Agricultural Outreach Plan (AOP)

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 Migrant and Seasonal Farm Workers (MSFWs). The MSFW program, 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 is 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.

(1) Assessment of Need

A. An Assessment of the Agricultural Activity in the State

1. The top five labor-intensive crops, the months of heavy activity, and the geographic area of prime activity.

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. Northern Arizona has a colder climate than Southern Arizona, which is characterized by warm temperatures. January – March is peak crop harvest season for broccoli, cabbage, carrots and celery in both regions. April – June is characterized by sweet corn and tomatoes in the North and squash, onions, cucumbers, and apricots in the South. July – September is peak season for melons, peaches, and sweet corn in the North and apples, dates, and figs in the South. Lastly, parts of the Arizona economy like Yuma county are built around agriculture and lettuce and most other vegetables are primarily harvested during the last quarter of the calendar year. The “Guide to Arizona Agriculture” by the Arizona Department of Labor was used to reference the peak harvest months.

2. Summarize the agricultural employers’ needs in the State.

In recent years, there has been a steady increase of H-2A clearance orders submitted to the SWA for foreign labor and the quantity of H-2A workers that agricultural employers are requesting. In Arizona, agricultural employers are very concerned about the lack of US domestic workers in the State. Employers believe there are several factors that are contributing to a lack of domestic workers, and they cite an aging workforce that is not being replenished by younger workers as the primary factor. Currently most farm workers in the State are seasonal farmworkers that work and live in Arizona year-round. However, as older domestic agriculture workers in the State continue to age out of the industry, we project a statewide increase in the number H-2A work visas will be submitted to the SWA.
3. Identify any economic, natural, or other factors that are affecting agriculture in the State of any projected factors that will affect agriculture in the State

Growers’ share concerns over the effect that water shortage in Arizona has had on crops, as well as a noticeable trend of migrant seasonal workers not returning to work the following season.

B. An Assessment of the Unique Needs of Farmworkers

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 farm workers in Arizona are Arawakan (Peru), Nahuatl (Central Mexico) Mixtec, and Zapotec (Southern Mexico and Oaxaca). During peak season, there are approximately 61,233 MSFWs in Arizona and as few as 23,268 MSFWs during non-peak season.

The estimated population of MSFWs in Arizona is approximately 127,676, including dependents, and is based on the most recent “Agricultural Profile of Arizona” released by the National Center for Farmworker Health in May 2014. Arizona farm labor estimates indicate 61,233 total workers, broken down into sub–groups as follows:

- 14,988 migrant workers
- 39,890 seasonal workers
- 6,355 livestock workers

This population estimate reflects input received from the Department of Agriculture, DOL, Department of Education, Department of Health and Human Services, and Reference USA. 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 farm worker 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. Updated results will be considered to make changes as necessary to the Agricultural Outreach Plan.

Seasonal and migrant farm workers 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 provider services to migrant farm workers and agricultural employers. Migrant farmworkers require 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 farm
workers due to lack of US 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. DES recognizes that farm workers possess specific needs and face certain barriers that result from cultural, educational, linguistic, scheduling, logistic, and other dynamics that are inherent to that population.

Farm worker needs include, but are not limited to the following:

- Timely labor market information to facilitate planning for continuous employment;
- Occupational guidance and training to maintain a job or transition into a different occupation or industry;
- Transportation to seek employment or supportive services;
- 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;
- Fair and equitable conditions and supervision from trained and committed field foremen, supervisors and farm labor contractors;
- 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
- Pesticide and heat stress prevention training.

Barriers that confront farm workers include, but are not limited to the following:

- Decreased demand for a farm worker labor force due to innovations in automated farming, agricultural technology, and application of chemical herbicides;
- Urban sprawl resulting in farm worker 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, Limited English Proficiency 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 farm worker 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 farm workers 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.

The Area Coordinator and State Director of Operations with National Farmworker Jobs Program (NFJP) Portable Practical Educational Preparation, Inc. (PPEP) assisted DES with gathering statistical data for an assessment of the needs of farmworkers in Arizona.

(2) Outreach Activities

(A) Contacting Farmworkers who are not being reached by the Normal Intake Activities Conducted by the Employment Service Offices

The State’s ability to connect with the MSFW population has become quite challenging in recent years because most farm workers who visit ARIZONA@WORK Job Centers have come to file for Unemployment Insurance 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 is committed to meeting with them wherever they meet and/or congregate. To facilitate this process, DES has incorporated the use of new technologies to assist the outreach teams in the field. New MSFW outreach policy 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 farm worker communities.

Out of necessity, the MSFW Outreach Worker Unit has found new and creative ways in which to better connect with this special population. Outreach activities now include:

- A Memorandum of Understanding (MOU) with the NFJP Partner PEPP Amigo to maximize and co-coordinate outreach efforts throughout Arizona;
- A MOU with the Housing Authority of Yuma County to assist resident farmworkers via worker’s rights workshops;
- Conducting H-2A worker orientations at the beginning of the season to provide information on workers’ rights, Employment Services Complaint System, Employment Services, 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;
- Working closely with the NFJP Provider PPEP;
- 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; and
- Attending job fairs and recruiting events.

Arizona will continue to explore and utilize new technology that provides access and mobility needed to work with this unique population. The HP Tablet and mobile printer equipment is part of the mobile tool set provided to enhance MSFW outreach specialist’s efficiency and effectiveness to provide onsite service delivery to MSFWs and agricultural employers. Tablets allow MSFW Outreach Specialists to access electronic documents, guidelines, inspection checklists, and related material to conduct housing inspections and agricultural surveys. The mobile equipment has enabled staff to download program specific documents, complete, and print them as they conduct outreach and field visit inspections and/or interviews with agricultural employers and farm workers.

The new mobile process has also allowed for a smoother and timelier transition from the tablet to the state computer system. Employers and farm workers can sign required documents in the field. Mobile equipment has allowed for a more timely, complete, and accurate documentation, including the capability of photos and/or audio—video recording of information pertinent to outreach and complaint/apparent violation related activities. Mobile hotspots provide the ability to perform job duties across the entire State. The equipment has afforded outreach staff the opportunity to download and print information of interest to farm workers, agricultural employers, and partner entities. This information includes, but is not limited to required posters; documents and FLC paperwork; complaint and apparent violation forms; resource directories; referral documents; job orders; etc. The new equipment has become a time saver for the staff who spend much time in the field providing services to farm workers and employers.

(B) Providing Technical Assistance to Outreach Workers

Increased collaboration between the SWA and other organizations, such as the US Department of Labor Wage and Hour Division has provided trainings on the Migrant Seasonal Protection Act, field checks, and housing inspections. Department of Agriculture (AZDA) and Occupational Safety and Health Administration (OSHA), has provided increased opportunities to offer outreach staff with technical assistance, such as training, conferences, and additional resources, which include, but are not limited to 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
- Housing Inspections
- Pesticides
- Field Checks

(C) Increased Training among Core Partners and Unemployment Insurance

In Arizona, Employment Service staff, MSFW outreach representatives, ES Complaint Representatives and the State Monitor Advocate work in conjunction with UI to cross train representatives to recognize UI related and MSFW complaint related issues to ensure a
seamless referral and warm handoff to each other. The office of the SWA in San Luis, Arizona is a MSFW Significant office and the only UI walk-in site in Arizona.

Increased interstate collaboration will allow coordination with other States such as California, Idaho, Colorado, and Washington for technical assistance and guidance on best practices servicing the farm worker population.

The service goals projected for PY 2020 have been slightly increased due to the program’s performance this past program year. Partner agencies dedicated to serving the MSFW population play a major part in the collaboration to assist this population. Cross-referrals are made between agencies as barriers are identified to meet the farm workers’ needs. On a quarterly basis partner agency 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
  - Seminars

(D) Providing State merit Staff and Outreach Workers Professional Development

DES 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 our Arizona Management System principles and practices to develop people, establish and communicate accountability, and promote problem-solving throughout the administration, the Division and ARIZONA@WORK.

(E) Coordinating Outreach Efforts with NFJP Partner

To better serve the farmworker community across Arizona, the SWA, signed a mutually beneficial non-financial MOU with NFJP partner PEPP to work together to maximize our outreach efforts and reach those farmworkers who are not reached by conventional methods.

The purpose of the non-financial MOU is to:

- State the willingness to work cooperatively and expeditiously to assure maximum services to MSFWs in Arizona; and
- Combine the resources and knowledge of the SWA and NFJP partner PEPP more efficient service delivery.

Both parties agreed to the following responsibilities, which will enhance and facilitate the cooperative working relationship:

- Contact and make employment and training services available to MSFWs in Arizona.
- Ensure that information about services and the complaint system is available for dissemination to MSFWs in the language prevalent among the farmworker population in Arizona or specific area (e.g., posters, pamphlets, media, workshops, etc.)
- Ensure that data gathered regarding MSFWs and Labor Market Information (LMI) is shared for planning purposes
- Develop cooperative efforts which are mutually beneficial in serving MSFWs, and to pursue avenues on how to avoid duplication of services and maximize each other’s effectiveness in meeting MSFW’s needs
- Request participation with the LWDBs in the service delivery area throughout the state and mutually ensure that services for the farmworker and NFJP monies are being provided in those communities
- Ensure that both agencies’ staff are offered and provided with the opportunity to participate in each other’s workshops (e.g., job Search, LMI WIOA, Regulations, Outreach, etc.)
- Outreach workers from both agencies will meet at least quarterly to coordinate outreach activity. Duplication of services can be minimized and a maximum number of MSFWs can be contacted and served with coordinated efforts, including the following:
  - MSFW outreach workers will distribute PPEP information about available training and services for education and employment opportunities;
  - PPEP outreach workers will distribute ES informational pamphlets, UI, and Job Opportunities and Basic skills opportunities;
  - PPEP outreach workers will promote filing of initial and continued Unemployment Insurance claims via the www.azui.com internet site;
• The MSFW outreach workers will distribute and make referrals to PPEP’s High School Equivalency Program (GED) for MSFW adults;
• MSFW Outreach Program will be a referral entity for self-employment and micro-enterprise training programs; and
• ES outreach workers will distribute information and make referral to PPEP TEC Charter High School serving MSFW.

To enhance the collaborative efforts the MOU with NJJP partner PEPP will allow the SWA to train PEPP outreach workers to recognize employment related law, health and safety, wage and hour, and discrimination issues and refer any farmworkers that may be affected through a referral system developed by our YPIC partners. The enhanced cooperating will give the SWA the ability to co-coordinate outreach activities with PEPP that will lead to an increase in the number of farm workers that we collectively reach.

(3) Services Provided to Farmworkers through the One-stop Delivery System

A. Providing the Full Range of Educational and Training Services to the Agricultural Community

Employment Service staff in partnership with WIOA core and community partners, will strive to meet or exceed federal program requirements with respect to MSFW program equity and minimum service level indicators of compliance. The Employment Service 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. Employment Service 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. DES/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. DES/DERS 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 employment services, 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 Employment Service 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/National Farmworkers Jobs Program (NFJP) WIOA Section 167 program, or affiliated offices throughout the national Employment Service 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 Work Opportunity Tax Credit, 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.

Employment Service’s progressive plan for service delivery to MSFWs is consistent with the U.S. DOL Employment and Training Administration program equity and minimum service delivery indicators of compliance requirements. The 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 State works with our National Farmworkers Jobs Program (NFJP) partner Portable, Practical Educational Preparation or PPEP, Inc. via a MOU to leverage our shared resources enhance opportunities for MSFW’s through a non-discriminatory mode of service delivery that is
qualitatively equivalent and quantitatively proportionate to services provided to non-MSFWs.

- PEPP, Inc.
- Adelante
- Arizona Department of Agriculture
- Arizona Department of Transportation
- Cochise Private Industry Council
- Campesinos Sin Frontera’s
- Chicanos Por La Causa
- Census 2020
- City of Phoenix
- City of Yuma
- Equal Employment Opportunity Commission
- Goodwill of Central and Northern Arizona
- Housing Authority of Yuma County
- Mexican Consulate
- Occupational Safety and Health Administration
- Regional Center for Border Health
- ResCare Workforce Services
- Sunset Community Health Center
- US DOL Department of Wage and Hour
- 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;
- 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.

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 40-60 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 Department of Labor Wage & Hour Division,
• Field sanitation regulations by the Occupational Safety and Health Administration (OSHA),
• Occupational safety and health monitored by the Arizona Division of Occupational Safety and Health (ADOSH), and
• Employment equality enforced by the Equal Employment Opportunity Commission (EEOC).

(B) Marketing the Employment Services Complaint System to Farmworkers and Advocacy Groups.

The Employment Service Complaint System is promoted to farmworkers and farmworker advocacy groups such as PEPP, ResCare, YPIC, CPIC, Goodwill, Maximus and the City of Phoenix and is provided verbally and in writing through orientations, seminars, conferences, printed material handed out at special events, such as Día Del Campesino and the Melon Festival, and outreach efforts provided by outreach specialists. In addition, outreach representatives are prepare and provide packets to farmworkers containing information regarding the Employment Service 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 visit inspections. In addition, each ARIZONA@WORK Job Center also displays required posters informing the public of the Employment Service Complaint System in English and Spanish. Partner organizations and advocacy groups are being encouraged to attend complaint system trainings led by our DES/DER training department.

(C) Marketing the Agricultural Recruitment System to Employers

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 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 (YF VA); and
  • Western Growers Association (WGA)

(4) Other Requirements

(A) Collaboration

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 50 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.

(B) Review and Public Comment

A 45–day review and comment period was provided to afford listed, interested entities an opportunity to provide comments, suggestions, and recommendations for consideration in the development of this AOP. A final copy of the approved Plan will be shared with all interested partners.

1. Consider any comments received in formulating its final proposed AOP

Input provided was incorporated into this Plan, as appropriate.

(2) Inform all commenting parties in writing whether their comments have been incorporated, and if not.

(4) The AOP must be submitted in accordance with paragraph (d) of this section and planning guidance issued by the Department.

Per 20 CFR 653.107, section 3, the SWA must solicit information and suggestions from WIOA sec. 167 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 to the Department, the SWA must provide the proposed AOP to NFJP grantees, public agencies, agricultural employer organizations, and other organizations expressing an interest and allow at least 30 calendar days for review and comment.

(3) Transmit the comments and recommendation received and its response with the submission of the AOP

Table 3 includes a list of organizations from which information and suggestions were solicited along with any comments or recommendations received.

Table 2: NFJP/WIOA–Section 167 State Grantee and Other Interested Entities

<table>
<thead>
<tr>
<th>NAME</th>
<th>AGENCY REPRESENTED</th>
<th>ADDRESS</th>
<th>CONTACT INFO</th>
<th>COMMENTS RECEIVED</th>
<th>INCORPORATED?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Maria Chavez</td>
<td>National Farmworker Jobs Program Board Member / Arizona Interagency Farm Workers Coalition, Inc.</td>
<td>802 E. 46th St. Tucson, AZ 85713</td>
<td><a href="mailto:chavezmariva@yahoo.com">chavezmariva@yahoo.com</a></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Maria J. Silva</td>
<td>Queen Creek Family Resource</td>
<td>20435 S. Ellsworth Road Queen</td>
<td><a href="mailto:msilva@qcusd.org">msilva@qcusd.org</a></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I. The AOP must include a statement confirming NFJP grantees, other appropriate MSFW groups, public agencies, agricultural employer organizations, and other interested employer organization have been given an opportunity to comment on the AOP.

Individuals and entities representing various service provider disciplines pertaining to every aspect of MSFW occupational and family life, including those in Table 2, were invited to participate in the review and comment process to develop this AOP for integrated delivery of Agricultural Wagner–Peyser Services for PY 2020. Entities involved included representatives from the NFJP/WIOA Section 167, community–based organizations, labor enforcement agencies, farm worker individuals and families, MSFW advocacy groups, local and state dignitaries, and program volunteers. The Arizona State Monitor Advocate and Foreign Labor Certification Coordinator (SMA/FLC) was afforded an opportunity to review, approve and comment on the AOP, policies, and procedures related to service delivery to MSFWs. Table 2, includes a list of organizations from which information and suggestions were solicited.

(C) Data Assessment

Table 3: Services to Farmworkers based on the Average from the Current State Plan

<table>
<thead>
<tr>
<th>Service Goals Proposed State Plan 2016 – 2020</th>
<th>4-Year Average</th>
<th>Proposed Service Goals 4-year State Plan 2020</th>
</tr>
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<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Number registered/Applications for services</td>
<td>3500</td>
<td>2810</td>
</tr>
<tr>
<td>Number Referred to Employment</td>
<td>1575</td>
<td>1695</td>
</tr>
<tr>
<td>Number received staff assisted services</td>
<td>2275</td>
<td>2609</td>
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<tr>
<td>Number referred to Support Services</td>
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<td>Number receiving counseling-Career Guidance</td>
<td>1050</td>
<td>1499</td>
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<td>Number of Job Developments</td>
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<tr>
<td>Number placed in Jobs</td>
<td>1150</td>
<td>1490</td>
</tr>
<tr>
<td>Number of placements. 50 above minimum wage</td>
<td>1100</td>
<td>1130</td>
</tr>
<tr>
<td>Placed in Long Term Non-Ag Jobs</td>
<td>75</td>
<td>64</td>
</tr>
</tbody>
</table>

The Migrant Indicators of Compliance listed in the table above helps the SWA set accountability measures to ensure that ARIZONA@WORK offices are meeting federal standards for services to MSFWs. This is accomplished by tracking services provided to MSFWs compared to services provided to non-MSFWs, to ensure that MSFWs are receiving services that are qualitatively equivalent and quantitatively proportionate to services provided to non-MSFWs.

(D) Assessment of progress

As one of twenty "Significant Migrant and Seasonal Farmworker States," the SWA has made significant gains in two processes – data entry and co-outreach – that will ensure compliance per 20 CFR 653.107. The SWA trains staff on properly identifying farmworkers, offering farmworkers the full spectrum of services and entering outcomes in AJC. The SWA met or surpassed the following qualitatively equivalent and quantitatively proportionate services for MSFW's over the previous 4-year plan:

- Referred to Jobs
- Received a Staff Assisted Services
- Referred to Support Services
- Career Counseling
- Placed in Jobs
- Placed in Jobs with Pay Rate $11.50/hr. or More
Historically the SWA has underachieved in following two categories: (1) Job Development Contacts; and (2) Placed in Jobs: Regular Non-Agriculture.

In PY 2018, the SWA identified the need to work with the partners agencies to leverage combined resources and achieve better results with Job Development Contacts and Placed in Jobs: Regular Non-Agriculture. Moving forward, the goal is for enhanced partnerships especially the MOUs to help achieve better results.

(E) State Monitor Advocate

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.