA petition and how the state will ensure the provision of appropriate career service to workers in the groups identified in the petition (TAA Sec. 221(a)(2)(A)).NOTE: until the TAA PROGRAM is reauthorized, the requirements to provide rapid response and appropriate career services to worker groups on whose behalf a petition has been filed is not applicable.

The State RR Policy, Chapter 2 Section 900, describes how the RR team provides early intervention to groups of workers on whose behalf a TAA petition has been filed. RR funds are used for these activities. The TAA Policy Manual describes the required activities to provide adversely affected workers with opportunities to get the skills, credentials, resources, and support necessary to return to suitable employment as quickly as possible.

RR teams, led by LWDB staff, consist of TAA, WIOA Title I–B, and Wagner–Peyser ES representatives, who conduct onsite presentations at the employer location (whenever permissible). Every effort is made to provide information sessions before the commencement of the layoffs/closures. These presentations consist of overviews of the benefits and services that can be expected from each of the partner groups with an emphasis on how TAA, WIOA Title I–B, and Wagner Peyser staff will be working together as a team to offer the customer individualized comprehensive reemployment benefits and services. DOL mandates co-enrollment of TAA participants into the WIOA DW Program. As a result, TAA Program staff have worked with the staff from the local areas and developed processes to follow.

On July 1, 2022, the termination provision under Section 285(a) of the Trade Act of 1974, as amended, took effect. Until further notice, the Department of Labor may not issue any determinations and may not accept any new petitions or requests for reconsideration. Workers who were certified and separated from their job on or before June 30, 2022, may still be eligible for benefits and services. When workers who were certified and separated from their jobs on or before June 30, 2022, are identified during a Rapid Response event, they are referred to the TAA and ES programs to receive any available additional services and assistance.

b. Adult and Dislocated Workers Program Requirements

1. Work-Based Training Models

If the State is utilizing work-based training models (e.g. on-the-job training, incumbent worker training, transitional jobs, and customized training) as part of its training strategy and these strategies are not

already discussed in other sections of the plan, describe the State's strategies for how these models ensure high quality training for both the participant and the employer.

The State utilizes work-based training to effectively serve job seekers, workers, and employers. Arizona's BST takes the lead in promoting the training model through its business outreach and engagement, wherein the reciprocal benefits of work-based training are highlighted: reduction in training costs, development or enhancement of workers' requisite skills, improved job satisfaction and productivity, or layoff aversion.

Specific information on work-based training is provided as follows:

- On-the-job-training (OJT): Provides participants work experience and new transferable skills of the training program, which are ideal for individuals with barriers. LWDBs may reimburse employers up to 50 percent of the worker's wages, and employers that provide OJT are required to hire participants that successfully complete training. LWDBs also have the flexibility to increase the reimbursement to 75 percent when factors, as described in TEG 19-16, are met and documented.
- Incumbent worker training: Averts layoffs by transitioning employees to other positions that will not be eliminated and create backfill opportunities for less-skilled employees. RR Coordinators work with employers who have notified the state and LWDBs of imminent layoffs. This program provides an option of training employees in new skills to transition the employee into other positions and avert layoffs. 20 percent of the LWDB's total Adult and DW funds may be used for incumbent worker training. LWDBs may reimburse according to the following schedule: (1) employers with <50 employees: grant reimburses 90 percent and employer matches 10 percent; (2) employers with 51-100 employees: grant reimburses 75 percent and employer matches 25 percent; (3) employers with >101 employees: grant reimburses 50 percent and employer matches 50 percent.
- Customized training: Assists employers in training current employees and participants referred to the employer for both pre-vocational and/or incumbent training. Customized training may cover topics such as the introduction of new technologies, new production or service procedures, as well as upgrading to new jobs that require additional skills. Customized training will also be used as an incentive to attract businesses to relocate to Arizona and required to pay for a significant portion of the training costs based on the number of employees participating, the wage, and other factors. Customized training requires a commitment from the employer to hire the participants after successful completion of the training program.
- Registered Apprenticeship: Operate through binding contracts, much like WIOA service agreements. LWDBs may use their Title I funds to enter into agreements to support Registered Apprenticeships, such as OJT or Customized agreements to reimburse employers the wages of the apprentice for a specified period of time. ITAs may also be used to fund the cost of the related training for the apprentice, if the RAP is on the ETPL. RA Sponsors may request to be added to the ETPL and an ITA may be used to pay for the related training.

In addition to business outreach and engagement, the following strategies help ensure high-quality training for employers, workers, and job seekers:

- Prioritization of work-based training that is related to in-demand occupations, aligned with career pathways and industry sectors, and results in a recognized postsecondary credential. **Training must result in transferable skills within the industry in which the worker is currently employed, or other growing industries within the LWDA and in an occupation with a high potential for sustained demand or growth as determined by the LWDB;**
- Collection and analysis of performance data on work-based training programs;
- Policy that prohibits work-based training contracts with employers who fail to provide participants with long term employment opportunities, with wages, benefits, and working conditions comparable to other employees who have worked a similar amount of time and who are doing the same type of work;
- Monitoring of onsite work-based training to ensure training, wages, hours, benefits, and working conditions are provided in accordance with the contract; and
- Tracking and monitoring of training participants' performance and progress to determine supportive service needs, the appropriateness of the training activity, whether placement in unsubsidized employment has occurred.

2. Registered Apprenticeship

Describe how the State will incorporate Registered Apprenticeship into its strategy for service design and delivery (e.g., outreach to sponsors and prospective sponsors, identifying potential participants and connecting them to apprenticeship opportunities).

The AAO continues to strengthen and improve the integration of Registered Apprenticeship into the State's workforce system. The AAO coordinates closely with Local Workforce Development Boards, Local Workforce Area Partners, and the ARIZONA@WORK Business Service Teams **through a regional support model that assigns a dedicated Apprenticeship and Training Representative to each Local Workforce Area. These representatives serve as primary points of contact to engage with local partners, industry, and business communities to enhance program awareness, facilitate program development and registration, and increase participation.** The opportunities, facilitated by employers or sponsors through Registered Apprenticeship, offer structured learning and on-the-job training, with apprentices earning a progressively increasing paycheck and a nationally recognized certificate upon completion.

To increase employer participation and expand apprenticeship opportunities in the local areas, the AAO **supports Local Workforce Development Boards to serve as multiemployer intermediary sponsors. This model helps reduce perceived barriers for employers by centralizing administrative responsibilities, aligning apprenticeship operations with regional labor market needs, and leveraging the creative braiding of various WIOA funding streams and other workforce resources to support program operation and ensure success and sustainability of its apprentice participants.**

The AAO continues to partner with education providers, community colleges, postsecondary institutions, and Career Technical Education Districts (CTEDs) to offer related technical instruction **and develop pre-apprenticeship programs.** These partnerships facilitate smooth transitions from education to apprenticeship, strengthen workforce pipelines, and expand access to apprenticeships statewide. These

education providers can also act as intermediary sponsors for apprenticeship programs, expanding opportunities for employers and industries to engage in RAPs.

All Registered Apprenticeship Programs (RAPs) receive automatic approval **to be an eligible training program** and are included on the ETPL **when they opt in**. This inclusion enables successfully registered participants to qualify for funding to alleviate costs associated with related technical instruction, including expenses for books, materials, tools, and more.

The AAO also engages other state agencies and local municipalities to promote Registered Apprenticeship as a strategy for addressing public workforce vacancies, succession planning, and industry-specific talent needs. Aside from addressing workforce recruitment challenges, this strategy can also help enhance and strengthen work culture, standards, and the quality of service delivery. Likewise, demonstrating state, county, and city-sponsored programs can help illustrate the program's effectiveness, encouraging private employers and fostering expanded opportunities for workforce development and Registered Apprenticeship Program growth.

In addition, the AAO coordinates with other workforce programs, such as Reentry and Vocational Rehabilitation, who serve individuals with significant barriers to employment to increase integration with Registered Apprenticeship. Through joint education and outreach, these partnerships promote Registered Apprenticeship as a pathway for participants while increasing understanding of complementary services, encouraging broader participation, improving access for these populations, and supporting apprenticeship outcomes.

3. Training Provider Eligibility Procedure

Provide the procedure, eligibility criteria, and information requirements for determining training provider initial and continued eligibility, including Registered Apprenticeship programs (WIOA Section 122).

Arizona's ETPL includes approved Training Providers who are eligible to receive WIOA Title I-B funds to train eligible adults, DWs, In-School Youth (pursuant to the waiver approved by the U.S. DOL) and Out-of-School Youth Program participants in accordance with the WIOA of 2014, and 20 CFR § 680, 683 Subpart F, and 685.140, TEGL 3-18, TEGL 8-19, TEGL 8-19, change 1, TEGL 10-16, **Change 3**. Records are maintained on Arizona Job Connection (AJC), the State's labor exchange system, allowing training providers to complete an application on the AJC website

All approved programs are available to the public and to all ARIZONA@WORK partners to view on AJC. ADES and LWDBs share the responsibility of managing the ETPL, including approving programs for initial and continued eligibility, reviewing the quality of training services, verifying that the approved programs lead to industry recognized postsecondary credentials, ensuring training provider compliance and accuracy of information, removing training providers or programs, and monitoring of training providers.

The ETPL policy ensures Registered Apprenticeship programs are informed of their eligibility and advises the program sponsor on the option to opt into the ETPL. The policy also states that Registered

Apprenticeship programs are identified as eligible providers and are not subject to the requirements to initial and continued eligibility requirements in this policy. If a Registered Apprenticeship Program is registered with the AAO or the U.S. DOL Office of Apprenticeship, the program is available to be an ETP. Apprenticeship programs that are not registered with the AAO or the U.S. DOL, Office of Apprenticeship are not excluded from the ETPL but do need to be evaluated and meet criteria for initial and continued eligibility to be added to the ETPL and to remain on the list. The ETPL team is working with the Arizona Apprenticeship Program to identify any barriers or misconceptions that prevent RAPs from opting into the ETPL.

ADES approves training providers after ensuring they meet the training provider eligibility requirements listed in the WIOA and State policy. Training providers must maintain licenses from appropriate federal, state or professional licensing authorities, as required by law, have a written student grievance policy and refund policy, and also maintain liability insurance.

As part of the ETPL policy, under Licensing and Business Requirements, in-state and out-of-state postsecondary institutions must be authorized by a State governing body to operate in the State of Arizona, or the state where they have operations if applicable. This does not apply to RAPs. Training providers must also:

- Be a legal entity, registered to do business in Arizona.
- Licensed through Arizona Private Postsecondary Education unless exempt under state law.
- Current license from appropriate Arizona or a state licensing authority.
- Comply with non-discrimination and equal opportunity provisions of all Federal and State applicable laws.
- Provide training that are physically and programmatically accessible for individuals who are employed and individuals with barriers to employment, including individuals with disabilities.
- Comply with all requirements from WIOA, federal regulations, federal guidance, and State policies.

Training providers that have been debarred by any State or the Federal government are not eligible to be included on the ETPL during the debarment period.

LWDBs are required to establish Local ETPL policies. The State ETPL policy requires LWDBs to ensure access to training services throughout the state including rural areas, by approving programs that use technology-based learning and meet all state and local requirements. LWDB staff assume the responsibilities for the training provider program eligibility process and must work with ADES to ensure there are a sufficient number and types of training services, including ETPs with expertise in assisting individuals with disabilities and eligible providers with expertise in assisting adults in need of adult education and literacy activities and serving the local area.

LWDBs must maximize customer choice using a comprehensive process to ensure that a significant number of ETPs are available to all job seekers in the local area. The state ETPL policy allows LWDBs to require additional criteria, except for Registered Apprenticeship Programs, and additional information from local providers to become eligible and remain eligible as a local provider in the LWDA. When

reviewing provider applications for inclusion on the state's ETPL, the policy requires LWDBs to use only the state's requirements and not the LWDB's additional local criteria.

Under the policy, LWDB staff must require the training provider to supply information regarding the training provider's partnerships with a business. The information may include whether the training program is offered or was designed as a result of the partnership and must also include a list of employers that have committed to hiring graduates from the training program. After approval, each training program is evaluated individually by the ETPL coordinator in the local area where the training provider is located to determine if the training programs meet state and local ETPL requirements, including initial performance data standards, resulting in a federally or locally recognized credential and being related to an in-demand industry or occupation in Arizona.

The local ETPL coordinator reviews the following: a detailed description of the program, the total cost of the program, including the cost of tuition, books, and any fees, credential information, and labor market information for the related occupation, including the minimum entry-level wage and demand for the occupation in the local area, and initial performance data. Arizona uses the training program's credential attainment rate as the performance factor for initial eligibility. Programs that are approved at the local level are reviewed for accuracy and completeness by the State ETPL program manager and placed on the statewide ETPL for a one-year initial eligibility period.

LWDBs target training programs that support in-demand industries and occupations and prepare participants for jobs in identified career pathways. Using Labor Market Information (LMI), ARIZONA@WORK staff also determine higher-paying jobs, in-demand industry sectors, and occupations in the local area and work with local employers to determine the minimum requirements for these jobs and the types of training and certification requirements for these positions. Using this information, ARIZONA@WORK staff will reach out to local training providers to encourage them to add their training program to the ETPL.

All training programs listed on the ETPL, except Registered Apprenticeship Programs, are reviewed bi-annually for continued eligibility in accordance with WIOA and State policy for the ETPL. Arizona consults with LWDBs, community colleges, and other training providers, and holds regular statewide calls to discuss the requirements for tracking performance and gathering performance data, identifying barriers, and developing strategies for collecting the required information in a timely manner. Registered Apprenticeship programs are not subject to performance requirements.

The LWDB and the State ETPL Program manager will review the training provider's program performance based on the performance accountability measures, using data on all WIOA Title I-B participants who participated in the training program during the performance period. The LWDB and State ETPL Program manager also determines whether the training provider submitted the eligible training performance report timely and accurately. Each program's performance will be evaluated against state performance standards to determine whether the program will remain on the list. Training providers must submit the following performance data annually for all programs listed on the ETPL, and data must include all students (WIOA and non-WIOA) who participated in each training program:

- The percentage of program participants who are in unsubsidized employment during the second quarter after exit from the program;
- The percentage of program participants who are in unsubsidized employment during the fourth quarter after exit from the program;
- The median earnings of program participants who are in unsubsidized employment during the second quarter after exit from the program;
- The percentage of program participants who obtain a recognized credential or a secondary school diploma or its equivalent during participation or within a year after exit (A secondary school diploma or its equivalent is only counted in this measure if the participants has retained or obtained employment or are in a postsecondary education or training program leading to a recognized credential within one year after exit).

This includes collecting performance and cost information and any other required information related to programs from training providers.

Removal of Program and Training Providers

Failure to meet performance requirements can result in punitive action to include written warnings, suspension, or removal of a training provider program from the ETPL. The State ETPL Manager must notify the training provider when a provider application or a training program has been denied or removed from the State ETPL. The LWDB must notify the State ETPL Manager and the training provider when a training program is denied or removed from the local ETPL, or if the LWDB is recommending removal from the State ETPL. Both, the State ETPL Manager and the LWDB must communicate the decision to deny an application and/or the intent to deny eligibility or remove a provider or program to the other party before taking written action.

Training Providers must be removed if:

- All the training providers programs have been removed.
- The training provider has not maintained licenses or insurance.
- The training provider violates WIOA, Federal and State regulations, Federal and State policies, and Federal and State Laws.
- They make false claims to participants and/or the State Board and LWDBs. In addition to performance, programs must be removed if they no longer result in a credential.

Training Providers may be removed if:

- No WIOA participant has used this provider from the last two years of their renewal date.

Training providers eligibility will also be terminated if the training provider is determined to have committed a substantial violation. A substantial violation is identified when at least one of these types of violations has occurred:

- Fails to meet the State's procedure for timely and accurately submitting required information for annual ETP performance reporting.
- Fails to meet the State's procedure for timely and accurately submitting all required information for initial or continued eligibility.

- Violates any provision of WIOA Title I or its regulations, including the nondiscrimination and equal opportunity provisions.
- DES or the LWDB determines that the institution intentionally supplied inaccurate information within the state system of record (AJC).
- The institution, over a period of five years, has had three separate complaints filed against it under 29 CFR part 38 of the WIOA nondiscrimination and equal opportunity provisions that have resulted in final determinations finding one or more violation(s).
- The institution is found to have not complied with the corrective or remedial actions identified to end and/or redress the violation(s) stemming from a single complaint under 29 CFR part 38.
- There is an order against the institution under 29 CFR § 38.113 suspending, terminating, denying, or discontinuing WIOA Title I financial assistance to the institution.

DES will consider exceptional circumstances beyond the institution's control (e.g., natural disasters, unexpected personnel transitions, and unexpected technology-related issues) when determining if an institution committed a substantial violation for failing to timely and accurately submit required information. If it is determined that an institution committed a substantial violation, the institution is prohibited from having its programs on the published ETPL for a minimum of two years and it is liable to repay any WIOA Youth, Adult, and Dislocated Worker Program funds to the LWDB received during the period of noncompliance, and the timeframe is subject to local area policy.

If DES receives a WIOA participant complaint alleging these types of substantial violations, the complaint will be referred to the appropriate State or Federal investigative body for a determination. If a LWDB receives the complaint, it must notify DES. The process for removing an ETP from the ETPL is detailed in the DES Standard Work document.

Appeals

Training providers have a right to appeal any DES or LWDB decision or action that has an adverse effect on the training provider's organization. Appeals regarding the eligibility of a training provider or program for the local ETPL must be filed with the LWDB within 45 days. LWDBs appeal policy for training providers must include an informal resolution process and an opportunity for a hearing. Appeals regarding the eligibility of a training provider or program for the State ETPL by DES must be filed with DES. All State-level appeals that are not resolved using the informal resolution process must be heard by the DES Office of Appeals.

The WAC updated the [ETPL Policy](#) which was approved in May 2024. The policy may be accessed on the [ARIZONA@WORK Workforce Arizona Council](#) page (<https://arizonaatwork.com/sites/default/files/2024-05/2024.10%20Eligible%20Training%20Provider%20List%20Policy.pdf>).

4. Describe how the State will implement and monitor for the Adult Priority of Service requirement in WIOA section 134 (c)(3)(E) that requires American Job Center staff, when using WIOA Adult program funds to provide individualized career services and training services, to give priority of service to recipients of public assistance, low-income individuals, and individuals who are basic skills deficient (including English language learners).

Arizona implements the Adult priority of service through its Adult and DW Program Registration, Eligibility, Enrollment, and Tracking Policy. Consistent with WIOA section 134 (c)(3)(E), the policy requires that priority be given to recipients of public assistance, other low-income individuals, and individuals who are basic-skills deficient when using Adult funds to provide individualized career and training services. The policy also requires LWDBs to establish their own priority of service policy that is consistent with State policy.

ADES verifies and reinforces local area compliance with the Adult priority of service through monitoring and technical assistance:

- Sharing of DOL's Quarterly Report Analysis with local areas and exploring ways to meet the Adult priority goal.
- Technical assistance related to the Adult priority of service report, which is generated through the data visualization platform Tableau. The Tableau report allows local areas to track individualized career and training services to individuals who meet the statutory criteria and determine whether they meet the 50.1 percent threshold and/or the 75 percent goal.
- **Development of the Adult Program Priority Guide, which describes the population included in the priority groups and documentation of job seekers' inclusion in such groups.**
- Annual monitoring of the Adult program, which includes the implementation of priority of service, in accordance with WIOA and State policy and procedures. Monitoring involves a review of LWDB policies, participant files, and case information in the Arizona Job Connection system. A monitoring report is sent to the LWDB within ten business days from the desk review. The report identifies findings and observations, and it prompts LWDBs to respond to the findings within 20 business days from the receipt of the report. Cross-functional **quarterly** meetings are held to review monitoring activities and identify areas where technical assistance is needed.

The Title II AEFLA program, administered by the Arizona Department of Education, reviews the MOUs for each local workforce area to verify inclusion of the priority of service for eligible Title II participants.

5. Describe the State's criteria regarding local area transfer of funds between the adult and dislocated worker programs

The ADES Transfer of Funds Policy, in accordance with WIOA section 133, allows the transfer of up to 100 percent of allocated funds, between the adult and DW Programs. The policy establishes the criteria for LWDBs to request such transfer and, specifically, requires that the LWDB, after conferring with the chief

elected official(s), complete the [Transfer of Funds Request Form \(WIO-1075A\)](#)³⁵. The form prompts the LWDB to justify the transfer request by describing:

- The situation that necessitates the local area’s need to transfer funds. The description must include labor market information and other economic conditions that contributed to the need for the transfer.
- How the transfer of funds will impact the participant levels in both the adult and DW Programs:
 - If requesting to transfer 100 percent of the local area DW funds to the adult program (or the reverse), the local area must provide a detailed explanation of how it plans to ensure that career and training services are available to eligible DWs (or adults) in the area. The local area must take into account that individuals who may be eligible for DW services include not just individuals who were laid off or terminated, but also displaced homemakers, certain spouses of active-duty members of the Armed Forces, previously unemployed individuals who are unemployed due to economic conditions in the area or natural disasters, etc.
 - The local area must provide an estimate of the number of adults and DWs expected to be served if the transfer is granted.
- The effect of the transfer on the current provider of training and other services, including the impact on jointly-funded employment and training programs in the local ARIZONA@WORK Job Center.
- The expected change in WIOA performance outcomes (for instance, an increase in the employment rate) for both programs if funding is better aligned with participant and local area needs.

The DERS fiscal and program oversight units review each local area request and approve or deny the request within 30 days.

6. Describe the State’s policy on WIOA and TAA co-enrollment and whether and how often this policy is disseminated to the local workforce development boards and required one-stop partners. Trade Act Sec. 239(f), Sec. 235, 20 CFR 618.325, 20 CFR 618.824(a)(3)(i).

The Title I Adult and DW Policy on Program Registration, Eligibility, Enrollment and Tracking instructs Title I service providers to co-enroll participants with other workforce partners and work closely to address the needs of co-enrolled customers and ensure services are made available to eligible individuals who are referred by partner programs based on priority of service criteria. This policy was last updated in November 2021.

On July 1, 2022, the termination provision under Section 285(a) of the Trade Act of 1974, as amended, took effect. Unless the program is reauthorized, the Department of Labor may not issue any determinations and may not accept any new petitions or requests for reconsideration. Due to TAA’s current termination status, only workers who were certified and separated from their job on or before

³⁵ [The Transfer of Funds Policy and the corresponding Transfer of Funds Request Form \(WIO-1075A\)](#) were updated in 2025.

June 30, 2022, may be eligible for TAA services and required to be co-enrolled in the DW program, unless one of the following exceptions apply:

- The individual is a member of a certified worker group who does not meet the individual eligibility requirements under the WIOA DW Program, including but not limited to the Selective Service registration requirements; or
- The individual is a member of a certified worker group but declines to be co-enrolled. Any member of a certified worker group who declines to be co-enrolled in the DW program will not be denied benefits and services under the TAA program at ADES if otherwise eligible.

The LWDB service provider will provide timely access to appropriate ES, benefits, training, supportive services, and supplemental assistance to trade-affected workers who are co-enrolled in the DW Program.

LWDB service providers will coordinate with the TAA program at ADES when a DW is likely to be eligible for benefits and services available under the TAA program.

Under certain circumstances, including but not limited to, a general announcement of a closure, a partially separated worker and adversely affected incumbent worker (AAIW) are required to be co-enrolled when they meet the eligibility criteria as defined under WIOA section 3(15) for a DW.

- A partially separated worker means an individual including an employer, who has not experienced a total separation due to a lack of work.
- For the purpose of filing a TAA petition to DOL, a partially separated worker for an employer is any worker with hours and wages that have been reduced to anything under 80 percent of the average weekly hours and wages during a period which is subject to the DOL petition investigation.
- For the purpose of providing TAA benefits and services to a worker group covered under a TAA Certification issued by DOL, a partially separated worker will be any worker with hours and wages that have been reduced to anything under 80 percent of the average weekly hours and wages during a certification period.

All Title I policies are posted on the ADES website. ADES notifies all stakeholders when policies are revised.

7. Describe the State's formal strategy to ensure that WIOA and TAA co-enrolled participants receive necessary funded benefits and services. Trade Act Sec. 239(f), Sec. 235, 20 CFR 618.816(c)

TAA and WIOA Policy reinforce the collaboration between TAA staff and WIOA Title I-B staff to assist in the reemployment of adversely affected workers as soon as possible. The State's strategy for partnership is ongoing communication between the TAA and WIOA program staff done through the Arizona Job Connection (AJC) shared case management system, email, telephone, or video calls to discuss participant statuses and agree on action steps to best assist the participant with funded benefits and services. The AJC system allows for the ease of sharing case notes, Individual Employment Plans (IEPs), assessment results, services provided, and the status of such services. To leverage funds, training approved through WIOA is allowed as a TAA approved training option, while TAA approved training is often accepted as WIOA-approved training. The programs' collaboration allows one program to provide benefits or services

that are not allowed through the other program and fills any gaps an individual may encounter if co-enrollment were not an option.

8. Describe the State’s process for familiarizing one-stop staff with the TAA program. 20 CFR 618.804(j), 20 CFR 618.305

TAA staff attend **scheduled** meetings organized by the various one-stop operators, during which TAA program information is shared with all partners. TAA staff are available to provide virtual presentations to one-stop staff on program information including eligibility requirements and the benefits and services available to participants. Contact information is also given to one-stop staff for inquiries or to refer WIOA participants to a TAA representative for assistance.

c. Youth Program Requirements.

With respect to youth workforce investment activities authorized in section 129 of WIOA, States should describe their strategies that will support the implementation of youth activities under WIOA. State’s must-

1. Identify the State-developed criteria to be used by local boards in awarding grants or contracts for youth workforce investment activities and describe how the local boards will take into consideration the ability of the providers to meet performance accountability measures based on primary indicators of performance for the youth program as described in section 116(b)(2)(A)(ii) of WIOA.³⁶

Further, include a description of how the State assists local areas in determining whether to contract for services or to provide some or all of the program elements directly.

When selecting a youth provider, LWDBs must take the following into consideration for the service provider:

- Financial stability;
- Experience in successfully providing services to disconnected youth and youth with barriers to employment, including youth with disabilities;
- Demonstrated success in serving youth, specifically youth with barriers and out-of-school youth;
- Length of time in business;
- Available network of business and community partners; and
- Ability to meet performance accountability measures based on performance indicators for youth.

To ensure quality, job-driven training programs are available for youth, LWDBs are required to include criteria to be used in procuring youth training programs in their local plans, taking into consideration: (1) if the training program is related to an in-demand occupation, or career pathways identified in the state and local plans; and (2) if the training program results in a recognized credential.

³⁶ Sec. 102(b)(2)(D)(i)(V)

LWDBs must also include youth service provider procurement criteria in their local plans. To guide the LWDBs in determining whether to competitively procure for services or to provide some or all of the program elements directly, the State:

- Describes in its youth policy the requirements for program design and service delivery;
- Highlights that LWDBs have the flexibility to provide WIOA Title I-B youth program elements directly based on whether they can most efficiently and cost-effectively provide the 14 elements and the services that are part of the program design.

If the LWDB does not provide youth services directly, it must award grants or contracts on a competitive basis according to federal procurement guidelines in the Code of Federal Regulations Part 200 and 2900 - Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards.

2. Explain how the State assists local workforce boards in achieving equitable results for out-of-school and in-school youth.

Describe promising practices or partnership models that local areas are implementing and the state's role in supporting and scaling those models within the state for both in-school and out-of-school youth.

The statewide **waivers** on individual training accounts for in-school youth **and the out-of-school youth expenditure requirement** continue to be a tool for LWDBs to facilitate equitable results for out-of-school and in-school youth. As noted in section VI(e) of the State Plan, the statewide waivers:

- Allow universal youth access to training programs on the ETPL, which have been vetted for quality and alignment with the State's and the local area's in-demand industries and occupations.
- **Promote the appropriate provision of services to youth, based on the youth's unique needs, regardless of one's school status at program entry.**

In addition, LWDBs and local area youth providers work with relevant State entities, educational institutions, and community organizations to enhance program efficacy and advance equitable results for youth. To illustrate, local areas:

- Collaborate with agencies that administer core and other partner programs to facilitate and streamline referrals and coordination of services.
- Engage entities such as juvenile corrections and foster care programs to extend and coordinate appropriate services to eligible youth with barriers to employment.
- Implement targeted outreach campaigns and collaborations with community-based organizations to connect with youth with specific barriers to employment. Such organizations include New Freedom Recovery Center, an organization providing a restorative environment for individuals recently released from incarceration, and United Methodist Outreach Ministries (UMOM), an organization providing crisis shelter and affordable housing.
- Cultivate partnerships with the public school system, including alternative schools that serve specific populations of at-risk students, to identify and connect with youth who may benefit from ARIZONA@WORK services.

The State supports LWDBs and youth service providers by helping build their capacity to foster strategic partnerships as well as develop and implement innovative services. Such support encompasses:

- Policies that inform the framework for local area initiatives, including policies that require or encourage co-enrollment between relevant programs, such as those described in Section III (b) of the State Plan.
- Guidance and technical assistance that help clarify and operationalize policies as well as explore promising practices. Technical assistance takes the form of statewide webinars, one-on-one technical assistance sessions, and programmatic resources and guides.
- Platforms, such as the monthly ARIZONA@WORK meetings, that allow local areas to share their successes and best practices and learn about other workforce and human service programs that serve the same client populations and impact the larger workforce ecosystem.

3. Describe how the State assists local workforce boards in implementing innovative models for delivering youth workforce investment activities, including effective ways local workforce boards can make available the 14 program elements described in WIOA section 129(c)(2); and explain how local areas can ensure work experience, including quality pre-apprenticeship and registered apprenticeship, is prioritized as a key element within a broader career pathways strategy.

In addition to promoting equitable results for youth and supporting local area strategic partnerships, the State's policies, operational and programmatic guidance, and technical assistance, as previously described, also reinforce each local area's effective delivery of the 14 program elements. Local area youth program design and delivery models include:

- Provider contracts with community colleges, established through competitive procurement. This facilitates the local area's link to a segment of the youth population and streamlines the connection between education, occupational skills training, and other relevant program elements.
- Partnership with CTE Programs, promoting the inclusion of various CTE programs on the ETPL, to which in-school and out-of-school youth have access. CTE programs essentially align with various youth program elements, including occupational skills training.
- Operation of youth centers, providing a hub for potential and enrolled youth participants. The youth centers promote a targeted approach to the provision and/or ensuring access to the 14 program elements.
- The use of referral platforms that complement the State's system of record, Arizona Job Connection, and enhance the referral process within the ARIZONA@WORK workforce development system.

To ensure that local areas prioritize work experience as a key element within a broader career pathways strategy, the State emphasizes in its Youth program policy³⁷ and technical assistance³⁸ the 20 percent expenditure requirement for work experience.

³⁷ <https://des.az.gov/services/employment/workforce-innovation-and-opportunity-act-wioa/title-i-b-policy-and-procedure>

³⁸ <https://des.az.gov/services/employment-workforce-innovation-and-opportunity-act/wioa-resources>

Furthermore, the State uses the monthly ARIZONA@WORK partners meeting to feature programs with whom LWDBs and service providers may collaborate to enhance their Youth services design and delivery. Such programs include the following: Arizona Department of Child Safety, which serves foster youth; Fresh Start Women’s Foundation, which provides linkages to pre-apprenticeship opportunities and facilitates financial literacy classes; and Center for Energy Workforce Development, which promotes education and training in the energy industry.

4. Provide the language contained in the State policy for “requiring additional assistance to enter or complete an educational program, or to secure and hold employment” criterion for out-of-school youth specified in WIOA section 129(a)(1)(B)(iii)(VIII) and for “requiring additional assistance to complete an education program, or to secure and hold employment” criterion for in-school youth specified in WIOA section 129(a)(1)(C)(iv)(VII). If the state does not have a policy, describe how the state will ensure that local areas will have a policy for these criteria.

The State recognizes the diverse needs of its youth, influenced by geographic, cultural, and demographic variables. Because of this diversity, local areas are deemed better positioned to set their own parameters for identifying in-school or out-of-school youth who require additional assistance to enter/complete an educational program or to secure or hold employment.

While the State youth policy does not define a youth who “requires additional assistance,” it requires the LWDB to:

- Define in its local plan and policies a youth who requires additional assistance to enter/complete an educational program or to secure or hold employment.
- Establish a definition that is reasonable, quantifiable, objective, and based on evidence.

The State reviews local plans every two years and verifies the inclusion of the LWDB’s definition and eligibility documentation for in-school and out-of-school youth who require additional assistance to enter or complete an education program or to secure and hold employment.

d. Single-area State Requirements

In States where there is only one local workforce investment area, the governor serves as both the State and local chief elected official. In such cases, the State must submit any information required in the local plan (WIOA section 106(d)(2)). States with a single workforce area must include—

- 1. Any comments from the public comment period that represent disagreement with the Plan. (WIOA section 108(d)(3).)**

Not Applicable

- 2. The entity responsible for the disbursement of grant funds, as determined by The Governor, if different from that for the State. (WIOA section 108(b)(15).)**

Not Applicable

- 3. A description of the type and availability of WIOA Title I Youth activities and successful models, including for youth with disabilities. (WIOA section 108(b)(9).)**

Not Applicable

- 4. A description of the roles and resource contributions of the one-stop partners.**

Not Applicable

- 5. The competitive process used to award the subgrants and contracts for Title I activities.**

Not Applicable

- 6. How training services outlined in section 134 will be provided through individual training accounts and/or through contracts, and how such training approaches will be coordinated.**

Describe how the State will meet informed customer choice requirements regardless of training approach.

Not Applicable

- 7. How the State Board, in fulfilling Local Board functions, will coordinate title I activities with those activities under title II.** Describe how the State Board will carry out the review of local applications submitted under title II consistent with WIOA secs. 107(d)(11)(A) and (B)(i) and WIOA sec. 232.

Not Applicable

- 8. Copies of executed cooperative agreements which define how all local service providers will carry out the requirements for integration of and access to the entire set of services available in the one-stop delivery system, including cooperative agreements with entities administering Rehabilitation Act programs and services.**

Not Applicable

e. Waiver Requests (optional)

States wanting to request waivers as part of their title I-B Operational Plan must include a waiver plan that includes the following information for each waiver requested:

1. Identifies the statutory or regulatory requirements for which a waiver is requested and the goals that the State or local area, as appropriate, intends to achieve as a result of the waiver and how those goals relate to the Unified or Combined State Plan;
2. Describes the actions that the State or local area, as appropriate, has undertaken to remove State or local statutory or regulatory barriers;
3. Describes the goals of the waiver and the expected programmatic outcomes if the request is granted;
4. Describes how the waiver will align with the Department’s policy priorities, such as:
 - a. Supporting employer engagement;
 - b. Connecting education and training strategies;
 - c. Supporting work-based learning;
 - d. Improving job and career results, and
 - e. Other guidance issued by the department.
5. Describes the individuals affected by the waiver, including how the waiver will impact services for disadvantaged populations or individuals with multiple barriers to employment; and
6. Describes the processes used to:
 - a. Monitor the progress in implementing the waiver;
 - b. Provide notice to any local board affected by the waiver;
 - c. Provide any local board affected by the waiver an opportunity to comment on the request;
 - d. Ensure meaningful public comment, including comment by business and organized labor, on the waiver.
 - e. Collect and report information about waiver outcomes in the State’s WIOA Annual Report.
7. The most recent data available regarding the results and outcomes observed through implementation of the existing waiver, in cases where the State seeks renewal of a previously approved waiver.

For PY 2026 to 2027, Arizona requests the continuation of the following waivers:

- Use of individual training account (ITA) for in-school youth
- Lowering the out-of-school youth expenditure requirement (out-of-school priority)

Both waivers are intended to **support the Departments’ strategies³⁹ as well as promote** the State’s vision of economic growth and opportunity for all Arizonans and, specifically, its strategic goal of preparing Arizona’s youth for workforce success. To realize this goal, Arizona’s workforce system seeks to promote, for in-school and out-of-school youth, access to career services and training programs in high-growth industries.

Individual Training Account for In-School Youth

Regulatory Requirement to be Waived. Arizona requests to renew the waiver to establish an individual training account (ITA) for in-school youth. Under 20 CFR § 681.550, DOL allows ITA for out-of-school

³⁹ [America's Talent Strategy: Building the Workforce for the Golden Age](#)

youth, ages 16 to 24, using WIOA Youth funds. As the regulation specifically applies to out-of-school youth but not in-school youth, Arizona has requested the waiver to allow ITA for in-school youth as well. **The waiver has been approved until June 30, 2026.**

Barriers to Requesting the Waiver. Neither State nor local policies present any barriers to requesting the waiver.

Goals and Programmatic Outcomes. The strategic goal of preparing Arizona’s youth for workforce success applies to all youth: out-of-school as well as in-school. The ITA for in-school youth waiver will continue to facilitate, for all youth, access to training programs that lead to workforce success. Through an ITA, and similar to their out-of-school youth counterparts, in-school youth will have the opportunity to choose from training programs on the Eligible Training Provider List (ETPL), which have been vetted for quality and alignment with the State’s and the local area’s in-demand industries and occupations.

The waiver is expected to continue to positively impact youth participants. Specifically, for each program year that the waiver is in place, the State projects that the performance outcomes for in-school youth with an ITA will be higher than the overall performance outcomes for in-school youth.

Outcomes through Waiver Implementation. In PY 2024,⁴⁰ 44 in-school youth received training services through an ITA. Of those participants included in the PY 2024 performance indicators, in-school youth who received training with an ITA were more likely to have employment in the second and fourth quarters after exit, attained a credential, or achieved a measurable skill gain, and have higher earnings, as illustrated below:

Performance Outcomes for In-School Youth with ITA (PY 2024)

Indicator	In-School Youth with ITA-Funded Training			In-School Youth Total		
	Achieved a Positive Outcome	Qualified to Achieve a Positive Outcome	Rate (%)	Achieved a Positive Outcome	Qualified to Achieve a Positive Outcome	Rate (%)
Employment Rate 2nd Quarter	39	50	78%	229	324	71%
Median Earnings	\$8,776			\$5,629		
Employment Rate 4th Quarter	42	52	81%	234	316	74%

⁴⁰ Arizona’s PY 2024 Annual Report Narrative <https://des.az.gov/sites/default/files/media/WIOA-Annual-Statewide-Performance-Report-Narrative-Titles-I-III-PY2024.pdf?time=1772589551321>

Credential Attainment Rate	33	51	65%	159	291	55%
Measurable Skill Gains	41	53	77%	181	300	60%

In the 2024 waiver request, Arizona projected that the use of ITA for in-school youth would have the following impact:

- At least 75 in-school youth would use an ITA to fund occupational skills training on the ETPL.
- The employment rate for in-school youth with an ITA would be at least five percent higher than the overall employment rate for in-school youth.
- The credential attainment rate for in-school youth with an ITA would be at least 30 percent higher than the overall credential attainment rate for in-school youth.
- The measurable skill gains rate for in-school youth with an ITA would be at least 10 percent higher than the overall measurable skill gains rate for in-school youth.

The PY 2024 annual report shows in-school youth with an ITA performed better than expected in the following measures:

- Employment rate, second and fourth quarters after exit -- seven percent more than the overall employment rate for in-school youth.
- Measurable skill gains -- 17 percent more than the overall measurable skill gains rate for in-school youth.

While in-school youth with an ITA's credential attainment rate is 10 percent higher than the overall credential attainment rate of all in-school youth, the difference is less than the 30 percent projection described in the 2024 waiver request. The projections on credential attainment rate and the number of in-school youth using ITAs (at least 75 in-school youth) were informed by PY 2023 data,⁴¹ which showed the following: the credential attainment for in-school youth with an ITA was 28 percent more than the overall in-school youth credential attainment rate; and 82 in-school youth used an ITA.

Notwithstanding the decline in the number of in-school youth using an ITA, PY 2024 data (as well as prior ones noted here) show greater outcomes for in-school youth who used an ITA.

Alignment with DOL's Policy Priorities. The ITA for in-school youth supports **Pillar V: flexibility and innovation. It has allowed the State and local areas to tailor services according to the needs of the youth, enhancing their outcomes.** As previously described, the PY 2022 performance indicators show stronger employment and credential outcomes for in-school youth with an ITA, compared to in-school youth without an ITA.

Moreover, extending ITA to in-school youth aligns with WIOA's purpose of increasing access to and opportunities for employment, education, and training, particularly for individuals with barriers to

⁴¹ Arizona's PY 2023 Annual Report Narrative
<https://des.az.gov/sites/default/files/media/WIOA-Annual-Statewide-Performance-Report-Narrative-Titles-I-III-PY2023.pdf?time=1772557263184>

employment. Individuals who are low-income are a population considered to have a barrier to employment, and in-school youth are statutorily required to be low-income to be eligible for youth program services.

Individuals Affected by the Waiver. The waiver is expected to continue to benefit in-school youth by allowing training funds through an ITA:

- To support their transition from secondary education into a postsecondary training program on the ETPL.
- To help those enrolled in a training program on the ETPL complete their program.

Notably, the waiver will continue to assist those who were enrolled in the youth program as in-school youth but have subsequently dropped out or left school during program participation. Because such youth continue to be categorized as in-school youth, they would not have access to an ITA and its advantages without the waiver. Thus, the waiver fosters reengagement of “in-school youth” in the attainment of a recognized postsecondary credential.

Monitoring Progress in Implementing the Waiver. ADES will continue to monitor the progress in implementing the waiver through:

- Verifying the use of ITA to exclusively fund training programs on the ETPL for all participants, including in-school youth, as part of its annual programmatic monitoring.
- Periodic meeting with LWDB directors to review each local area’s implementation of the waiver and provide technical assistance, as appropriate.
- Data collection and performance outcomes analysis related to in-school youth with ITA, which will continue to be reported in the WIOA Annual Performance Report Narrative for Titles I and III.

Local Board and Public Comment on the Waiver. From December 17, 2025 to January 5, 2026, the State surveyed local workforce development board directors and staff about waiver requests, and 88 percent of respondents agreed that the ITA for in-school youth waiver would reduce barriers to service delivery, promote innovative programmatic options, enhance outcomes for job seekers and employers, and support the State’s strategic goals.

The ITA for in-school youth waiver request is applicable statewide and is being submitted to DOL as part of Arizona's Unified State Plan **Modification**, which is available for public review and comment from **March 23, 2026 to April 3, 2026**.

Out-of-School Priority

Regulatory Requirement to be Waived. Arizona requests to continue the waiver on the out-of-school priority under WIOA section 129(a)(4)(A) and 20 CFR § 681.410, which requires that at least 75 percent of statewide funds spent on direct services to youth and local area youth funds, excluding administrative costs, be used for out-of-school youth.

Arizona requests to lower the out-of-school youth expenditure requirement from 75 percent to 50 percent of statewide and local area funds. **The waiver was initially requested in 2024 and has been approved until June 30, 2026.**

Barriers to Requesting the Waiver. Neither State nor local policies present any barriers to requesting the waiver.

Goals and Programmatic Outcomes. A waiver that lowers the out-of-school youth expenditure requirement from 75 percent to 50 percent aligns with the State’s goal of preparing Arizona’s youth, both in-school and out-of-school, for workforce success. It also aligns with the State’s current waiver that allows the use of ITAs for in-school youth, as previously described.

The waiver will facilitate continued support for statewide initiatives, such as the Free Application for Federal Student Aid (FAFSA) Challenge and the Jobs for Arizona Graduate (JAG) programs. Both programs promote successful transition to postsecondary education and underscore the impact of postsecondary education on earnings, [which increase as educational attainment rises](#).⁴² In coordination with the Arizona College Campaign program, the FAFSA Challenge’s goal is 60 percent postsecondary education attainment statewide by 2030. The JAG program provides targeted support to high school students before and after graduation. It has notably served youth belonging to priority populations under WIOA, including low-income youth.

In addition, the waiver will extend the flexibility for local areas to enroll more in-school youth, when warranted by the local area’s demographic composition, and deliver appropriate services that are based on the youth’s needs and goals, rather than the youth’s school status at program enrollment.

Three local workforce development boards have submitted support letters for the out-of-school priority waiver **for PYs 2024 and 2025** and highlighted the following to reinforce the request:

- Data on school attendance: School attendance is a criterion for eligibility as an in-school youth in the Title I-B Youth program, and two local areas noted a higher proportion of youth who are attending school than those who are not.
One local area has an in-school youth population of 11,643 (16-18 years old), compared to 10,388 out-of-school youth (19-24 years old). Its overall dropout rate is at 4.8 percent. Another local area reported a graduation rate of 88.6 percent to illustrate, in part, that a significant portion of area youth who are potentially eligible for services are in school.
- Targeted support for priority populations: Another local area seeks to leverage the waiver to promote equitable outcomes for in-school youth. Local area data shows that certain students who are considered to be individuals with barriers to employment under WIOA are less likely to graduate from high school within four years, compared to the overall local area rate of 78.3 percent. For instance, 52.6 percent of students in foster care graduate within four years, while 58.1 percent of homeless students graduate within four years.

The 2024 waiver request projected that approximately 500 more in-school youth would be served, using both local area and statewide funds, as a result of the waiver. **While PY 2024 did not see an increase in in-school youth served in the local areas, Arizona anticipates that the continuation of the out-of-school priority waiver will promote stronger outcomes for youth -- when services are provided to close any gaps**

⁴² <https://www.bls.gov/careeroutlook/2023/data-on-display/education-pays.htm>

between youth skills and employer needs and funding restrictions based on youth's school status at program entry are eased.

Alignment with DOL's Policy Priorities. The waiver supports **Pillar V: flexibility and innovation**. It has allowed the State and local areas to tailor services according to the needs of the youth, enhancing their outcomes. In addition, it aligns with WIOA's purpose of increasing access to and opportunities for employment, education, and training, particularly for individuals with barriers to employment. Individuals who are low-income are a population considered to have a barrier to employment, and in-school youth are statutorily required to be low-income to be eligible for youth program services.

Individuals Affected by the Waiver. The waiver is expected to benefit in-school youth, including those who left or dropped out of school during program participation, by allowing the use of more program funds to provide them with appropriate and necessary career and training services.

The waiver is not intended to decrease out-of-school youth participation nor diminish their services. Rather, and as noted earlier, it will allow programs to provide services based on need instead of school status⁴³.

The waiver will not preclude out-of-school youth expenditure of more than 50 percent, or even up to 100 percent, if warranted by the needs of the youth population each program serves.

Monitoring Progress in Implementing the Waiver. ADES will monitor the progress in implementing the waiver through:

- Periodic meetings with LWDB directors to review each local area's implementation of the waiver and provide technical assistance, as appropriate.
- Data collection and performance outcomes analysis, which will continue to be reported in the WIOA Annual Performance Report Narrative for Titles I and III.

Local Board and Public Comment on the Waiver. From December 17, 2025 to January 5, 2026, the State surveyed local workforce development board directors and staff about waiver requests, and 75 percent of respondents agreed that the out-of-school youth priority waiver would reduce barriers to service delivery, promote innovative programmatic options, enhance outcomes for job seekers and employers, and support the State's strategic goals.

The out-of-school youth priority waiver request is applicable statewide and is being submitted to DOL as part of Arizona's Unified State Plan **Modification**, which is available for public review and comment from **March 23, 2026 to April 3, 2026**.

Program-Specific Requirements for Wagner-Peyser Program (Employment Services)

All Program-Specific Requirements provided for the WIOA core programs in this section must be addressed for either a Unified or Combined State Plan.

⁴³ Once the school status of a youth is determined, that school status remains the same throughout the youth's participation in the WIOA youth program. This distinction is drawn for purposes of reporting against the OSY expenditure requirement ([TEGL 21-16](#)).

a. Employment Service Staff

1. Describe how the State will staff the provision of labor exchange services under the Wagner-Peyser Act, such as through State employees, including but not limited to state merit staff employees, staff of a subrecipient, or some combination thereof.

Arizona continued to utilize state merit staff, and anticipates minimal changes will be needed to comply with the requirements as outlined in the U.S. DOL published Wagner-Peyser Act Staffing Final Rule (88 FR 82658, November 24, 2023) that requires states to use state merit staff to provide ES services. **With the announcement of the delay of the compliance date⁴⁴ for the Wagner-Peyser Act Staffing Final Rule, Arizona intends to explore alternative staffing models, should the flexibility become available.**

2. Describe how the State will utilize professional development activities for Employment Service staff to ensure staff is able to provide high quality services to both jobseekers and employers

The professional development provided to new ES staff working with job seekers and employers consists of New Employee Orientation, Onboarding Basic Skills Training, and periodic continuing education classes, on an as-needed basis. To ensure that staff are prepared and able to provide high-quality services to both job seekers and employers, weekly reflection meetings are conducted to address and review metrics, program concerns, problem solving techniques, and discuss best practices. In addition, regular monitoring of staff performance by managers/supervisors, will be conducted for the development of additional classroom training activities, webinars, and individualized training.

ES training objectives include an introduction to ARIZONA@WORK partner programs, Career Exploration, How to Conduct a Job Search, and Customer Service. In addition, an in-depth Computer Based Training (CBT) on the Arizona Job Connection records data system training that covers; Getting Started, Systems Search, Adding Information, and Enrollments. Targeted training is also offered to staff, to obtain nationally recognized Workforce Development Certifications. Supervisors and managers are required to complete: Benefits and Challenges of Remote Work, Effective Leadership Practices, Communication Best Practices for Leaders, and Effective Performance Management. All staff members are offered opportunities for education and career enhancement and personal development, through the incorporation of workforce development related LinkedIn Learning courses. This training through LinkedIn Learning focuses on areas of professional development that enhance their ability to provide better services to job seekers. Additional courses that have been established include; Remote Work Basics, Successful Communications and Teamwork in a Remote Environment, Ergonomics and Safety in the Home Office, and Security Concerns in a Remote Work Environment.

Additionally, ES staff have the following opportunities to discuss subjects, including career pathways, labor market information, current industry needs and employer projects, and other items relevant to the current economy through: (i) weekly ARIZONA@WORK Statewide Business Services virtual meetings to encourage best practices, employer programs, and employer projects to be shared with the entire team; (ii) trainings to keep the team prepared with the most current employer program information or

⁴⁴ **[Training and Employment Notice 10-23, Change 1 Announcing the Release of Wagner-Peyser Act Staffing, Delay of Merit Staffing Compliance Date Final Rule](#)**

initiatives for employers from executive leadership or the Governor's Office; (iii) provide assistance to all business service teams throughout ARIZONA@WORK partners to work together and prevent duplication; and (iv) the opportunity to attend training to learn about the value of hiring veterans, individuals with disabilities or who are justice-involved.

3. Describe strategies developed to support training and awareness across core programs and the Unemployment Insurance (UI) program and the training provided for Employment Services and WIOA staff on identification of UI eligibility issues and referral to UI staff for adjudication

The launch of the [Comprehensive Arizona Claims Tracking Unemployment Insurance System](#)⁴⁵ (known as CACTUS), the State's new UI web-based system took place in September 2025. Information continues to be provided by Unemployment Insurance leadership on the monthly ARIZONA@WORK partner meetings on the identification of UI eligibility issues and [referral to Unemployment Insurance](#) for adjudications. Core program partners who participate in the monthly meetings are provided with updates, clarification, and guidance. Questions are responded to during the meeting and any follow-up actions are shared at the next scheduled meeting. In addition, Unemployment Insurance information is posted on the Arizona Department of Economic Security website: [Unemployment Insurance Benefits](#)⁴⁶ with links to video tutorials, in English and Spanish.

Employment Service team members have limited access to CACTUS. Unemployment Insurance leadership also provided training to Employment Service team members on their CACTUS access to view a claimant's status and pending issues with the claimant's account. In addition, Unemployment Insurance leadership worked with Employment Service leadership to develop standard work to assist claimants who visit an Arizona Job Center with UI issues in CACTUS. Issues that cannot be supported by the Employment Service team member are escalated to a Unemployment Insurance team member who will contact the claimant within three business days. The development of structured CACTUS training modules that may be accessed by core program partners are planned for future release.

b. Explain how the State will provide information and meaningful assistance to individuals requesting assistance in filing a claim for unemployment compensation through one-stop centers, as required by WIOA as a career service

In September 2025, the State launched the [Comprehensive Arizona Claims Tracking Unemployment Insurance System](#)⁴⁷ (known as CACTUS), its new Unemployment Insurance web-based system. Video tutorials, in English and Spanish, are posted on the Arizona Department of Economic Security website: [Unemployment Insurance Benefits](#)⁴⁸ to guide claimants, and those assisting them, on how to file a new unemployment insurance claim and how to file a weekly claim, as well as CACTUS access instructions and dashboard. Claimants may access CACTUS at any comprehensive ARIZONA@WORK Job Center or ARIZONA@WORK affiliate site resource room which are equipped with telephones, fax machines, and computers to submit Unemployment Insurance claims and contact the Unemployment Insurance Call

⁴⁵ <https://uibenefits.az.gov/vosnet/default.aspx>

⁴⁶ <https://des.az.gov/services/employment/unemployment-individual>

⁴⁷ <https://uibenefits.az.gov/vosnet/default.aspx>

⁴⁸ <https://des.az.gov/services/employment/unemployment-individual>

Center for additional information and assistance in addition to perform job searches or accessing career services.

Employment Service team members are available to assist claimants who require additional assistance. Employment Service team members have limited access to CACTUS and have received training from UI in order to view a claimant's status and pending issues with the claimant's account. UI issues that cannot be supported by the Employment Service team member are escalated to a UI team member who will contact the claimant within three business days.

c. Describe the State's strategy for providing reemployment assistance to UI claimants and other unemployed individuals

Claimants may access CACTUS, at any ARIZONA@WORK Job Center to submit Unemployment Insurance claims and contact the Unemployment Insurance Call Center for additional information and assistance. Through the automated interface between the CACTUS and Arizona Job Connection (AJC), all claimants are registered as job seekers in AJC within 24 hours of filing for unemployment benefits. This registration includes the client's email address, (if provided) demographics, and basic work history. Claimants may engage Employment Service team members to receive reemployment assistance at an ARIZONA@WORK Job Center, online through a Google Meet appointment, or by phone (1-833-762-8196). Reemployment assistance includes job search; create or edit resumes; recruitment connections including hiring events and job fairs; information on job market trends; referrals to work based learning or other workforce programs to assist with addressing employment barriers.

Employment Service team members also receive referrals from the RESEA Program to provide reemployment assistance to selected UI claimants throughout the state of Arizona. The collaboration between the UI Benefits Program and the RESEA Program allows the RESEA staff to provide more efficient service to RESEA participants: UI claimants profiled as most likely to exhaust their UI benefits. The RESEA Program is conducted 100 percent virtually, providing coverage to all the workforce development areas statewide. The RESEA Program strategies include reducing the "no show" rate of scheduled RESEA appointments and evaluating service delivery processes by analyzing key performance indicators such as the number of individuals who complete the RESEA appointments and who return to work prior to the exhaustion of their UI benefits. This collaboration ensures that claimants receive educational information in their UI packet about reemployment services through ARIZONA@WORK and receive targeted email notices promoting job opportunities and hiring events in their area.

d. Describe how the State will use W-P funds to support UI claimants, and the communication between W-P and UI, as appropriate including the following:

1. Coordination of and provision of labor exchange services for UI claimants as required by the Wagner-Peyser Act;
2. Registration of UI claimants with the State's employment service if required by State law;
3. Administration of the work test for the State unemployment compensation system, including making eligibility assessments (for referral to UI adjudication, if needed), and providing job finding and placement services for UI claimants; and
4. Provision of referrals to and application assistance for training and education programs and resources.

Employment Service staff are co-located with team members that support Adult, Dislocated Worker, and Youth programs in ARIZONA@WORK Job Centers across the state. ES staff are equipped to respond to the needs of UI claimants with services available through ARIZONA@WORK Job Centers and/or through virtual methods statewide. ES staff provides a variety of labor exchange services to prepare UI claimants in all aspects of job readiness, such as job matching, job referrals, and placement assistance.

ARIZONA@WORK requires registration and ES enrollment into ES for all approved UI claimants, based on information provided during initial filing of the UI claim. An account is created for each UI claimant in the Arizona Labor Exchange System - Arizona Job Connection (AJC) to provide these job seekers with access to self-serve or staff assisted ES such as resume creation, job search, training and education programs, and information on hiring events across the state. Staff can view job seeker resumes and work history and make job referrals based on the claimants' interests, skills, and abilities. ES staff can play an important role in guiding UI claimants towards education and training organized around career pathways, through a range of one-on-one assistance including counseling and career planning, training provider information, and referrals for training and education to other ARIZONA@WORK and local partners.

e. Agricultural Outreach Plan (AOP). Each State agency must develop an AOP every four years as part of the Unified or Combined State Plan required under sections 102 or 103 of WIOA. The AOP must include an assessment of need. An assessment describes the unique needs of farmworkers in the area based on past and projected agricultural and farmworker activity in the State. Such needs may include but are not limited to: employment, training, and housing.

1. Assessment of Need. Provide an assessment of the unique needs of farmworkers in the area based on past and projected agricultural and farmworker activity in the State. Such needs may include but are not limited to: employment, training, and housing.

Arizona's Agricultural Outreach Plan includes a variety of strategies to ensure that the full range of employment and training programs and services, delivered through the ARIZONA@WORK system, are accessible and meet the needs of MSFWs. The MSFW Outreach Team, within Arizona's State Workforce Agency (SWA) - DES, will provide services through commonly branded ARIZONA@WORK Job Centers to assist MSFWs and English Language Learners (ELL) individuals to make career and labor market decisions,

receive support service referrals to local providers, and identify opportunities to improve their lives. WIOA principles will be utilized to enhance service delivery to the MSFW population statewide through the ability to tailor services in the LWDA with partners who are able to provide services and meet the needs of this population. Service delivery to MSFWs will be consistent with 20 CFR § 653.107, WIOA Title I final regulations, and applicable WIOA workforce development strategies. Program performance will be monitored continuously to ensure that outreach and program services are conducted in accordance with Federal program mandates for services to MSFWs that are qualitatively equivalent and quantitatively proportionate to services provided to other categories of workers. LWDBs will develop local plans to include how MSFWs will be served to ensure their needs are being met.

The SWA recognizes that farmworkers possess specific needs and face certain barriers that result from cultural, educational, linguistic, scheduling, logistic, and other dynamics that are inherent to that population. Farmworker needs include, but are not limited to the following:

- Timely labor market information to facilitate planning for continuous employment;
- Occupational guidance and **referral to** training to maintain a job or transition into a different occupation or industry;
- **Referral to supportive services**, including transportation to seek employment;
- **Referral to** affordable and adequate housing;
- Information from various jurisdictions on labor laws and worker rights, protections, and responsibilities;
- Supportive services to enable MSFWs to obtain and maintain employment;
- **Information or education on** fair and equitable conditions and supervision from trained and committed field foreman, supervisors and farm labor contractors;
- **Information or education on** fair and equitable pay that includes health benefits; this is a necessity for the laborers, as well as for the safety of our nation's food supply and reducing health and public assistance cost; and
- **Training on** pesticide and heat stress prevention.

Barriers that confront farm workers include, but are not limited to the following:

- Decreased demand for a farmworker labor force due to innovations in automated farming, agricultural technology, and application of chemical herbicides;
- Urban sprawl resulting in farmworker job displacement without corresponding assistance for reemployment;
- Lack of timely, reliable data and information pertinent to intrastate and interstate job openings and supportive services;
- Provider service delivery hours of operation that conflict with MSFWs work schedules;
- Lack of transportation, limiting access to jobs and supportive services;
- Limited employment opportunities in rural areas, and increased competition for entry– level jobs;
- Underemployment or unemployment due to limited literacy education, LEP skills, and lack of non– agricultural job experience;

- Limited participation in support programs due to lack of understanding of eligibility and other factors, such as impact on immigration status for having utilized certain services;
- Lack of full-time, year-round work, combined with low wages, that relegates MSFWs to living below the poverty line;
- Competition from undocumented workers who work for less pay and substandard living and working conditions;
- Competition from intrastate and interstate farm labor contractors who follow migrant streams accompanied by their own farmworker crews;
- Limited educational opportunities for MSFWs and English Language Learner individuals;
- Lack of knowledge with respect to automation (phones and computers), resulting in increasing challenges to access information, services, and benefits;
- Stigma associated with working/living a seasonal lifestyle in conjunction with crop seasons (Non-Agricultural employers expect seasonal farmworkers to quit when the season starts again, and are, therefore, reluctant to hire them);
- Limited job search techniques/skills for finding jobs outside of agriculture; and
- Lack of understanding on the benefits of having a full-time, year-round job with benefits versus a seasonal job that may pay a higher per hour wage.

2. An assessment of the agricultural activity in the State means: 1) Identifying the top five labor-intensive crops, the months of heavy activity, and the geographic area of prime activity; 2) Summarize the agricultural employers' needs in the State (i.e. are they predominantly hiring local or foreign workers, are they expressing that there is a scarcity in the agricultural workforce); and 3) Identifying any economic, natural, or other factors that are affecting agriculture in the State or any projected factors that will affect agriculture in the State

The top five labor-intensive crops in Arizona include broccoli, cauliflower, lettuce, celery, and cabbage. Typically crop harvest or peak season and the ability to grow certain crops varies on the climate. The months of heavy activity are November through March in the Southwest part of Arizona. Northern Arizona has a colder climate than Southern Arizona. January through March is the peak crop harvest season for broccoli, cabbage, carrots, and celery in both regions. April to June is characterized by sweet corn, cantaloupe, and tomatoes in the North and squash, onions, cucumbers, and apricots in the South. July to September is peak season for melons, sweet corn in the North and apples, and dates in the South. Yuma County, in the Southwestern part of the state, is built around agriculture, and lettuce and most other vegetables are primarily harvested here during the last quarter of the CY. The "Guide to Arizona Agriculture"⁴⁹ by the Arizona Department of Agriculture was used to reference the peak harvest months.

Growers share concerns over the effect that water shortages in Arizona have had on crops, as well as a noticeable trend of migrant seasonal workers not returning to work the following season. Concerns related to the water shortage in Arizona include lawmakers regulating the usage of water. Employers are using technology such as aquapods and drip system irrigation to control and reduce water usage. The agriculture industry in Arizona has also faced changes in the irrigation system, resulting from the latest

⁴⁹ https://agriculture.az.gov/sites/default/files/AZDA_GuideToAZAg_2018.pdf

impact of the E.coli outbreak in 2018. Farms in Arizona worked closely with the University of Arizona and together, they established systems to treat open water sources for their irrigation systems. This impact has also caused farmers to take measures in having to discard crops due to contamination.

3. An assessment of the unique needs of farmworkers means summarizing Migrant and Seasonal Farm Worker (MSFW) characteristics (including if they are predominantly from certain countries, what language(s) they speak, the approximate number of MSFWs in the State during peak season and during low season, and whether they tend to be migrant, seasonal, or year-round farmworkers). This information must take into account data supplied by WIOA Section 167 National Farmworker Jobs Program (NFJP) grantees, other MSFW organizations, employer organizations, and State and/or Federal agency data sources such as the U.S. Department of Agriculture and the U.S. Department of Labor (DOL) Employment and Training Administration

Data indicates that migrant farmworkers in Arizona are primarily from Mexico, Peru, Guatemala, and El Salvador. The primary languages spoken by migrant farmworkers include various dialects derived from Mesoamerican languages spoken in southern Mexico and Central America, Spanish, and English. The dialects most commonly used by farmworkers in Arizona are Arawakan (Peru), Nahuatl (Central Mexico), Mixtec, and Zapotec (Southern Mexico and Oaxaca). The estimated population of MSFWs in Arizona is approximately **160,693**, including dependents, and is based on the most recent **2024 Arizona Farmworker Enumeration Profiles Study (AZ-FEPS) released by the University of Arizona in October 2024.**⁵⁰ Arizona farm labor estimates indicate **80,437** total workers, broken down into subgroups as follows:

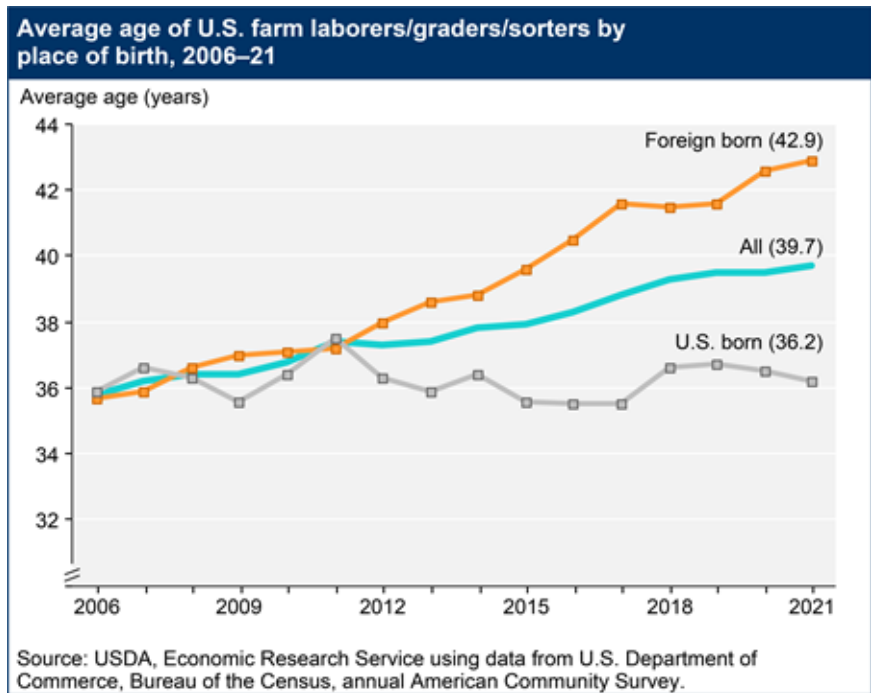
- **22,872** migrant workers;
- **57,565** seasonal workers; and
- **11,136** livestock workers

(Note: data from **2024**).

The Hired Farm Workforce Is Aging

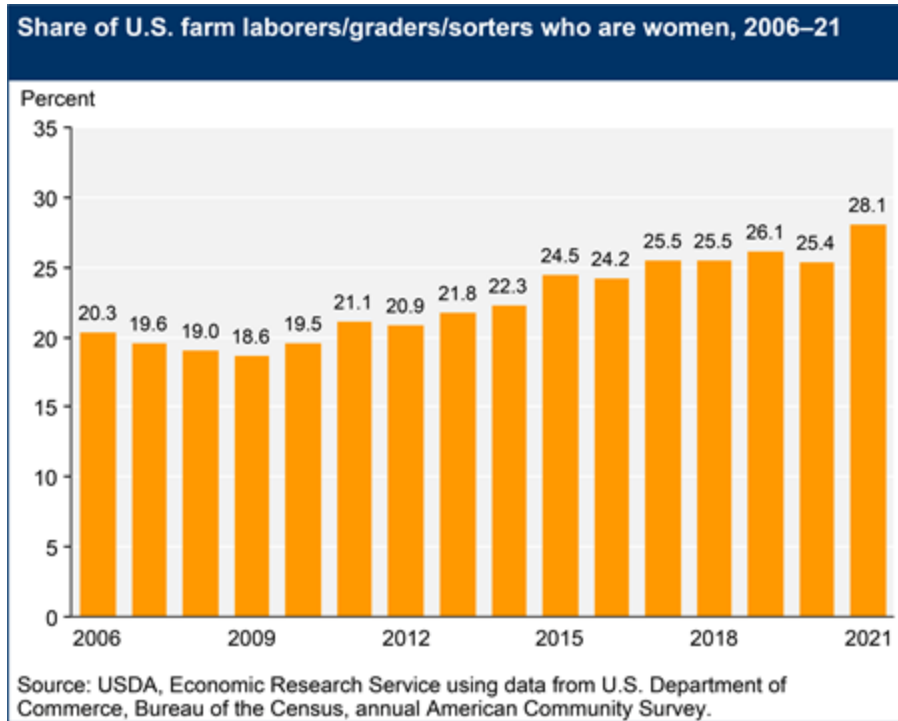
As fewer young immigrants are entering agriculture, the average age of foreign-born farmworkers has risen, pulling up the average for the farm workforce as a whole. The average age of immigrant farmworkers rose by seven years between 2006 and 2021. In contrast, the average age for U.S. born farmworkers has remained roughly constant over this period.

⁵⁰ [Arizona Farmworker Enumeration Profiles Study \(AZ-FEPS\)](#)



Women Are an Increasing Share of the Hired Farm Workforce

The share of farmworkers who are women declined in 2006–09, from 20.3 percent to 18.6 percent, but has since climbed to 28.1 percent (in 2021). The fact that the female share fell during the Great Recession and has risen during the recovery is consistent with men moving into agriculture as employment in the nonfarm economy declines, and out of agriculture as nonfarm job prospects improve. The rising female share is also consistent with the fact that, as labor costs rise, some growers are adopting mechanical aids (such as hydraulic platforms that replace ladders in tree-fruit harvesting, and mobile conveyor belts that reduce the distance heavy loads must be carried) which facilitate more women and older workers in performing tasks that traditionally have been performed by younger men.



This population estimate reflects input received from the U.S. Department of Agriculture, DOL, U.S. Department of Education, U.S. Census Bureau, U.S. Department of Health and Human Services, and Reference USDA. Many organizations and government agencies that work with the MSFW population use such enumeration report data in providing services, planning, policy setting, health care support, regulatory assistance, identification of underserved areas, agricultural production, determining whether resources are appropriate to the need, and many other areas. The National Center for Farmworker Health report is used by several agencies to estimate and plan for services to the farmworker population in Arizona. To ensure the most current population data is considered, the SWA will collaborate with other MSFW service providers and partner entities in a coordinated effort to continue to capture current information to track this population. Study updates will include information on individuals engaged in field and orchard agriculture, food processing, and horticultural specialties, and will assess the make-up of animal agriculture. This data is the most current available.

Seasonal and migrant farmworkers are identified, coded, tracked and referenced in service reports for the purpose of meeting compliance with Federal program requirements. Farm Labor Contractors and Farm Labor Contractor Employees, i.e., crew leaders and field foremen/supervisors, employed seasonally by more than one agricultural producer, will be coded as migrant and/or seasonal farmworkers, and services provided to them will contribute to the attainment of program indicators of compliance. The SWA will focus its efforts to identify and provide services to migrant farmworkers and agricultural employers. Migrant farmworkers have a greater need for support services when they migrate to areas where they are not familiar with potential services and resources, while agricultural employers face concern over scarcity of farmworkers due to lack of U.S. domestic applicants, need for immigration policy change, and immediate improvement to legislation and regulations impacting the agricultural industry.

Arizona engages MSFW service providers to identify and address needs, explore solutions, and collaborate to remove barriers to improve living and working conditions.

4. Outreach Activities

The local offices outreach activities must be designed to meet the needs of MSFWs in the State and to locate and contact MSFWs who are not being reached through normal intake activities. Describe the State agency's proposed strategies for:

Many Farmworkers throughout the state are not aware of the services that are available to them through State programs and partner agencies outside of UI and SNAP. If they do visit the ARIZONA@WORK Job Centers, it's to file for UI benefits or to report a situation that has occurred in their work environment. Arizona ensures that the same services that are available to the general public are also available to the MSFW population. To facilitate this, Outreach Workers and the SWA are committed to meeting with them wherever they meet and/or congregate.

A. Contacting farmworkers who are not being reached by the normal intake activities conducted by the employment service offices

The MSFW team has increased the number of outreach workers and has strategically added new team members in the Maricopa County area. This new team is located in the central part of Arizona which will allow the program as a whole to reduce travel time and allow the team to conduct more outreach. This will allow the Yuma County team to better cover Yuma and La Paz Counties and the Maricopa team to cover the rest of the state.

This will result in reaching more farmworkers and employers in new areas where there has been very little activity in the past. MSFW outreach staff will emphasize providing useful information to agricultural employers, ELL individuals, and MSFWs to enable them to exercise informed choices on accessing services through multiple physical and/or electronic entry-points. Outreach policy will afford staff the flexibility, time, tools, and training necessary to participate in joint ventures to identify and address dynamics that affect living and working conditions within farmworker communities:

- A MOU with the National Farmworker Jobs Program (NFJP) Partner with Portable Practical Educational Preparation, (PPEP) to maximize and co-coordinate outreach efforts throughout Arizona;
- Conducting H-2A worker orientations at the beginning of the season to provide information on workers' rights, ES Complaint System,
- ES, training assistance, and local support services;
- Attending the Migrant Farmworker Programs offered in some school systems to support the migrant population;
- Attending health and local community activities that draw farm workers;
- Collaborating with other organizations that serve the farm worker population;
- Posting informational flyers in laundromats, churches and stores where workers are known to congregate after work, and where farm worker family's shop;

- Setting up information tables at stores and events, when farm workers are waiting for pick-up or drop-off during workdays;
- Attending job fairs and recruiting events;
- Coordinating with LWDBs to create recruiting events for agricultural companies to help create a domestic workforce;
- Expand the partnership with the Mexican Consulate in various locations throughout the state to include Nogales, Douglas, Yuma and Phoenix. This will include co-outreaches and sharing knowledge of services available to MSFW clients;
- Collaborate with the Department of Education’s Migrant Education Program to conduct co-outreaches and provide resources for MSFWs and their families; and
- Partner with the Arizona Alliance for Community Health Centers. This network allows the MSFW staff to conduct co-outreaches with these teams, provide basic healthcare needs to workers, and provide beneficial information to the farmworkers. The team has also been able to connect employers to this network to provide health fairs for their employees. The Arizona MSFW Program will continue to leverage this partnership in Yuma, Maricopa, La Paz, and Pima Counties.

B. Providing technical assistance to outreach staff. Technical assistance must include trainings, conferences, additional resources, and increased collaboration with other organizations on topics such as one-stop center services (i.e. availability of referrals to training, supportive services, and career services, as well as specific employment opportunities), the Employment Service and Employment-Related Law Complaint System (“Complaint System” described at 20 CFR 658 Subpart E), information on the other organizations serving MSFWs in the area, and a basic summary of farmworker rights, including their rights with respect to the terms and conditions of employment.

Increased collaboration between the SWA and other organizations, such as the U.S. DOL Wage and Hour Division has provided training on the Migrant Seasonal Protection Act, field Visits, and housing inspections. The Arizona Department of Agriculture (AZDA) and the U.S. Occupational Safety and Health Administration (OSHA), have provided increased opportunities to offer technical assistance to outreach staff, such as training, conferences, and additional resources like the Arizona Interagency Farmworker Coalition (AIFC) Conference; and various trainings, including:

- Sexual Harassment in the Fields;
- Discrimination;
- OSHA Compliance;
- Apparent Violations;
- Human Trafficking;
- Food Safety; and
- Pesticides.

Employment Services and Employment-Related Law Complaint System

In Arizona, ES staff, MSFW outreach representatives, ES Complaint Representatives, Title 1B, NFJP Grantee Staff, and the State Monitor Advocate work in conjunction to train staff representatives to recognize MSFW complaint related issues to ensure a seamless referral and warm handoff to each other.

Partner agencies dedicated to serving the MSFW population play a major part in the collaboration to assist this population. As barriers are identified, cross-referrals are made between agencies to meet the farm workers' needs. On a quarterly basis, partner agencies are reporting approximately 1,600 MSFWs contacted during outreach activities.

Outreach activities from partner agency connections include:

- Healthcare agencies;
- Health and career fairs;
- Training opportunities;
- Community events;
- Job Fairs and recruiting events; and
- Seminars.

The SWA provides a wide variety of professional development training to staff and outreach workers designed to strengthen how staff obtain, retain, and apply knowledge, skills, and attitudes:

- **Customer Service Excellence:** Provides individuals with basic principles of customer service and demonstrates techniques and best practices to improve relationships among internal and external customers and stakeholders.
- **Dealing with Difficult Situations:** Prepares participants to utilize listening and communication skills when working with individuals who tend to be argumentative, passive, inconvenient and/or contradictory in the work environment.
- **De-Escalating Conflict:** Prepares participants to use skills and strategies to develop positive and meaningful relationships, identify their unique perspective and style of handling conflict, and explore practical ways to reduce and de-escalate work-place conflict.
- **Critical Thinking and Decision Making:** Helps participants improve their critical thinking and decision-making skills. The decision-making process, decision-making styles, ethical decision-making and problem-solving will be examined.
- **Bridging the Communication Gap:** Teaches participants to learn how to improve communication with team members through knowledge of perception, simple techniques for clear expectations, how to help others to produce quality work, and to de-escalate volatile situations.
- **Leadership Foundation:** Designed to give new and aspiring leaders the foundation to build confidence, productivity, and the ability to get things done through other people. At the conclusion of this course, leaders will gain more insight into developing and mentoring their team, creating an engaging workplace, and developing their own leadership savvy.
- **Strengthening Communication Strategies:** Designed to improve communication skills, teamwork and customer satisfaction while decreasing interoffice conflicts.

The seven courses listed above along with a wide variety of other professional development curricula and a Personal Development Plan helps the SWA promote and implement the Arizona Management System principles and practices to develop people, establish and communicate accountability, and promote problem-solving throughout DERS and ARIZONA@WORK.

C. Increasing outreach worker training and awareness across core programs including the Unemployment Insurance (UI) program and the training on identification of UI eligibility issues.

4) Outreach Activities. *The local offices outreach activities must be designed to meet the needs of MSFWs in the State and to locate and contact MSFWs who are not being reached through normal intake activities. Describe the State agency's proposed strategies for*

(1) Contacting farmworkers who are not being reached by the normal intake activities conducted by the ES offices.

Many Farmworkers throughout the state are not aware of the services that are available to them through State programs and partner agencies outside of UI and SNAP. If they do visit the ARIZONA@WORK Job Centers, it's to file for UI benefits or to report a situation that has occurred in their work environment. Arizona ensures that the same services that are available to the general public are also available to the MSFW population. To facilitate this, the Outreach Team and the SWA are committed to meeting with them wherever they meet and/or congregate. The MSFW Outreach Team has increased the number of outreach workers and has strategically added new team members in the Maricopa County area. This new team is located in the central part of Arizona which will allow the program as a whole to reduce travel time and allow the team to conduct more outreach. This will allow the Yuma County team to better cover Yuma and La Paz Counties and the Maricopa team to cover the rest of the state.

This will result in reaching more farmworkers and employers in new areas where there has been very little activity in the past. MSFW Outreach Team will emphasize providing useful information to agricultural employers, ELL individuals, and MSFWs to enable them to exercise informed choices on accessing services through multiple physical and/or electronic entry-points. Outreach policy will afford staff the flexibility, time, tools, and training necessary to participate in joint ventures to identify and address dynamics that affect living and working conditions within farmworker communities:

- A MOU with the National Farmworker Jobs Program (NFJP) Partner with Portable Practical Educational Preparation, (PPEP) to maximize and co-coordinate outreach efforts throughout Arizona;
- Conducting H-2A worker orientations at the beginning of the season to provide information on workers' rights, ES Complaint System,
- ES, training assistance, and local support services;
- Attending the Migrant Farmworker Programs offered in some school systems to support the migrant population;
- Attending health and local community activities that draw farm workers;
- Collaborating with other organizations that serve the farm worker population;
- Posting informational flyers in laundromats, churches and stores where workers are known to congregate after work, and where farm worker family's shop;
- Setting up information tables at stores and events, when farm workers are waiting for pick-up or drop-off during workdays;
- Attending job fairs and recruiting events;

- Coordinating with LWDBs to create recruiting events for agricultural companies to help create a domestic workforce;
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(2) Providing technical assistance to outreach staff. *Technical assistance must include trainings, conferences, additional resources, and increased collaboration with other organizations on topics such as one-stop center services (i.e. availability of referrals to training, supportive services, and career services, as well as specific employment opportunities), the ES and Employment-Related Law Complaint System (“Complaint System” described at 20 CFR 658 Subpart E), information on the other organizations serving MSFWs in the area, and a basic summary of farmworker rights, including their rights with respect to the terms and conditions of employment.*

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- Discrimination;
- OSHA Compliance;
- Apparent Violations;
- Human Trafficking;
- Food Safety; and
- Pesticides.

(3) Increasing outreach staff training and awareness across core programs including the Unemployment Insurance Program and the training on identification of UI eligibility issues.

The State Agency will provide training of core programs by the representatives of those core programs such as Family Assistance Administration and Unemployment Insurance Program on a yearly basis minimum to all outreach staff. Throughout the year, The State Agency will partner with these programs to have them conduct meetings with the outreach staff twice a year to inform them of any changes that

can help or impact outreach. In addition, the contact information for these agencies will be incorporated in the outreach materials given to the farmworkers. The State Agency will assign the outreach staff any training conducted by the Department of Labor NMA System, Monthly SWA meetings, SWA Conferences, and Workforce GPS Events to help increase awareness of these services.

(4) Providing outreach staff professional development activities to ensure they are able to provide high quality services to both jobseekers and employers.

In Arizona, ES staff, MSFW outreach Staff, ES Complaint Representatives, Title 1B, NFJP Grantee Staff, and the State Monitor Advocate work in conjunction to train staff representatives to recognize MSFW complaint related issues to ensure a seamless referral and warm handoff to each other. Partner agencies dedicated to serving the MSFW population play a major part in the collaboration to assist this population. As barriers are identified, cross-referrals are made between agencies to meet the farm workers' needs. On a quarterly basis, partner agencies are reporting approximately 1,600 MSFWs contacted during outreach activities.

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- Leadership Foundation: Designed to give new and aspiring leaders the foundation to build confidence, productivity, and the ability to get things done through other people. At the

conclusion of this course, leaders will gain more insight into developing and mentoring their team, creating an engaging workplace, and developing their own leadership savvy.

- Strengthening Communication Strategies: Designed to improve communication skills, teamwork and customer satisfaction while decreasing interoffice conflicts.

The seven courses listed above along with a wide variety of other professional development curricula and a Personal Development Plan helps the SWA promote and implement the Arizona Management System principles and practices to develop people, establish and communicate accountability, and promote problem-solving throughout DERS and ARIZONA@WORK.

D. Providing State merit staff outreach workers professional development activities to ensure they are able to provide high quality services to both jobseekers and employers

The SWA provides a wide variety of professional development training to staff and outreach workers designed to strengthen how staff obtain, retain, and apply knowledge, skills, and attitudes:

- Customer Service Excellence: Provides individuals with basic principles of customer service and demonstrates techniques and best practices to improve relationships among internal and external customers and stakeholders.
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The seven courses listed above along with a wide variety of other professional development curricula and a Personal Development Plan helps the SWA promote and implement the Arizona Management System principles and practices to develop people, establish and communicate accountability, and promote problem-solving throughout DERS and ARIZONA@WORK.

E. Coordinating outreach efforts with NFJP grantees as well as with public and private community service agencies and MSFW groups

ES progressive plan for service delivery to MSFWs is consistent with the U.S. DOL ETA program equity and minimum service delivery indicators of compliance requirements. The Unified State Plan places emphasis on strategies to collaborate and work with partners to ensure a seamless delivery of services for an improved and integrated ARIZONA@WORK system. The SWA works with NFJP partner PPEP, Inc. via an MOU to leverage our shared resources and enhance opportunities for MSFWs through a non-discriminatory mode of service delivery that is qualitatively equivalent and quantitatively proportionate to services provided to non-MSFWs:

- PPEP, Inc.;
- Adelante;
- Arizona Department of Agriculture;
- Arizona Department of Transportation;
- Cochise Private Industry Council;
- Campesinos Sin Fronteras;
- Chicanos Por La Causa;
- Census 2020;
- City of Phoenix;
- City of Yuma;
- Equal Employment Opportunity Commission;
- Housing Authority of Yuma County;
- Mexican Consulate;
- Occupational Safety and Health Administration;
- Regional Center for Border Health;
- Sunset Community Health Center;
- U.S. DOL Wage and Hour Division; and
- Yuma Private Industry Council.

5. Services provided to farmworkers and agricultural employers through the one-stop delivery system

Describe the State agency's proposed strategies for:

A. Providing the full range of employment and training services to the agricultural community, both farmworkers and agricultural employers, through the one-stop delivery system. This includes:

(i) How career and training services required under WIOA Title I will be provided to MSFWs through the one-stop centers; and

(ii) How the State serves agricultural employers and how it intends to improve such services.

ES staff in partnership with ARIZONA@WORK statewide, will strive to meet or exceed federal program requirements with respect to MSFW Program equity and minimum service level indicators of compliance. The ES mission includes assisting agricultural and non-agricultural employers in recruitment

efforts and in attaining and maintaining compliance with laws and regulations impacting terms and conditions of employment in their business operations. ES will focus on flexibility, customer choice, universal access and continuous improvement in developing services in commonly branded ARIZONA@WORK Job Centers to allow for self-service and staff-assisted services to MSFWs. ADES/DERS will continue to develop strategic partnerships that will promote employer job orders, applicant talents, employment and training opportunities, and timely resolution of complaints, apparent violations, and other labor-related issues. Elements covered on an equitable and nondiscriminatory basis will include, but will not be limited to, MSFW benefits and protections, career guidance, vocational counseling, testing, job development, and job referral services. The SWA will adhere to guiding principles that ensure a system of service delivery that:

- Is individual and family driven;
- Is effectively integrated and coordinated;
- Protects the rights of families and individuals;
- Allows smooth transition between programs;
- Builds community capacity to serve families and individuals;
- Emphasizes prevention and early intervention;
- Respects clients, partners, and fellow employees;
- Is evaluated for outcomes;
- Is accessible, accountable, and comprehensive;
- Is culturally and linguistically appropriate and respectful; and
- Is strength-based and delivered in the least intrusive manner.

i. How career and training services required under WIOA Title I will be provided to MSFWs through the one-stop centers:

ARIZONA@WORK Job Centers in areas of need are fully multilingual and provide MSFW and ELL individuals with services including, but not limited to, assistance with the following:

- Full range of ES, benefits, and protections;
- Utilizing job order information effectively;
- Staff-assisted activities and/or as requested or necessary when accessing self-assisted services via electronic technologies;
- Referrals to agricultural and non-agricultural jobs, training, and support services, as well as available testing, counseling, and other job development services;
- Basic information on labor rights, protections, and responsibilities with respect to terms and conditions of employment;
- Preparation and resolution of complaints on acts and/or omissions by ES or other U.S. DOL funded programs;
- Preparation, acceptance, resolution, and/or referral of labor-related complaints and apparent violations in accordance with established policies and procedures;
- Referral of individual or family members to supportive services for which they may be eligible;
- Making appointments for individuals and families;

- Contact to follow-up as necessary and appropriate to provide supportive service and information to the maximum extent possible;
- Information on services available in local offices, and contact information on the nearest commonly branded ARIZONA@WORK Job Center, including PPEP/NFJP WIOA Section 167 program, or affiliated offices throughout the national ES network;
- Resume preparation, information on how to post résumés on-line and how to conduct on-line job searches;
- Communicating between ELL individuals referred to jobs and employers;
- Utilization of WOTC, subsidized employment resources, and other employer incentives to promote employment and job upgrades for MSFWs; and
- Connections to local agencies and resources that can assist with services needed, such as housing, medical, legal, emergency food boxes, immigration, etc.

ES progressive plan for service delivery to MSFWs is consistent with the U.S. DOL ETA program equity and minimum service delivery indicators of compliance requirements. The Unified State Plan places emphasis on strategies to collaborate and work with partners to ensure a seamless delivery of services for an improved and integrated ARIZONA@WORK system. The SWA works with NFJP partner PPEP, Inc. via an MOU to leverage our shared resources and enhance opportunities for MSFWs through a non-discriminatory mode of service delivery that is qualitatively equivalent and quantitatively proportionate to services provided to non- MSFWs:

- PPEP, Inc.;
- Adelante;
- Arizona Department of Agriculture;
- Arizona Department of Transportation;
- Cochise Private Industry Council;
- Campesinos Sin Fronteras;
- Chicanos Por La Causa;
- Census 2020;
- City of Phoenix;
- City of Yuma;
- Equal Employment Opportunity Commission;
- Housing Authority of Yuma County;
- Mexican Consulate;
- Occupational Safety and Health Administration;
- Regional Center for Border Health;
- Sunset Community Health Center;
- U.S. DOL Wage and Hour Division; and
- Yuma Private Industry Council.

ii. How the State serves agricultural employers and how it intends to improve such services.

In addition to an updated service delivery plan for farmworkers, Arizona intends to improve services to agricultural employers by working on recruitment strategies that will assist employers in the hiring process and enhancement of recall procedures for seasonal workers by:

- Making employers aware of services available to them through seminars, meetings, outreach, pamphlets, and conferences;
- Explain and utilize the Agricultural Recruitment system to recruit a domestic workforce;
- Increase employer roundtables via a virtual method to share best practices and resources for employers;
- Increase the number of in person Employer Roundtables in strategic locations throughout Arizona;
- Explaining the benefits of using the recall system to employers;
- Attempting to obtain a recall list of workers at an earlier date/time; and
- Participating in the Annual Farmworker Health, Information, and Service Fair.

B. Marketing the employment service complaint system to farmworkers and other farmworker advocacy groups

The State Monitor Advocate and outreach representatives have successfully provided workshops and seminars in collaboration with state and federal enforcement agencies designed to increase the number of agricultural employers utilizing the one-stop system. Our bi-annual employment seminars bring in 40 to 60 companies. The MSFW team intends to continue using workshops and seminars to provide training to agricultural supervisors, field forepersons, and farm labor contractors to help them excel in the crucial role they play in attaining and retaining a viable workforce.

Topics that are intended to be provided to agricultural employers and farmworkers through workshops and seminars include, but are not limited to:

- Overviews of the MSFW Protection Act (MSPA) enforced by the DOL Wage & Hour Division;
- Field sanitation regulations by OSHA;
- Occupational Safety and Health monitoring by the Arizona Division of Occupational Safety and Health (ADOSH); and
- Employment equality enforced by the Equal Employment Opportunity Commission (EEOC).

The ES Complaint System is promoted to farmworkers and farmworker advocacy groups such as PPEP, EQUUS, ARIZONA@WORK One Stop Centers, and the Department of Education Migrant Education Program, and is provided verbally and in writing through orientations, seminars, conferences, printed material handed out at special events, such as Día Del Campesino, employer health fairs, and outreach efforts provided by outreach specialists. In addition, outreach representatives prepare and provide packets to farmworkers containing information regarding the ES Complaint System, services available to farmworkers through ARIZONA@WORK Job Centers, farmworker rights, and contact information for different agencies and organizations that service the farmworker population when they conduct outreach and field visits. In addition, each ARIZONA@WORK Job Center also displays required posters informing the public of the ES Complaint System in English and Spanish. Partner organizations and

advocacy groups are being encouraged to attend complaint system training led by the SWA's training department.

C. Marketing the Agricultural Recruitment System for U.S. Workers (ARS) to agricultural employers and how it intends to improve such publicity.

As part of a publicity improvement effort, the Agricultural Recruitment System (ARS) will be marketed to agricultural employers through informational presentations, detailed explanations, and question-and-answer opportunities at a variety of events, including, but not limited to:

- Annual California/Arizona (CA/AZ) Agricultural Employer seminar;
- AIFC-AZ Interagency Farmworkers seminar;
- Bi-annual employer round table meetings; and
- Various employer associations; such as Yuma Fresh Vegetable Association (YFVA) and Western Growers Association (WGA).

6. Other Requirements

The State Monitor Advocate and outreach specialists will continue to develop and perform lead roles in coalitions based in agriculturally active areas to leverage resources and share knowledge of solutions in a coordinated fashion. Collaborative efforts will continue with the AIFC, a community-based non-profit corporation with a membership of approximately 30 partners including public, private, federal, and state enforcement and non-enforcement agencies, farmworkers, agricultural employers, and advocacy groups. The State Monitor Advocate and outreach specialists will continue to support coalitions and objectives to create a better understanding of issues affecting the farmworker community and will collaborate in creating forums and seminars to address issues and concerns of interest within the farmworker community.

A. Collaboration

Describe any collaborative agreements the state workforce agency (SWA) has with other MSFW service providers including NFJP grantees and other service providers. Describe how the SWA intends to build upon/increase collaboration with existing partners and in establishing new partners over the next four years (including any approximate timelines for establishing agreements or building upon existing agreements).

B. Review and Public Comment

In developing the AOP, the SWA must solicit information and suggestions from NFJP grantees, other appropriate MSFW groups, public agencies, agricultural employer organizations, and other interested organizations. In addition, at least 45 calendar days before submitting its final AOP, the SWA must provide a proposed plan to NFJP grantees, public agencies, agricultural employer organizations, and other organizations expressing an interest and allow at least 30 days for review and comment. The SWA must: 1) Consider any comments received in formulating its final proposed AOP; 2) Inform all commenting parties in writing whether their comments have been incorporated and, if not, the reasons

therefore; and 3) Transmit the comments and recommendations received and its responses with the submission of the AOP.

The AOP must include a statement confirming NFJP grantees, other appropriate MSFW groups, public agencies, agricultural employer organizations and other interested employer organizations have been given an opportunity to comment on the AOP. Include the list of organizations from which information and suggestions were solicited, any comments received, and responses to those comments.

As part of the development of the Arizona Agricultural Outreach Plan (AOP) State Plan, the document was sent out for public comment on December 19, 2023 and remained open until January 19, 2024. The following organizations received notification of the public comment period:

- National Farmworker Jobs Program Board Member/Arizona Interagency Farm Workers Coalition, Inc., Tucson, AZ 85713
- Identification & Recruitment Coordinator Migrant Education Program Arizona Department of Education, Phoenix, AZ 85007
- Arizona Farmworker Enumeration Profiles Study, Phoenix, AZ 85006
- Portable Practical Education Preparation (PPEP) NFJP/WIOA 617, Tucson, AZ 85713
- Queen Creek Family Resource Center-Migrant Program, Queen Creek, AZ 85142
- University of Arizona, Arizona College of Public Health, Tucson, AZ 85724

No public comments were received.

C. Data Assessment

Review the previous four years Wagner-Peyser data reports on performance. Note whether the State has been meeting its goals to provide MSFWs quantitatively proportionate services as compared to non-MSFWs. If it has not met these goals, explain why the State believes such goals were not met and how the State intends to improve its provision of services in order to meet such goals.

Over the last four years, the State has met **8** out of **11** total indicators. While all were not met, the State considers this a success still. The reason for this success is due to the State Monitor Advocate training provided by the SWA throughout this four year period to ensure the SWA understands its role is in providing quantitatively and qualitatively proportionate services as compared to non-MSFWs. This has been an ongoing effort and continues to be a priority for the Monitor Advocate.

In order to meet the three indicators that were not met, The Monitor Advocate will increase and continue to provide support and technical assistance throughout the state as needed. Desk reviews of all offices will be conducted on a frequent basis to ensure all MSFWs are provided with quality services and have access to as many equitable opportunities as possible. Reviews will also ensure that staff is accurately identifying MSFW clients so that the system can accurately reflect individuals in program metrics. This will be accomplished by visiting local offices in person and leveraging virtual meetings to increase technical assistance statewide.

D. Assessment of Progress

The plan must include an explanation of what was achieved based on the previous AOP, what was not achieved and an explanation as to why the State believes the goals were not achieved, and how the State intends to remedy the gaps of achievement in the coming year.

Over the last four years, the SWA has made progress and achievements to effectively reach farmworkers throughout the State of Arizona.

Achieved:

Increase significant offices: (Sites increased from **6** to **7**)

- 610 North Morley (NOGALES);
- 820 East Cottonwood Lane (CASA GRANDE);
- 700 West Beale Street (KINGMAN);
- 3826 West 16th St (YUMA);
- 4635 South Central (PHOENIX)
- 3406 North 51st Ave (PHOENIX); and
- **515 E 7th St (Douglas).**

Increase staffing levels of outreach program: went from four to ten with teams based in Yuma and Phoenix to further reach more MSFW clients. The addition of the Phoenix teams were strategically added as this is located in the central part of Arizona.

Exceeded

Outreach contacts per week: The team constantly exceeded the weekly contact of MSFW outreach with an average of 400 percent quarterly.

Outreach with partners:

- Arizona Alliance for Community Healthcare Centers;
- Portable, Practical Educational Preparation (PPEP);
- National Farmworker Jobs Program (NFJP);
- ADE Migrant Education Program;
- Farmer Coalition;
- Mexican Consulate;
- Chicanos Por La Causa; and
- Campesinos Sin Fronteras.

The SWA met or surpassed the following qualitatively equivalent and quantitatively proportionate services for MSFW's over the previous four year plan:

Indicators met:

- Received basic career services (staff-assisted);
- **Received** staff-assisted career guidance services;
- **Received** staff-assisted job search activities;

- Referred to employment;
- Referred to federal training;
- Referred to other Federal/State assistance;
- Received individualized career service; and
- Individuals placed in a job.

Some of the indicators were not met. The strategies to close gaps are mentioned in the previous section.

Not Achieved:

- Received Unemployment Insurance (UI) Claim Assistance;
- Median earnings of individuals in unsubsidized employment; and
- Individuals placed long term in non-agricultural jobs.

E. State Monitor Advocate

The plan must contain a statement confirming the State Monitor Advocate has reviewed and approved the AOP.

The State Monitor Advocate (SMA), is involved in the research, composition, review, and approval of the Agricultural Outreach Plan. Additionally, the SMA reviewed all sections of the unified State Plan related to service delivery to MSFWs.

Program-specific Requirements for Adult Education and Family Literacy Act Programs

The Unified or Combined State Plan must include a description of the following as it pertains to adult education and literacy programs and activities under title II of WIOA, the Adult Education and Family Literacy Act (AEFLA).

a. Aligning of Content Standards

Describe how the eligible agency has aligned its content standards for adult education with State-adopted challenging academic content standards, as adopted under section 1111(b)(1) of the Elementary and Secondary Education Act of 1965, as amended (20 U.S.C. 6311(b)(1)).

Arizona's adult education content standards, guidance, and resources can be found on the Arizona Department of Education website.

<https://www.azed.gov/adultedservices/arizona-adult-education-standards>

All programs are required to use the adopted standards to guide instruction, as a requirement of the Title II WIOA Adult Education Grant Contract with approved local providers. State Grant Contract Requirements:

- Requirement 28: The local provider will ensure that print and digital curricular resources used for instruction are aligned to **Arizona Adult Education Content Standards**.
- Requirement 29: The local provider will provide sufficient paid time for adult education instructors to plan and prepare for instruction aligned to the **Arizona Adult Education Content Standards**.

The *Arizona Adult Education Literacy Through Social Studies Standards* were aligned to the *Arizona Adult Education English Language Arts Standards* and the *Arizona Social Studies Standards-for grades 7-12*. The *Arizona Adult Education English Language Proficiency Standards (ELPS)*, were adapted from the *Arizona English Language Proficiency Standards*, developed by AIR (American Institute for Research) and the *Arizona English Language Proficiency Standards for K-12*.

All of the content standards have been tagged with employability skills and digital literacy skills, aligned to the International Society of Technology Education Standards (ISTE). Recently, the AZ Department of Education began using the PASSPort portal, as part of an agency-wide initiative, to create digital versions of the content standards for teachers to easily search to guide instructional planning.

b. Local Activities

Describe how the eligible agency will, using the considerations specified in section 231(e) of WIOA and in accordance with 34 CFR 463 subpart C, fund each eligible provider to establish or operate programs that provide any of the following adult education and literacy activities identified in section 203 of WIOA, including programs that provide such activities concurrently. The Unified or Combined State Plan must include at a minimum the scope, content, and organization of these local activities.

Adult Education and Literacy Activities (Section 203 of WIOA)

Arizona state law designates adult education as a department within the Arizona Department of Education (ADE), which acts as the administrative body for Adult Education Services according to A.R.S. 15–232, 15–233, and 15–234. Under WIOA, ADE is the Eligible Agency with sole responsibility for administering and **developing** policy for adult education and literacy activities in the state.

The purpose of Adult Education in Arizona, under WIOA, is to enable local adult education providers, as core partners of Arizona’s workforce system, to develop, implement and improve adult education and literacy services throughout the state to further the vision and goals as outlined in the Arizona Unified Workforce Development Plan and WIOA, in order to:

- Assist adults to become literate and obtain the knowledge and skills needed for employment and economic self-sufficiency;
- Assist adults who are parents or family members to obtain the education and skills needed to participate successfully in the educational development of their children and improve the economic opportunities of the family;
- Assist adults in the attainment of high school equivalency diplomas and in the transition to postsecondary education and training through career pathways; and
- Assist immigrants and other individuals who are English Language Learners to improve their **language proficiency** in reading, writing, speaking and listening skills in English; improve their math skills; and acquire an understanding of the American system of government, individual freedoms, and the responsibilities of citizenship.

The following three Arizona Adult Education Goals are the basis of a strategic plan that addresses and operationalizes the WIOA requirements for Title II as described in this Plan:

- **System Goal:** The Arizona Adult Education System is an integral component of Arizona’s educational pipeline leading to postsecondary education and career pathways.
- **Profession Goal:** Arizona Adult Educators empower adult learners to transition to postsecondary education and livable–wage employment.
- **Instruction Goal:** Arizona Adult Education Instruction prepares adult learners for success in postsecondary education and the workforce.
- **Competitive Funding Process:** ADE conducts a competitive *Request for Grant Applications (RFGA)* process to award **WIOA Title II** funding under section 231 to eligible organizations to establish and operate local **education** programs for the provision of adult education and literacy activities in Arizona. Organizations may include:
 - A local education agency;
 - A community–based organization or faith–based organization;
 - A volunteer literacy organization;
 - An institution of higher learning;
 - A public or private non–profit agency;
 - A library;
 - A public housing authority;
 - A non–profit institution that is not described above and has the ability to provide adult education and literacy activities to eligible individuals as described in WIOA;
 - A consortium or coalition of the agencies, organizations, institutions, libraries, or authorities described above; and
 - A partnership between an employer and an entity described above.
- To be considered eligible for consideration of an award, an applicant must be an organization with demonstrated effectiveness in providing adult education and literacy activities. To demonstrate effectiveness, the organization must provide, as part of the application process, performance data showing improvement in the skills of eligible individuals, in particular individuals who are basic-skills deficient, in the content domains of reading, writing, mathematics, English language acquisition, and other subject areas relevant to the services identified in the RFGA. The applicant must also provide information regarding its outcomes for participants related to employment, attainment of secondary school diploma (or its recognized equivalent), and transition to postsecondary education and training. The competitive RFGA process ensures that the following components are incorporated:
 - **Direct and Equitable Access:** ADE is committed to conducting a competitive RFGA process that ensures direct and equitable access to all eligible providers competing for Title II grant contracts. Information regarding the application and process is made available broadly via public websites **and** email distribution **lists to eligible organizations**. An adequate amount of time to complete the application is allowed, based on best practices as determined by ADE’s Grants Management Department. Submittal of applications is done using the Grants Management Enterprise system that allows equitable access to all **organizations and** individuals, including those with disabilities.
 - **Fair and Equitable Evaluation:** Applications are evaluated based on a scoring rubric as described in the application and **includes the** required WIOA **Federal** considerations and

other factors as determined by ADE. The evaluation team members are professionals in adult education and the workforce system. Award amounts are determined by evaluation results and the demographic and educational needs of the local workforce area/s to ensure grant funding awards are fair and equitable.

- **Coordination with Local Boards:** A procedure is included in the RFGA evaluation process to ensure that the applicable LWDB reviews the application(s) and provides comments and/or recommendations regarding the application's alignment to the strategies and goals of the local plan under section 108 of WIOA. Comments and recommendations provided by LWDBs are reviewed as part of the evaluation process.
- **General Education Provisions Act (GEPA) Statement:** Each applicant requesting funds is required to include a description of the steps the applicant proposes to take to ensure equitable access to, and participation in, its Federally assisted program for students, teachers, and other program beneficiaries with special needs. Section 427 GEPA highlights six types of barriers that can impede equitable access or participation: gender; race; national origin; color; disability; or age. Based on local circumstances, applicants must determine whether these or other barriers may prevent participation in the program or activities, and the steps to be taken to overcome identified barriers must be included in the application.
- **Eligible Individual:** An "eligible individual" for Adult Education services is an individual who:
 - Has attained 16 years of age; and
 - Is not enrolled or required to be enrolled in secondary school under Arizona State Law (A.R.S. § 15-802); and
 - Meets Arizona state eligibility requirements under A.R.S. § 15-232 B (*The department of education shall provide classes under this section only to adults who are citizens or legal residents of the United States or are otherwise lawfully present in the United States. This subsection shall be enforced without regard to race, religion, gender, ethnicity or national origin*); and
 - Is basic skills deficient; or
 - Does not have a secondary school diploma or its recognized equivalent and has not achieved an equivalent level of education; or
 - Is an English language learner.
- **Allowable Activities:** In Arizona, adult education providers funded under Section 222(a)(1) are contracted to establish and operate programs that provide the following services and activities to eligible individuals as defined below:
 - **Adult Basic Education (ABE):** Literacy instruction aligned to Arizona Adult Education Content Standards provided to eligible individuals with educational functioning levels (EFLs) ABE 1, 2, 3, or 4 as defined by the National Reporting System (NRS). Workforce Preparation activities (as described below) are provided concurrently with ABE instruction. WIOA Final Rules Subpart D, § 463.30.
 - **Adult Secondary Education (ASE):** Literacy instruction aligned to Arizona Adult Education Content Standards to eligible individuals ABE 5 or 6, as defined by the NRS. ASE activities are also designed to lead to the attainment of a secondary diploma (or its

equivalent) and transition to postsecondary education, training, or employment. Workforce Preparation activities (as described below) are provided concurrently with ASE instruction. WIOA Final Rules Subpart D, § 463.30.

- **English for Speakers of Other Languages (ESOL):** Literacy instruction aligned to Arizona Adult Education English Language Proficiency Standards to help eligible learners achieve proficiency in reading, writing, speaking and comprehension of the English language. ESOL instruction should also lead to attainment of a secondary diploma (or its equivalent), transition to postsecondary/training, or employment.⁵¹
- **Integrated English Literacy and Civics Education (IELCE):** Education services provided to English language learners to achieve competence in the English language and acquire the basic and more advanced skills needed to function effectively as parents, workers, and citizens. Services must include:
 - instruction in literacy and English language acquisition: and
 - instruction on the rights and responsibilities of citizenship and civic participation.
- Services may include workforce preparation and workforce training.⁵²
- **Workforce Preparation:** Instruction provided concurrently with ABE, ASE, or ESOL/IELCE activities that is designed to help eligible individuals acquire a combination of basic academic skills, critical thinking skills, digital literacy skills, and self-management skills. Workforce preparation activities are designed to increase employability skills and the development of competencies in using resources and information, working with others, and understanding systems to successfully transition to and complete postsecondary education, training, and employment. WIOA Final Rules Subpart D, § 463.34.
- **Integrated Education and Training:** A service approach to providing adult education and literacy activities concurrently and contextually with workforce preparation activities and workforce training in a specific occupation or occupational cluster for the purpose of educational and career advancement. Required IET components are:
 - 1) adult education and literacy,
 - 2) workforce preparation activities, and
 - 3) workforce training.

Instruction is based on occupationally relevant materials for the purpose of educational and career advancement. Participation is intended for eligible individuals at all skill levels, including adults with low academic skills.⁵³

Special Rule: Each eligible agency awarding a grant or contract under this section shall not use any funds made available under this title for adult education and literacy activities for the purpose of supporting or providing programs, services, or activities for individuals who are under the age of 16 and are enrolled or required to be enrolled in secondary school under State law, except that such agency may use such funds

⁵¹ WIOA Final Rules Subpart D, § 463.31 and § 463.32

⁵² WIOA Final Rules Subpart D, § 463.33.

⁵³ WIOA Final Rules Subpart D, §§ 463.35 through 463.38.

for such purpose if such programs, services, or activities are related to family literacy activities. In providing family literacy activities under this title, an eligible provider shall attempt to coordinate with programs and services that are not assisted under this title prior to using funds for adult education and literacy activities under this title for activities other than activities for eligible individuals.

Arizona Adult Education will award grants or contracts in compliance with 34 CFR part 463, Subpart C to include the following:

From grant funds made available under section 222:

- (a)(1) of the Act, each eligible agency must award competitive multiyear grants or contracts to eligible providers within the State or outlying area to enable the eligible providers to develop, implement, and improve adult education and literacy activities within the State or outlying area.
- (b) The eligible agency must require that each eligible provider receiving a grant or contract use the funding to establish or operate programs that provide adult education and literacy activities, including programs that provide such activities concurrently.
- (c) In conducting the competitive grant process, the eligible agency must ensure that—
 - All eligible providers have direct and equitable access to apply and compete for grants or contracts;
 - The same grant or contract announcement and application processes are used for all eligible providers in the State or outlying area; and
 - In awarding grants or contracts to eligible providers for adult education and literacy activities, funds shall not be used for the purpose of supporting or providing programs, services, or activities for individuals who are not eligible individuals as defined in the Act, except that such agency may use such funds for such purpose if such programs, services, or activities are related to family literacy activities. Prior to providing family literacy activities for individuals who are not eligible individuals, an eligible provider shall attempt to coordinate with programs and services that do not receive funding under this title.
- (d) In awarding grants or contracts for adult education and literacy activities to eligible providers, the eligible agency must consider the following:
 - (1) The degree to which the eligible provider would be responsive to—
 - (i) Regional needs as identified in the local workforce development plan; and
 - (ii) Serving individuals in the community who were identified in such plan as most in need of adult education and literacy activities, including individuals who—
 - (A) Have low levels of literacy skills; or
 - (B) Are English language learners;
 - (2) The ability of the eligible provider to serve eligible individuals with disabilities, including eligible individuals with learning disabilities;
 - (3) The past effectiveness of the eligible provider in improving the literacy of eligible individuals, especially those individuals who have low levels of literacy, and the degree to which those improvements contribute to the eligible agency meeting its

State-adjusted levels of performance for the primary indicators of performance described in § 677.155;

- (4) The extent to which the eligible provider demonstrates alignment between proposed activities and services and the strategy and goals of the local plan under section 108 of the Act, as well as the activities and services of the one-stop partners;
- (5) Whether the eligible provider's program—
 - (i) Is of sufficient intensity and quality, and based on the most rigorous research available so that participants achieve substantial learning gains; and
 - (ii) Uses instructional practices that include the essential components of reading instruction;
- (6) Whether the eligible provider's activities, including whether reading, writing, speaking, mathematics, and English language acquisition instruction delivered by the eligible provider, are based on the best practices derived from the most rigorous research available, including scientifically valid research and effective educational practice;
- (7) Whether the eligible provider's activities effectively use technology, services and delivery systems, including distance education, in a manner sufficient to increase the amount and quality of learning, and how such technology, services, and systems lead to improved performance;
- (8) Whether the eligible provider's activities provide learning in context, including through integrated education and training, so that an individual acquires the skills needed to transition to and complete postsecondary education and training programs, obtain and advance in employment leading to economic self-sufficiency, and to exercise the rights and responsibilities of citizenship;
- (9) Whether the eligible provider's activities are delivered by instructors, counselors, and administrators who meet any minimum qualifications established by the State, where applicable, and who have access to high-quality professional development, including through electronic means;
- (10) Whether the eligible provider coordinates with other available education, training, and social service resources in the community, such as by establishing strong links with elementary schools and secondary schools, postsecondary educational institutions, institutions of higher education, Local WDBs, one-stop centers, job training programs, and social service agencies, business, industry, labor organizations, community-based organizations, nonprofit organizations, and intermediaries, in the development of career pathways;
- (11) Whether the eligible provider's activities offer the flexible schedules and coordination with Federal, State, and local support services (such as child care, transportation, mental health services, and career planning) that are necessary to enable individuals, including individuals with disabilities or other special needs, to attend and complete programs;

- (12) Whether the eligible provider maintains a high-quality information management system that has the capacity to report measurable participant outcomes (consistent with section § 666.100) and to monitor program performance; and
- (13) Whether the local area in which the eligible provider is located has a demonstrated need for additional English language acquisition programs and civics education programs.

(Authority: 29 U.S.C. 3321)

Special Rule. Each eligible agency awarding a grant or contract under this section shall not use any funds made available under this title for adult education and literacy activities for the purpose of supporting or providing programs, services, or activities for individuals who are under the age of 16 and are enrolled or required to be enrolled in secondary school under State law, except that such agency may use such funds for such purpose if such programs, services, or activities are related to family literacy activities. In providing family literacy activities under this title, an eligible provider shall attempt to coordinate with programs and services that are not assisted under this title prior to using funds for adult education and literacy activities under this title for activities other than activities for eligible individuals.

Need for Adult Education in Arizona: The U.S. Census Bureau’s American Community Survey (2024) includes the following demographic data for Arizona:

- Approximately 642,000 adults aged 18 and older lack a secondary diploma.
- Over 556,000 adults aged 18 and older speak English “less than very well.”
- In Arizona, there are 18,402 eligible participants between the ages of 16-19. These students are not enrolled in school and do not have a high school diploma.

c. Corrections Education and other Education of Institutionalized Individuals

Describe how the eligible agency will, using the considerations specified in section 231(e) of WIOA and in accordance with 34 CFR 463 subpart C, fund eligible providers to establish or operate programs that provide any of the following correctional educational programs identified in section 225 of WIOA:

- Adult education and literacy activities;
- Special education, as determined by the eligible agency;
- Secondary school credit;
- Integrated education and training;
- Career pathways;
- Concurrent enrollment;
- Peer tutoring; and
- Transition to re-entry initiatives and other post release services with the goal of reducing recidivism.

Each eligible agency using funds provided under Programs for Corrections Education and Other Institutionalized Individuals to carry out a program for criminal offenders within a correctional institution must give priority to serving individuals who are likely to leave the correctional institution within 5 years of participation in the program.

ADE awards Section 225 grant funds for corrections education and education of institutionalized individuals using the same RFGA process and timeline described for Section 231 funds. The grants are awarded on a multi-year cycle, and all providers are subject to the same funding cycle. The review of applications includes evaluation based on the 13 considerations outlined in Title II of WIOA. All applications are evaluated using the same rubric and scoring criteria. Special consideration is given to eligible applicants indicating priority to serving individuals who are likely to leave the correctional institution within five years of participation in the program.

Arizona Adult Education ensures that not more than 20 percent of funds allocated to local providers with grant contracts under section 231 are used to carry out services under Section 225. And, as part of the grant contract, funded providers are required to ensure that if WIOA funds are used to provide educational services to individuals in a correctional or other institution as described in Section 225, priority must be given to serving individuals who are likely to leave the correctional institution within five years of participation in the program.

d. Integrated English Literacy and Civics Education Program

Describe how the eligible agency will, using the considerations specified in section 231(e) of WIOA and in accordance with 34 CFR 463 subpart C, fund eligible providers to establish or operate Integrated English Literacy and Civics Education (IELCE) programs under section 243 of WIOA. Describe how adult English language learners, including professionals with degrees and credentials in their native countries, are served in IELCE programs.

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be offered in combination with integrated education and training activities found in 34 CFR section 463.36.

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will include instruction in literacy and English language acquisition and instruction on the rights and responsibilities of citizenship and civic participation.

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to prepare adults who are English language learners for, and place such adults in, unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency.

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to integrate with the local workforce development system and its functions to carry out the activities of the program.

Arizona has a long history of providing English language acquisition activities and civics education, first under WIA, and then under WIOA since its passage in 2014. The State has built on its past success in providing instruction to English language learners to meet the requirements under WIOA Section 243. The provision of educational services to English Language Learners under Section 243 are referred to in

Arizona as Integrated English Literacy and Civics Education PLUS Training (IELCE + T) programs. IELCE + T programs must include the IELCE educational services (described above in Allowable Activities and in WIOA § 463.33) and must be delivered in combination with IET activities (described above in Allowable Activities and in WIOA § 463.36).

Beginning in PY25-26, the Notification of Grant Award for Arizona did not include section 243 funds; the previous 243 funds were moved to the Section 231 allocation. The grant contract with local providers requires the delivery of Integrated English Literacy and Civics Education services for the purpose of preparing adults who are English language learners for, and placing such adults in, unsubsidized employment in In-Demand industries and occupations leading to economic self-sufficiency.

The IELCE + T program must include:

- Integration of civics engagement skills into career pathways and workforce preparation activities targeted to English language learners, including professionals who hold degrees or credentials in other countries;
- Integration of educational technology and Blended Learning models into civics educational activities, including the use of technology and social media to increase learner opportunities for responsible civic engagement;
- Training and technical assistance on research and evidence-based instructional strategies that promote deeper learning, including the incorporation of experiential civics learning opportunities and digital storytelling;
- Collaborative agreements and formal partnerships with local area workforce system entities, including ARIZONA@WORK Job Centers, libraries, postsecondary institutions and employers; and
- Dissemination and replication of evidence-based resources and promising practices.

e. State Leadership

1. Describe how the State will use the funds to carry out the required State Leadership activities under section 223 of WIOA.

Arizona utilizes funds available under Section 223 to provide State Leadership activities to further develop and enhance the adult education system throughout the state as described in the Purpose and Goals identified above under Local Activities.

ADE/AES will use State Leadership funds to carry out **required** activities under Section 223 by reviewing qualitative and quantitative participant and teacher data to identify state leadership priorities.

(1) Align adult education services with other core programs and ARIZONA@WORK partners to implement the strategies in this plan:

- Strengthen the formal collaborative agreements created between local Title II providers with partners, especially Title I-B, to ensure that all eligible job seekers have access to information and services that will lead to positive employment outcomes.

- Improve the alignment of programmatic and operational services, such as common intake, orientation, assessment, and data sharing, among all partners statewide to promote co-enrollment and ensure a customer-centric approach with consistent and coordinated access to services.
- Identify and implement a universal career exploration and career training platform to use across core partner programs for participants.
- Identify and articulate career pathways with entry points for adult learners who have barriers such as disabilities, low basic skills, lack of secondary diplomas, and/or lack of English language skills.
- Promote workplace literacy programs to meet the basic skills needs, including digital literacy, of employee cohorts to meet the needs of local employers.
- Provide training on the planning and development and implementation of IETs which requires being aligned with local employment needs.
- Provide digital curricular resources that implement workforce preparation, career pathways, and contextualized units of study.

(2) Establish or operate high-quality professional development programs to improve adult education instruction:

- Maintain grant contract requirements to assist local adult education providers with the planning and implementation of high-quality Professional Learning (PL) for instructional staff, including:
 - Local providers must expend a minimum of ten percent of adult education grant funds for state-approved PL activities.
 - Local providers must submit annual plans for PL implementation based on needs analysis that identifies areas for improvement.
 - Local providers must submit final reports detailing the PL goals, interventions, and strategies that were implemented in that PY, based on the plans noted above, and including performance outcome data.
 - Local providers must address the AZ Adult Education Teacher Standards in Mathematics, English Language Arts, and English Language Proficiency Standards, along with *Learning Forward's Professional Learning Standards*, to help determine PL goals that focus on improving teacher effectiveness and student outcomes.
- Provide training and technical assistance on evidence- and research-based strategies that accelerate learning and promote readiness for postsecondary education and employment, **through the following state leadership initiatives:**
 - Annual Arizona Adult Education Institute
 - Annual Teachers 'n' Technology **Conference**
 - Using the Arizona Adult Education Content Standards;
 - Teaching Skills That Matter training series;
 - **Adult Reading Instruction Supported by Evidence (ARISE) series;**
 - Standardized assessment training, TABE **13&14** and CLAS-E;
 - **Integrated Education and Training series;**
 - ARIZONA@WORK partner meetings and trainings

- Technology integration and digital literacy;
- Blended learning models and promising practices;
- Assistive technology and Universal Design for Learning (UDL) strategies;
- Teaching and Learning and Program Administrator webinar series;
- Building Literacy Skills through Civic Engagement series;
- Math Institute, “Curriculum for Adults Learning Math”; and
- Online curricula training
- Leadership development:
 - Annual Arizona Adult Education Institute;
 - Annual Administrator Orientation and Refresher; and
 - Leadership Excellence and Development (LEAD) Institute.

(3) Provide technical assistance to local providers of adult education:

- Provide technical assistance in multiple ways, including onsite visits, regular and ad hoc virtual meetings, facilitated asynchronous courses, workshops, webinars, phone calls, email, and the Annual Business Meeting.
- The Program Implementation Plan, submitted to ADE by adult education local providers, serves as a comprehensive document that contains required processes, current IETs, key personnel, and other operations details.
- Technical assistance needs are determined through ongoing data monitoring administrative check-ins, report reviews, site monitoring activities, and program-initiated requests.
- WIOA Title II Local Provider Technical Assistance Guide.
- Provide training and targeted technical assistance on the three available pathways to earn an Arizona High School Equivalency (HSE) Diploma, approved by the Arizona State Board of Education.
 - GED[®] Testing Pathway
 - College Credit Pathway
 - HSE + Career Readiness Pathway
- Provide training and targeted technical assistance on planning and implementing IET programming that meets local workforce area needs.
- Pre-IET and IET Implementation Plans are required to be submitted by the adult education local providers for review and approval prior to implementing Pre-IET and IET services. This review process also ensures that all elements of an IET program are fully incorporated and are eligible for MSG 3, 4, or 5 in alignment with WIOA and State requirements.

(4) Monitoring and evaluating the quality of, and improvement in, adult education and disseminate information about promising practices within Arizona:

- Assess the quality of the implementation of State Leadership activities and initiatives through the use of:
 - Analysis of evaluation surveys after training and PL events to determine satisfaction and ascertain if learning objectives were met;
 - Analysis of final reports and project summaries provided by local providers to assess the implementation of initiatives;

- Analysis of applicable outcome data of participating providers to determine the impact to learners as a result of initiatives;
- Site visits and classroom observations to document implementation of strategies learned; and
- Teacher reflections to determine and identify implementation successes and challenges.
- Conduct the evaluation and monitoring of local providers as described below in Assessing Quality;
- Utilize information obtained during quality assessment, evaluation processes, and monitoring activities to identify promising practices; and
- Disseminate information about promising practices to local providers using a variety of strategies, including face-to-face and virtual training sessions, webinars, online courses, technical assistance, and written guidance.

2. Describe how the State will use the funds to carry out permissible State Leadership Activities under section 223 of WIOA, if applicable

Arizona utilizes funds available under Section 223 to provide State Leadership activities to further develop and enhance the adult education system throughout the state as described in the Purpose and Goals identified above under Local Activities.

ADE/AES will use State Leadership funds for permissible activities under Section 223 by reviewing qualitative and quantitative participant and teacher data to determine professional learning and technical assistance needs for adult education program staff.

The support of State or regional networks of literacy resource centers.

- Provide local programs with access to online curricula for ABE and ESOL instruction;
- WIOA Title II Local Provider Technical Assistance Guide and Arizona Shop Talk webinar series;
- Administrator Orientation and Refresher series;
- Annual Business Meeting;
- Online Assessment Coordinator course;
- Online TABE proctor certification course;
- Multiple synchronous courses designed for adult educators
- [Teaching and Learning | Arizona Department of Education](#)

The development and implementation of technology applications, translation technology, or distance education, including professional development to support the use of instructional technology.

- Digital Literacy Framework;
- Creating Effective IETs Training Series;
- Arizona Adult Education Institute, a three-day conference for Arizona Adult Education administrators, teachers, and support staff;
- Training sessions on implementing digital tools and increasing digital literacy; and
- Teachers ‘n’ Technology Institute.

f. Assessing Quality

Describe how the eligible agency will assess the quality of providers of adult education and literacy activities under title II. Describe how the eligible agency will take actions to improve such quality, including providing the activities described in section 223(a)(1)(B) of WIOA. Describe how the eligible agency will use evaluations, data analysis, program monitoring, or other methods to improve the quality of adult education activities in the State.

Arizona adult education providers are evaluated on both fiscal and programmatic areas based on a model incorporating these factors:

- A cyclical system for risk assessment and **program** monitoring;
- Monthly desk–monitoring, including data analysis and technical assistance; and
- Evidence of high-quality, data–driven and **standards**–based instruction that is aligned **to content standards to include digital literacy and employability skills.**

Comprehensive case reviews are conducted **by State staff**. The case review **process** includes an analysis of each local provider’s prior-years performance data, monitoring results, professional learning plan, **IET implementation**, programmatic **operations** and fiscal reporting. This team approach has been valuable in providing comprehensive targeted technical assistance to local providers.

Monitoring for compliance with federal and state requirements is a critical part of the Arizona Adult Education Program Improvement model. Desk monitoring is conducted on all programs throughout the year, and on-site monitoring is conducted based on risk assessment results and issues identified **through technical assistance.**

- **Desk Monitoring:** Monthly review and analysis of data management, submitted reports (both programmatic and fiscal), and ongoing teacher certification verification.
- **On-site Monitoring:** Field–based fiscal audits, A.R.S. § 15–232b mandated verification of eligibility for services, and programmatic monitoring annually based on an agency–developed risk assessment.

A monitoring tool aligned to grant assurances and requirements is utilized to ensure comprehensive monitoring of all funded providers. Results are shared with program administrators and their leadership team.

Local providers that do not meet the state performance indicators and/or who have been identified as having serious programmatic issues are placed on a Corrective Action Plan (CAP). The State Office Program Improvement Team provides technical assistance and support to providers during the CAP process.

Program Reporting is part of the annual program improvement model. Each local program completes a comprehensive set of final reports on program operations, performance, **and** professional learning.

Data Management

The Arizona Adult Education Performance Accountability System is comprised of the following components to assess the effectiveness of local providers:

- A secure, **cloud**-based data management system that collects student demographic, participation, and outcome measures, including performance results as identified in the NRS;
- Performance outcome measures consist of the following indicators:
 - Percentage of program participants who achieve at least one Measurable Skill Gain through
 - Educational Functioning Level gain;
 - Attainment of the HSE diploma;
 - **Transcript of Progress Report of Secondary or Postsecondary Credits;**
 - **Progress toward Employment of Training Milestones** in a workplace literacy program; or
 - Passing a knowledge-based exam for an industry recognized credential.
 - Percentage of program participants in unsubsidized employment during the second quarter after exit from the program;
 - Percentage of program participants in unsubsidized employment during the fourth quarter after exit from the program;
 - Median earnings of program participants in unsubsidized employment during the second quarter after exit from the program;
 - Percentage of program participants who obtain a recognized postsecondary credential or secondary credential; and
 - Percentage of program participants who, during a PY, are in education or training programs that lead to recognized postsecondary credentials or employment, and who are achieving measurable skill gains toward credentials or employment.

Snapshot data are reviewed monthly by state staff through desk monitoring of each provider to analyze performance trends and identify potential performance issues. Additionally, analyses of provider data is used to inform technical assistance and training efforts.

Data Sharing

A data sharing agreement with ADES's UI Wage system for data matching for employment outcomes is in place, and the data matching report is requested quarterly. This agreement is critical to supporting Arizona Adult Education's ability to report employment outcomes for individuals enrolled in Title II programs. Arizona has a high rate of participants eligible for and in agreement to data sharing, allowing for minimal implementation of surveys for employment and wage information.

In addition to state UI information, ADE is a participant in the State Wage Interchange System (SWIS) and with the National Student Clearinghouse for data matching for postsecondary outcomes. ADE-AES has contracts for SWIS and NSC for services to support federally required follow-up measures in order to determine employment and postsecondary performance outcomes for Title II participants.

Evaluating Quality of Professional Development

ADE uses a variety of methods to assess **the** quality of the professional learning and **state leadership initiatives**, including: 1) Conducting evaluation surveys after training and professional development events to determine their effectiveness; 2) Requiring submission of final reports by local providers that are analyzed by ADE to assess the quality of implementation of initiatives, including implementation of professional learning and technology integration; 3) Analyzing outcome data of participating providers to determine if there was an impact on **participants** as a result of an initiative; and 4) Conducting site visits and classroom observations to observe **initiative implementation**.

Planning and implementing high-quality professional learning for adult educators is an integral component of an effective adult education program. It is also part of the Federal law and state grant requirements.

- The Title II: Workforce Innovation and Opportunity Act (WIOA) requires *the establishment or operation of high-quality professional development programs to improve the instruction provided pursuant to local activities required under section 231(b)*.
- The Arizona Department of Education – Adult Education Grant contract requires a minimum of 10% of the grant funds awarded to adult education providers, as well as earned income, to be expended for professional learning for adult educators that align and support the: *Learning Forward Standards for Professional Learning*; the *Arizona Adult Education Teacher Standards*; and the *Arizona Adult Education Content Standards*. Additional information on the teaching and learning requirements and grant assurances are provided in the most recent **Arizona Adult Education Grant Contract**.
- The *AES Adult Education Professional Learning Implementation Plan* is a living document **and should be** iterative and revised as new teachers are hired, program priorities change, or based on student outcomes data. **The State office has developed a technical assistance guide to support the implementation plan and professional learning activities at the local level.**

Program-Specific Requirements for State Vocational Rehabilitation (Combined or General)

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan must include the following descriptions and estimates, as required by sections 101(a) and 606 of the Rehabilitation Act of 1973, as amended by title IV of WIOA.

a. State Rehabilitation Council.

1. All VR agencies, except for those that have an independent consumer-controlled commission, must have a State Rehabilitation Council (Council or SRC) that meets the criteria in Section 105 of the Rehabilitation Act. The designated State agency or designated State unit, as applicable, has:

(A) is an independent State commission

(B) has established a State Rehabilitation Council

2. In accordance with Assurance (a)(1)(B), if selected, please provide information on the current composition of the Council by representative type, including the term number of the representative, as applicable, and any vacancies, as well as the beginning dates of each representative's term.

Council Representative	Current Term Number/Vacant	Beginning Date of Term Mo./Yr.
Statewide Independent Living Council (SILC)	2	10/2024
Parent Training and Information Center	vacant/application pending	
Client Assistance Program	vacant/application pending	
Qualified Vocational Rehabilitation (VR) Counselor (Ex Officio)	1	10/2024
Disability Group Representative	2	10/2023
Disability Group Representative	1	10/2022
Disability Group Representative	1	10/2023
Disability Group Representative	2	10/2022
Disability Group Representative	1	10/2014
Business, Industry, and Labor	2	10/2025
Business, Industry, and Labor	2	10/2022
Business, Industry, and Labor	1	10/2024
Business, Industry, and Labor	Vacant	
Current/Former Recipient of VR Services	1	10/2024
State Educational Agency Responsible for Students with Disabilities to Receive Services under Part B of the Individuals with Disabilities Education Act (IDEA)	2	10/2025
American Indian VR Project 121 Director	1	10/2022

Council Representative	Current Term Number/Vacant	Beginning Date of Term Mo./Yr.
State VR Director (Ex Officio)	1	10/2022
State Workforce Development Board	vacant	

3. If the SRC is not meeting the composition requirements in Section 105(b) of the Rehabilitation Act and/or is not meeting quarterly as required in Section 105(f) of the Rehabilitation Act, provide the steps that the VR agency is taking to ensure it meets those requirements.

As of February 2026, the Arizona State Rehabilitation Council has 20 members with four vacancies. Applications are pending for the Parent Information and Training Center representative and the Council is conducting outreach to fill the State Workforce Board Development Board and Business, Industry, and Labor vacancies. The Governor's Offices assigns all new members a starting term date to begin when the previous member's term ended.

The members of the SRC meet quarterly as required.

4. In accordance with the requirements in Section 101(a)(21)(A)(ii)(III) of the Rehabilitation Act, include a summary of the Council's input (including how it was obtained) into the State Plan and any State Plan revisions, including recommendations from the Council's annual reports, the review and analysis of consumer satisfaction and other Council reports.

The SRC receives program updates from the VR Administrator and other program staff on a quarterly basis. Updates include information and statistics regarding VR performance measures, appeals, federal and state funding, spending strategies, strategic initiatives for VR as well as the Department of Economic Security (designated state agency), Client Satisfaction survey results, and the comprehensive statewide needs assessment. In preparation for developing and modifying the PY 2024-2027 state plan, VR and SRC reviewed current state plan recommendations, goals, and priorities. Title VI funds will continue to be declined as Title I funding is sufficient to cover VR and Supported Employment expenditures for the foreseeable future. The decision to decline Title VI funds was included in the original and modified version of this State Plan, and made available for public comment in January 2024 and March 2026. SRC is aware that VR desires to maintain current goals for the next two program years. At the time, the SRC has not requested changes to recommendations, goals, priorities and strategies identified in this plan; updates will be made prior to final submission if requested by SRC. SRC recommendations:

- Continue collaborative efforts through WIOA for the purpose of increasing equitable access to services for individuals with disabilities, specifically students and transition-aged youth, and improving local education agency awareness of, and referrals to VR.
- Continue efforts to increase awareness and provide outreach regarding VR services to individuals with disabilities (including a broad spectrum of disability populations). Utilize low-cost outreach modes including social media, public service announcements, guest appearances on local

television programs, announcements at professional sporting events, etc. in order to preserve funds for direct services provision.

- Continue efforts to identify and alleviate VR service provision barriers in Arizona.
- Continue to strive to meet performance indicators and update the SRC on strategies being implemented.
- Maintain partnerships with current Project 121 American Indian VR programs in Arizona and continue to identify opportunities and strategies to partner with tribes that do not have existing Project 121 programs

5. Provide the VR agency's response to the Council's input and recommendations, including an explanation for the rejection of any input and recommendations.

VR agrees with all recommendations provided by the SRC. The agreed upon goals, priorities and strategies outlined in section (c) of this plan address all recommendations. The SRC's recommendations and feedback, including the declination of Title VI funds noted in section (e), was included in the State Plan that was made available for public comment in January 2024 and March 2026. SRC was notified of the opportunity to review and submit additional comments during both public comment periods.

SRC Recommendation 1: Continue collaborative efforts through WIOA for the purpose of increasing equitable access to services for individuals with disabilities, specifically students and transition-aged youth, and improving local education agency awareness of, and referrals to VR.

VR Response: VR agrees with the recommendation and has expanded its dedicated Transition and Pre-ETS teams in order to increase outreach and provide support and technical assistance to schools, vendors, and staff. VR continues to partner with the Arizona Department of Education to better support students with disabilities in Career and Technical Education programs, and is working with Project Search programs to increase enrollment and opportunities for students.

SRC Recommendation 2: Continue efforts to increase awareness and provide outreach regarding VR services to individuals with disabilities (including a broad spectrum of disability populations). Utilize low-cost outreach modes including social media, public service announcements, guest appearances on local television programs, announcements at professional sporting events, etc. in order to preserve funds for direct services provision.

VR Response: VR agrees with the recommendation and has worked with a contractor to develop a comprehensive outreach strategy and social media campaign to increase awareness of RSA programs within specific populations (e.g. general, youth, medical providers, K-12 and post-secondary schools, potential business partners, early intervention groups, etc.), as well as the broader community. VR has already significantly increased its promotion of client successes and disability awareness activities on social media and will be launching new marketing materials and informational videos in the coming year.

SRC Recommendation 3: Continue efforts to identify and alleviate VR service provision barriers in Arizona.

VR Response: VR agrees with the recommendation and will continue to review policies and processes with the goal of identifying and eliminating unnecessary requirements. In the past year, VR has simplified the VR application and IPE forms, introduced enhanced electronic signature options, eliminated unnecessary signature requirements on eligibility and IPE extensions, eliminated a required financial need assessment prior to plan, and simplified financial need criteria.

SRC Recommendation 4: Continue to strive to meet performance indicators and update the SRC on strategies being implemented.

VR Response: VR agrees with the recommendation and **continues** to partner with the VR **Technical Assistance Center and other resources** to review program performance data, identify barriers to successful achievement of negotiated performance measures, and train staff. The VR Administrator will continue to provide the SRC with updates on program performance and progress toward achievement of the negotiated measures.

SRC Recommendation 5: Maintain partnerships with current Project 121 American Indian VR Programs in Arizona and continue to identify opportunities and strategies to partner with tribes that do not have existing Project 121 Programs.

VR Response: VR agrees with the recommendation and maintains Memorandum of Understandings with the Navajo, White Mountain Apache, Hopi, Salt River Pima, and Tohono O’odham 121 programs. The MOU’s maximize funds and resources of both the State and Tribal VR programs to co-serve American Indians with disabilities who reside within the state of Arizona. Each entity maintains sole responsibility to abide by all mandates set forth within the Rehabilitation Act of 1973, as amended. Service collaboration, transition planning, and sharing of resources and training opportunities between the entities are hallmarks of these agreements.

VR **will continue working with** the Sonoran University Center for Excellence in Developmental Disabilities (UCEDD) to develop and implement unique opportunities to braid funding in order to support students with disabilities on Tribal lands. **The Intergovernmental Service Agreement (ISA) supporting these efforts has been renewed through June 2029 to ensure continued collaboration.**

b. Comprehensive Statewide Needs Assessment (CSNA).

Section 101(a)(15), (17), and (23) of the Rehabilitation Act require VR agencies to provide an assessment of:

1. The VR services needs of individuals with disabilities residing within the State, including:

A. Individuals with the most significant disabilities and their need for Supported Employment;

The following findings and recurring themes pertaining to individuals with the most significant disabilities and their need for Supported Employment emerged from Arizona’s 2023 CSNA:

- Training in Supported Employment and Customized Employment is needed for all staff, community rehabilitation providers, and partners.

- Fear of benefit loss continues to impact the return-to-work behavior of SSA beneficiaries. There is a need for benefits planning for consumers and their families.
- Access to available, accessible and affordable transportation to work and appointments remains a significant need, especially in the rural areas.
- Work experience, assistive technology, soft skills, job search and placement assistance and job coaching were cited repeatedly as important rehabilitation needs. Individuals who experience mental health issues need access to more behavioral health services to support employment success.
- Individuals are in need of training in self-advocacy, as well as Financial literacy and empowerment training.
- Lack of job skills and work experience, as well as employer perceptions about employing people with disabilities are significant barriers to employment.
- Counseling staff need training in how to effectively meet the needs of individuals with multiple disabilities and intersecting needs.
- Assistive Technology (AT) is an important and needed service. Recipients need training in how to use the AT/ aids/devices prior to starting postsecondary education or job.

B. Individuals with disabilities who are minorities and individuals with disabilities who have been unserved or underserved by the VR program;

The following findings and recurring themes emerged from Arizona’s 2023 Comprehensive Statewide Needs Assessment (CSNA):

- The rehabilitation needs of minorities or individuals from different ethnic groups did not differ significantly from other populations served by VR except for the need for language translators or bilingual staff working with them at VR or at service providers. Language barriers remain a challenge for non-English speakers with disabilities.
- Training in cultural awareness and how different cultural beliefs and practices impact individuals is needed for service providers and VR staff.
- Individuals with sensory impairments, especially Blind individuals and Deaf individuals, were cited as potentially underserved because of staff shortages in these specialty units. In addition, there are not many providers that are fluent in American Sign Language or have experience working with blind individuals, which limits the availability and speed of service delivery.
- Individuals who are blind need more mobility training options and other adjustment to blindness training skills.

C. Individuals with disabilities served through other components of the workforce development system; and

The following findings and recurring themes emerged from Arizona’s 2023 CSNA:

- Individuals with disabilities who access the ARIZONA@WORK centers often find that there is no sign language interpreter available or up to date or working assistive technology. When an individual comes into an ARIZONA@WORK Center with a physical disability, or identifies as

having a disability, the Center staff refer directly to VR without making an effort to work with the individual.

- VR leadership and ARIZONA@WORK leadership have a very good working relationship at the State and many local levels, and they were moving beyond a referral relationship prior to COVID, but the pandemic set back the progress made. Although consumers are referred to ARIZONA@WORK Job Centers, these are primarily for employment preparation workshops and not shared funding of cases or training.
- Community Rehabilitation Provider staff have little or no knowledge of how the ARIZONA@WORK Job Centers or WIOA partners work in their State.
- VR staff recognize that there is great benefit to being co-located at the job center and that this leads to collaborations and a higher likelihood that individuals with disabilities who access the Job Centers will receive services matched to their needs.
- It appears to VR staff that the Job Centers don't have a good working knowledge of working with people with disabilities and that they are not aware of the breadth and scope of VR services and the processes to make referrals. Cross-training remains a significant and ongoing need.

D. Youth with disabilities, including students with disabilities and their need for pre-employment transition services. Include an assessment of the needs of individuals with disabilities for transition career services and pre-employment transition services, and the extent to which such services are coordinated with transition services provided under IDEA.

The following findings and recurring themes emerged from Arizona's 2023 CSNA:

- The rehabilitation needs of youth and students with disabilities are similar to adults except they need more work experience and pre-employment transition services. The primary needs of transportation, work experience, work skills, soft skills, mental health concerns, assistive technology, and employers willing to give them a chance are the same as adults.
- VR has developed some innovative and impactful pre-employment transition services work-based learning programs, including Project SEARCH programs in partnership with the tribal 121 VR programs. These are commendable programs that provide rich learning experiences for students with disabilities.
- Youth and students with disabilities need more opportunities to participate in work preparation at the school level.
- More providers of pre-employment transition services are needed across the State.
- VR needs to be present at Individualized Education Plan (IEP) meetings in order to help with the transition process. The lack of staff, or turnover, at both VR and the schools during the pandemic, adversely impacted VR's presence at IEPs. It is important that VR be visible in these settings so that students, youth and their families understand the breadth of VR services available.
- Peer mentoring is a need for youth and students with disabilities as they need to have strong role models that show them what is possible for their future.
- Young people experiencing homelessness or who are in foster care (or aging out) are not as likely to have employment success because of the potential lack of family involvement.

- Youth transitioning to postsecondary education settings are not getting connected with their needed accommodations in a timely manner because they do not have an identified person assisting them in this process like they did in secondary school.

2. Identify the need to establish, develop, or improve community rehabilitation programs within the State.

The following findings and recurring themes emerged from Arizona’s 2023 CSNA:

- There is a need for more providers for all VR services in the rural areas of the State. In many places, there are simply no providers, especially for job coaching and Supported Employment.
- There is a significant need for Customized Employment providers. There are very few active in the State.
- Community Rehabilitation Provider (CRP) agencies appear to be in a staffing crisis since the pandemic. Staff turnover at CRPs has been significant and this affects wait times for services for all individuals referred.
- There is a need for more pre-employment transition services providers.
- There is a recurring concern that the quality of vendor services was weak, job placements are in low paying, high-turnover jobs, and it appears that CRPs need better training and incentives to develop higher quality placements.
- State imposed insurance requirements for vendors are expensive and difficult to obtain and may deter new vendors from applying.
- There is a need to streamline processes related to authorizing and paying for purchased services.

c. Goals, Priorities, and Strategies

Section 101(a)(15) and (23) of the Rehabilitation Act require VR agencies to describe the goals and priorities of the State in carrying out the VR and Supported Employment programs. The goals and priorities are based on (1) the most recent CSNA, including any updates; (2) the State’s performance under the performance accountability measures of Section 116 of WIOA; and (3) other available information on the operation and effectiveness of the VR program, including any reports received from the SRC and findings and recommendations from monitoring activities conducted under Section 107 of the Rehabilitation Act. VR agencies must—

1. Describe how the SRC and the VR agency jointly developed and agreed to the goals and priorities and any revisions; and

The SRC and VR agency engage in collaborative discussions regarding VR program performance, goals and priorities throughout the year. During every quarterly meeting, the council receives programmatic information and updates from the VR Administrator or other program staff on topics such as VR performance measures, appeals, federal and state funding, strategic initiatives, and Client Satisfaction survey results. VR staff and the SRC members review the current state plan, including prior recommendations and agreed upon goals and strategies. The agreed upon goals and strategies submitted in 2024 will be continued for the next two program years. At the time, the SRC has not

requested changes to current recommendations, goals, priorities and strategies identified in this plan; updates will be made prior to final submission if requested by SRC.

2. Identify measurable goals and priorities in carrying out the VR and Supported Employment programs and the basis for selecting the goals and priorities (e.g., CSNA, performance accountability measures, SRC recommendations, monitoring, other information). As required in Section 101(a)(15)(D), (18), and (23), describe under each goal or priority, the strategies or methods used to achieve the goal or priority, including as applicable, description of strategies or methods that—

A. Support innovation and expansion activities;

B. Overcome barriers to accessing VR and supported employment services;

C. Improve and expand VR services for students with disabilities, including the coordination of services designed to facilitate the transition of such students from school to postsecondary life (including the receipt of VR services, post-secondary education, employment, and pre-employment transition services); and

D. Improve the performance of the VR and Supported Employment programs in assisting individuals with disabilities to achieve quality employment outcomes.

List and number each goal/priority, noting the basis, and under each goal/priority, list and number the strategies to achieve the goal/priority

Goal 1: Reduce the percentage of participant attrition prior to IPE, thus increasing the percentage of individuals working toward achievement of an employment outcome.

Strategies:

- Conduct additional analysis to identify and address potential trends in closures without an employment outcome, specifically closures after eligibility but prior to signed IPE, and closures after implementation of the IPE but without employment.
- Utilize guidance from TAC-23-03 and TAC-24-01 to further identify and address unnecessary barriers and streamline processes for application, eligibility, IPE development and service provision.

This goal was based on program data from the RSA Data Dashboards, results and recommendations from the 2023 CSNA, and results from the SRC's Client Satisfaction Survey. Progress will be monitored through review of the RSA Data Dashboard metrics and Client Satisfaction survey results. If proposed strategies are successful, VR expects to see a decrease in the percentage of individuals existing prior to IPE. VR also anticipates an increase in timeliness of eligibility and IPE, as well as increase in client satisfaction as measured through the SRC's Client Satisfaction survey.

Goal 2: Improve access to services and support for individuals with disabilities across Arizona.

Strategies:

- Develop and implement an annual marketing and outreach plan that includes targeted outreach to underserved populations and communities, students with disabilities, schools, partner agencies, and employers. Explore methods for tracking effectiveness of materials and activities.
- Expand Statewide Transition and Pre-ETS teams in order to provide targeted outreach to students with disabilities and technical assistance to Pre-ETS contracted providers.
- Continue partnering with Sonoran UCEDD to develop, implement, and sustain unique opportunities to braid funding in order to support students with disabilities on Tribal lands.
- Educate staff on partner agencies and community resources that individuals may be referred to for assistance with unmet needs (e.g. food, housing, childcare) while participating in the VR program.
- Re-establish VR staff position that will assist with addressing community rehabilitation provider needs, training, and communications.
- Develop and implement Customized Employment and enhanced Supported Employment services, as well as associated training for staff and vendors. Educate staff and vendors on utilization of these services as an alternative to Trial Work experiences.
- Continue providing Innovation and Expansion funds to Statewide Independent Living Council (SILC) to assist with coordination of services for individuals with disabilities such as Youth Leadership Forum(s) and conference.

This goal was based on results and recommendations from the 2023 CSNA, ongoing staff/vendor feedback, and program data from the RSA Data Dashboards. Progress will be monitored through review of RSA Data Dashboard metrics, program management reports, and agency scorecards (weekly/monthly metric trackers). If proposed strategies are successful, VR expects to see an increase in the number of VR applicants and students with disabilities receiving Pre-ETS. Other indicators of success would include statewide implementation of Customized Employment and enhanced Supported Employment services, increase in collaborative projects with Tribal VR programs, and positive feedback from staff and vendors regarding contracted services.

Goal 3: Meet or exceed negotiated WIOA Performance Measures.

Strategies:

- Utilize technical assistance and training available through VR **Technical Assistance Center** to further educate staff on WIOA performance measures and reporting requirements.
- Simplify and streamline required data collection, reporting of performance measures, and methods for obtaining supporting documentation through implementation of a modernized case management system.
- Review current policy, procedures, and best practices and address any unnecessary barriers to services and supports that assist individuals in preparing for quality employment outcomes and contribute to achievement of negotiated performance measures.

This goal is based on program data from the RSA Data Dashboards. Progress will be monitored through review of RSA Data Dashboard Performance metrics (in comparison to negotiated performance measures), program management reports, and agency scorecards (weekly/monthly metric trackers). If proposed strategies are successful, VR expects to meet or exceed negotiated performance measures.

d. Evaluation and Reports of Progress: VR and Supported Employment Goals

For the most recently completed program year, provide an evaluation and report of progress for the goals or priorities, including progress on the strategies under each goal or priority, applicable to that program year. Sections 101(a)(15) and 101(a)(23) of the Rehabilitation Act require VR agencies to describe—

1. Progress in achieving the goals and priorities identified for the VR and Supported Employment Programs;

List the goals/priorities and discuss the progress or completion of each goal/priority and related strategies

Goal 1: Reduce the percentage of participant attrition prior to IPE, thus increasing the percentage of individuals working toward achievement of an employment outcome.

Overall Progress: In progress; goal will be continued. Between PY23 and PY24, VR increased Eligibility and IPE timeliness by approximately 2% but saw minimal change in attrition prior to IPE and closures after IPE without employment.

- Strategy 1: Conduct additional analysis to identify and address potential trends in closures without an employment outcome, specifically closures after eligibility but prior to signed IPE, and closures after implementation of the IPE but without employment.
 - Progress: During PY 2024, VR conducted problem solving meetings throughout the year to further analyze client attrition from the VR program. State and regional leadership teams reviewed authorization data and caseload statistics in attempts to identify operational trends. Closure data was reviewed however it was noted that some closures were coded as 'Unable to Locate or Contact', closure reasons such as 'No Longer Interested in Receiving Services' and 'All Other Reasons' were also frequently used. To gain deeper insight, regional leadership performed manual review of a sample of closed cases with the primary goal to pinpoint the specific drivers behind case exits prior to IPE and employment. The review revealed that the most prevalent reason for case closure was a lack of consistent communication between the client and VR staff. As a result of this review, five field offices have been selected to increase contact from a minimum of every 90 calendar days to a minimum of every 30 calendar days. Results will be monitored over PY 25 and PY 26 to assess the impact on client attrition without employment.

VR will continue to analyze available data and refine programmatic reports available through the new case management system in order to identify other circumstances that may be impacting attrition.

- Strategy 2: Utilize guidance from TAC-23-03 and TAC-24-01 to further identify and address unnecessary barriers and streamline processes for application, eligibility, IPE development and service provision.

- Progress: During PY 2024, VR analyzed policies, procedures, and best practices to identify ways to streamline processes and improve timeliness. Public meetings were conducted for all substantive policy changes prior to implementation. Changes identified in PY 2024 and implemented with the launch of inFormed on July 1, 2025 include: simplified VR application and IPE forms, enhanced electronic signature options (e.g. Docusign and 'on-screen' signing using mouse, type or touchscreen), elimination of unnecessary signature requirements on eligibility and IPE extensions, elimination of a required financial need assessment prior to plan, and simplified financial needs criteria. A client portal that will allow individuals to submit referrals, update contact information, communicate with VR staff, and upload supporting documents is part of a future development plan for inFormed.

During PY24, VR began filling new Customer Service Representative (CSR) positions. The CSR role was created specifically to support local field staff with engaging and maintaining contact with potential applicants and recipients of services. VR continues to work with HR to post and fill positions, with the goal of having CSR coverage for every field office.

VR also partnered with Northern Arizona University (NAU) Institute of Human Development (IHD) to establish an interagency service agreement that simplifies, streamlines, and encourages the provision of assistive technology services for VR clients. The contract includes comprehensive assistive technology assessments, purchase and loan of recommended equipment, installation and configuration of equipment, and training/technical assistance.

Goal 2: Improve access to services and support for individuals with disabilities across Arizona.

Overall Progress: In progress; goal will be continued. RSA Data Dashboards show an increase in applicants and students with disabilities receiving Pre-ETS between PY 23 and PY 24.

- Strategy 1: Develop and implement an annual marketing and outreach plan that includes targeted outreach to underserved populations and communities, students with disabilities, schools, partner agencies, and employers. Explore methods for tracking effectiveness of materials and activities.
 - Progress: In PY 2024, VR contracted with a third party marketing firm to begin developing informational videos and materials, including a VR Roadmap, VR Client Handbook, Pre-ETS flier, Overview of VR services and a VR Youth Flier. All materials are planned for completion in PY 2025.

VR developed and implemented a robust plan for conducting outreach and sharing program successes. This plan includes social media posts, client success stories, updating workforce websites, and sharing data on successful employment placements and closures. VR also developed and implemented the use of virtual backgrounds celebrating NDEAM and other awareness months. Virtual backgrounds are used during meetings with partners and community members to garner interest in RSA programs and increase

disability awareness. During this progress period, VR developed and shared 36 social media posts (2 highlighting employment data, 22 highlighting client successes), 9 internal messages to employment and rehabilitation staff, 9 client success videos, and 3 website updates to increase awareness of Arizona programs.

- Strategy 2: Expand Statewide Transition and Pre-ETS teams in order to provide targeted outreach to students with disabilities and technical assistance to Pre-ETS contracted providers.
 - Progress: VR hired an additional Transition Specialist in November 2024 and an additional Pre-Employment Transition Services Specialist in March 2025. The expansion of the Transition and Pre-ETS teams has enhanced partnerships with schools, community agencies and contracted providers. The additional Transition Specialist has allowed the team to provide increased technical assistance to schools and RSA staff, boosted visibility at community events thus producing greater interest in our Transition School to Work (TSW) contracts, and successfully revitalized our Project SEARCH partnership with JTED in Tucson. The addition of a second Pre-ETS Specialist has allowed for more contracted provider engagement, resulting in increased referrals and the re-engagement of several providers. The increased presence at statewide conferences, community events and engagement with schools has positively impacted the understanding of Pre-ETS for VR staff and stakeholders across the state.
- Strategy 3: Continue partnering with Sonoran UCEDD to develop, implement, and sustain unique opportunities to braid funding in order to support students with disabilities on Tribal lands.
 - Progress: The Sonoran Center has four employees dedicated to serving tribal youth and plays a central role in delivering Pre-Employment Transition Services (Pre-ETS). The Intergovernmental Service Agreement (ISA) supporting these efforts has been renewed through June 2029 to ensure continued collaboration. Pre-ETS are provided in partnership with several educational institutions, including Window Rock High School for Navajo Tribal Youth, Baboquivari High School for Tohono O’odham Tribal Youth, and Hopi High School for Hopi Tribal Youth. Outreach efforts have also begun at Tuba City High School to engage Navajo Tribal Youth. Additionally, the Sonoran Center has developed the WayFinder curriculum, a culturally tailored guide and activity designed specifically to support tribal youth.
- Strategy 4: Educate staff on partner agencies and community resources that individuals may be referred to for assistance with unmet needs (e.g. food, housing, childcare) while participating in the VR program.
 - Progress: During PY24, VR continued to develop and expand the Employment Outreach Team and establish relationships with workforce partners and job center staff. Efforts to increase collaboration include attending monthly meetings and maintaining ongoing communication with Registered Apprenticeship and Re-entry teams, as well as partners in the Workforce Solutions Administration. The team is creating an informational session for workforce staff that will focus on a customer service approach to job seekers. The

goal of this project is to cross-train staff on the programs and services available through all partners, ensuring job seekers receive referrals to services they need.

VR's Behavioral Health, Transition, and Developmental Disabilities Coordinators conduct quarterly meetings with staff working in speciality populations. Updated information on community and national resources is shared during these meetings. Additionally, the transition team provides a monthly roundup of resources email for staff, and the behavioral health team provides quarterly newsletters with resources and outreach opportunities for staff to extend to VR clients.

- Strategy 5: Re-establish VR staff position that will assist with addressing community rehabilitation provider needs, training, and communications.
 - Progress: VR successfully established and filled a Service Liaison position in PY 2024. This role works closely with program leadership, shared service teams, and Arizona RSA's Managed Service Provider to review and improve service specifications, and provide field staff with information and support related to the planning, purchase and provision of services. The responsibilities and contributions of this role will continue to expand in the coming years.
- Strategy 6: Develop and implement Customized Employment and enhanced Supported Employment services, as well as associated training for staff and vendors. Educate staff and vendors on utilization of these services as an alternative to Trial Work experiences.
 - Progress: VR engaged with three providers to trial new Customized Employment services. The trial included three providers who were dually contracted with the Division of Developmental Disabilities and Vocational Rehabilitation, and nine clients with dual diagnoses living in urban, rural, and tribal areas. Asynchronous, Arizona-specific Customized Employment training was provided to VR and CRP staff. This trial facilitated the creation of extensive resources and training materials along with elevating awareness of Customized Employment processes across systems. VR plans to launch a new contract for customized employment services in the Fall of 2026.
- Strategy 7: Continue providing Innovation and Expansion funds to Statewide Independent Living Council (SILC) to assist with coordination of services for individuals with disabilities such as Youth Leadership Forum(s) and conference.
 - Progress: In PY 2024, VR provided \$285,000 to the AZSILC to support the development of the Resource Plan and implementing activities. The AZSILC's goals and objectives specific to youth include engaging Youth Leaders directly in AZSILC Councils, Committees, events, or via paid employment, and through the support of Youth Leadership education opportunities.

Goal 3: Meet or exceed negotiated WIOA Performance Measures.

Overall Progress: In progress; goal will be continued. For PY24, AZRSA exceeded the minimum individual indicator of 50% for all five WIOA Performance Indicators and achieved an overall State Program Score of 93.80%.

- Strategy 1: Utilize technical assistance and training available through VRTAQ-QM to further educate staff on WIOA performance measures and reporting requirements.
 - Progress: Throughout PY24, VRTAC-QM staff assisted VR with review and analysis of RSA data dashboards, provided feedback on policies, procedures, and case management system functionality, and hosted two sessions on performance measures at Arizona's all-staff conference in October 2024. In late PY24, Arizona engaged a contractor for assistance with analyzing existing program data and identifying strategies to improve data accuracy and performance. This work resulted in significant data validation and clean-up activities related to enrollments, MSGs and credentials in preparation for transition to a new case management system. The contractor also partnered with Arizona to test and enhance the new case management system's data collection and reporting functionality related to performance measures.
- Strategy 2: Simplify and streamline required data collection, reporting of performance measures, and methods for obtaining supporting documentation through implementation of a modernized case management system.
 - Progress: inFormed did not launch in PY24 as anticipated. Development and testing conducted in PY24 to prepare for the transition to inFormed on July 1, 2025 included: use of conditional logic to reduce unnecessary data collection and duplicative data entry; data collection 'cards' that display progress bars and include edit checks, allowing staff to quickly identify required fields and potential data entry errors; training 'records' that allow MSGs, credentials, and supporting documents to be linked to specific enrollments, creating more intuitive data entry and easier tracking;; additional case statuses to separate clients with employment from those with stable employment, improving awareness of, and ability to monitor individuals on track to achieve an employment outcome; and dashboards that provide individual staff with a variety of metrics and alerts related to their caseload, office, or region. Interfaces with Einstein (state UI wage data) and Equifax (out-of-state wages) to obtain and record post-exit employment wages, greatly reducing need for manual entry.

Future activities include development of a client portal that will improve communication and exchange of information, including documentation supporting MSGs, credentials, and employment; and a contract and data sharing agreement with the National Student Clearinghouse for post-exit enrollment and credential information.

- Strategy 3: Review current policy, procedures, and best practices and address any unnecessary barriers to services and supports that assist individuals in preparing for quality employment outcomes and contribute to achievement of negotiated performance measures.

- Progress: During PY 2024, VR updated policies and procedures for Measurable Skills Gains and Credential Attainment. Updates were non-substantive and made with the goal of increasing understanding of MSGs and credentials, and clarifying documentation and reporting requirements.

As stated under Goal 1, VR spent significant effort reviewing policies and procedures in PY24 to assist with development of a modernized case management system. Examples of significant changes identified in PY 2024 and implemented with the launch of inFormed on July 1, 2025 include: simplified VR application and IPE forms, enhanced electronic signature options (e.g. Docusign and ‘on-screen’ signing using mouse, type or touchscreen), elimination of unnecessary signature requirements on eligibility and IPE extension forms, elimination of a required financial need assessment prior to plan and simplified financial needs criteria.

During PY24 VR also began exploring ways to simplify information and processes related to VR appeals. As a result of these efforts, an online appeal request form and revised explanation of appeal rights was developed. The new notification of appeal rights explains the multiple ways in which an appeal can be requested and includes a QR code that links directly to the online request form.

2. Performance on the performance accountability indicators under Section 116 of WIOA for the most recently completed program year, reflecting actual and negotiated levels of performance. Explain any discrepancies in the actual and negotiated levels; and

Median Earnings: Prior to July 1, 2025 , VR staff manually entered wages into the case management system every quarter. While staff were able to utilize UI wage data, human error and general confusion regarding quarters and post-exit wage availability likely contributed to failure to meet negotiated measures for median wages.

Credential/MSG: VR’s prior case management system utilized past-tense wording on questions/data fields related to MSGs and credentials. This led to staff entering historical enrollments, MSGs and credentials. This and failure to disenroll, resulted in individuals being included in Arizona’s denominator who were not actually enrolled during their participation in VR services.

Performance Indicators	PY 2024 Negotiated Level	PY2024 Actual
Employment (second quarter after exit)	49.0%	49.0%
Employment (fourth quarter after exit)	42.7%	47.2%
Median Earnings (Second Quarter after exit)	\$5,200	\$5,103

Performance Indicators	PY 2024 Negotiated Level	PY2024 Actual
Credential Attainment Rate	30.0%	28.4%
Measurable Skills Gains	37.0%	27.4%

3. The use of funds reserved for innovation and expansion activities (Sections 101(a)(18) and 101(a)(23) of the Rehabilitation Act) (e.g., SRC, SILC).

Innovation and Expansion funds were provided to the Arizona Statewide Independent Living Council (AZSILC) to assist in the provision of allowable activities for Independent Living. In PY 2024, VR provided \$285,000 to the AZSILC to support the development of the Resource Plan and implementing activities. The AZSILC has a robust State Plan for Independent Living through collaboration with five Centers for Independent Living serving all 15 counties. The AZSILC has four ambitious goals and 18 objectives to educate individuals with disabilities on the Independent Living philosophy, systemic advocacy opportunities, and disability justice principles ; collaborate with other entities and agencies to mitigate healthcare, housing, transportation, and employment barriers; model inclusive communication and outreach practices, engage Youth Leaders directly in AZSILC Councils, Committees, events, or via paid employment and through the support of Youth Leadership education opportunities,; and engage in advocacy through public policy committee, and continues to be a national leader related to Emergency Preparedness and access to healthcare.

e. Supported Employment Services, Distribution of Title VI Funds, and Arrangements and Cooperative Agreements for the Provision of Supported Employment Services.

1. Acceptance of title VI funds:

(B) VR agency does NOT elect to receive title VI funds and understands that supported employment services must still be provided

2. If the VR agency has elected to receive title VI funds, Section 606(b)(3) of the Rehabilitation Act requires VR agencies to include specific goals and priorities with respect to the distribution of Title VI funds received under Section 603 of the Rehabilitation Act for the provision of supported employment services. Describe the use of Title VI funds and how they will be used in meeting the goals and priorities of the Supported Employment program.

Not Applicable

3. Supported employment services may be provided with Title 1 or Title VI funds following placement of individuals with the most significant disabilities in employment. In accordance with Section 101(a)(22) and Section 606(b)(3) of the Rehabilitation Act, describe the quality, scope, and extent of supported employment services to be provided to individuals with the most significant disabilities, including youth with the most significant disabilities; and the timing of transition to extended services.

Quality

VR provides Supported Employment services to eligible individuals with the most significant disabilities. Supported Employment services are planned and authorized by VR staff and provided through contracted providers. Upon contract award, providers receive training on the scope of work and service requirements from VR's Managed Service Provider and VR staff. As of July 2025, 63 vendor agencies are contracted to provide supported employment job coaching and extended services (for youth with the most significant disabilities). Services and providers are available in every county across the state. Job coaching providers working directly with individuals are required to have at minimum, a high school diploma and several years of experience working with individuals with disabilities. VR utilizes a contract monitoring unit who conduct annual desk and site audits in order to ensure compliance with contract requirements.

For individuals in need of Supported Employment, VR staff, the individual (and guardian, if necessary), and provider work together to develop an agreed upon plan for delivery of services. Providers are required to report activity to VR staff on a monthly basis. VR staff are responsible to review the monthly activity and approve the service costs or request a meeting to revise the service plan goals and objectives. During PY 2024, 333 individuals in Supported Employment plans exited the VR program with competitive integrated employment.

Expanding and improving Supported and Customized Employment services remains a priority for VR and a new Customized Employment scope of work is currently being **trialed** through Sonoran UCEDD. In 2024, VR did a call to providers, and three were identified to participate, based upon certain criteria including: service areas, dual contract with DDD and VR, and the ability to provide extended support services. Selected providers received training via an asynchronous platform, which offered an Arizona specific customized employment training, followed by in person support to apply the knowledge with clients. Nine job seekers/VR clients were identified to participate and reflected the diverse population in Arizona. This includes individuals living in rural, urban and tribal areas. The job seekers also reflect individuals who are eligible for additional services such as developmental disabilities, behavioral health and Tribal VR. This trial has facilitated the creation of extensive resources, training materials, and the initial stages of state systems change; to ensure the success and sustainability of the customized employment service. VR plans to launch **a new contract for** customized employment services in the Fall of 2026.

Scope

VR utilizes a consistent process of eligibility and Order of Selection determination for all individuals. An individual with the most significant disability who needs intensive VR services in order to obtain and maintain competitive and integrated employment is considered to be in need of Supported Employment services. Individuals who are determined to need Supported Employment services have access to the full scope of VR services. Individuals and staff will work to identify a financial or natural resource to provide ongoing support services as needed once VR services have concluded.

Financial resources include long term extended support services provided by the Division of Developmental Disabilities (DDD) or Arizona Health Care Cost Containment System (AHCCCS). Additional sources such as a Plan to Achieve Self-Sufficiency or Impairment Work Related Expense plan is available

to individuals who receive Social Security award monies. VR holds agreements with six Employment Networks who may support individuals in employment after case closure from VR. Natural support in an employment setting can be developed while the individual is receiving VR supported employment services. VR staff may also provide training to managers, supervisors, and coworkers in order to develop natural support within the competitive and integrated employment setting.

Extent

VR recognizes Supported Employment as a viable employment option as long as the employment outcome meets the criteria of providing competitive wages in an integrated setting. Supported Employment services may be provided to individuals with the most significant disabilities by VR for up to 24 months or longer, if necessary and agreed upon by the individual and VR staff.

Timing of Transition to Extended Services

During development of the Individualized Plan for Employment, VR works with an individual to assess the need for Supported Employment and extended services. If Supported Employment and extended services are determined to be necessary, VR and the individual explore potential sources of extended services which may include alternative funding sources such as AHCCCS, DDD and natural supports. Once the individual obtains employment, Supported Employment services are provided for up to 24 months (or longer if necessary and an exception is approved) to assist the individual in achieving stable employment prior to transitioning to extended services. During the provision of supported employment services, the individual is provided with job training, coaching, observation, and/or follow-up services to reinforce and stabilize the employment through on-worksites monitoring or off-site meetings between the individual and VR staff or vendor. The individual is considered stable in their employment when a reduction in support services has occurred and a continuing level of support has been identified and the individual has achieved the highest level of independence on the job, as determined by the individual, job coach, and Staff.

Once an individual is determined to be stable in their employment, a meeting is held with the individual, VR staff, and the extended service provider. If all parties are in agreement that the individual is stable in their employment and can be transitioned to extended services, responsibility for the funding for job coaching and extended services is transferred to the extended service provider. If the individual is a youth with a disability and no other source of extended services is available, VR will provide extended services for up to four years or until the youth reaches the age of 25, whichever happens first. If the individual is transitioned to non VR funded extended services, VR staff monitor the individual's progress and job stability over the next 90 days. At the conclusion of the 90 day period, if the individual remains stable in the job and the team agrees, the case will be closed as meeting an employment outcome.

4. Sections 101(a)(22) and 606(b)(4) of the Rehabilitation Act require the VR agency to describe efforts to identify and arrange, including entering into cooperative agreements, with other State agencies and other appropriate entities in order to provide supported employment services. The description must include extended services, as applicable, to individuals with the most significant disabilities, including the provision of extended services to youth with the most significant disabilities in accordance with 34 C.F.R. § 363.4(a) and 34 C.F.R. § 361.5(c)(19)(v).

Individuals eligible for Supported Employment services must have a severe physical or mental impairment that seriously limits three or more functional capacities (such as mobility, communication, self-care, self-direction, interpersonal skills, work tolerance, or work skills) in the context of an employment outcome; and whose vocational rehabilitation can be expected to require multiple VR services over an extended period of time (6 months or longer). If an individual meets this criterion, they may receive Supported Employment services available through VR for up to 24 months, or longer, if an extension of time is necessary and agreed upon by VR and the individual. The individual may also receive Extended Services funded through another source such as the Arizona Healthcare Cost Containment System (AHCCCS) or, if the individual is not younger than 14 and not older than 24, they may also receive extended services provided by VR for up to four years or until the age of 25.

During development of the Individualized Plan for Employment, VR works with an individual to assess the need for Supported Employment and extended services. If Supported Employment and extended services are determined to be necessary, VR and the individual explore potential sources of extended services which may include alternative funding sources such as AHCCCS (which funds extended services provided by the Division of Developmental Disabilities (DDD) and the Regional Behavioral Health Authorities (behavioral health clinics), and natural supports such as family, friends, an employer, etc. VR, DDD, and behavioral health clinics encourage contracted providers to contract with all partner agencies in order to ensure consistent service delivery and a seamless transition from supported employment to extended services for the individual. Extended services typically consist of a minimal but consistent amount of job coaching per month for as long as the individual needs to maintain employment.

Community Rehabilitation Program providers state contracts

VR contracts with Community Rehabilitation Program providers to ensure supported employment services are available to individuals with disabilities across the state. As of July 2025, 63 contracted providers offer supported employment job coaching and extended services (for youth) to individuals with the most significant disabilities. Services are available in every county in the state. Additional collaboration to identify resources for individuals with significant disabilities, including youth with significant disabilities, continues to be explored within the Arizona Department of Economic Security, with other state agencies, and within the individual's own support network.

Collaboration with AHCCCS (Arizona's Medicaid Agency)

VR has an Interagency Service Agreement with AHCCCS that details the coordination of services, including the provision of supported employment and extended supported employment services, to individuals designated with a Serious Mental Illness. VR has a Statewide Behavioral Health Coordinator and Specialist who are responsible for implementation of the agreement between VR and AHCCCS. This

team provides guidance and technical assistance to staff from both VR and behavioral health to ensure referrals and service delivery are streamlined and effective for the identified population. Designated VR staff are assigned to behavioral health clinical teams in every county throughout the state in order to enhance service delivery, customer satisfaction, and successful outcomes through the provision of vocational rehabilitation and supported employment services.

The Interagency Service Agreement with AHCCCS includes the provision of funding for extended services by the designated behavioral health provider. Extended services funded through behavioral health are available in every county. The assigned VR staff coordinate the extended services with the behavioral health clinical team in order to ensure the services continue to be provided once the individual exits the VR program. The individual will receive extended services funded by AHCCCS for the duration of their participation in behavioral health services.

Collaboration with the Arizona Department of Developmental Disabilities

A Memorandum of Understanding between VR and the Arizona DDD describes the cooperation and coordination from referral through supported employment and extended services for individuals with developmental disabilities. VR has a Statewide Developmental Disabilities Coordinator and Specialist dedicated to the oversight and implementation of the agreement between VR and DDD. These positions work closely with the DDD Employment Services team to provide guidance and technical assistance to staff from both VR and DDD to ensure referrals and service delivery are streamlined and effective for the identified population. Direct service staff in each local VR office have been identified to serve individuals referred from DDD. In addition, VR offices with increased referrals has necessitated additional staff to serve individuals referred by DDD.

The memorandum between VR and DDD includes provision of DDD funded extended services for individuals who are eligible for Arizona Long term Care System (ALTCs). Extended services funded by DDD are available in most counties. In counties where DDD does not have extended services funded by DDD available, VR staff and DDD staff collaborate to find alternative sources of extended services (such as ticket to work, natural supports, etc). The transition from supported employment to extended services is coordinated with DDD in order to ensure continuation of services after closure from VR.

Collaboration with Employment Networks

VR has six Memorandum of Understandings with local providers for the provision of ongoing Partnership Plus services. Dedicated VR staff continue to encourage provider agencies to become Employment Networks through the Social Security Ticket to Work program. Provider agencies will then provide extended support following the successful conclusion of VR services to individuals who are Ticket to Work participants.

f. Annual Estimates

Sections 101(a)(15) and 101(a)(23) of the Rehabilitation Act require all VR agencies to annually conduct a full assessment of their resources and ability to serve all eligible individuals before the start of the Federal fiscal year. In accordance with 34 C.F.R. § 361.29(b), annual estimates must include the following projections:

1. Estimates for next Federal fiscal year—

A. VR Program; and

Priority Category (if applicable)	No. of Individuals Eligible for Services	No. of Eligible Individuals Expected to Receive Services under VR Program	Costs of Services using Title I Funds	No. of Eligible Individuals Not Receiving Services (if applicable)
N/A	14,275	14,275	48,109,222	N/A

B. Supported Employment Program.

Priority Category (if applicable)	No. of Individuals Eligible for Services	No. of Eligible Individuals Expected to Receive Services under Supported Employment Program	Costs of Services using Title I and Title VI Funds	No. of Eligible Individuals Not Receiving Services (if applicable)
1- Most Significantly Disabled	1205	1205	\$7,411,446	N/A

g. Order of Selection

The VR agency is not implementing an order of selection and all eligible individuals will be served.

The VR agency is implementing an order of selection with one or more categories closed. * VR agencies may maintain an order of selection policy and priority of eligible individuals without implementing or continuing to implement an order of selection.

1. Pursuant to Section 101(a)(5) of the Rehabilitation Act, this description must be amended when the VR agency determines, based on the annual estimates described in description (f), that VR services cannot be provided to all eligible individuals with disabilities in the State who apply for and are determined eligible for services.

2. For VR agencies that have defined priority categories describe—

A. The justification for the order

Arizona has been serving all eligible individuals since March 2020. No order of selection is being implemented at this time.

B. The order (priority categories) to be followed in selecting eligible individuals to be provided VR services ensuring that individuals with the most significant disabilities are selected for services before all other individuals with disabilities; and
Arizona is not implementing an Order of Selection.

C. The VR agency's goals for serving individuals in each priority category, including how the agency will assist eligible individuals assigned to closed priority categories with information and referral, the method in which the VR agency will manage waiting lists, and the projected timelines for opening priority categories. NOTE: Priority categories are considered open when all individuals in the priority category may be served.

As of March 2020, all individuals who are determined eligible begin to receive services immediately. Fiscal forecasts for FFY 2026 and FFY 2027 show that VR should have sufficient funds to continue serving all eligible individuals without implementation of the order of selection.

3. Has the VR agency elected to serve eligible individuals outside of the order of selection who require specific services or equipment to maintain employment?

No

h. Waiver of Statewideness.

The State plan shall be in effect in all political subdivisions of the State, however, the Commissioner of the Rehabilitation Services Administration (Commissioner) may waive compliance with this requirement in accordance with Section 101(a)(4) of the Rehabilitation Act and the implementing regulations in 34 C.F.R. § 361.26. If the VR agency is requesting a waiver of statewideness or has a previously approved waiver of statewideness, describe the types of services and the local entities providing such services under the waiver of statewideness and how the agency has complied with the requirements in 34 C.F.R. § 361.26. If the VR agency is not requesting or does not have an approved waiver of statewideness, please indicate "not applicable."

VR is requesting a waiver of state wideness. VR has entered into 30 Interagency Transfer Agreements (ITAs) with Public Education Agencies in Arizona to facilitate a seamless transition of students with disabilities from high school to employment (also known as Transition School to Work or TSW). Each agreement has an associated budget and the agreed upon non-federal funds are transferred from the Public Education Agency to VR on a quarterly basis.

All requirements as listed in the VR services portion of the Unified State Plan, as well as all VR eligibility and order of selection criteria will apply to the individuals and services provided under the Interagency Transfer Agreements (ITAs) for Transition School to Work (TSW). Services outlined in the ITA/TSW agreements will not be provided to an individual unless that individual is eligible for VR and in an Order of Selection priority category that is open for services.

The TSW programs operated through the ITAs serve high school students with disabilities who are eligible for VR and not on an Order of Selection waitlist (pre-employment transition services for potentially eligible students with disabilities who are enrolled in educational programs are provided

outside of these specific TSW programs). The enhanced TSW services provided by the participating high schools are structured and goal oriented vocational-educational services and assist the students in developing work readiness skills, selecting their vocational goals, and preparing them for a successful transition from school to work. All services are approved by VR prior to provision and individualized VR services are provided as described on an approved Individualized Plan for Employment. Students in the TSW programs receive services that lead to the acquisition of knowledge/skills in the following areas:

- Self-assessment (interest inventories, learning styles, aptitudes, strengths), disability awareness and personal accommodations for disability, self-determination skills, career exploration;
- Disability awareness and building skills in self-determination, identification of career goals, including a complete labor market research, initial development of job readiness skills;
- Identification of post-secondary education/training opportunities, including training and funding options, career tracks, development of résumé/cover letter writing skills, practice in mock interviews, and familiarity with filling out job applications;
- Knowledge of how to apply to training institutions, how to apply for scholarships and Pell Grants, how to obtain accommodations for their disabilities, how to perform job searches (for either paid employment or community service);
- Development of a portfolio to record the skill building process with an end goal of self-actualization and successful career planning. The content of the portfolio will meet individual student needs; each portfolio will contain individualized information similar to the following:
 - Self-Awareness (Orientation and Adjustment to Disability) content including but not limited to: student's Individualized Education Plan (IEP), assessment results, abilities, interests, and independent living skills addressed; transportation;
 - Career Exploration including but not limited to: career path research, informational interview reports, financial planning, student's Individualized Plan for Employment (IPE);
 - Job Readiness including but not limited to: Job Applications, information regarding post-secondary school choices, Free Application For Federal Student Aid (FAFSA) and other financial aid information, resume, interview skills, IPE amendments (if applicable);
 - Work Experience including but not limited to: campus and/or community work experience, career planning, issue resolution, job shadowing, volunteer experiences, IPE amendments (if applicable);
 - Post High School Plan including but not limited to: Contact information for VR counselor, Community Career Center and Disability Support Services, Supported Education at Post Secondary School (if applicable).

TSW school districts provide 42.6%, non-federal funds, of the agreed upon TSW Budget. TSW budgets can be amended at any time.

School	Number of Students	Budget SFY 2025	Non Federal-Match SFY 2025	Total Federal Funds -ITA School Budget funds + RSA Administrative funds
Agua Fria Union High School District #216	19	\$229,379.88	\$86,213.83	\$180,521.97
Arizona State School for the Deaf and Blind: Phoenix Day School for the Deaf	42	\$243,524.44	\$103,741.41	\$191,653.73
Benson Unified School District #9	6	\$100,108.78	\$40,345.94	\$78,785.61
Blue Ridge Union School District #32	7	\$92,468.35	\$39,391.52	\$72,772.59
Buckeye Union High School District #201	65	\$612,435.36	\$239,597.46	\$481,986.63
Catalina Foothills Unified School District #16	21	\$237,476.27	\$101,164.89	\$186,893.82
County of Maricopa -Cave Creek Unified School District	19	\$60,130.35	\$25,615.53	\$47,322.59
Chino Valley Unified School District #51	28	\$172,630.80	\$73,540.72	\$135,860.44
County of Maricopa -Deer Valley Unified School District #97	516	\$1,581,309.99	\$650,634.06	\$1,244,490.96
Flagstaff Unified School District #1	117	\$865,413.22	\$339,514.85	\$681,080.20
Flowing Wells Unified School District #8	7	\$195,996.09	\$83,494.33	\$154,248.92
Pinal County Schools-Florence Unified School District #1	45	\$299,363.37	\$127,528.80	\$235,598.97
Glendale Union High School District	44	\$976,316.70	\$415,910.91	\$768,361.24

Higley School District #60	5	\$232,440.00	\$88,369.44	\$182,930.28
County of Yavapai-Humboldt Unified School District	3	\$278,759.70	\$118,751.63	\$219,383.88
Mesa Unified School District #4	125	\$1,224,418.92	\$520,963.46	\$963,617.69
County of Gila, Miami Unified School District #40	2	\$79,037.58	\$33,670.01	\$62,202.58
Nogales Unified School District #1	20	\$188,369.90	\$80,245.58	\$148,247.11
Page Unified School District #8	12	\$183,448.54	\$78,149.08	\$144,374.00
Peoria Unified School District #11		\$893,325.24	\$368,628.55	\$703,046.96
Prescott Unified School District #1	29	\$90,143.04	\$38,400.94	\$70,942.57
Scottsdale Unified School District #48	23	\$555,176.48	\$236,505.18	\$436,923.89
Snowflake Unified School District #5	11	\$115,126.95	\$49,044.08	\$90,604.91
Sunnyside Unified School District # 12	74	\$569,509.44	\$233,452.02	\$448,203.93
St. David Unified School District #21	8	\$109,297.34	\$46,560.67	\$86,017.01
County of Maricopa-Tempe Unified School District #213	73	\$759,385.01	\$323,498.01	\$597,636.00
Tombstone Unified School District #1	6	\$75,293.90	\$29,951.17	\$59,256.30
Tucson Unified School District #1	123	\$2,311,319.00	\$984,622.00	\$1,819,008.05
Arizona State School For The Deaf and Blind (Tucson ASDB)	17	\$360,117.13	\$153,409.90	\$283,412.18

Vail Unified School District #20	165	\$857,933.33	\$365,479.60	\$675,193.53
Totals	1632	\$14,549,655.10	\$6,076,395.57	\$11,450,578.56

i. Comprehensive System of Personnel Development.

In accordance with the requirements in Section 101(a)(7) of the Rehabilitation Act, the VR agency must develop and maintain annually a description (consistent with the purposes of the Rehabilitation Act) of the VR agency’s comprehensive system of personnel development, which shall include a description of the procedures and activities the State VR agency will undertake to ensure it has an adequate supply of qualified State rehabilitation professionals and paraprofessionals that provides the following:

1. Analysis of current personnel and projected personnel needs including—

A. The number of personnel currently needed by the VR agency to provide VR services, broken down by personnel category; and

B. The number and type of personnel that are employed by the VR agency in the provision of vocational rehabilitation services, including ratios of qualified vocational rehabilitation counselors to clients;

C. Projections of the number of personnel, broken down by personnel category, who will be needed by the VR agency to provide VR services in 5 years based on projections of the number of individuals to be served, including individuals with significant disabilities, the number of personnel expected to retire or leave the field, and other relevant factors.

Personnel Category	No. of Personnel Employed	No. of Personnel Currently Needed	Projected No. of Personnel Needed in 5 Years
VR Counselor	195	216	238
Program Supervisor	32	34	37
Rehabilitation Service Technician	50	57	60

D. Ratio of qualified VR counselors to clients:

Approximately 1:78

E. Projected number of individuals to be served in 5 years:

VR anticipates serving approximately 14,212 individuals during PY 2030.

2. Data and information on personnel preparation and development, recruitment and retention, and staff development, including the following:

- A. A list of the institutions of higher education in the State that are preparing VR professionals, by type of program; the number of students enrolled at each of those institutions, broken down by type of program; and the number of students who graduated during the prior year from each of those institutions with certification or licensure, or with the credentials for certification or licensure, broken down by the personnel category for which they have received, or have the credentials to receive, certification or licensure.

Institute of Higher Education	Type of Program	No. of Students Enrolled	No. of Prior Year Graduates
University of Arizona	Rehabilitation Studies and Services BSE	75	21
University of Arizona	Counseling- Clinical Rehabilitation and Clinical Mental Health Counseling MA	53	28
University of Arizona	Clinical Rehabilitation Counseling Emphasis	13	5
University of Arizona	Clinical Mental Health Counseling Emphasis	40	14
University of Arizona	Counselor Education & Supervision Ph.D.	12	2
University of Arizona	School Counseling Emphasis (SC)	4	9
University of Arizona	Counselor Education & Supervision Ph.D. (CESPHD)	12	2
University of Arizona	Special Education and Rehabilitation Minor (SERMINU)	73	21

B. The VR agency’s plan for recruitment, preparation and retention of qualified personnel, which addresses the current and projected needs for qualified personnel; and the coordination and facilitation of efforts between the VR agency and institutions of higher education and professional associations to recruit, prepare, and retain personnel who are qualified, including personnel from minority backgrounds and personnel who are individuals with disabilities.

VR established and implemented promotional tiers for VR counseling staff several years ago and continues to explore ways to attract and retain current and future employees. VR advertises job openings on state and public-facing job boards as well as the CRCC website. VR plans to begin using the Payback Information Management System (PIMS) to post job openings and recruit graduates of rehabilitation programs across the county.

VR works closely with the University of Arizona to provide internship opportunities for students in the rehabilitation counseling degree programs. VR hires interns whenever possible and seeks to continue using the internships to recruit qualified personnel.

VR seeks to attract and retain a diverse workforce by offering remote and hybrid work options, Infant at Work programs, generous vacation and sick leave, tuition reimbursement, rideshare and public transit subsidies, stipends for qualified bilingual staff, and accommodations for disability related needs. VR regularly informs members of various councils (SRC, SILC, Governor’s Council on Blindness and Visual Impairment) of vacant positions. VR continues to actively work with the DSA human resources departments to ensure job boards, position announcements, and position requirements are fully accessible and do not pose additional barriers to employment. The VR program represents the highest number of staff with disabilities of all of the units within the DSA.

C. Description of staff development policies, procedures, and activities that ensure all personnel employed by the VR agency receive appropriate and adequate training and continuing education for professionals and paraprofessionals:

i. Particularly with respect to assessment, vocational counseling, job placement, and rehabilitation technology, including training implemented in coordination with entities carrying out State programs under section 4 of the Assistive Technology Act of 1998; and

ii. Procedures for the acquisition and dissemination of significant knowledge from research and other sources to VR agency professionals and paraprofessionals and for providing training regarding the amendments to the Rehabilitation Act made by the Workforce Innovation and Opportunity Act.

Upon hire, VR ensures all rehabilitation professionals and paraprofessionals develop the skills and abilities necessary to assist individuals with disabilities in achieving competitive integrated employment in the evolving labor force by training staff in the following topic areas:

- Referral, Application, and Intake
- Informed Choice and Vocational Counseling
- Eligibility and Order of Selection
- VR Services

- IPE Planning and Development;
- Job Readiness
- Managing the Electronic Case File
- Voter Registration
- Disability Awareness
- Ticket to Work
- Assessments
- Case Closure
- WIOA Law and Regulations
- Strengthening Communications
- Customer Service Excellence
- WIOA Partners and Programs
- Exploring Career Pathways
- Americans with Disabilities Act (ADA)
- Limited English Proficiency
- Fair Labor Standards
- Diversity
- Records Management

In addition to new hire training, VR maintains a long standing Interagency Service Agreement with the University of Arizona to provide graduate level coursework for VR staff seeking to meet requirements to sit for the national Certified Rehabilitation Counselor exam. The agreement includes the provision of quarterly workshops for all VR staff regarding relevant rehabilitation topics such as motivational interviewing, counseling techniques, and medical aspects of disability. Continuing education credits for the Commission on Rehabilitation Counselor Certification are available for workshop participants.

VR maintains a contract with the Arizona Center for the Blind and Visually Impaired (ACBVI) to provide staff with training and resources in the areas of disability awareness and assistive technology. Staff attend the annual Assistive Technology conference, a collaboration between VR and Arizona Technology Access Program to learn about assistive technology through hands-on/virtual experiences. Additional conferences are available throughout the year to educate staff on specific disability populations, cultural awareness, and transition aged youth.

To further assist in the understanding of employer needs, current labor market trends, and on the job accommodations, the Employer Outreach Representatives host conference calls with employers once per month. During these calls, VR staff and employers exchange information regarding employer needs, how to best prepare individuals with disabilities to meet those needs, available accommodations, and training opportunities.

VR staff have always been encouraged to participate in internal and external professional development opportunities. In PY 2020, VR purchased the YesLearning Management System (YesLMS) system in order to provide VR specific, virtual training opportunities for staff. Participation is tracked through the YesLMS system. In PY 2022, the VR Technical Assistance Center for Quality Management (VRTAC-QM) partnered

with YesLMS to share a number of courses in Ethics and Supervision, RSA Data, Pre-ETS, Performance Management and Rapid Engagement.

Information, training announcements, and resources are regularly sent to all staff through a weekly email from agency leadership. Local offices and other units host weekly huddles (short meetings) to ensure all staff are aware of important information and updates. VR staff specializing in services to transition aged youth, behavioral health, and intellectual/developmental disabilities host monthly meetings where staff learn best practices, problem-solve challenging situations, and share resources. **Arizona VR hosted an agency wide staff conference in PY24 and PY25. Both conferences offered sessions on WIOA Performance Measures and state performance.**

3. Description of VR agency policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) to ensure that VR agency professional and paraprofessional personnel are adequately trained and prepared, including—

- A. Standards that are consistent with any national or State-approved or -recognized certification, licensing, registration, or other comparable requirements that apply to the profession or discipline in which such personnel are providing VR services; and**
- B. The establishment and maintenance of education and experience requirements, in accordance with section 101(a)(7)(B)(ii) of the Rehabilitation Act, to ensure that the personnel have a 21st century understanding of the evolving labor force and the needs of individuals with disabilities.**

VR considers it a priority to hire and retain personnel who meet national standards for rehabilitation counseling. The Commission on Rehabilitation Counselor certification is the standard VR utilizes to set the highest level of qualified staff standard for VR rehabilitation professionals. VR staff positions are structured to align with the WIOA Comprehensive System of Personnel Development standards and are strategically tiered to offer a career ladder for individuals interested in obtaining additional education and certification. This structure allows the agency to maintain and attract Certified Rehabilitation Counselors as well as entry and mid level staff who satisfy the minimum WIOA education and experience requirements.

VR seeks to ensure all VR staff have an appropriate understanding of the evolving labor force and the needs of individuals with disabilities, through the maintenance of education and experience personnel requirements, as well as requirements for ongoing training and professional development. These personnel requirements are outlined in the agency's job descriptions and annual performance appraisals, verified throughout the hiring process and during the annual review cycle, and are reinforced and expanded upon through additional training, policies and procedures.

Basic education requirements for VR staff include:

- Entry VR Staff: Bachelor's degree in a field of study reasonably related to rehabilitation counseling or another field that reasonably prepares individuals to work with individuals with disabilities and employers and two years of experience working with individuals with disabilities.
- Intermediate VR Staff: Master's degree in a field of study closely related to rehabilitation counseling and one year of experience working with individuals with disabilities.

- Senior VR Staff: Meets Intermediate credential requirements and has a current CRC certification.

Requirements related to the knowledge, skills and abilities for all levels of VR staff include:

- Knowledge of Federal and State laws, statutes, rules, regulations pertaining to VR services; At least one year of case management experience; Experience working with individuals with disabilities; Broad knowledge of physical, mental, and cognitive disabilities; Familiar with referral and community resources; Understands computer access technology and assistive aids & devices; Knowledge of occupational opportunities and labor market trends; Ability to motivate individuals in achieving goals; Effective oral and written communication; Strong time management skills; Resourceful and problem solver; and Excellent interpersonal skills.

4. Method(s) the VR agency uses to ensure that personnel are able to communicate in appropriate modes of communication with or in the native language of applicants or eligible individuals who have limited English speaking ability.

VR utilizes several mechanisms in order to best serve applicants who use alternate modes of communication or have limited English proficiency. The Arizona state personnel system facilitates the recruitment of qualified bilingual and American Sign Language certified staff and a stipend is available for those who qualify. These efforts continue to increase the number of employees who communicate in multiple languages in offices across the State. All staff are trained to serve individuals with limited English proficiency and have received supplemental instruction specific to VR limited English proficiency policies and procedures. Staff who are Deaf/Hard of Hearing or who are serving individuals who are Deaf/Hard of Hearing have access to video phones as well as laptops and cell phones outfitted with the software necessary to successfully engage with others. Staff are provided with computers, video phones, cell phones, accessibility-related software, note takers, and other devices as needed.

VR contracts with multiple vendors who can assist in face to face and virtual translation, Video Remote Interpreting (VRI), language phone line translation/interpretation and written translation of critical documents.

Video phones are available in local offices to provide Video Relay Services (VRS) for phone calls and teleconference meetings. All VR materials can be made available in alternative formats and are consistently made available in large print and Spanish. Each district has access to Braille materials and the ability to provide print material in alternative languages and formats per individual and staff request.

In addition to offering accessible training via virtual platforms such as ZOOM (CART/ASL are provided by VR for VR training) and YES LMS, VR maintains in person training sites throughout the state. Each training site is equipped with computers, accessibility related software and other devices as needed for accommodation purposes. Assistive listening and visual aid devices and other equipment and software are provided at all training sessions upon request from training participants.

5. As appropriate, describe the procedures and activities to coordinate the designated State unit's comprehensive system of personnel development with personnel development under the Individuals with Disabilities Education Act.

VR works closely with the ADE Exceptional Student Services to provide opportunities to remain current in transition policies and procedures. An Interagency Service Agreement exists that outlines cross training opportunities between partners. VR and ADE collaborate annually to provide a transition conference which serves to bring the community of providers together to learn about national policies, trends and best practices in serving youth with disabilities. Additionally, VR partners with ADE in providing training throughout the year on how VR services can contribute to Secondary Transition IEP Requirements and Post School Outcomes.

j. Coordination with Education Officials.

In accordance with the requirements in Section 101(a)(11)(D) of the Rehabilitation Act—

1. Describe plans, policies, and procedures for coordination between the designated State agency and education officials responsible for the public education of students with disabilities, that are designed to facilitate the transition of the students with disabilities from the receipt of educational services in school to the receipt of vocational rehabilitation services, including pre-employment transition services.

VR is part of a multi-agency Interagency Service Agreement that encourages and facilitates the cooperation and collaboration between VR, DDD, and the Public Education Agencies (PEAs), represented by the ADE. The vision for the agreement is to facilitate a seamless transition of high school students with disabilities from secondary school to employment with the intent of maximizing their employability and integration into the workforce and community. The current agreement between VR, DDD, and ADE was executed on June 27, 2022. The Interagency Service Agreement serves to establish a statewide, interagency system of transition services in order to facilitate service provision in the following areas:

- Technical assistance and consultation;
- Outreach and identification of students;
- Referral of individuals;
- Joint planning; and
- Scope of individualized services.

Under the umbrella of the agreement, VR provides coordinated transition services to all secondary schools throughout the state. VR has dedicated staff assigned to every school district statewide and these staff work collaboratively with students and school staff to coordinate on and off campus delivery of Pre-ETS, VR orientations, eligibility determinations, IPE planning, and VR service provision. VR works to engage students as early as possible within their high school experience for the purpose of providing Pre-ETS (Pre-ETS) to potentially eligible and eligible students with disabilities. VR's eligibility and order of selection criteria are applied to transition youth in the same manner as they are to all other individuals who apply for VR services. VR staff work with school staff to identify the transition services being provided by the school to avoid duplication of services.

Students who are eligible to receive VR services are assisted in developing an IPE as soon as possible during the transition planning process, but at the latest, before exiting high school. To assist in the identification of an employment goal and completion of the IPE prior to exiting high school, VR coordinates with school staff to engage students with disabilities in Pre-ETS and other VR services as appropriate to explore interests and abilities, learn about career pathways, increase self-determination knowledge and skills, identify educational resources, and develop an understanding of work in order to make an informed career choice.

All students with disabilities between the ages of 14-22 may receive Pre-ETS and eligible transition aged youth ages 14-24 have access to the full array of VR services to assist with the transition from school to work. Provision of Pre-ETS, as well as all other VR services are the responsibility of VR. Public Education Agencies (PEAs) are responsible for ensuring the provision of transition services required under IDEA. PEAs assist any student interested in Pre-ETS with the completion of the Pre-ETS Request Form, including verification that the individual is a student with a disability. The Pre-ETS Request Form is utilized by the student, to identify in which of the five required Pre-ETS the student wants to participate. Pre-ETS options include job exploration counseling, work-based learning, work readiness training, counseling on post-secondary opportunities and instruction in self-advocacy.

VR partners with ADE every year to host an annual Transition Conference. This conference provides opportunity to conduct outreach and educate VR staff, education staff, students, and families on Pre-ETS and transition services available through VR and the schools. Additional outreach efforts to inform students with disabilities, their families, and schools about Pre-ETS and other VR services include sharing brochures, flyers or informational letters, scheduling individual and group VR orientation presentations, attending IEP meetings, and encouraging referral to VR during the provision of Pre-ETS to potentially eligible students. Pre-ETS providers are also responsible for conducting outreach to local schools to ensure staff and students are aware of available services. VR, DDD, and ADE frequently partner during interagency training, conferences, transition fairs, and webinars to share information on coordination of services and joint processes that support students in transition/employment.

VR has 30 Interagency Transfer Agreements (ITAs) with PEAs statewide to provide enhanced transition services. The ITAs are commonly known as Transition from School to Work (TSW) programs. The PEAs that have TSW programs provide non-federal dollars to VR to generate funds for the purpose of funding VR personnel, PEA personnel and other costs for the provision of vocational services agreed upon by both parties in ITAs.

2. Describe the current status and scope of the formal interagency agreement between the VR agency and the State educational agency. Consistent with the requirements of the formal interagency agreement pursuant to 34 C.F.R. § 361.22(b), provide, at a minimum, the following information about the agreement:

A. Consultation and technical assistance, which may be provided using alternative means for meeting participation (such as video conferences and conference calls), to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including pre-employment transition services and other vocational rehabilitation services;

B. Transition planning by personnel of the designated State agency and educational agency personnel for students with disabilities that facilitates the development and implementation of their individualized education programs (IEPs) under Section 614(d) of the Individuals with Disabilities Education Act;

C. The roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services and pre-employment transition services;

D. Procedures for outreach to and identification of students with disabilities who need transition services and pre-employment transition services. Outreach to these students should occur as early as possible during the transition planning process and must include, at a minimum, a description of the purpose of the vocational rehabilitation program, eligibility requirements, application procedures, and scope of services that may be provided to eligible individuals;

E. Coordination necessary to satisfy documentation requirements set forth in 34 C.F.R. part 397 regarding students and youth with disabilities who are seeking subminimum wage employment; and

F. Assurance that, in accordance with 34 C.F.R. § 397.31, neither the SEA nor the local educational agency will enter into a contract or other arrangement with an entity, as defined in 34 C.F.R. § 397.5(d), for the purpose of operating a program under which youth with a disability is engaged in work compensated at a subminimum wage.

The current Interagency Service Agreement (ISA) between VR, DDD, and ADE was executed on June 27, 2022.

VR provides technical assistance and consultation using various formats of communication which include video conference, in person meetings, and other electronic communications throughout the transition process in order to identify appropriate school to post school activities and services as outlined in the ISA and in the following manner:

- Provide state and regional guidance and training to enhance the knowledge, skills, and abilities of personnel involved in providing transition services;
- Participate in Individualized Education Plan meetings, when invited, to provide vocational guidance;

- Disseminate VR service information and other resources that are available; and
- Attend transition fairs and other outreach events.

VR has a statewide Transition team responsible for providing training and technical assistance to all VR and PEA staff in the state regarding how to assist with transitioning students with disabilities to post-school activities, including VR services. This team frequently engages with the ADE, statewide and local communities of practice on transition, as well as each school district and local area. The team partners in professional development opportunities with the ADE Secondary Transition team to increase PEA knowledge of available VR services and how they support students with disabilities in transitioning from school to work. VR also has dedicated staff (VR Counselors and support staff) assigned to each PEA to ensure local support is available to the schools and students with disabilities. These staff outreach to their assigned PEA to provide information on how to connect and collaborate with VR, contact information for local VR offices, availability of Pre-ETS, etc.

Coordinated transition planning occurs between PEAs and VR staff. VR staff are available to provide group and individual presentations to parents and students who are identified by the PEA staff. PEA staff are encouraged to make families aware of the ability to invite VR staff to students' Individualized Education Planning meetings to provide information on the VR program and discuss postsecondary and employment opportunities. Transition services are planned in the Individualized Education Plan **by the end of 9th grade** or age 16, whichever comes first, or earlier when appropriate. **When written consent is provided by client and parent/guardian for VR staff to attend**, VR staff assist in identifying the VR services and community support available to assist with transition planning. This coordinated service planning assists the student and parents in focusing on the student's needs for continued education, employment, and independent living services after graduation from high school.

Staff from the PEA and VR jointly identify students who will require and benefit from involvement in the VR program in order to meet post-secondary education and employment goals. Staff of the local PEA and VR coordinate the development of the Individualized Education Plan and IPE and involve other community resources such as the DDD and the Arizona Healthcare Cost Containment System and others as appropriate.

Services and activities mandated by the Individuals with Disabilities Education Act (IDEA) are provided by the local PEA staff; services and support are not duplicated by VR. PEA staff develop a plan for transition services as mandated by IDEA and are encouraged to invite VR staff to participate in transition planning activities. VR staff participate in individual student planning sessions when available and provide program information as well as technical assistance with regard to services and community resources on an ongoing basis. VR is responsible for the provision of Pre-ETS for students with disabilities who are between the ages of 14-22. VR staff provide informational presentations and materials to PEAs, parents and students regarding Pre-ETS and other services available through the VR program. Eligibility and Order of Selection determinations are made by qualified VR staff, but the planning and development of the IPE occurs in conjunction with the student, the student's guardians, and PEA staff. The IPE is developed and implemented by VR staff prior to the student exiting from high school if possible.

Within the scope of the ISA with the ADE regarding the transition activities, VR is responsible for the following outreach activities:

- Provision of brochures, flyers, informational letters and/or VR orientation videos to explain the VR program and the role the VR program plays in transition planning and Individualized Education Plan development;
- Explanation of VR referral, application, eligibility and order of selection criteria and process, as well as the potential services that may be available through VR;
- Scheduling individual information meetings with students and their parents/legal guardians at the school or local VR office;
- Scheduling and conducting group orientation and individual intake appointments at the school;
- Conducting presentations of the VR program and services to school staff;
- Working closely with ADE and other agencies such as DDD to ensure referrals are coordinated between the programs.

PEAs are considered the lead agency for the provision of transition services; however, ongoing support from partner agencies is necessary for success. PEAs are also responsible for providing VR with documentation of the completion or refusal of transition services (in accordance with 34 CFR Part 397) for youth with disabilities interested in seeking subminimum wage employment. VR is responsible for assisting the youth to complete all other requirements of 34 CFR Part 397 as necessary, and for providing the youth with documentation of their completion or refusal of all required activities, including transition activities, within the federally required timeframes. VR and ADE Exceptional Student Services have a formal data sharing agreement which allows the agencies to identify areas of need for students, including the need for Pre-ETS for students with disabilities between the ages of 14-22.

Youth seeking subminimum wage employment are referred to VR to complete the required activities as described in Section 511 of the Rehabilitation Act. VR coordinates with the student's Local Educational Agency to verify completion of transition services or if necessary, arrange for the provision of Pre-ETS. Documentation verifying the completion (or refusal) of transition services is completed by the school and provided to VR staff. VR staff provide a copy of this document to the youth and maintain a copy in the VR case file. Documentation verifying completion or refusal of all other required activities (e.g. Pre-ETS, Career Counseling, VR application and eligibility determination, IPE development and case closure) is completed by VR staff and copies are provided to the student (via hand, email, or mail) as each activity is completed or refused. Fillable templates for each required activity are available in the VR case management system. Use of templates ensures all required information is completed and provided to the youth for each activity. When all required activities have been completed or refused, VR staff provide the youth with a cover sheet itemizing all documents they have received. The youth is responsible for providing these documents to the subminimum wage provider/employer. VR has developed a short video as well as several documents to help youth, families, and subminimum wage providers understand the process and requirements.

The ISA includes assurances that PEA/LEAs will not enter into a contract or other arrangement with holders of special wage certificates (14c) for the purpose of operating a program under which youth with disabilities are paid subminimum wage.

k. Coordination with Employers

VR has two Employment Outreach Specialists who focus on building strategic relationships with Arizona employers, and local workforce teams, to promote the employment of individuals with disabilities. The Employment Outreach Specialists utilize in demand industries, career pathways and training programs informed by current trends and industry needs; in synchronization with current labor market information to strengthen these business relationships. They work in partnership with business service staff housed in ARIZONA@WORK job centers to support job seekers with disabilities and educate employers on the benefits of hiring and retaining individuals with disabilities. Through this partnership, the State Labor Exchange portal currently has 508 employers who have been identified as actively recruiting people with disabilities.

The Employment Outreach Specialists are the conduit between Arizona employers, VR staff, contracted vendors and individuals with disabilities. They facilitate webinars, teleconferences, workshops, employer panels and networking events in collaboration with local workforce partners. These staff members maintain contact with Arizona employers to ensure awareness of labor market trends, current workforce needs and to maintain a pulse on Arizona's growing industry partners. Each year, the Employment Outreach Specialists collaborate with education and workforce partners to facilitate multiple job fairs and job preparation events. Arizona pioneered and continues to host sensory friendly job fairs for individuals with autism and other disabilities. These events have grown and through collaboration with state and local workforce partners, the event has grown to include large employers such as Wells Fargo, Raytheon and more. This event has also increased the education of employers and workforce partners, culminating in an event planned for the Spring of 2026 called an "Exceptional Workers Summit" and being hosted by Maricopa County Workforce Development (Title 1B and Vocational Rehabilitation). Historically, the Employment Outreach Specialists have co-facilitated and led community partners in hosting the DREAM fair, the largest job fair for individuals with disabilities in Arizona. This event occurs twice per year in Tucson and Phoenix and consistently has over 200 job seekers and 40 employers. As the team moves to shift the workforce model to one that is more inclusive, the local ARIZONA@WORK Business Service Representatives have taken an active role in the planning and facilitation of the event, in collaboration with the Employment Outreach Specialists. Monthly employer outreach networking events are held virtually, where employers discuss their current job openings, how to apply and the desired skill set of prospective employees. In addition, this provides a networking opportunity for employers, vendors, VR staff, community partners, workforce staff and VR individuals with disabilities. Employment Outreach Specialists also facilitate monthly in depth employer presentations, where employers present information on job openings, compensation, application processes and how to request accommodations to VR staff. Participation in apprenticeship programs by individuals with disabilities has increased over 100 percent in the last three years. This success is attributed to the monthly apprenticeship collaboration meetings with the Employment Outreach Specialists and the information being shared with VR staff, educating them on the benefits of apprenticeship programs for people with disabilities.

The Employment Outreach Team continues to develop resources for staff and employers. One item that is currently in development, is a comprehensive resource that will provide employers with information,

resources and training to assist in facilitating inclusive hiring practices, employer support with accommodations for employees with disabilities, and information regarding local workforce programs to assist in filling workforce needs with trained and qualified professionals, including Vocational Rehabilitation. Another resource that will be rolled out this year is the Industry Specific Employers document. This resource was developed for use by VR staff, to assist in awareness and access to information regarding current job openings with employers in the local area, access to key information regarding the position, and a point of contact with the Employment Outreach Specialist who is working with the employer. This includes the identification of employers who are background and disability friendly.

VR is still planning to grow the Employment Outreach Team. At this time, there are currently 3 members of the team (1 Employment Outreach Supervisor and 2 Employment Outreach Specialists in Maricopa County). Due to unforeseen challenges with staffing and federal funding, the growth was not as fast as anticipated. By the end of PY 2026, VR plans to have an Employment Outreach Team of 11 staff members. This includes a Supervisor of the Employment Outreach Team, 9 Employment Outreach Specialists across the state, and a Program Project Specialist to support with Employer referrals, scheduling of trainings, community events and more. The 9 Employment Outreach Specialists will be assigned to various counties across the state, in alignment with the local workforce area designation. This will ensure an accurate pulse on the current job market and employment opportunities within each of the unique regions across the state. By placing Employment Outreach Specialists throughout the state, this will increase the partnership with local workforce teams and ensure a collaborative and enhanced workforce, including people with disabilities. This will also provide for local connections with job seekers and employers.

In addition to the work described above, the Employment Outreach Team oversees the planning and facilitation of an internal service called "Your Career: Tools for Success." This service provides interested individuals with access to 5 modules and 3 supplemental modules to assist clients with job development. With the support of their VR Counselor, clients can determine which module(s) currently aligns with their job preparedness and search needs. Interested individuals attend workshops covering career planning, applying for the job, interview skills and practice, and employment skills such as asking for accommodations, financial literacy, navigating the Human Resources process and more.. Once an individual completes the workshops, they can choose to work with the VR Employment Outreach Specialist, along with their chosen vendor. This fosters a collective team approach in which the Employment Outreach Specialist may have a direct connection with a local employer in the client's chosen industry. This collaboration can lead to successful job matches for both the employer and the client.

Transition

VR ensures that Pre-ETS are available statewide, to all students with disabilities between the ages of 14-22. VR works with local schools and other organizations to assist students in requesting Pre-ETS. Thus, ensuring access to career planning and job readiness skills, as addressed through the five required service areas, while still enrolled in school. This service assists students in identifying their interests, preferences and strengths, leading to viable employment goals and outcomes. In addition, our VR ES also

works closely with the transition team to provide services to youth with disabilities, focusing on employability skills such as resume building, soft skill development, adjustment to disability related needs and self-advocacy skills to assist with obtaining employment. These youth also have access to a full range of VR services, should they choose to apply and are determined eligible for VR, aside from the Pre-ETS services.

Employer Outreach Representatives work in partnership with VR transition staff to provide information on career pathways including Registered Apprenticeships, college and university disability resource and career centers, and internships. This partnership helps staff and educators obtain the accommodations and career services that students need to prepare for and obtain employment, both prior to and after post-secondary education/training. In the next two years, we plan to grow our Employer Outreach Representative partnership with high school transition programs, VR transition staff, and other program administrators to facilitate mock interviews and pre employment workshops for youth with disabilities. Employer Outreach Representatives will also work alongside Joint Technical Education Districts to connect individuals in the VR program with industry professionals, fostering employment opportunities. In addition, Employer Outreach Representatives offer innovative reverse job fairs. These events provide an opportunity to showcase the skills developed through pre-employment and high school transition services. This capstone experience allows students to professionally present themselves to employers who are seeking employees.

VR has developed an agreement with the Sonoran University Center for Excellence in Developmental Disabilities (UCEDD) with the intent of partnering with local schools to assist with the development of community based Work-Based Learning experiences for students with disabilities. Sonoran UCEDD staff, in conjunction with VR, will coordinate with local businesses to develop summer work programs and job opportunities at specific work sites. School staff will be trained to support students at the worksite thus enabling students to gain real work experience and job readiness skills while having access to necessary support. VR and the Sonoran UCEDD also work collaboratively to establish and maintain Project SEARCH sites. Current sites include youth internship opportunities in hospital, distribution logistics, and hospitality industries. Additional Project SEARCH sites in hospital settings are being developed and coordinated with specific school districts and private schools.

I. Interagency Cooperation with Other Agencies

In accordance with the requirements in Section 101(a)(11)(C) and (K), describe interagency cooperation with and utilization of the services and facilities of agencies and programs that are not carrying out activities through the statewide workforce development system to develop opportunities for community-based employment in integrated settings, to the greatest extent practicable for the following:

1. State programs (designate lead agency(ies) and implementing entity(ies)) carried out under Section 4 of the Assistive Technology Act of 1998;

VR utilizes Arizona Technology Access Program (AzTAP) when needed, to assist in meeting the assistive technology needs of individuals with disabilities. VR staff refer individuals to AzTAP when their needs or

requests are beyond the scope of VR. VR vendors utilize AzTAP's loan library to trial equipment prior to recommending its purchase. VR also partners with AzTAP and the ADE Exceptional Student Services to present an annual conference that allows staff to learn about AT devices, resources, and implementation strategies, as well as increase assistive technology expertise and obtain hands-on experience with devices through participation in interactive sessions.

2. Programs carried out by the Under Secretary for Rural Development of the Department of Agriculture;

VR does not have any formal agreements with programs carried out by the Under Secretary for Rural Development of the U.S. Department of Agriculture in Arizona. Connections facilitated by VR's involvement on the Workforce Arizona Council have led to an exchange of information and opportunity to engage in conversation if there should be intersections between Title IV and USDA Rural Development opportunities to enhance the employment opportunities for individuals with disabilities.

3. Non-educational agencies serving out-of-school youth;

VR does not have any agreements specific to serving out-of-school youth, but all agreements mentioned throughout this plan serve populations that include out-of-school youth. VR's agreements specific to behavioral health and developmental disabilities translate into increased opportunities for out-of-school youth with significant disabilities to be referred to VR. VR's strong collaborative partnerships with lead agencies as well as participation in local communities of practices, workgroups, and outreach activities help with increasing community awareness of the VR program.

VR continues to partner with Diverse Ability Inc. to provide Youth Leadership Forums around the state. These forums provide an opportunity for youth to learn self advocacy and leadership skills as well as explore career opportunities. Forums are available to youth (under age 30) with disabilities who have completed at least one year of high school.

As appropriate, VR staff refer individuals to out of school youth programs available through workforce and community partners such as the Pima County and Workforce Development Summer Work Program. VR staff utilize local communities of practices to establish and maintain informal partnerships and referral connections with other entities that serve out of school youth, such as Job Corps and Goodwill. Information and opportunities available through these partners is routinely shared with VR staff.

4. State use contracting programs;

Arizona statute allows any state governmental unit or public procurement unit to directly contract with any Certified Non-Profit Agency that Serve Individuals with Disabilities (CNAID) for any good or service the CNAID provides without needing to conduct a competitive effort. The VR program directly contracts with the Arizona Industries for the Blind for document imaging services utilizing the state use contracting mechanism. The DSA utilizes several of the state use contracting programs for purchase of printer toner and confidential document destruction.

5. State agency responsible for administering the State Medicaid plan under title XIX of the Social Security Act (42 U.S.C. 1396 et seq.);

VR continues to have a strong relationship with Arizona's Medicaid System, known as the Arizona Health Care Cost Containment System (AHCCCS), and is a committed member of various partnerships dedicated to furthering employment opportunities for people with disabilities in Arizona, such as the Association of People Supporting Employment First and the Employment First Initiative with Sonoran Center.

VR maintains a close partnership with AHCCCS via the Interagency Service Agreement related to the provision of VR services to individuals with a Serious Mental Illness designation as discussed in various sections of this plan. VR and AHCCCS work closely to coordinate VR services, including supported ES for individuals with the most significant disabilities and extended supported employment services (provided by AHCCCS; or, for individuals who do not qualify for AHCCCS supports and are youth with the most significant disabilities, provided by VR) for individuals in the behavioral health and developmental disabilities systems. This collaboration provides a streamlined process for which individuals with behavioral and developmental disabilities get referred to VR and engage in services in an expedited manner with the goal of achieving and maintaining competitive integrated employment.

VR has a Statewide Behavioral Health team who are responsible for implementation of the agreement between VR and AHCCCS. This team provides guidance and technical assistance to staff from both VR and behavioral health to ensure referrals and service delivery are streamlined and effective for the identified population. Dedicated staff and counselors from each partner agency ensure individuals are referred for VR services when appropriate and these staff continue to work together to support individuals throughout the VR process by encouraging participation, providing services as comparable benefits (transportation, counseling, etc.), ensuring a seamless transition to extended services as appropriate, etc.

6. State agency responsible for providing services for individuals with developmental disabilities;

VR has a longstanding partnership with the Arizona DDD. A MOU outlines the processes to be followed for new referrals, exchange of information, and coordination of services. The MOU also ensures individuals who are involved in both DDD, and the foster care system have streamlined access to the VR program. Both VR and DDD have developed standardized processes that provide detailed instructions on how staff must collaborate together to ensure individuals are served efficiently and effectively.

VR maintains two positions dedicated to the oversight and implementation of the agreement between VR and DDD. These positions work closely with the DDD ESS team to provide guidance and technical assistance to staff from both VR and DDD to ensure referrals and service delivery are streamlined and effective for the identified population. Initially, direct service staff in local VR offices were identified to serve individuals referred from DDD.. While that is still the case in areas with fewer referrals, in some of the more populated areas of the state increased referrals over the past few years has necessitated that local offices have multiple staff serving individuals referred by DDD. VR and DDD are focused on continuing to increase referrals and the employment outcomes of individuals with developmental disabilities. Data on referrals, services, and employment outcomes are tracked and analyzed each month.

7. State agency responsible for providing mental health services; and

As mentioned above, VR has maintained an Interagency Service Agreement with Arizona Health Care Cost Containment System (AHCCCS), Arizona's Medicaid system, to provide enhanced VR services to individuals with a Serious Mental Illness designation since 1992. VR works with AHCCCS to review and modify the agreement on an annual basis to ensure a strong partnership and up to date services for individuals with a SMI designation are being realized. Each Regional Behavioral Health Authority (RBHA) health plan contracted with AHCCCS uses the Interagency Service Agreement statewide collaborative protocols to establish specific service delivery responsibilities and outline the roles and responsibilities for VR and RBHA behavioral health clinic staff. VR staff, behavioral health clinic staff and mutual vendors collaborate to provide ES that are integrated with the individual's behavioral health services and fully support the individual's employment and disability related needs. VR meetings are held at the behavioral health clinical site to encourage collaboration with all agencies, increase access to services, and reduce barriers for individuals with disabilities. All Interagency Service Agreement participating agencies partake in continuous training and process improvement through quarterly and biannual meetings.

8. Other Federal, State, and local agencies and programs outside the workforce development system.

A Memoranda of Understanding between VR and the American Indian VR programs of the Navajo, Tohono O'odham, White Mountain Apache, Hopi, and Salt River Pima nations exists for the purpose of coordinating services to American Indians with disabilities that reside both on and off the reservation as well as providing technical assistance in areas of mutual interest.

Secondary Students with Disabilities: VR has an Interagency Service Agreement with the ADE and DDD regarding the provision of transition services to high school students with disabilities.

Postsecondary Students with Disabilities: VR has MOUs with several community colleges within the state and is actively seeking to establish new agreements with the remaining colleges and universities. These agreements address the provision of disability-related accommodations to individuals with disabilities served by VR and the colleges. VR currently has agreements with the Maricopa County Community College District (ten colleges), Cochise County Community College, and Pima County Community College.

9. Other private nonprofit organizations.

Non-profit status of providers or referral sources is not tracked but VR develops contracts and agreements with all providers, including private non-profit organizations, in accordance with the Arizona Procurement Code (Chapter 23 of the Arizona Revised Statutes) to meet the needs and objectives of the VR program and assist individuals with disabilities in preparing for, obtaining, and maintaining employment.

Assurances

The designated State agency or designated State unit, as appropriate and identified in the State certifications included with this VR services portion of the Unified or Combined State Plan and its

supplement, through signature of the authorized individual, assures the Commissioner, that it will comply with all of the requirements of the VR services portion of the Unified or Combined State Plan and its supplement, as set forth in sections 101(a) and 606 of the Rehabilitation Act. The individual authorized to submit the VR services portion of the Unified or Combined State Plan and its supplement makes the following assurances:

The VR agency must select the “Edit” button to review and agree to the VR State plan Assurances.

Do you attest that these assurances will be met?

Yes

Vocational Rehabilitation (Combined or General) Certifications

States must provide written and signed certifications that:

1. The (enter the name of designated State agency or designated State unit, as appropriate,) is authorized to submit the VR services portion of the Unified or Combined State Plan under title I of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by title IV of WIOA[1], and its State Plan supplement under title VI of the Rehabilitation Act;

^[1] Public Law 113-128.

Enter the name of designated State agency or designated State unit, as appropriate

Arizona Rehabilitation Services Administration

2. In the event the designated State agency is not primarily concerned with vocational and other rehabilitation of individuals with disabilities, the designated State agency must include a designated State unit for the VR program (Section 101(a)(2)(B)(ii) of the Rehabilitation Act). As a condition for the receipt of Federal funds under title I of the Rehabilitation Act for the provision of VR services, the (designated State agency or the designated State unit when the designated State agency has a designated State unit)[2] agrees to operate and is responsible for the administration of the State VR Services Program in accordance with the VR services portion of the Unified or Combined State Plan[3], the Rehabilitation Act, 34 CFR 361.13(b) and (c), and all applicable regulations[4], policies, and procedures established by the Secretary of Education. Funds made available to States under section 111(a) of the Rehabilitation Act are used solely for the provision of VR services and the administration of the VR services portion of the Unified or Combined State Plan;

^[2] All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

^[3] No funds under title I of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.

^[4] Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76, 77, 79, 81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3474; and the State VR Services program regulations at 34 C.F.R. part 361.

Enter the name of designated State agency
Division of Employment and Rehabilitation Services

3. As a condition for the receipt of Federal funds under title VI of the Rehabilitation Act for supported employment services, the designated State agency, or the designated State unit when the designated State agency has a designated State unit, agrees to operate and is responsible for the administration of the State Supported Employment Services Program in accordance with the supplement to the VR services portion of the Unified or Combined State Plan^[5], the Rehabilitation Act, and all applicable regulations^[6], policies, and procedures established by the Secretary of Education. Funds made available under title VI are used solely for the provision of supported employment services and the administration of the supplement to the VR services portion of the Unified or Combined State Plan;

^[5] No funds under title VI of the Rehabilitation Act may be awarded without an approved supported employment supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.

^[6] Applicable regulations, in part, include the citations in footnote 4, as well as Supported Employment program regulations at 34 C.F.R. part 363.

4. The designated State unit or, if not applicable, the designated State agency has the authority under State law to perform the functions of the State regarding the VR services portion of the Unified or Combined State Plan and its supplement and is responsible for the administration of the VR program in accordance with 34 CFR 361.13(b) and (c);

5. The State legally may carry out each provision of the VR services portion of the Unified or Combined State Plan and its supplement.

6. All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law.

7. The (enter the name of authorized representative below) has the authority under State law to receive, hold, and disburse Federal funds made available under the VR services portion of the Unified or Combined State Plan and its supplement;

Enter the name of authorized representative below
Kristen Mackey

8. The (enter the title of authorized representative below) has the authority to submit the VR services portion of the Unified or Combined State Plan and the supplement for Supported Employment services;

Enter the title of authorized representative below
Kristen Mackey

9. The agency that submits the VR services portion of the Unified or Combined State Plan and its supplement has adopted or otherwise formally approved the plan and its supplement.

Footnotes

^[1] Public Law 113-128.

^[2] All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

^[3] No funds under title I of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.

^[4] Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76, 77, 79, 81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3474; and the State VR Services program regulations at 34 C.F.R. part 361.

^[5] No funds under title VI of the Rehabilitation Act may be awarded without an approved supported employment supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.

^[6] Applicable regulations, in part, include the citations in footnote 4, as well as Supported Employment program regulations at 34 C.F.R. part 363.

Certification Signature

To review and complete the Certification section of the VR portion of the State plan, please select the "Edit" button.

Note, please do not edit the table header or formatting. Only edit the table contents.

If you accidentally edit the table headers and structure, open this link to the blank table. You can copy and paste the table into the narrative field, and start over if needed.

Vocational Rehabilitation Program Performance Indicators

Each State VR program must submit expected levels of performance in its Unified or Combined State Plan and in the two-year modification of that plan. Expected levels of performance for the first two years of a state plan must be submitted in the initial submission of the Unified or Combined State Plan and in the initial submission of the two-year modification of that Plan, for years three and four, as described in 34 CFR § 361.170(a). Expected levels of performance must be stated to the nearest tenth of a percent (XX.X %) or to the nearest whole dollar for median earnings. State VR programs are reminded that the expected levels of performance must be published for public comment prior to plan submission in accordance with state law, regulation, and policy.

After the Unified or Combined State Plan submission, each State VR program must reach agreement with RSA on the negotiated levels of performance for the indicators for each of the first two years of the

Unified or Combined State Plan (or for the third and fourth years of the Unified or Combined State Plan during the required two-year modification process) in accordance with WIOA section 116(b)(3)(A)(iv).

RSA will use its statistical adjustment model to derive pre-program year estimated levels of performance for each indicator. Each State VR program and RSA will consider the negotiation factors outlined in WIOA section 116(b)(3)(A)(v) during the negotiation process. Once negotiated levels of performance are agreed upon, each State VR program must incorporate the negotiated levels of performance into the Unified or Combined State Plan and the two-year modification of that plan prior to the plan's approval (section 116(b)(3)(A)(iv) of WIOA).

Effectiveness in Serving Employers

In the final rule implementing WIOA, the Departments indicated that they would initially implement this indicator in the form of a pilot to test the feasibility and rigor of three proposed approaches. During Program Year (PY) 2022, the Departments initiated the rulemaking process to establish a standard definition of Effectiveness in Serving Employers. States will continue to report two of three proposed approaches until the Departments issue the final rule and implement the indicator.

GEPA 427 Form Instructions for Application Package - Vocational Rehabilitation EQUITY FOR STUDENTS, EDUCATORS, AND OTHER PROGRAM BENEFICIARIES

OMB Control Number 1894-0005 Expiration 02/28/2026

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA Section 427 Form Instructions for State Applicants

State applicants must respond to the following four questions:

1. Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.
2. Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?
3. Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?
4. What is your timeline, including targeted milestones, for addressing these identified barriers?

- Applicants identify any barriers that may impede equitable access and participation in the proposed project or activity, including, but not limited to, barriers based on economic disadvantage, gender, race, ethnicity, color, national origin, disability, age, language, migrant status, rural status, homeless status or housing insecurity, pregnancy, parenting, or caregiving status, and sexual orientation.
- Applicants use the associated text box to respond to each question. However, applicants might have already included some or all this required information in the narrative sections of their applications or their State Plans. In responding to this requirement, for each question, applicants may provide a cross-reference to the section(s) in their State Plans that includes the information responsive to that question on this form or may restate that information on this form.
- Applicants are not required to have mission statements or policies that align with equity to apply.
- Applicants that have already undertaken steps to address barriers must still provide an explanation and/or description of the steps already taken in each text box, as appropriate, to satisfy the GEPA Section 427 requirement.
- Applicants that believe no barriers exist must still provide an explanation and/or description to each question to validate that perception, as appropriate, to satisfy the GEPA Section 427 requirement.

Please refer to GEPA 427 - Form Instructions for Application Package

1. Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The first of four questions is:

Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.

The mission of the Arizona Vocational Rehabilitation program is to work with persons with disabilities to achieve their goals for employment and independence. All employees of Vocational Rehabilitation (VR) are required to abide by the most current Code of Ethics of the Commission on Rehabilitation Counseling. This high standard for all staff is intended to assure the public that the rehabilitation

counseling profession accepts its responsibilities to provide caring services, inclusive of equitable access and opportunities to participate, to individuals with disabilities. VR program policies reinforce the provision of informed choice throughout the VR process to support applicants or clients by providing information to assist them in choosing their services and service providers.

2. Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The second of four questions is:

Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?

The program's efforts to continuously improve and enhance service provision to Individuals with disabilities has uncovered several barriers to equitable access. Individuals with disabilities may have barriers such as geographic location reducing availability of providers, lack of transportation to access services, and inconsistent coordination between multiple state agencies.

3. Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The third of four questions is:

Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?

The Arizona Vocational Rehabilitation program has embraced the power and potential of virtual service provision. Both VR program staff and community rehabilitation providers are able to provide services, as appropriate and desired by the individual with a disability, virtually. Additionally, the VR program incentivizes service providers to travel to rural counties by offering a higher rate of compensation. Virtual service delivery and higher payment for services in rural areas are mechanisms implemented to reduce barriers related to geographic location and lack of transportation. The VR program also offers several mechanisms such as bus passes, taxi, and mileage reimbursement to reduce the burden of transportation for clients. We have working agreements with multiple state agencies, programs, and local area schools to enhance the working relationships between agencies serving mutual clients. Each agreement defines roles, responsibilities, and expectations. The VR program has staff members dedicated to working with these agencies and we continue to refine the agreements and enhance our collaborative working relationships to reduce barriers that individuals with disabilities face when working with multiple state systems and/or transitioning between provider agencies.

4. What is your timeline, including targeted milestones, for addressing these identified barriers?

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The final of four questions is:

What is your timeline, including targeted milestones, for addressing these identified barriers?

The VR program plans to reevaluate and adjust payment structures for service providers on an annual basis. The ability to maintain reimbursement rates commensurate with the cost of conducting business with VR is essential ensuring service providers provide services in rural communities. Many VR service contracts are continuously open for new providers to join or for existing providers to expand their service offering. We plan to continue allowing VR service providers to expand virtual service delivery options. Connecting individuals via virtual mechanisms has proven to reduce transportation and geographic barriers. Agreements with other partner entities are reviewed every year at a minimum. When this review is conducted, the parties meet to determine if adjustments to the roles, responsibilities, and deliverables are necessary.

GEPA 427 Form Instructions for Application Package - Supported Employment

EQUITY FOR STUDENTS, EDUCATORS, AND OTHER PROGRAM BENEFICIARIES

OMB Control Number 1894-0005 Expiration 02/28/2026

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA Section 427 Form Instructions for State Applicants

State applicants must respond to the following four questions:

1. Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.
 2. Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?
 3. Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?
 4. What is your timeline, including targeted milestones, for addressing these identified barriers?
- Applicants identify any barriers that may impede equitable access and participation in the proposed project or activity, including, but not limited to, barriers based on economic disadvantage, gender, race, ethnicity, color, national origin, disability, age, language, migrant status, rural status, homeless status or housing insecurity, pregnancy, parenting, or caregiving status, and sexual orientation.
 - Applicants use the associated text box to respond to each question. However, applicants might have already included some or all this required information in the narrative sections of their applications or their State Plans. In responding to this requirement, for each question, applicants may provide a cross-reference to the section(s) in their State Plans that includes the information responsive to that question on this form or may restate that information on this form.
 - Applicants are not required to have mission statements or policies that align with equity to apply.
 - Applicants that have already undertaken steps to address barriers must still provide an explanation and/or description of the steps already taken in each text box, as appropriate, to satisfy the GEPA Section 427 requirement.
 - Applicants that believe no barriers exist must still provide an explanation and/or description to each question to validate that perception, as appropriate, to satisfy the GEPA Section 427 requirement.

Please refer to GEPA 427 - Form Instructions for Application Package

1. Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The first of four questions is:

Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.

Not applicable

2. Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The second of four questions is:

Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?

Not applicable

3. Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps

the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The third of four questions is:

Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?

Not applicable

4. What is your timeline, including targeted milestones, for addressing these identified barriers?

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The final of four questions is:

What is your timeline, including targeted milestones, for addressing these identified barriers?

Not applicable

VII. Program-Specific Requirements for Combined State Plan Partner Programs

States choosing to submit a Combined State Plan must provide information concerning the six core programs—the Adult program, Dislocated Worker program, Youth program, Wagner-Peyser Act program, Adult Education and Family Literacy Act program, and the Vocational Rehabilitation program— and also submit relevant information for any of the eleven partner programs it elects to include in its Combined State Plan. When a State includes a Combined State Plan partner program in its Combined State Plan, it need not submit a separate plan or application for that particular program. ²⁴ If included, Combined State Plan partner programs are subject to the “common planning elements” in Sections II-IV of this document, where specified, as well as the program-specific requirements for that program.

[24] States that elect to include employment and training activities carried out under the Community Services Block Grant (CSBG) Act (42 U.S.C. 9901 et seq.) under a Combined State Plan would submit all other required elements of a complete CSBG State Plan directly to the Federal agency that administers

the program. Similarly, States that elect to include employment and training activities carried by the Department of Housing and Urban Development would submit all other required elements of a complete State Plan for those programs directly to the Federal agency that administers the program.

Title I - Adult Program

	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter after Exit)	73.0%		73.7%	
Employment (Fourth Quarter after Exit)	68.5%		69.2%	
Median Earnings (Second Quarter after Exit)	\$9,200		\$9,292	
Credential Attainment Rate	72.9%		73.6%	
Measurable Skill Gains	75.0%		75.8%	

Title I - Dislocated Worker Program

	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter after Exit)	78.5%		79.3%	
Employment (Fourth Quarter after Exit)	74.0%		74.7%	
Median Earnings (Second Quarter after Exit)	\$9,800		\$9,898	
Credential Attainment Rate	74.0%		74.7%	
Measurable Skill Gains	75.0%		75.8%	

Title I - Youth Program

	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter after Exit)	76.5%		77.3%	
Employment (Fourth Quarter after Exit)	74.5%		75.2%	
Median Earnings (Second Quarter after Exit)	\$6,750		\$6,818	
Credential Attainment Rate	62.0%		62.6%	

Measurable Skill Gains	67.5%		68.2%	
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Title II - Adult Education and Family Literacy Act Program

	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter after Exit)	41.0%		42.0%	
Employment (Fourth Quarter after Exit)	42.0%		42.5%	
Median Earnings (Second Quarter after Exit)	\$8,500		\$8,686	
Credential Attainment Rate	26.0%		28.0%	
Measurable Skill Gains	47.0%		48.0%	

Title III - Wagner-Peyser Act Employment Service Program

	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter after Exit)	61.5%		62.1%	
Employment (Fourth Quarter after Exit)	58.2%		58.8%	
Median Earnings (Second Quarter after Exit)	\$8,400		\$8,484	

Title IV – Vocational Rehabilitation Program

	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter after Exit)	49.0%		49.5%	
Employment (Fourth Quarter after Exit)	44.0%		44.4%	
Median Earnings (Second Quarter after Exit)	\$5,100		\$5,151	
Credential Attainment Rate	26.3%		26.6%	
Measurable Skill Gains	30.0%		30.3%	

All WIOA Core Programs

	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Effectiveness in Serving Employers	Baseline	Baseline	Baseline	Baseline

Other Appendices

Appendix 1: Commonly Used Abbreviations

AAO	Arizona Apprenticeship Office
AATN	Arizona Advanced Technology Network
ABEC	Arizona Business and Education Coalition
ACA	Arizona Commerce Authority
ACMF	Arizona Coalition of Military Families
ADCRR	Arizona Department of Corrections Rehabilitation & Reentry
ADE	Arizona Department of Education
ADES	Arizona Department of Economic Security
AES	Adult Education Services
AHCCCS	Arizona Health Care Cost Containment System
AJC	Arizona Job Connection
AJLA	America's Job Link Alliance
AMS	Arizona Management System
AZSILC	Arizona Statewide Independent Living Council
BIL	Bipartisan Infrastructure Law
BOP	Bureau of Prison
BST	Business Services Team
CFR	Code of Federal Regulations
CRP	Community Rehabilitation Provider

AAO	Arizona Apprenticeship Office
CSBG	Community Services Block Grant
CSNA	Comprehensive Statewide Needs Assessment
CTE	Career and Technical Education
CY	Calendar Year
DARE	Drug Abuse Resistance Education
DDD	Division of Developmental Disabilities
DERS	Division of Employment and Rehabilitation Services
DOE	Department of Education
DOL	Department of Labor
DW	Dislocated Worker
ELL	English Language Learner
ES	Employment Services
ESOL	English for Speakers of Other Languages
ETPL	Eligible Training Provider List
FFY	Federal Fiscal Year
IIA	Investing In America
IET	Integrated Education and Training
IRC	International Rescue Committee
JA	Junior Achievement
JRT	Job Readiness Training
JVSG	Job for Veterans State Grants
LFPR	Labor Force Participation Rate
LQ	Location Quotient
LVER	Local Veteran Employment Representatives
LWDAs	Local Workforce Development Areas

AAO	Arizona Apprenticeship Office
LWDBs	Local Workforce Development Boards
MSA	Metropolitan Statistical Area
MSFW	Migrant and Seasonal Farmworker
NAICS	North American Industrial Classification System
NASWA	National Association of State Workforce Agencies
NFJP	National Farmworker Jobs Program
NRS	National Reporting System
NTN	Nineteen Tribal Nations
OEO	Office of Economic Opportunity
PEA	Public Education Agency
PIO	Public Information Office
PPEP	Portable Practical Educational Preparation
PROWD	Partners for Reentry Opportunities in Workforce Development
PY	Program Year
RESEA	Reemployment Services and Eligibility Assessment
RR	Rapid Response
SCC	Second Chance Centers
SCSEP	Senior Community Service Employment Program
SNAP E&T	Supplemental Nutrition Assistance Program Employment and Training
SRC	State Rehabilitation Council
TAA	Trade Adjustment Assistance
TANF	Temporary Assistance for Needy Families
UI	Unemployment Insurance
VR	Vocational Rehabilitation

AAO	Arizona Apprenticeship Office
WAC/the Council	Workforce Arizona Council
WARN	Worker Adjustment and Retraining Notification
WBL	Work-Based Learning
WIOA	Workforce Innovation and Opportunity Act
WIPS	Workforce Integrated Performance System

Appendix 2: In-Demand Occupations

SOC Code	SOC Title	Estimated Occupational Employment (2024)	Average Annual Wages (2024)	Annualized Projected Employment Percent Change (2024-2026)	Minimum Education Level	Future Ready Designated Occupations*
29-1123	Physical Therapists	5,215	\$104,250	3.2%	Doctoral or professional degree	
25-1071	Health Specialties Teachers, Postsecondary	3,532	\$125,330	2.7%	Doctoral or professional degree	
29-1051	Pharmacists	7,751	\$136,410	1.5%	Doctoral or professional degree	
29-1021	Dentists, General	2,773	\$201,240	1.6%	Doctoral or professional degree	
29-1229	Physicians, All Other	5,626	\$234,150	2.3%	Doctoral or professional degree	
29-1221	Pediatricians, General	1,358	\$241,970	2.7%	Doctoral or professional degree	
29-1215	Family Medicine Physicians	4,494	\$306,890	2.3%	Doctoral or professional degree	
29-1127	Speech-Language Pathologists	3,584	\$98,390	3.2%	Master's degree	
29-1122	Occupational Therapists	2,841	\$101,360	2.8%	Master's degree	
29-1171	Nurse Practitioners	7,343	\$132,920	5.6%	Master's degree	
29-1071	Physician Assistants	3,818	\$143,160	4.0%	Master's degree	
13-1151	Training and Development Specialists	10,789	\$75,090	1.4%	Bachelor's degree	X
13-1041	Compliance Officers	11,757	\$79,240	0.9%	Bachelor's degree	X
19-5011	Occupational Health and Safety Specialists	2,995	\$84,920	2.0%	Bachelor's degree	X

13-1081	Logisticians	3,158	\$90,030	2.1%	Bachelor's degree	
29-1141	Registered Nurses	69,727	\$95,230	2.8%	Bachelor's degree	
17-2051	Civil Engineers	6,434	\$97,630	0.8%	Bachelor's degree	X
27-1011	Art Directors	2,416	\$99,430	2.1%	Bachelor's degree	
13-2052	Personal Financial Advisors	8,004	\$104,330	1.5%	Bachelor's degree	
15-1211	Computer Systems Analysts	12,037	\$106,930	0.8%	Bachelor's degree	
17-2141	Mechanical Engineers	5,641	\$109,580	1.4%	Bachelor's degree	X
15-2051	Data Scientists	3,966	\$112,460	3.2%	Bachelor's degree	
15-1299	Computer Occupations, All Other	5,859	\$114,540	1.0%	Bachelor's degree	
13-1111	Management Analysts	20,510	\$117,750	1.2%	Bachelor's degree	
17-2112	Industrial Engineers	7,244	\$119,890	1.2%	Bachelor's degree	X
15-1212	Information Security Analysts	3,767	\$123,780	2.5%	Bachelor's degree	
17-2071	Electrical Engineers	5,811	\$124,080	0.9%	Bachelor's degree	X
53-2011	Airline Pilots, Copilots, and Flight Engineers	2,257	\$209,750	0.9%	Bachelor's degree	
31-2021	Physical Therapist Assistants	1,798	\$65,540	4.0%	Associate's degree	
49-9062	Medical Equipment Repairers	1,116	\$70,780	3.0%	Associate's degree	
29-1126	Respiratory Therapists	3,546	\$76,990	4.0%	Associate's degree	
29-2034	Radiologic Technologists and Technicians	5,420	\$85,250	2.5%	Associate's degree	
29-1292	Dental Hygienists	5,176	\$96,050	1.8%	Associate's degree	
29-2032	Diagnostic Medical Sonographers	1,775	\$99,370	3.5%	Associate's degree	
49-9021	Heating, Air Conditioning, and Refrigeration Mechanics and Installers	12,534	\$58,540	1.8%	Postsecondary non-degree award	X
33-2011	Firefighters	5,652	\$60,660	1.0%	Postsecondary non-degree award	X
29-2055	Surgical Technologists	2,555	\$69,300	3.1%	Postsecondary non-degree award	

29-2061	Licensed Practical and Licensed Vocational Nurses	5,662	\$72,840	1.8%	Postsecondary non-degree award	
49-3011	Aircraft Mechanics and Service Technicians	5,290	\$79,040	1.9%	Postsecondary non-degree award	
53-2012	Commercial Pilots	1,835	\$121,860	1.2%	Postsecondary non-degree award	
21-1093	Social and Human Service Assistants	6,826	\$43,110	2.2%	High school diploma or equivalent	
35-1012	First-Line Supervisors of Food Preparation and Serving Workers	26,953	\$46,210	0.8%	High school diploma or equivalent	
43-6013	Medical Secretaries and Administrative Assistants	18,436	\$47,670	2.0%	High school diploma or equivalent	
29-2052	Pharmacy Technicians	11,160	\$47,880	1.5%	High school diploma or equivalent	
39-9031	Exercise Trainers and Group Fitness Instructors	8,770	\$48,340	2.6%	High school diploma or equivalent	
27-4021	Photographers	3,727	\$49,190	1.8%	High school diploma or equivalent	
49-9099	Installation, Maintenance, and Repair Workers, All Other	4,633	\$49,700	1.2%	High school diploma or equivalent	
31-9099	Healthcare Support Workers, All Other	3,604	\$50,480	2.0%	High school diploma or equivalent	
49-9071	Maintenance and Repair Workers, General	35,854	\$50,960	0.9%	High school diploma or equivalent	X
21-1094	Community Health Workers	1,303	\$51,260	2.4%	High school diploma or equivalent	
53-3033	Light Truck Drivers	21,958	\$51,450	1.4%	High school diploma or equivalent	
37-1011	First-Line Supervisors of Housekeeping and Janitorial Workers	4,382	\$51,640	1.5%	High school diploma or equivalent	
53-2031	Flight Attendants	3,581	\$52,900	1.3%	High school diploma or equivalent	
47-2231	Solar Photovoltaic Installers	1,633	\$54,190	4.4%	High school diploma or equivalent	X
37-1012	First-Line Supervisors of Landscaping, Lawn Service, and Groundskeeping Workers	5,157	\$54,980	1.3%	High school diploma or equivalent	
49-9011	Mechanical Door Repairers	1,211	\$57,110	2.3%	High school diploma or equivalent	
47-2031	Carpenters	20,978	\$58,340	2.0%	High school diploma or equivalent	X
47-2073	Operating Engineers and Other Construction Equipment Operators	13,907	\$60,280	1.5%	High school diploma or equivalent	X

49-3031	Bus and Truck Mechanics and Diesel Engine Specialists	4,603	\$60,330	0.7%	High school diploma or equivalent	X
47-2221	Structural Iron and Steel Workers	2,706	\$60,640	1.4%	High school diploma or equivalent	X
47-2111	Electricians	20,205	\$61,520	1.9%	High school diploma or equivalent	X
49-3042	Mobile Heavy Equipment Mechanics, Except Engines	9,167	\$64,990	1.7%	High school diploma or equivalent	
49-9044	Millwrights	568	\$65,330	2.3%	High school diploma or equivalent	X
35-1011	Chefs and Head Cooks	3,063	\$65,930	1.5%	High school diploma or equivalent	
47-2152	Plumbers, Pipefitters, and Steamfitters	11,306	\$67,010	1.5%	High school diploma or equivalent	X
41-3021	Insurance Sales Agents	12,501	\$67,580	1.1%	High school diploma or equivalent	
41-9022	Real Estate Sales Agents	13,935	\$68,570	1.2%	High school diploma or equivalent	
49-9041	Industrial Machinery Mechanics	5,241	\$69,800	2.1%	High school diploma or equivalent	X
51-1011	First-Line Supervisors of Production and Operating Workers	8,989	\$76,780	0.2%	High school diploma or equivalent	X
49-1011	First-Line Supervisors of Mechanics, Installers, and Repairers	11,901	\$78,060	0.8%	High school diploma or equivalent	X
47-1011	First-Line Supervisors of Construction Trades and Extraction Workers	23,495	\$79,600	1.9%	High school diploma or equivalent	
41-4012	Sales Representatives, Wholesale and Manufacturing, Except Technical and Scientific Products	23,291	\$80,790	0.5%	High school diploma or equivalent	
33-3051	Police and Sheriff's Patrol Officers	9,712	\$82,400	1.0%	High school diploma or equivalent	
41-1012	First-Line Supervisors of Non-Retail Sales Workers	6,044	\$90,060	0.7%	High school diploma or equivalent	
49-9051	Electrical Power-Line Installers and Repairers	2,781	\$93,580	1.7%	High school diploma or equivalent	X
33-3021	Detectives and Criminal Investigators	4,091	\$98,670	0.4%	High school diploma or equivalent	
33-1012	First-Line Supervisors of Police and Detectives	1,896	\$113,780	0.9%	High school diploma or equivalent	
35-2014	Cooks, Restaurant	29,619	\$39,660	1.7%	No formal educational credential	

35-2012	Cooks, Institution and Cafeteria	6,838	\$40,890	2.0%	No formal educational credential	
47-2061	Construction Laborers	41,672	\$47,220	2.3%	No formal educational credential	X
47-2081	Drywall and Ceiling Tile Installers	5,319	\$50,240	1.7%	No formal educational credential	
47-2044	Tile and Stone Setters	1,901	\$51,290	2.3%	No formal educational credential	
47-2141	Painters, Construction and Maintenance	9,778	\$51,570	1.7%	No formal educational credential	
35-3011	Bartenders	14,800	\$52,500	0.9%	No formal educational credential	
47-2181	Roofers	4,239	\$52,680	1.6%	No formal educational credential	X
47-2051	Cement Masons and Concrete Finishers	8,090	\$57,010	0.9%	No formal educational credential	X
47-5041	Continuous Mining Machine Operators	2,435	\$59,740	2.5%	No formal educational credential	X
43-5052	Postal Service Mail Carriers	5,462	\$60,690	1.6%	No formal educational credential	
27-2021	Athletes and Sports Competitors	1,014	\$80,770	1.2%	No formal educational credential	

**Future Ready Occupations were those identified by the Office of Economic Opportunity as occupations that benefit the environment or conserve natural resources, or in which workers' duties involve making their establishment's production processes more environmentally friendly.*

Source: Arizona Office of Economic Opportunity

Appendix 3: Future Ready Sub-Industries Within In-Demand Industries

NAICS Code	Future Ready Sub-industries	In-Demand Industry
236115	New Single-Family Housing Construction (except For-Sale Builders)	Construction
236116	New Multifamily Housing Construction (except For-Sale Builders)	
236117	New Housing For-Sale Builders	
236118	Residential Remodelers	
236210	Industrial Building Construction	
236220	Commercial and Institutional Building Construction	
237110	Water and Sewer Line and Related Structures Construction	
237130	Power and Communication Line and Related Structures Construction	
237210	Land Subdivision	

237990	Other Heavy and Civil Engineering Construction	
238210	Electrical Contractors and Other Wiring Installation Contractors	
621491	HMO Medical Centers	Health care and social assistance
423210	Furniture Merchant Wholesalers	Wholesale trade
423520	Coal and Other Mineral and Ore Merchant Wholesalers	
423740	Refrigeration Equipment and Supplies Merchant Wholesalers	
423810	Construction and Mining (except Oil Well) Machinery and Equipment Merchant Wholesalers	
423930	Recyclable Material Merchant Wholesalers	
424520	Livestock Merchant Wholesalers	
424690	Other Chemical and Allied Products Merchant Wholesalers	
212210	Iron Ore Mining	
212230	Copper, Nickel, Lead, and Zinc Mining	
212312	Crushed and Broken Limestone Mining and Quarrying	
485111	Mixed Mode Transit Systems	Transportation and warehousing
485113	Bus and Other Motor Vehicle Transit Systems	
485119	Other Urban Transit Systems	
485210	Interurban and Rural Bus Transportation	
485410	School and Employee Bus Transportation	
485510	Charter Bus Industry	
485999	All Other Transit and Ground Passenger Transportation	
311352	Confectionery Manufacturing from Purchased Chocolate	Manufacturing
311412	Frozen Specialty Food Manufacturing	

311613	Rendering and Meat Byproduct Processing	
311999	All Other Miscellaneous Food Manufacturing	
312140	Distilleries	
313230	Nonwoven Fabric Mills	
314110	Carpet and Rug Mills	

Source: The Office of Economic Opportunity Research Funded by the Families and Workers Fund Powering Climate & Infrastructure Careers Challenge (PCICC)

Appendix 4: Public Comment Summary and Response Matrix

The public comment process for the WIOA PY 2026–2027 Arizona State Plan Modification was conducted from March 30, 2026, through April 3, 2026. It provided stakeholders and the public an opportunity to review the draft modification and assess whether the proposed updates were sufficiently clear, regionally grounded, operationally credible, and aligned with how the ARIZONA@WORK system operates in practice. The comments received did not challenge the overall direction of the modification; rather, they largely sought sharper specificity, stronger implementation language, and clearer articulation of roles, expectations, and system identity. The State Plan Modification team reviewed all comments submitted during the public comment period and incorporated revisions where applicable and appropriate.

Comment ID	Stakeholder Category	Topic	State Response/Summary	Disposition
PC-01	LWDB Member	Business services alignment with in-demand industries	The State acknowledges the concern and will clarify how sector strategy, employer engagement, and performance monitoring better align with in-demand industries.	Accepted in part
PC-02	LWDB Member / Local Workforce System Staff / Core Program Partner	Information Technology as a cross-cutting sector; AI and digital skills	The State acknowledges the concern and will strengthen references to AI, digital skills, and technology competency while maintaining the current sector classification.	Accepted in part

PC-03	LWDB Member / Local Workforce System Staff	Construction and manufacturing alignment; ETPL quality safeguards; training mix	The State will strengthen the training alignment narrative and clarify ETPL quality safeguards and related policy language where supported.	Accepted in part
PC-04	LWDB Member / Unidentified Local Workforce Stakeholder	Regional economic variation, rural and tribal relevance, and sector mismatch	The State agrees regional variation should be more clearly acknowledged and will clarify that statewide priorities are implemented through local and regional strategy.	Accepted
PC-05	Education and Training Provider	Coordination across programs; local authority; One-Stop Operator role; partner responsibility	The State agrees clarifying language is appropriate so coordination is not misread as shared operational control and local board, MOU, and IFA authority remains clear.	Accepted
PC-06	Local Workforce System Staff	ETPL governance, local labor market information, local review, and RAP/ITA clarification	The State agrees ETPL language should clarify local review, State final approval, and RAP/ETPL requirements.	Accepted
PC-07	Local Workforce System Staff / LWDB Member	Rapid Response planning, coordination, funding, and team structure	The State revised Rapid Response language to reflect both State and local roles, including local planning, coordination, and execution.	Accepted
PC-08	Local Workforce System Staff	Reentry services, prison locations, and related guidance	The State revised the narrative to identify the four current prison	Accepted in part

			locations. Questions regarding expansion and process were noted but are operational matters outside the scope of this modification.	
PC-09	Local Workforce System Staff / LWDB Member	Business services team structure, Title IV integration, and ARIZONA@WORK branding	The State will refine business services language to avoid implying separate teams or branding silos. Unsupported insertions were not adopted where cited text could not be located.	Accepted in part
PC-10	Local Workforce System Staff / LWDB Member	Acronyms, formatting, grammar, duplication, template clean-up, and cosmetic edits	The State agrees to make technical edits throughout the document, including spelling out terms where needed, correcting formatting, and removing duplicate or stray text.	Accepted
PC-11	LWDB Member / Local Workforce System Representative	Unified Plan scope and recognition of all required one-stop partners	The State acknowledges the comment and will better recognize the broader ARIZONA@WORK network and required partners while maintaining the federal structure of a Unified Plan.	Accepted in part
PC-12	LWDB Member / Local Workforce System Representative	Staff orientation, onboarding, and ARIZONA@WORK brand identity	The State appreciates the recommendation but treats it primarily as an implementation issue rather than a required substantive plan revision.	Noted / No substantive change

PC-13	LWDB Member / Local Workforce System Representative	Annual convenings, data modernization progress, negotiation timing, and definitional clarity	The State will clarify modernization progress and certain governance references where appropriate. Federal timing questions are addressed only to the extent current information is available.	Accepted in part
PC-14	Core Program Partner (Title II)	Title II narrative, data management language, and measurable skill gain terminology	The State agrees and will revise Title II narrative and technical terminology to reflect current program language and practice.	Accepted
PC-15	Local Workforce System Staff / LWDB Member	Child care access, supportive services flexibility, and physical technology access points	The State acknowledges the comments. Childcare waiver issues remain under review, while access-language revisions may be made where supported by the plan.	Accepted in part
PC-16	Local Workforce System Representative	MSFW references, complaint process link, AT/disability training guidance, and acronym clarity	The State agrees technical clarification is appropriate and will revise or add detail where supported. Some operational questions may require follow-up outside the plan narrative.	Accepted in part
PC-17	Local Workforce System Representative	Waivers, in-school youth ITA guidance, allocation questions, and defining “the State”	The State will clarify responsible entities and available waiver guidance where possible, while avoiding overstatement on pending federal actions.	Accepted in part

PC-18	Local Workforce System Representative	Five strategic pillars, AI emphasis, stakeholder list, and engagement/session documentation	The State agrees stronger framing is appropriate and may add or retain appendix material identifying engagement sessions and participants.	Accepted in part
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STATE OF ARIZONA
OFFICE OF THE GOVERNOR

KATIE HOBBS
GOVERNOR

EXECUTIVE OFFICE

April 6, 2026

The Honorable Lori Chavez-DeRemer
Secretary of Labor
United States Department of Labor
200 Constitution Avenue, N.W.
Washington, D.C. 20210

Dear Secretary Chavez-DeRemer:

Arizona is pleased to submit the Two-Year Modification to Arizona's Workforce Innovation and Opportunity Act (WIOA) Unified State Plan for Program Years (PY) 2026-2027, updating our PY 2024-2027 Plan to reflect current economic conditions, workforce needs, and implementation priorities. This modification advances our vision of a prosperous and resilient Arizona, one that creates real opportunity for every Arizonan across our urban, rural, and tribal communities.

Arizona's workforce strategy is grounded in practical coordination: aligning state agencies, local workforce development boards, education and training providers, community partners, and employers to strengthen our talent pipeline and deliver measurable results. This Two-Year Modification builds on that foundation with targeted updates to ensure our system continues to help employers hire and retain skilled workers, and helps Arizonans, especially youth and individuals with barriers to employment to enter and advance in high-quality jobs and careers.

Through this modification, Arizona is updating and strengthening our statewide approach in the following areas:

- **Labor market alignment and sector strategy:** Refining priority sectors and career pathways based on updated labor market information and employer demand, including continued focus on industries critical to Arizona's growth and competitiveness such as semiconductors, advanced manufacturing, aerospace & defense, clean energy, healthcare, construction, and other priority sectors.
- **Work-based learning and apprenticeships:** Expanding and improving Registered Apprenticeship and other work-based learning models building on efforts such as BuilditAZ, to increase participation, improve completion outcomes, and meet industry needs in skilled trades and high-growth occupations.

- **System integration and service quality:** Strengthening one-stop service delivery through clearer operational expectations, improved partner coordination, and enhanced customer experience and outcomes so job seekers and businesses receive timely, high-quality, consistent services statewide.
- **Data, performance, and continuous improvement:** Updating performance strategies and accountability practices to support stronger outcomes, transparent reporting, and data-informed decision-making across programs and local areas.
- **Expanded access:** Expanding effective supports for individuals with barriers to employment, strengthening outreach and service strategies for untapped talent, and continuing collaboration with tribal nations and rural partners to ensure the workforce system delivers opportunity statewide.
- **Infrastructure and connectivity:** Continuing to advance the infrastructure and workforce needed to connect communities to reliable, high-speed internet, an essential enabler for modern training, job search, and business operations particularly in rural and tribal areas.

Arizona's Two-Year Modification also reflects our continued investments in workforce innovation and training capacity, including the Future48 Workforce Accelerators and other state strategies that prepare Arizonans for the jobs building our nation's future. These updates sharpen our ability to meet today's workforce challenges while preparing for what's next ensuring that economic growth translates into opportunity, mobility, and job quality for Arizona workers and families.

Thank you for your partnership and continued support of Arizona's workforce development system. We look forward to working with the U.S. Department of Labor to implement this modified plan and to continue improving outcomes for the businesses and job seekers we have the privilege to serve.

Sincerely,

A handwritten signature in black ink, appearing to be 'KH', followed by a long horizontal line extending to the right.

Katie Hobbs
Governor
State of Arizona



ARIZONA DEPARTMENT OF
EDUCATION

March 10, 2026

The Honorable Linda McMahon
Secretary, U.S. Department of Education
U.S. Department of Education
400 Maryland Ave, SW
Washington, D.C. 20202

Dear Secretary McMahon,

On behalf of the Arizona Department of Education, I am pleased to support the revised **Program Year (PY) 2026-2028 Arizona WIOA State Plan**. This unified plan represents the collaborative efforts of the Arizona WIOA core partners and state agencies, including Title II AEFLA, administered by the Arizona Department of Education.

The state plan showcases the significant accomplishments and work that has been done across the state and addresses the plans to provide services to eligible individuals in the ARIZONA@WORK System to support the five pillars as outlined in *America's Talent Strategy: Building the Workforce for the Golden Age*.

The Arizona Adult Education System continues to implement innovative programs and educational service delivery models to those individuals who would like to earn an Arizona High School Equivalency Diploma, improve basic academic and employability skills, become proficient in English, and/or earn an industry recognized credential leading to post-secondary education and/or employment.

Additionally, under my leadership, the Arizona Department of Education, Adult Education and CTE program areas, have been convening regional meetings across the state for local employers and businesses, CTE providers, Title II providers, community colleges, and workforce partners to develop and expand work based learning and apprenticeship programs focused on regional business needs.

We are committed to the goals, requirements, and assurances as described in the revised *PY2026-2028 Arizona WIOA State Plan*.

Sincerely,

A handwritten signature in black ink that reads "Tom Horne".

Tom Horne, esq.

Superintendent of Public Instruction

Arizona Department of Education

*We are a service organization committed to raising
academic outcomes and empowering parents.*

Commenter (Please indicate your name/organization)	Section/Element	Comment/Justification	Initial Workgroup Response	Action	Initial WAC Response	Action
Michael Guymon, Pima County Workforce Investment Board	Overall Comment	Despite its analytical strengths, the modification reveals several significant gaps between stated industry priorities and the actual reach and design of training programs. Perhaps the most telling metric is found in the Business Services data: only 20.7% of the 14,678 business clients served through ARIZONA@WORK between PY 2022 and 2024 were in in-demand industries. This means that nearly four out of five employer relationships — the foundational driver of a demand-driven workforce system — are occurring outside the sectors the plan explicitly prioritizes. Without corrective action to concentrate employer engagement on in-demand sectors, the system risks becoming supply-driven in practice while remaining demand-driven in rhetoric.				
Michael Guymon, Pima County Workforce Investment Board	Overall Comment	The removal of Information Technology (IT) as a standalone in-demand industry deserves particular scrutiny. While the decision is data-supported — IT recorded job losses of 19.6% annually from Q3 2021 to Q3 2024 — the plan's response is inadequate for a business community increasingly dependent on digital infrastructure. IT is re-categorized as a "cross-cutting" sector, but the plan provides no dedicated sector strategy, no specific training program investments, and no measurable targets for IT workforce development. Notably, Computer and Information Sciences training programs achieved an 82.2% employment alignment rate (third highest among all training subjects), demonstrating strong employer demand for these skills even if the sector classification has changed. The absence of a structured response to IT workforce needs is a material gap, particularly given that advanced manufacturing, semiconductors, and healthcare — all prioritized industries — require significant technology competency from their workforces.				
Michael Guymon, Pima County Workforce Investment Board	Overall Comment	Construction training alignment also deserves closer attention. Despite Construction being the fastest-growing in-demand sector by employment percentage (7.9% annually, 2021–2024) and the primary focus of the BuildAZ initiative, Construction Trades training programs show only a 52.6% employment alignment rate — among the lowest of any training subject. Engineering Technologies/Technicians, relevant to manufacturing and semiconductor workforce needs, show a similarly low 52.4% alignment rate. These figures suggest that while the plan correctly identifies construction and advanced manufacturing as priority sectors, the Eligible Training Provider List (ETPL) and training program mix have not yet been restructured to produce graduates reliably finding work in those fields. Increasing High Impact Training enrollment — currently representing only 19% of Title I-B participants despite far superior outcomes — is identified as an objective, but no specific enrollment targets or timelines are established.				
Michael Guymon, Pima County Workforce Investment Board	Overall Comment	The plan also acknowledges a significant and persistent weakness: statewide in-demand sector designations do not always reflect regional economic realities. Industries identified as in-demand statewide may not be the primary drivers of employment in northern or rural Arizona communities, and the plan lacks localized training program mapping or regionally differentiated sector strategies. This is particularly consequential for tribal and rural communities, where workforce training infrastructure — educators, providers, and internet access — is already limited. Additionally, the Finance and Insurance industry, which employs 169,589 Arizonans and experienced employment losses of -2.3% annually (2021–2025), is removed from in-demand status with no corresponding reskilling or transition strategy for its affected workforce. As overall employment growth slows to a projected 1.0% annually through 2026, the risk of sector displacement without adequate retraining pathways warrants more direct policy attention than this modification provides.				
Dawnette Polland, Yavapai College	Section II.B.2 – Implementation of State Strategy, A. Core Program Activities to Implement the State's Strategy	Recommend clarifying that while alignment and coordination across core programs are emphasized, implementation of service delivery strategies, including co-enrollment and operational practices, remains under the authority of Local Workforce Development Boards and is defined through local plans and MOU/IFA agreements, consistent with WIOA.	Internal comment: The prompt asks for State strategies. While it is true that the one-stop delivery system in each local area is overseen jointly by the LWDB & the CEO, local strategies identified in the local plan (and operationalized in the MOU) must align with State strategies identified in the State Plan. (JSK)	Pending Further Review/Discussion		
Dawnette Polland, Yavapai College	Section II.B.2 – Implementation of State Strategy, C. Coordination, Alignment, and Provision of Services to Individuals	Recommend clarifying that coordination and alignment of services across core programs does not imply shared operational control, and that service delivery responsibilities remain program-specific and governed by each program's statutory and regulatory requirements, as well as locally executed MOU/IFA agreements.		Pending Further Review/Discussion		
Dawnette Polland, Yavapai College	Section II.B.2 – Implementation of State Strategy, D. Coordination, Alignment, and Provision of Services to Employers	Recommend clarifying that coordination of employer services across partners supports efficiency but does not require consolidation of program-specific responsibilities, and that each partner maintains responsibility for delivering services within their authorized scope.		Pending Further Review/Discussion		
Dawnette Polland, Yavapai College	Section II.B.4 – One-Stop Delivery System	Recommend clarifying that the One-Stop Operator role is limited to coordination of service delivery among partners and does not include authority over partner staff, program operations, or service implementation, consistent with 20 CFR 678.620.	Internal comment: The LWDB may establish additional roles for the one-stop operator, per 20 CFR 678.620(a). An entity serving in the one-stop operator role may also serve as a service provider as long as appropriate firewalls are in place, etc. 20 CFR 678.625 (JSK)	Pending Further Review/Discussion		
Dawnette Polland, Yavapai College	Section II.B.4 – One-Stop Delivery System	Recommend clarifying that while integrated service delivery is encouraged, each required One-Stop partner retains responsibility for administering its own program in accordance with applicable federal and state regulations and locally executed MOU/IFA agreements.		Pending Further Review/Discussion		
Dawnette Polland, Yavapai College	Section II.B.6 – Program-Specific Requirements for Core Programs (Title I-B)	Recommend clarifying that Local Workforce Development Boards retain authority over the administration of Title I-B programs, including service delivery design, participant eligibility determinations, and funding decisions, in accordance with WIOA and the approved local plan.	Internal comment: While it is true that the LWDB, in partnership with the CEO, has oversight over Title I-B programs, criteria that determine participant eligibility are established under WIOA and its regulations. While the LWDB and the CEO must ensure appropriate use and management of Title I-B funds, the authority over "funding decisions" attributed to the LWDB by the commenter is unclear -- and it is noted that the CEO, not the LWDB, may designate a fiscal agent and is ultimately liable for Title I-B funds. (JSK)	Pending Further Review/Discussion		
Moriah Robles	Eligible Training Provider List	Recommend adding local labor market information for related occupations is reviewed as part of the evaluation of training programs for ETPL inclusion.				
Moriah Robles	Eligible Training Provider List	Recommend clarifying that although local ETPL coordinators often are tasked with the evaluation of training programs for the ETPL, the selection training providers' programs is a role and responsibility of the Local Workforce Development Boards per 20 CFR 679.370 (f) 1.				
	Overall Comment	The plan identifies key in-demand industries such as healthcare, construction, transportation, and manufacturing; however, it does not fully reflect the economic realities of regions like Yuma County, where agriculture and cross-border logistics are major drivers of the economy.				
Moriah Robles, ARIZONA@WORK Pinal County	Rapid Response, page 50	Recommend clarifying Rapid Response activities are planned, coordinated and executed at the local level. The LWDAs boards report local rapid response activities to the state's rapid response team.	Revised to read, "ADES administers RR at the State level, while LWDAs also receive funding for RR planning, coordination, and execution at the local level." (LL)	Revised		
Moriah Robles, ARIZONA@WORK Pinal County	Reentry Program, page 50	Recommend listing the four prisons where ARIZONA@WORK Re-entry services are provided. Is there a plan to offer these services at other prisons in the state?	Revised to read, "Within the SCC is an eight-week program of ES provided to inmates in four Arizona State Prison Complexes: currently in Perryville (Goodyear), Lewis - Stiner (Buckeye), Manzanita (Tucson), and Phoenix West. (LL)	Revised		

Commenter (Please indicate your name/organization)	Section/Element	Comment/Justification	Initial Workgroup Response	Action	Initial WAC Response	Action
Moriah Robles, ARIZONA@WORK Pinal County	Services to employers, page 51	Recommend replacing "Employment Specialist" with "ARIZONA@WORK partner programs that serve job seekers". Coordination does not just occur with Employment Service staff.	Agree with refining. Will remove "collaborate with Employment Specialist" and revise to read "ARIZONA@WORK BST leverage Labor Market Information tools..." (JSK)	Revised		
Moriah Robles, ARIZONA@WORK Pinal County	Title I: Adult, DW and Youth , page 64	Recommend spelling out "DW" in the header. General comment to spell out "RR " and "DW" instead of using abbreviations. Observations for DW are inconsistently used throughout the plan.	Agree with spelling out "Dislocated Worker", since the comment also refers to the inconsistent use of "DW," does the group have any concerns with spelling out Dislocated Worker in other parts of the Plan? (JSK)	Pending Further Review/Discussion		
Moriah Robles, ARIZONA@WORK Pinal County	Title I: Adult, DW and Youth , page 64	State staff serving business in a local area should be considered part of the local BST, and not two separate teams.	Identifying the State-level staff who collaborate with local area BSTs does not imply that they are a separate entity from the overall ARIZONA@WORK business services unit. (JSK)	Pending Further Review/Discussion		
Moriah Robles, ARIZONA@WORK Pinal County	D. Coordination, Alignment and Provision of Services to Employers , page 85	Clarify that the ARIZONA@WORK BST includes Title IV Employment Outreach team. This is not a separate team. Title IV falls under the ARIZONA@WORK branding	Strike Title IV Employment Outreach team. The addition was intended to bring awareness to the Employment Outreach Team and highlight the additional services that can be provided specific to serving individuals with disabilities.	Revised		
Moriah Robles, ARIZONA@WORK Pinal County	D. Coordination, Alignment and Provision of Services to Employers, page 87	Unsure why Title IV employment outreach team, needs to be added on this page, Title IV is a workforce partner, and coordination with other partners should be a given.	Strike Title IV Employment Outreach team. The addition was intended to bring awareness to the Employment Outreach Team and highlight the additional services that can be provided specific to serving individuals with disabilities.			
Moriah Robles, ARIZONA@WORK Pinal County	ETPL Policy (Revised 2026)	Recommend to add verbs to the list of new ETPL quality safeguards: for example- Set minimum operational history requirement for training providers- Ensure testing for the related recognized credential is accessible within six months of program completion, set a stackable credential requirement		Pending Further Review/Discussion		
Moriah Robles, ARIZONA@WORK Pinal County	Registered Apprenticeship- Page 158-159	Recommend clarify that for ITAs to be issued that RAP must be listed on the ETPL. Apprentices must meet program and training services requirements, and be approved for ITAs.	To further clarify, added "ITAs may also be used...for the apprentice, if the RAP is on the ETPL." (JSK)	Revised		
Joel Millman, ARIZONA@WORK Pinal County	WIOA Participant Definition, page 37	It is unfortunate that a Unified State Plan limits the focus to WIOA Titles I-IV. This limited view of the statewide and local workforce system ignores the contribution and required coordination via local plans, the MOU and IFA and other activities that do include the other "required" partners in the one-stop system as described in WIOA Sec. 121(b)(1)(B), which " identifies the entities that are required partners in the local one-stop delivery systems". This is contradictory to what is stated later in the plan (Alignment with Activities Outside the Plan" (page 80) - "The 12 LWDBs within the ARIZONA@WORK system, required, and other local partners (e.g., Job Corps, Youth Build, the U.S. Department of Housing and Urban Development [HUD] employment and training providers, and CTE providers), will coordinate implementation to align with the State's strategies." LWDBs are responsible for establishing a system that is "outside the plan". RECOMMENDATION: Insert language that recognizes ALL required partners of the public workforce system and the importance of the ARIZONA@WORK network to engage and leverage all resources offered by all partners to assist the targeted populations identified through each funding stream.		Pending Further Review/Discussion		
Joel Millman, ARIZONA@WORK Pinal County	Workforce System Weaknesses, page 61	In addition to those listed, an inherent weakness of the "system" is the lack of hiring orientations of new staff. (of all partners), ALL partner staff should be introduced to the ARIZONA@WORK system as part of the hiring process - not a post hire online offering that focuses on the core partners and ignores the interdependence of all partners to provide comprehensive, seamless levels of service via an integrated locally driven workforce system - under the ARIZONA@WORK brand - not their funding program name. RECOMMENDATION: Insert language indicating that all core partners will set the example by using language in their recruitment of new staff that emphasizes the fact that once hired, the partner staff will be assigned to one of 12 local workforce development areas (or possible more than one depending on the position). Job descriptions for field level (local office) positions should also be modified to include language explaining the local organizational structure including the requirements to adjust service delivery to align with local workforce board goals and each local workforce development plan the position serves.		Pending Further Review/Discussion		
Joel Millman, ARIZONA@WORK Pinal County	Assessment, page 72	"WIOA core partners will convene at least annually to review progress toward the goals and strategies outlined in this Unified Plan. These convenings will support cross-program alignment, strengthen service integration, and identify policy and operational improvements." At what level is this convening planned for - at the state level or are local boards part to this convening? Who represents Title I in this exercise?		Pending Further Review/Discussion		
Joel Millman, ARIZONA@WORK Pinal County	Capacity Building and Tech Assistance, page 76	"To address identified weaknesses in data sharing and system integration, Arizona will (?) strengthen its data infrastructure by: Modernizing workforce and partner program data systems, including Unemployment Insurance (UI), Vocational Rehabilitation (VR), and workforce program platforms." - Weren't both systems modernized since the plan was submitted two years ago? RECOMMENDATION: We should update language (not future tense) to show that progress has been made. (see page 134 (UI) and page 137 (Voc Rehab))	If update is deemed necessary - here is language for the VR modernization project. The Vocational Rehabilitation program launched inFormed, a modernized case management system designed to streamline processes and improve service delivery in July 1, 2025.	Revised		
Joel Millman, ARIZONA@WORK Pinal County	D. Coordination, Alignment and Provision of Services to Employers, page 86/87	"Coordinate efforts with businesses using State and local workforce development board members and ARIZONA@WORK business service teams and Title IV Employment Outreach team." This makes it sound as though Title IV is a separate business service function than the "ARIZONA@WORK" business service teams when employer engagement is technically a function of the local boards - all under the ARIZONA@WORK brand. RECOMMENDATION: The Title IV Employment Outreach team will integrate into each local workforce development area's business service team to expand local capacity and coordinate outreach effort under the ARIZONA@WORK brand.				
Joel Millman, ARIZONA@WORK Pinal County	Allocation Formula, page 120	3. Twenty-five percent of the total WIOA DW funding at the beginning of each year is reserved for statewide Rapid Response activities.	Disagree with adding "statewide" as the 25% is used to fund RR activities at the State and local area levels. (JSK)	Pending Further Review/Discussion		
Joel Millman, ARIZONA@WORK Pinal County	General Comment, page 121	With the State's written approval. RECOMMENDATION: If not explained earlier in the plan - define who "the State" is. This will help clarify between Arizona, OEO, the WAC and DES - be specific which entity is referenced for particular passages.	No concerns with specifying ADES (JSK)	Pending Further Review/Discussion		
Joel Millman, ARIZONA@WORK Pinal County	Allocation Formula pages 119-126	Review language on these pages. Seems repetitive and can possibly be consolidated.				

Commenter (Please indicate your name/organization)	Section/Element	Comment/Justification	Initial Workgroup Response	Action	Initial WAC Response	Action
Joel Millman, ARIZONA@WORK Pinal County	Authorization and Funding, page 126	QUESTION: Is the following narrative current? "The Arizona Department of Education is soliciting grant applications for the 2024-2028 Arizona Adult Education Grant Awards. Providers from entities eligible to receive Workforce Innovation and Opportunity Act (WIOA) Title II funds are encouraged to apply."	Revise to: The Arizona Department of Education held a competitive grant application process for awarding Title II grant funds for the 2024-2028 Arizona Adult Education Grant Contract. Twenty-one adult education providers were approved to provide educational services to eligible Title II participants in the twelve local workforce areas.	Revised - in purple		
Joel Millman, ARIZONA@WORK Pinal County	Program Data/A. Data Alignment and Integration, page 134	Very pleased to read this: Arizona will research innovative solutions used by other States to expand and integrate its information systems used within the ARIZONA@WORK system. <i>In addition, technological solutions identified and/or implemented by LWDBs will provide insight into successful data integration strategies that can be implemented across ARIZONA@WORK partner programs. Arizona aims to improve, across the core and other partner programs, the ability to exchange common data elements and expand data reporting and analysis to enable data-driven decisions that support continuous improvement through regular assessment and evaluation.</i>				
Joel Millman, ARIZONA@WORK Pinal County	p.134, 138	QUESTION: Which MSFW program does the following narrative refer to - those MSFWs identified by Employment Service staff or the Sec. 167 MSFW Title I provider (e.g., PPEP) who is the required partners? <i>"Arizona currently is able to track participation in Title I, III, JVSG, UI, TAA, and MSFW through one data system, and will seek solutions to track additional program customers."</i> Page 138 These wages are also applied to the other partner programs tracked in AJC, including JVSG and TAA. (MSFW not mentioned here)	Removed "MSFW" in the referenced paragraph on p. 134 as MSFW is not a program (JSK)	Revised		
Joel Millman, ARIZONA@WORK Pinal County; Title II agrees with this comment	General Comment	Is the term "digital literacy" meant to encompass "AI". A quick scan of the plan does not find "AI" mentioned. This would seem counter to the intent of TEGL 07-25 and WIOA Planning and Strategic Priorities outlined in that guidance document.				
Joel Millman, ARIZONA@WORK Pinal County	Rapid Response, page 155	EDIT FOR SENTENCE STRUCTURE: "RR funds enable required and allowable activities described in the publicly posted WIOA policy, Chapter 2, Section 900. State-level RR activities are managed by the State RR coordinator".	Unable to identify the suggested edit(s) for sentence structure (JSK) --- maybe mirror edit in row 16 above? replace "State-level RR activities are managed by the State RR coordinator" with "ADES administers RR at the State level, managed by the State RR coordinator." (LL)	Pending Further Review/Discussion		
Joel Millman, ARIZONA@WORK Pinal County	Rapid Response, page 155	EDIT FOR SENTENCE STRUCTURE: Second paragraph from bottom of the page - run-on sentence.	For clarity, revised as follows: "Employers are also made aware of programs designed to prevent layoffs, such as the Shared Work Program. The Shared Work Program provides an alternative for employers faced with a reduction in force and allows businesses to divide..." (JSK)	Revised		
Joel Millman, ARIZONA@WORK Pinal County	Rapid Response, page 157	Plan narrative: "RR teams consist of TAA, WIOA Title I-B, and Wagner-Peyser ES representatives, who conduct onsite presentations at the employer location (whenever permissible)." Per DES RR Policy Sec. 904: The team is led by LWDB staff, including local representatives of the WIOA Title I-B programs and service providers, who are designated to serve on the Rapid Response event team for dislocation events that affect workers in their LWDA.	Added "led by LWDB staff" for better alignment with State policy (JSK)	Revised		
Joel Millman, ARIZONA@WORK Pinal County	General Comment, page 157	EXAMPLE: b. Adult and Dislocated Workers Program Requirements/1. Work-Based Training Models - Double check formatting throughout the plan. There appears to be inconsistencies with section introductions - some highlighted in red, some narrative is center-justified, etc. This particular section's opening sentence "If the State is utilizing work-based training models (e.g. on-the-job training, incumbent worker training, transitional jobs, and customized training) as part of its training strategy and these strategies are not already discussed in other sections of the plan, describe the State's strategies for how these models ensure high quality training for both the participant and the employer," seems to be from planning guidance but is formatted as if it is written as part of the State's narrative response.	Noted. Narrative will be uploaded to State Plan portal, excluding the prompts. Specific texts use red ink to show changes from the four-year Plan. (JSK)	No Change		
Joel Millman, ARIZONA@WORK Pinal County	page 231	recurring themes emerged from Arizona's 2023 CSNA : "VR leadership and ARIZONA@WORK leadership have a very good working relationship at the State and many local levels, and they were moving beyond a referral relationship prior to COVID, but the pandemic set back the progress made." Stating "VR leadership AND ARIZONA@WORK leadership..." implies these are two distinctly different entities when in fact - under the intent of the law - Voc Rehab IS ARIZONA@WORK leadership. They so happen to be the expert leaders in serving the disabled population. This should not be an "us and them" but statements like this resonate throughout the system stifling seamless delivery of service planning under an agreed upon brand. We need to fundamentally change how the ARIZONA@WORK brand is defined and ensure all required partners - especially the core partners - identify with it.	The intent is to show that VR is actively involved in workforce development activities at the local area. ARIZONA@WORK leadership, inclusive of VR leadership, at local levels had begun to make progress in moving beyond a referral relationship prior to COVID, but the pandemic set back the progress made.	Revised		
Joel Millman, ARIZONA@WORK Pinal County	General statement	All partners not identifying with the brand is problematic: "Although consumers are referred to ARIZONA@WORK Job Centers, these are primarily for employment preparation workshops and not shared funding of cases or training. Community Rehabilitation Provider staff have little or no knowledge of how the ARIZONA@WORK Job Centers or WIOA partners work in their State." All Voc Rehab offices in the state should carry the ARIZONA@WORK brand.	Business cards and email signatures blocks all use the ARIZONA@WORK brand. VR offices that are not co located with WIOA partners do not have ARIZONA@WORK building signage. Community Rehabilitation Providers (CRP) staff are paid VR vendors to provide 1:1 support to job seekers with disabilities. No change needed as a general statement.	No Change		
Joel Millman, ARIZONA@WORK Pinal County	Strategy 3, page 240	Check the font on this page for consistency.				
Joel Millman, ARIZONA@WORK Pinal County	Coordination with Employers, page 265	"The 9 Employment Outreach Specialists will be assigned to various counties across the state, in alignment with the local workforce area designation." RECOMMENDATION: Have Specialists assigned per local workforce development areas rather than counties. This may be the intent but it is not clear with the reference of the county assignments.	The nine Employment Outreach Specialists will be assigned to work with designated local workforce development area(s).	Revised - in purple		

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Beverly Wilson, ADE	Implementation of State Strategy (page 79)	ADES collaborates with the ADE, which administers adult education and literacy activities under Title II of WIOA to support coordination of services for individuals participating in programs overseen by both agencies. As an ARIZONA@WORK partner, ADE supports local Title II providers through its Adult Education Services office. Activities include working to ensure local program directors understand their roles in the one-stop system, as well as how support services available through partners can provide benefit to Title II participants. Recently, increased efforts have been made to ensure cost sharing and utilizing workforce set-aside funds to support the ARIZONA@WORK system	Revise to: The Arizona Department of Education administers Title II, the adult education and high school equivalency system. As an ARIZONA@WORK partner, ADE provides technical assistance, monitoring, and training to approved adult education providers that includes their responsibilities in the system to ensure shared participants are supported in their educational and employment goals. Recently, increased efforts have been made to collaborate more closely with the executive directors of the local workforce boards to ensure cost sharing and the use of workforce set-aside funds support the ARIZONA@WORK system and Title II participants.			
Beverly Wilson, ADE	Title II - Data Management (page 223)	Educational Functioning Level gain	Revise to: Educational Functioning Level gain through progress testing using an NRS approved standardized assessment and passing a GED sub-test in a subject area.			
Beverly Wilson, ADE	Title II -Data Management (page 223)	Transcript of Progress Report of Secondary or Postsecondary Credits	Revise to: Transcript or Progress Report of Secondary or Postsecondary Credits for participants enrolled in an IET that is in partnership with a postsecondary institution.			
Beverly Wilson, ADE	Title II -Data Management (page 223)	Progress toward Employment of Training Milestones in a workplace literacy program	Revise to: Progress Toward Employment of Training Milestones in a workplace literacy program that demonstrates develop of substantive skills customized to the needs of the employer or documentation of a participant's increase in pay resulting from the gained skills or increased performance.			
Adriana McBride, ARIZONA@WORK Yuma County	Page 4-A- WIOA State Plan Type	Cosmetic: list Title I, II, III, IV in sequence	The comment appears to refer to the ICR prompt, not the narrative itself. (JSK)	No Change		
Adriana McBride, ARIZONA@WORK Yuma County	Page 5-Plan Introduction	Grammar: "include three regional sessions". Replace session with "Sections"	"Sessions" is correct. The term refers to the regional stakeholder engagement events, which took place during the four-year Plan development. (JSK)	No Change		
Adriana McBride, ARIZONA@WORK Yuma County	Appendix 1: Performance for 2026-2027	When will the negotiation process begin?	The DOL regional office communicated that the State performance negotiations will occur in the first two weeks of May 2026. (JSK)	No Change		
Adriana McBride/Nidia Herrera, ARIZONA@WORK Yuma County	Page 7, paragraph 1 line 7.	"Improve acces to child care and affordability". Can you share the plan for strategies for improvement? Facilitating child care access to participants in a timely manner is crucial for the participant to successfully complete a training program or maintain employment. In February of this year a waiver was addressed to DES on the flexibility of child care regarding using DES certified providers. The local area needs to be able to respond quickly for clients to address barrier to participate in trainings (OST, WEX, OJt, etc.)	The request to waive a provision in the State's supportive services policy, specifically on requirements related to childcare assistance, is being reviewed. (JSK)	No Change		
Nidia Herrera, ARIZONA@WORK Yuma County	Page 7	Access to technology remains a key factor for participants in Yuma County. While the plan highlights broadband expansion, it may also be helpful to emphasize physical access points such as on-site kiosks (computer stations) with staff support. These solutions help bridge the gap for participants who may have internet access but still lack devices or digital literacy. Expanding these types of access points as part of the infrastructure strategy could improve participation and service delivery outcomes				
Adriana McBride, ARIZONA@WORK Yuma County	Page 8, A. Title- "Economic, Workforce, and Workforce Development Activities Analysis:	Heading for "A". Is there an extra "workforce" in the title	The comment refers to the ICR heading; "workforce" and "workforce development" are distinct terms. (JSK)	No Change		
Adriana McBride, ARIZONA@WORK Yuma County	Page 42. 5-bullet-CTE. Title IB youth program.	Is there missing language after CTE. Section referencing "Title IB youth", should In-school be mentioned?	There is no missing language after "CTE" (which stands for career and technical education). (JSK)	No Change		
Nidia Herrera, ARIZONA@WORK Yuma County	Page 44. First paragraph, sentence #6	"training" is listed more than once. "Occupational Training Skills Training"				
Adriana McBride, ARIZONA@WORK Yuma County	Page 49.	Program are then reviewed every two year. Please clarify if the two years revision requirement is by the LWDB or by the State.	The existing ETPL policy and process remains unchanged. Regardless of timing, the initial and continued ETPL eligibility review is initiated by the local area and sent to the State for final approval and inclusion.			
Adriana McBride, ARIZONA@WORK Yuma County	Page 49.	In October of 2022 Arizona opened an online access point for filing complaints. Can you please list the link to the online point?	Added: link to file an Employment Service or employment-related law complaint https://des.az.gov/services/employment/employment-service-related-law-complaint/file-complaint (JSK)	Revised - in purple		
Adriana McBride, ARIZONA@WORK Yuma County	Page 49.	VR partners with external providers to offer disability awareness workshops, AT equipment. Can you please provide guidance (process) to access these training sessions? Also spell out SWA.	Procedural steps are not included as a part of the state plan. Unable to find SWA in this section however SWA is spelled out throughout the plan but is not in the Commonly Used Abbreviations list - recommend adding.	No Change	Natalie Guzman is the point of contact at AZRSA for this service and can be contacted at natalieguzman@azdes.gov.	
Adriana McBride, ARIZONA@WORK Yuma County	Page 50.	List all four State run prisons. How can the LWDA add a new person to the list. Please outline the process or provide guidance and contact information. How do we access PROWD grant funds?				
Adriana McBride, ARIZONA@WORK Yuma County	Page 121	Funding for administration is limited to a 10% of the allocation for each program. Is the 10% correct?	Yes, per 20 CFR 683.205(a)(2), local area expenditures for administrative purposes under WIOA formula grants are limited to no more than 10 percent of the amount allocated to the local area. (JSK)	No Change		
Adriana McBride, ARIZONA@WORK Yuma County	Pages 122-125	The allocation funding information is found duplicated, remove one.				

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Nidia Herrera, ARIZONA@WORK Yuma County	page 178	If the approval for In-school ITA's is not approved by June 30th. What is the guidance for the LWDA's?	The State anticipates approval for the continuation of the ITA for ISY waiver; LWDBs and Title I Youth programs may plan according to this. (Note this response is based on a Q&A session with the DOL Youth services unit, stating that it is safe to assume waiver will continue and States can plan accordingly.) (JSK)	Pending Further Review/Discussion		
Nidia Herrera, ARIZONA@WORK Yuma County	General Comments	No emphasize of the 5 strategic pillars that TEGL 05-25 & TEGL 07-25 describe the states modernizing their plan				
Nidia Herrera, ARIZONA@WORK Yuma County	Page 291	Will the list of stakeholders and the session dates be included in the Plan				