



Tanana  
Chiefs  
Conference

# **P.L. 102-477 Program Plan**

October 1, 2023 - September 30, 2028



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# 1. INTRODUCTION

The Tanana Chiefs Conference’s (TCC) P.L. 102-477 plan (477 plan) consolidates a wide range of education, employment, training and development, wellness and prevention, and related supportive services into an integrated and comprehensive service delivery that allows us to provide wrap-around services to meet tribal members in their various life situations, build their skills and support them overcoming challenges to reach their self-determination goals. TCC’s services integrates other non-477 federal funds whenever possible to enhance the holistic services and the “one-stop” benefit provided to tribal members.

Following TCC’s strategic plan, the 477 plan goal is to support tribal members to be **safe, thriving and empowered**. The four focuses of the plan are education and self-sustainability, ongoing support, wellness goals, and cultural identity. This holistic approach recognizes in order to reach economic sustainability, an individual must be healthy, educated in both traditional and western knowledge, feel safe, have financial flexibility through employment and supportive services, and understand themselves and their culture. This way families and tribal members can attain and maintain jobs and healthy lifestyles.

TCC’s Tribal Government and Client Services Department is the agency responsible for the delivery of services integrated under the plan. The Director of Tribal Government and Client Services will monitor the implementation of the 477 plan and utilize staff and services in Tribal Development, Tribal Government and Justice, Family Services and Support, and Community Infrastructure and Development divisions to assure integrated and comprehensive services.

# 2. TRIBAL AUTHORITY

Tanana Chiefs Conference (TCC), organized as Dena’ Nena’ Henash, or “Our Land Speaks,” is a sovereign Tribal consortium with forty-two Tribal members across Interior Alaska, including thirty-seven federally recognized Tribes and five Alaska Native associations. TCC is also an Alaska Native non-profit corporation organized under the Alaska Native Claims Settlement Act (“ANCSA”) to provide health and social services for the more than 13,000 Alaska Native people in the Interior Alaska region. See 43 U.S.C.



Figure 1: TCC Strategic Priorities

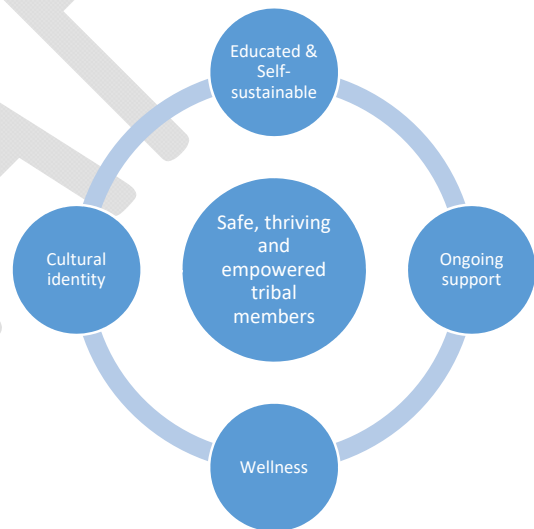


Figure 2: TCC 477 Plan Holistic Strategies

§ 1606(a)(5). It was formed in 1962, but its history dates back over 100 years, when Tribal chiefs from throughout the region banded together to advocate for education, health, housing and native land rights.

Tribal resolutions for the TCC PL102-477 plan are in Appendix XX.

### 3. CONSISTENCY TO THE ACT

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TCC's mission is to provide a unified voice in advancing sovereign tribal governments through the promotion of physical and mental wellness, education, socioeconomic development, and culture of the Interior Alaska Native people. TCC carries out our mission through consolidating federal education, training, employment, development, wellness and prevention, and related services in our 477 plan. This plan demonstrates how a tribal organization can integrate these federal programs activities and services, and self-determine the best way to implement the programs to meet the individual needs of our tribal members and families. This integration enhances the effectiveness of services as our organization has the flexibility to adapt services that our Tribes and tribal member's needs, resulting in reduced joblessness in the TCC region.

Additionally, the 477 Plan supports TCC to have a single database for all tribal members, reducing paperwork and eliminating duplication of effort. The TCC 477 plan extends the concept of self-governance and self-determination and reduces administrative costs, while improving the effectiveness to address tribally driven goals. It supports the organization reaching its mission by building the human resources and administrative capacity in our Tribes, thereby supporting them reach their self-determination goals.

### 4. TCC SERVICE AREA

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TCC provides services for the interior 42 tribal communities, including 37 federally recognized Tribes. The TCC service area spans about 235,000 square miles, consisting of the Middle Yukon and Upper Yukon drainages, the Koyukuk and Tanana drainages, and the Upper Kuskokwim drainage. The majority of TCC communities are inaccessible by road and can only be accessed by boat, snow machine, or airplane. The TCC region includes the following communities:

Alatna, Allakaket, Anvik, Arctic Village, Beaver, Birch Creek, Canyon Village, Chalkyitsik, Circle, Dot Lake, Eagle, Evansville, Fairbanks, Fort Yukon, Grayling, Galena, Healy Lake, Holy Cross, Hughes, Huslia, Kaltag, Koyukuk, Lake Minchumina, Manley Hot Springs, McGrath, Medfra, Minto, Nenana, Nikolai, Northway, Nulato, Rampart, Ruby, Shageluk, Stevens Village, Takotna, Tanacross, Tanana, Telida, Tetlin, Tok, and Venetie.

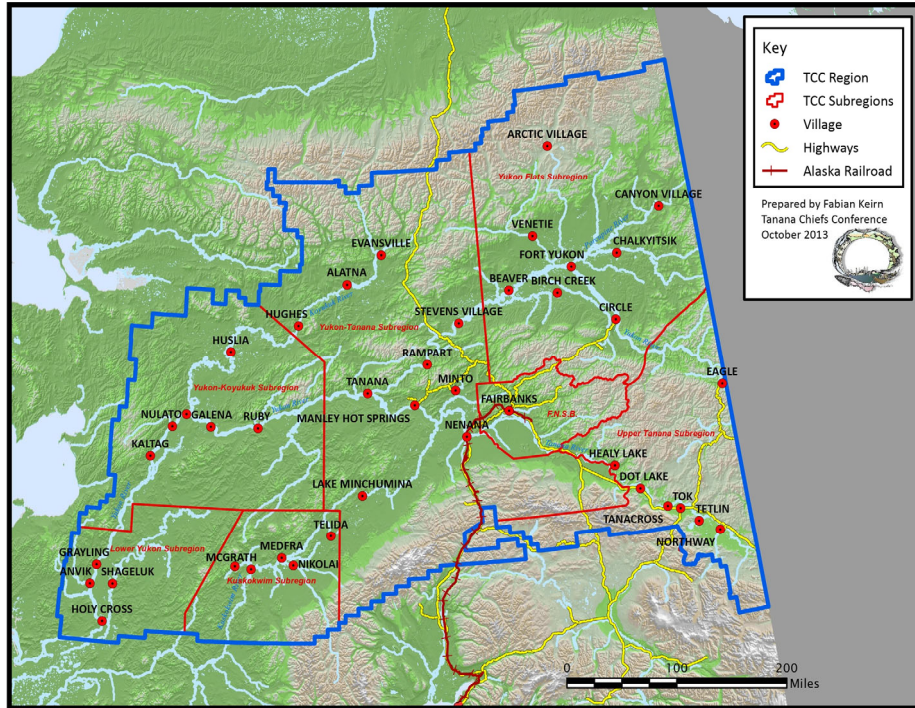


Figure 3: TCC Service Area

## 5. PROGRAMS TO BE INTEGRATED

TCC's 177 plans integrates statutory or formula programs we are eligible to receive for the purpose of assisting tribal members to become safe, thriving and empowered as follows:

- A. Department of Interior**
  - Adult Basic Education
  - Adult Vocational Training
  - Higher Education
  - Job, Placement and Training
  - Welfare Assistance
- B. Department of Labor**
  - Workforce Investment Opportunity Act Adult
  - Workforce Investment Opportunity Act Youth
- C. Department of Health and Human Services**
  - Child Care Development Fund
  - Community Services Block Grant
  - Low Income Household Energy Assistance Program
  - Low Income Household Water Assistance Program
  - Temporary Assistance to Needy Families
  - Native Employment Works
- D. Department of Education**
  - American Indian Vocational Rehabilitation Services

## 6. COMPREHENSIVE STRATEGY

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### 6.1. ECONOMIC DESCRIPTION

TCC communities face natural disasters, high unemployment and poverty rates, limited housing, and extremely high energy and food costs. There is limited technological and communications infrastructure, which hinders access to education, workforce development, and job opportunities.

Overall, outmigration is causing our tribal members to move into Fairbanks, often due to lack of jobs, quality education, water and sewer, public safety and/or housing. Tribal members in the TCC region have a lower income and higher poverty and unemployment rate than the State of Alaska. Poverty is higher for younger people.

#### 6.1.1. Population

TCC rural region population declined by 8 percent, and the Fairbanks North Star Borough (FNSB) declined by 1% between 2010 and 2020. At the same time period, Alaska and the United States experiences a population growth rates of 3 percent and 9 percent, respectively. The most recent Alaska population data in 2021<sup>1</sup> estimates there is a population of 12,883 in the rural TCC region with about 4,958 Alaska Native or American Indian individuals. It is estimated the population in the Fairbanks North Star Borough is 104,995 with 11,845 Alaska Native or American Indian individuals.

#### 6.1.2. Labor Force

The percentage of residents over 16 who are employed increased slightly from the 2010-2014 average of 63% to 2015-2019 average of 64%. Two TCC subregions faced decrease in employment, which was the Upper Kuskokwim (64% to 60%) and Yukon Tanana (68% to 67%).

The annual unemployment rate for the TCC region has steadily declined over the past five years, from 14% in 2015 to 11.6% in 2021. *The unemployment rate for American Indian and Alaska Native alone in the rural TCC service area averages at 18.3%.* In 2015, the TCC region experienced rates of unemployment over 200% higher than Alaska as a whole (14% and 6% respectively).

NOTE: TCC estimates higher unemployment rates for villages, because data collection is difficult in remote areas and the varying definitions of unemployment often results in statistical data with questionable reliability and validity relative to the actual employment status of interior Alaska.

Per capita income in the TCC region grew slightly between the two five-year periods, from \$25,276 in 2010 to 2014 to \$27,456 in 2015 to 2019. The TCC region's average per capita income remains approximately 25% lower than the average per capita income for Alaska and Fairbanks North Star Borough during this period (\$34,966 and \$34,958 respectively).

Median household income increased during the five-year period from 2015 to 2019 (\$55,735) when compared to the previous five-year period from 2010-2014 (\$51,639), but remains lower than the national (\$62,843), state (\$77,640), and Fairbanks (\$76,992) per capita incomes.

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<sup>1</sup> <https://live.laborstats.alaska.gov/pop/index.html>

During the five-year period between 2015 and 2019, the poverty rate of 18 percent for the TCC region (18%) was higher than Alaska (11%) and close to that of the U.S. Poverty levels among young people are higher than overall poverty estimates. During the five-year period from 2015 to 2019, an average of one in three young people experienced poverty in the Yukon-Koyukuk Census Area.

### 6.1.3. Economy

Local government is the largest employment sector in the TCC region, providing 37% of total employment. The next largest employment sectors are natural resources and mining, trade, transportation and utilities, and educational and health services. In FNSB, military is the largest employer (16%). Statewide, top employers are trade, transportation and utilities, educational and health services, and local government.

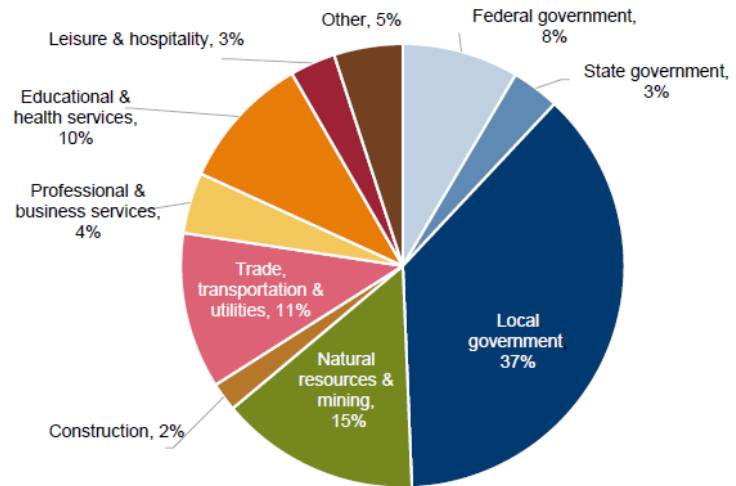


Figure 4: TCC Region Employment by Sector

#### A. Local governments

The main employers for government jobs are:

#### Tanana Chiefs Conference

TCC is one of the largest government employers in the TCC service area with over 1,000 positions. Job opportunities range from health services, forestry, fisheries, education and social services. Positions available in the villages include:

- Behavioral Health Aides
- Childcare providers
- Community Health Aide Practitioner
- Community Health Representative
- Cooks & Cook Substitutes
- Fisheries Tech - seasonal
- Head Start Teacher – Lead, Substitute, Assistants
- Health Center Directors
- Home Care Providers/Respite Care
- IT Tech
- Laborers - seasonal
- Practitioners – Mid Level PA
- Realty Tech - seasonal
- Safe Home Attendants
- Trauma Navigators
- Travel agents
- Tribal Administrators
- Tribal Family Youth Specialists
- Tribal Peace Officers
- Tribal Workforce Development Specialists
- Village Public Safety Officers
- Wildland Firefighter Crew members Tribal Offices

#### Tribal Governments

The TCC service area has 37 federally recognized Tribes. Tribes often have these job opportunities:

- Bookkeeper
- Housing Director

- Transportation Coordinator
- Tribal Administrator
- Tribal Court Administrator
- Tribal Court Clerk
- Tribal Family Youth Specialist
- Tribal Judge
- Wildlife and parks coordinator

### **City Councils**

Similar to Tribes, city councils are located in each village and have job opportunities, such as city clerk, mayor, bookkeeping, police, etc.

#### *B. Natural Resources and Mining*

Wildland fire fighting is an attractive job. It is seasonal, offers high-paying wages, and has a path to be a career. In addition to fire management, there are jobs for fisheries techs, bear guards, data collectors, etc. for the various entities doing projects, or on the national parks and preserves or Bureau of Land Management lands.

Mining continues to be large paying jobs. There is the Fort Knox Mine located north of Fairbanks, Pogo Mine near Delta Junction, Donlin Mine by the Upper Kuskokwim, Manh choh Mine by Teltin, and various smaller mine or exploration activities.

#### *C. Trade, Transportation & Utilities*

There are a number of jobs available with road construction, and trades. With the incoming infrastructure funds for Tribes, there will be a large demand for the next several years for laborers, trades, and broadband techs. Additionally, once infrastructure is built, there will be entrepreneurship opportunities in general maintenance to maintain these structures. Coinciding with the increase in infrastructure, there will be an increase demand for lumber, which has already gone up in price by 400%. This will create opportunities for Tribes and tribal members to use sawmills to generate lumber for their village or subregion.

### **State of Alaska, Department of Transportation**

Road construction is a major opportunity for highways and road work in villages. This offers jobs using heavy equipment and flagging.

### **Interior Regional Housing Authority**

Work with local hires to construct homes, such as laborers, carpenters, plumbers, helpers, operators, etc.

#### *D. Other large employers and employment opportunities*

##### **Doyon, Limited**

Doyon, Limited has a family of companies that provide career opportunities for first-time job hunters to careers. Jobs range from drilling, crafts, construction, management, information technology, administration to tourism.

##### **Fairbanks Native Association (FNA)**

Fairbanks positions in office work, Administration, Head Start, Behavioral Health and Substance Abuse Treatment, JOM, etc., to include: Administrative assistants, case managers, Head Start teachers and aides, data techs, coordinators, payroll, cooks, health/safety specialists, residential aides, counselors, registered nurses, Certified Nurse Assistants, project specialists, program managers, drivers, etc.

Other entities to work include school districts, post office, stores, and entrepreneurship opportunities, like bed and breakfast, native crafts and tourism.

## 6.2 EDUCATION, TRAINING AND RELATED SERVICES

TCC 477 plan offers a variety of services using a one-stop job center model to help tribal members achieve their personal and professional goals, and promote wellbeing, self-identify, and self-sustainability.

The average TCC client is experiencing low income, homelessness, substance abuse or in a single parent family. Many tribal members have a lack of work history, disability or skill/literacy deficiency. They also face a number of barriers to gain job skills and employment:

- Geographic isolation
- Lack of hands-on training opportunities
- Financial constraints inherent in pursuing education and training while raising a family
- Lack of adequate and culturally appropriate counseling opportunities
- Loss of security in the absence of village and family support systems
- Social stigmas contributing to employment barriers
- Generational and historical trauma
- Barrier crimes that prevent employment at native organizations

In order to assist tribal members to access the employment opportunities in the TCC region, the TCC 477 plan utilizes the services in Section 7 Description of Services and Activities, to help tribal members become employable, to maintain employment, and to advance in employment. The goal is to help tribal members be **safe, thriving and empowered**. The four focuses of the services in the plan are education and self-sustainability, ongoing support, wellness, and cultural identity. TCC does this by understanding the situation of each tribal member and where they want to be, and create a plan on what they need to take the next step. These individualized plans address many of the barriers listed. TCC strives to provide services in the community itself to remove the geographic barriers.

There are two other focuses of the TCC 477 plan, which are cultural identity and prevention. Cultural outreach and activities promote self-identity and wellbeing. TCC tribal members must be healthy and well if expected to gain and maintain employment.

TCC strives to address barriers our tribal members are facing upstream through prevention with youth. Ensuring reading, writing, and math literacy helps reduce the amount of remedial literacy and better prepare our tribal members for their next step in education or employment when graduating from high school. Youth are educated on barrier crimes. Lastly, TCC services are provided to all youth in the TCC service area, regardless of their family's income, because of the limited training opportunities. This builds a solid foundation for youth to enter the workforce and continue their growth with education, employment and training services, and reduces the chance of them entering the assistance programs.

## 7. DESCRIPTION OF SERVICES AND ACTIVITIES

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### 7.1 ACCESS TO SERVICES

#### 7.1.1 Intake

Individuals and families seeking services can enter through any program and access multiple services as deemed appropriate by trained staff, which has the ability to refer both internally and externally to provide wrap-around services to meet the needs of those we serve. Community based field staff in the TCC rural communities, jointly supervised by the local tribal governments and TCC, will coordinate intake and employment training related program services in their respective villages in accordance with existing regulations for each of the programs included in the proposed plan.

The participant service process includes the following steps:

- Intake application for services
- Assessment and evaluation of skills, abilities, and determination of needs
- Development of a Family Self-Sufficiency Plan or Individual Self-Sufficiency Plan.
- Case Management and staff support to ensure access and full use of the menu of services available for job seekers to achieve personal success. The level of services provided to any individual will be based on the needs of that person or family situation.

TCC is purchasing a database for all TCS tribal member service programs to use to centralize tribal member information to be accessed by staff working with the participant on plans and goals. Goals, terminations and follow-ups will be collected, entered and tracked efficiently and easily.

#### 7.1.2 Eligibility

Unless otherwise noted, eligible participants are Alaska Native, Native Americans or Native Hawaiian, either members of a federally-recognized tribe or eligible to enroll in a federally-recognized tribe, Certificate of Degree of Indian Blood, or the biological descendant of an enrolled member of a federally recognized Tribe or tribal entity residing in the TCC region. Eligibility may also be based on income and would be noted specifically by program.

#### 7.1.3 Rights and Due Process

All actions taken on cash assistance are provided in written notice. If a participant disagrees with the action that affects their eligibility, changes their cash assistance payment, or any other real or perceived grievance as a result of policies or action, the participant follows the **Rights and Due Process policy** to resolve the grievance (See Appendix XX).

If a participant wishes to appeal the decision of the appeal committee, he/she may do so by formal appeals process to the Secretary of Labor, U.S. Department of Labor, 200 Constitution Avenue, NW, Washington, DC 20210.

### 7.2 WORKFORCE DEVELOPMENT

TCC Workforce Development provides employment, career and economic development opportunities with the goal of identifying the strengths and potential of tribal members, breaking down barriers to

employment and ensuring they are prepared to enter the workforce in the TCC region. TCC focus on the strengths and potentials of the tribal members through employing the following case management process:

- Provide assessment services.
- Develop Employability Development Plans (EDP) based on the results.
- Utilize education, literacy, remedial education, on the job training, and supportive services based on EDP.
- Ensure completion of EDP in appropriate time frames.
- Provide follow-up services to ensure self-sustainability of clients.

### 7.2.1 Job Readiness and Placement Services

TCC works to prepare participants to become employed, sustain employment and overcome underemployment. Based on the EDP, TCC works to match skills and interests of tribal members with their goals and current employment opportunities. Education and training opportunities work to enhance tribal member skills to make the individual more competitive or marketable in their job search efforts. Staff research employment opportunities and refer tribal members based on their EDP. Tribal members have access to a computer lab, phones, fax and copy machine, and staff for job preparation and job search purposes. TCC hosts or participates in career fairs to share services, barriers to employment, and employment opportunities.

TCC focuses on life and employability skills that are necessary to gain and maintain employment. Topics can include developing healthy relationships, budgeting, employment conduct, problem solving, healthy lifestyles, protective factors, goal setting, and identifying strengths.

Individuals and families at risk of public assistance receive preventative services to lead to employment.

TCC works closely with TCC programs and community agencies to provide holistic services and ensure tribal members are receiving needed services to support self-sustainability, such as child care, health care, temporary shelter, meals, education, transportation, counseling, treatment, social service, or other reasonable expenses required for participation in job readiness and placement activities.

#### **Job readiness and placement activities may include:**

- Career guidance and counseling
- Cover letter drafting
- Driver's license attainment
- Education and training opportunities
- Email set up
- Employability and life skill trainings
- Financial literacy
- General Education Degree or Adult Basic Education preparation and testing<sup>2</sup>
- Vocational training
- Higher education<sup>2</sup>
- Goal setting
- Interview clothes
- Interview coaching
- Job applications
- Job or community work service referrals
- Job search
- Transportation assistance
- Relocation assistance
- Resume drafting and updating
- Supportive service referrals<sup>3</sup>

<sup>2</sup> See Section 7.4 Education and Indigenous Learning

<sup>3</sup> See Section 7.5.8 Supportive Services

- Work clothing and/or gear
- On the job training and job experience placements<sup>4</sup>

### **Guidelines**

- Tribal members must complete an EDP for services.
- There are no income restrictions for these services as TCC does not want to limit the employment growth of our Tribal Members. Tribal member eligibility will be determined based on if their EDP goals align with becoming employed, sustaining employment or overcoming underemployment.
- TCC will provide travel and supplies required for education and training opportunities that will lead to gainful employment. Trainings must be 3 weeks in length or less.
- TCC provides relocation assistance if Tribal member is moving within the TCC region to gain employment, sustain employment or overcome underemployment.
- Job readiness and placement services are a required activities for non-exempt tribal members enrolled in Temporary Assistance for Needy Families (TANF) with the goals of becoming employed, sustaining employment or overcoming underemployment.
- Job readiness and preparation activities will begin within 7 business days of an approved TANF application.
- TANF tribal members must participate for up to 40 hours per week in job readiness and placement activities.
- TANF tribal members must accept employment offers that match their Family Self-Sufficiency Plan. This is a joint decision of the tribal member and their case manager.

### **7.2.2 Training**

Training supports tribal members gain vocational and occupational skills to support them gain or maintain employment, or to overcome underemployment. Training aims to build occupational skills, technical skills, and knowledge to perform current or future labor market needs. Training is tribally directed based on what upcoming projects and jobs they identify in their communities that will create employment opportunities. Services include, but are not limited to:

- Adult Vocational Training (2-4 year) grants are provided to tribal members without the technical skills necessary to obtain a job that the current or future labor market needs.
- Occupation training for occupations in demand current or in the future labor market.
- Classroom training: consists of a structured curriculum taught in a classroom environment.
- Workshops: designed to meet specific training needs identified by a community and/or group of persons.
- Skills upgrading: Short term training designed to refresh and upgrade an individual's existing skills to a level which will make them competitive in the labor market.
- Life skills and employment skills: Designed to provide an individual with skills essential to coping with the realities of living and working in society. Lesson areas include problem solving, teamwork, leadership, and self-esteem, personal finance, conflict resolution and job seeking skills.

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<sup>4</sup> See Section 7.2.3 Adult Work Experience

## **Guidelines**

- Payments are made directly to the trainer or training facility.
- Supportive services will provide assistance in areas of need to ensure participants are able to attend the training opportunities.

### **7.2.3 Adult Work Experience**

Adult work experience provides temporary, on the job training and subsidized employment opportunities to tribal members to enhance work skills and habits, career and occupational exploration, network with employers and gain work experience to build their resume. The primary activity will be supervised work in an occupational area that furthers the participant's vocational needs, goals or interests. This increases employability of tribal members to gain unsubsidized employment after the training period, and is geared toward career exploration and job placement. Work experience may be offered while a training or job is being developed.

## **Guidelines**

- On the job training provides subsidized employment in the public or private sector for up to 1,000 hours.
- Work experience and career exploration assignments, or internships will generally be limited to 12 weeks with possible extensions up to a maximum of 24 weeks.
- TANF tribal members may be referred to job experience placement, which are 1 to 6 month fulltime work assignments.
- TCC works with non-profit, for-profit, and government agencies for job placements that meet the training needs of participants.
- Tribal members will be paid wages for work actually done. The wage rate will be the minimum wage or the prevailing wage rate for similar work at similar work sites.
- Work site supervisors will provide supervision and instruction in work habits, occupational skill development and work sampling. These activities will be outlined in a on the work experience contract.
- Work experience is defined in P.L. 104-193 as including work associated with the refurbishing of public assisted housing, if sufficient private sector employment is not available.
- TANF tribal members participating in on the job training or job experience placement will not include income gained in their benefits calculation.
- Adult work experience is not considered to be transitional employment, because:
  - Work experience is for short periods of time.
  - Work experience is offered to further the employability and skills of the tribal members.
  - Tribal members are not job ready.
  - Work sites are selected for what they offer the tribal member instead of the provision of a needed public service.
- TANF tribal members must accept employment offers that match their Family Self-Sufficiency Plan. This is a joint decision of the tribal member and their case manager.

### **7.2.4 Youth Employment & Training**

Youth employment and training is available year-round that provides employment and life skill building for Alaska Native and American Indian youth between the ages of 14-21. Youth build a plan with a case

manager on their goals, benchmarks, and services required. Supportive service may include funds for training, incentives for achievement, driver's education and clothing for job search and maintenance.

**Services include:**

- Resume building
- Interview skills
- Career exploration and training provided by TCC GO
- Job shadowing or placement
- Tutoring
- GED
- Financial management
- Life and soft skills

**A. Summer Youth Employment Program**

TCC Summer Youth Employment Program (SYEP) is available for youth that are Alaska Native and American Indian, age 14 to 21. TCC region has a high percentage of high-risk youth and unemployment, and often there are no job opportunities available for youth. Therefore, youth participants do not need to fall into an income category. Youth eligibility will be based on economic, social, scholastic and/or other factors.

Youth will have an opportunity to work for a total of eight weeks during the summer break to build employability skills and work experience. TCC partners with Tribes throughout the region to provide these job opportunities.

**7.2.5 Community Work Service**

Community work service provides tribal members the opportunity to learn and practice basic employment skills and ethics, increase work experience and expose to potential employers.

**Guidelines**

- Tribal members will receive no compensation for participation.
- TCC will place participants in community work service assignments according to state regulations that contribute to the common good of the community and achieve a useful public purpose.
- Community work service assignments will be limited to government agencies and non-profit religious, charitable, civic, cemetery, recreational or educational organizations.
- Community work service will not result in displacement or partial displacement, imposition of fines or penalties by a labor union, prevention of filling vacancy by an employee in lay-off status, or filling a vacancy created by a layoff or workforce reduction.
- TANF is unrelated to hours assigned to community work service, and TANF tribal members may be assigned to complete other activities concurrently.
- TANF tribal members must accept employment offers that match their Family Self-Sufficiency Plan. If the offer of employment is part time, the hours of Community Work Service will be reduced to accommodate the job.

**7.2.6 Vocational Rehabilitation**

Vocational rehabilitation provides Alaska Native and American Indian individuals with disabilities, including students in transition and veterans, in the TCC region the assistance to advance vocational opportunities that enrich tribal, cultural, and traditional values and promotes independence and self-

determined quality of life. Through culturally appropriate services, vocational rehabilitation works to prepare for, secure, retain or regain suitable employment and wild resource and harvest lifestyle that is consistent with individual strengths, resources, priorities, concerns, abilities, and informed choice.

The obligations and responsibilities inherent in the vocational rehabilitation program will continue within the TCC 477 plan.

TCC facilities are accessible, and have wheel chair accessibility, parking, door entrance, elevator (voice information) and restroom facilities for people with disabilities.

#### **A. Eligibility**

Tribal Members must:

1. Be a member of a federally recognized Tribe as described in Section 7.1.2.
2. Reside in the TCC service area;
3. Have a physical or mental impairment that constitute or result in a substantial impediment to employment; and
4. Seek to return the workforce through training and education programs offered in this plan to build their capacity and remove barriers to gain and maintain self-sustainability through quality employment.

#### **B. Service Integration**

TCC has a central intake process, as described in section 7.1.17.1.1, providing an assessment of services and direct referral. Staff also will travel quarterly to conduct home visits with potential consumers to initiate the intake process and discuss services, including those for students in transition and Veterans. Tribal members are able to access services throughout this 477 plan that support a tribal members journey to self-sufficiency, such as job readiness and placement, adult work services, supportive services, child care, education, and other services.

#### **C. Delivery of Services**

Upon receiving a request for service or referral, a vocational rehabilitation counselor will contact the applicant and arrange an on-site visit at the earliest convenience of the tribal member for the application review, disability assessment, and eligibility determination. Services will be delivered based on the tribal member's mutually accepted individualized plan for employment (IPE) that will include goals and services to prepare for meaningful employment or wild resource and harvest lifestyle outcomes.

Tribal members receive an individualized and consumer-choice IPE from the vocational rehabilitation counselors traveling to the tribal member's community and experience the resources, barrier, and goals are in the environment. Tribal members have a choice of who will assist them achieve their goals, including counseling and guidance from a natural support that is already in their lives and communities. The vocational rehabilitation counselor will obtain signed releases of information authorization from consumers to ensure that these individuals maintain consumer confidentiality, adhere to vocational rehabilitation service principles and standards, and project policies and procedures.

TCC strives to have staff from the TCC region to assure the cultural and traditional needs are met of tribal members and meet their success to reach and achieve their vocational goals. The TCC-TVR project assures that our program representatives are able to communicate with applicants and eligible

individuals in their Native language as requested or who have limited English proficiency, unless it is clearly not feasible to do so, to empower individuals with disabilities to achieve successful employment outcomes and wildlife harvest lifestyle opportunities.

Lastly, tribal members that relocate within the TCC region will maintain their counselor and natural supports.

Examples of services include, but are not limited to:

- **Vocational:** Knowledge acquired through training from an educational Institution, on the job, tutors, or a combination.
- **Pre-Vocational:** Academic and basic training to develop preparatory skills needed to enter vocational training or employment successfully.
- **Personal Adjustment:** Assists with personal habits and skills that will enable the individual to function effectively in the workforce with their disability.
- **Assistive Technology:** Assistive technology is available for rehabilitation needs.
- Individual vocational counseling and guidance.
- Diagnostic inventory and referrals services.
- Medical and psychiatric referral services.
- Assistive devices such as artificial limbs, hearing aids, wheelchairs, etc.
- Vocational training in schools, colleges, on-the-job training by correspondence or by tutor.
- Licenses, equipment, and tools.
- Suitable job placement referrals.
- Referrals for independent living services and recreational opportunities.
- Services traditionally used by tribes as described at 34 CFR 371.41 (a)(2) to eligible consumers and follow the *Athabascan Values* relevant to each individual case.

#### *D. Outcomes*

Each year, Vocational Rehabilitation will remove barriers to employment and/or subsistence to 35 eligible American Indian or Alaska Native tribal members, including veterans and students in transition, and 14 tribal members to become successfully employed this year.

#### *E. Partnerships*

TCC has an established network of partnerships with local agencies and organizations that can provide effective and reliable linkages for tribal members. Through collaboration with various agencies such as Alaska Division of Vocational Rehabilitation, Indian Health Service contract health, ResCare Home Care, Fairbanks Resource Agency, and Access Alaska, individuals will have opportunities for assistance in vocational rehabilitation services, physical restoration services, such as personal care assistance, independent living skills, cataract surgeries, prosthesis fitting and hearing aids.

TCC staff will continue to facilitate trainings, continued education and other professional development opportunities to assist with increased knowledge, respect and culturally responsive services. Staff are required in their annual performance reviews to maintain current knowledge of vocational rehabilitation best practices to improve competency, enhance the provision of consumer services, and the continued growth of the tribal vocational rehabilitation program.

#### ***F. Quality of management***

The Tribal Vocational Rehabilitation Program Manager is accountable for all program funds and authorization of allowable expenditures. Consumer satisfaction surveys of current and past vocational rehabilitation tribal members will be used on-going for the purpose of providing review and feedback on matters of general policy development. Tribal Vocational Rehabilitation Action Committees will be created on a case-by-case basis to review policies, obtain feedback on quality of services, issues that arise with individuals with disabilities, and assist in the evaluation of program progress. Case reviews and semi-annual internal and external evaluations of the project will be ongoing.

TCC will collect and track data to measure success towards projected outcomes, which includes:

- Number of successful closures
- Number of consumer served under an IPE
- Number of consumers that cost no more than \$35,000 per employment outcome
- Number of consumers with vocational rehabilitation services that cost of no more than \$10,000 annually
- Number of consumers who retained employment 6 and 12 months after initial placement
- Weekly earnings at entry and exit for successful employment closures

#### ***G. Rights & Responsibilities***

Tribal Vocational Rehabilitation program has a due process policy. During intake and closure of services, staff provide the applicant the Tribal Vocational Rehabilitation Policy & Procedure, and a Client Rights Form. The Client Assistant Program (CAP) brochure is explained and provided to each applicant. Consumers are informed of CAP at intake, during development of their IPE, and at case closure. The application and the IPE forms contain the local telephone number and address of CAP.

#### **7.2.7 Tribal Employment Rights Office (TERO)**

The Tribal Employment Rights Office (TERO) operates on the premise that Alaska Native and American Indian employment rights are sovereign and protected rights. TERO's work to maximize utilization of local tribal members in all employment, training and business opportunities in their communities. TERO provides technical assistance to Tribes to develop or implement cooperative labor agreements or tribal ordinances to ensure local hire of tribal members.

#### **7.2.8 Economic Development**

TCC requests full flexibility to use up to 25% of the P.L. 102-477 plan towards economic development. The purpose of TCC's economic development strategy is to remove barriers for tribal members to start or expand their own sustainable small businesses while sustaining the mission of TCC. A strategic priority of TCC is economic sovereignty, and services can consist of entrepreneurship, job creation, social enterprises or investments that feed and sustain TCC's programs.

#### ***A. Entrepreneurship***

TCC's Rural Economic Development program will work with tribal members within the TCC service area to achieve small business goals outlined by individual clients. These goals will be achieved through small business trainings, technical assistance, and access to funding sources. Through the successful completion of this program, clients will have the knowledge, tools, and resources for starting, running, and managing their own sustainable businesses.

Rural Economic Development services will be delivered to clients through a variety of platforms. Clients will be able to meet with the Rural Economic Development coordinator privately, either in person or virtually for one-on-one sessions. Services will also be delivered through a series of trainings that will cover topics following the themes of business plan development. These trainings will take place in both Fairbanks and within villages located in the TCC service area.

#### ***B. Job Creation***

Job creation services is based on working with partners who are willing to create jobs and career paths for the community and our participants to promote economic development for the region. This provides the linkage between training and employment. TCC works to have a community network of partner employers who are willing to take low income, low skilled workers and create job opportunities that help the participants grow their skill base and career by creating targeted jobs that give the participants access to long-term opportunities. Tribal members get meaningful employment, and exposure to professional and leadership development.

### **7.3 RE-ENTRY**

TCC's Reentry Program provides intensive case management for pre-release and released-from-incarceration tribal members but will not exclude non-tribal applicants. When participants are released from custody, the program will help participants find assistance for basic needs such as housing, clothing, employment, health services, and food assistance. Our long-term goal is to reclaim our people; by furthering education, for example, acquiring a general education diploma (GED) and/or vocational career training and teaching clients healthy choices and opportunities to engage in culture and traditions.

#### **7.3.1 Eligibility**

Participants must be less than 90 days out from their release date or released from prison and/or under DOC felony supervision to access services. All applicants may be eligible, and tribal members are prioritized. Our program will require all members to follow all State, Federal laws and all program rules

#### **7.3.2 Pre-release**

TCC's reentry staff will initiate contact with clients while incarcerated. The program will operate on in-house probation (IPO) referrals and self-made referrals. Staff will develop partnerships with IPOs with six prisons in Alaska to facilitate referrals. In addition, staff will conduct periodic visits to the state prisons, delivering presentations to staff and potential participants on the reentry programs services. The team will work with applicants within the prison to complete the intake packet and screening to determine eligibility to initiate enrollment.

Our staff will visit members frequently, offering group sessions on substance use disorders and planning for successful reentry. Groups will utilize cognitive behavioral therapy model that will practice essential skills before and after release from prison. Groups will be offered in the Fairbanks Correctional Center and the Northstar Center at 6-9 week cycles.

Staff is trained on trauma-informed care principles and cultural sensitivity. Staff will facilitate cultural practices such as drumming, singing, and storytelling to help support and prepare participants for reentry back into society.

Staff may also attend parole hearings to discuss rehabilitation planning and report on the program's progress once results are available.

### **7.3.3 Post-release**

Case managers and peer support professionals will work with the applicants, who have been released or within 90 days of being released by completing an intake packet and screening to determine eligibility and begin enrollment.

Our program offers many post-release services, including case management and peer support. These services are centered on assisting members with securing basic needs and support as reentrants transition back into society. Program goals will prioritize meeting all participants' immediate physical needs, then engage in services that promote stability, including returning home to rural villages and successfully reintegrating. In addition, staff will help applicants apply for assistance that supports self-sufficiency, for example, SNAP, social security, Alaska works employment profile, permanent fund dividend applications, and create a personal email account (unless not permitted).

In the event of a waitlist, so some reentrants will participate in the groups after they have been released from prison that will be held 1-2 times weekly.

### **7.3.4 Case management and peer support**

TCC reentry program staff will provide case management and peer support to all enrolled clients. Case management services may include; application completions for SNAP or food stamps, school or employment applications, acquiring appropriate clothing, safe and stable housing, managing appointments, completing all necessary coursework, and other tasks to support the integration of the participant. Case managers and peer supports will provide ongoing support services and supervision according to clients' needs and requirements. Applicants must adhere to parole/probation requirements. Case managers will monitor compliance and meet with non-compliant participants to help reestablish communication.

### **7.3.5 Supportive services**

Reentry staff will support participants utilizing the education, training, employment services, and supportive services available in the TCC 477 plan. Some specific supportive services for reentry participants are:

- Housing – Support participants secure affordable and sustainable housing, which may include financial assistance for security deposit, first month's rent, and/or utilities. Staff will conduct random housing inspections to ensure applicants live in safe, healthy conditions and comply with program rules.
- Clothing – Staff will assist participants in gaining work clothing and cold weather gear.
- Food – Up to \$250 can be spent on groceries. Case-by-case specifics will be reviewed to ensure clients are guaranteed enough food for themselves and their households.
- Employment services – Participants will have access to workforce development and vocational rehabilitation services in section 7.2.
- Education – Participants will have access to education services in section 7.4. Individuals interested in post-secondary opportunities will be guided to University of Alaska, Fairbanks' learning inside-out network (LION), who are trained to advise previously incarcerated people.

- Transportation – Staff will provide transportation for participants as much as possible, teach clients how to use the bus system, provide bus passes, donate bikes, and utilize taxi vouchers.
- Health - Staff will support all members in getting their physical, dental, and eye exams within the first month of being released from incarceration. This will assist with meeting the client's immediate health needs and encourage their understanding of the importance of self-care and health maintenance.
- Unemployed participants must volunteer their time to give back to the community as described in section 7.2.5. Volunteering at non-profits will help improve the general public's perception of reentering citizens, likely boosting the applicants' self-esteem and restoring self-worth.

## 7.4 EDUCATION AND INDIGENOUS LEARNING

Education and Indigenous Learning combines all of TCC's education and culture programming, so that we can holistically support our children in their education journey from birth to adulthood. It unites traditional knowledge and languages into Western education.

The Education and Indigenous Learning program promotes accredited post-secondary opportunities, career counseling and financial assistance for eligible students. The program advocates and promotes long term systemic change within the fields of education affecting Tribal citizens in Alaska, as well as help students navigate our education financial assistance.

We strive to prepare the youth to succeed, fully realize their worth, empowered by their self-identify, and how to become a productive member of society. The goals of the program are to improve educational outcomes in middle school and high school, reduce dropout rates, improve academic performance, enhance cultural awareness and pride, language preservation, career awareness, employment and leadership skills, and promote parental involvement in school related activities.

### 7.4.1 Adult Basic Education

The foundation to any employment or education opportunity is the achievement of a high school diploma or general education diploma (GED). Adult Basic Education provides remedial education, literacy building initiatives, GED preparation and testing, and English as a second language classes.

### 7.4.2 Scholarships

The purpose of the Tanana Chiefs Conference (TCC) Higher Education and Adult Vocational Training Scholarship programs is to provide financial assistance to eligible, qualified tribal members who are enrolled to an accredited university or institution; and who can demonstrate financial need. The funding is supplemental. Applicants are required to apply for all available state, federal and private financial aid; and utilize all available student and family resources. Higher Education students must be degree-seeking (associates, bachelors, graduate or professional degree).

#### A. *Service Providers*

Accredited institutions including universities, colleges, community colleges, and tribal colleges. Scholarships will be open to all fields of study and degree programs.

## **B. Guidelines**

- Education scholarships available to all tribally enrolled members and descendants not served directly through village-based, tribally administered Higher Education programs. If a student is denied scholarship funding by their Tribe, they can submit a copy and funding will be considered on a case-by-case basis.
- Both Higher Education and Adult Vocational Training scholarships can accommodate part-time students with a partial award amount for part-time status (less than full-time students, 6-11 credit hours).
- Students must maintain a current cumulative 2.0 GPA and a 12-credit minimum while attending full-time (or full-time status as determined by school). An Individual Education Plan is used to aid marginal students in improving their academic standing within institutions of higher learning, as well as aid them in identifying academic majors leading to meaningful employment.
- The Summer Session program provides enrolled students with funding to attend summer sessions.
- If awarded, scholarships payments will be sent directly to the institution's financial aid office.
- Higher Education students can only receive one BIA funded scholarship at a time, unless they can furnish documentation proving the BIA funding does not overlap for the same costs.

TCC identified funding for a competitive scholarship to support higher education students pursuing degrees that will result in producing classroom teachers and commercial pilots.

## **C. Financial hardship**

Students facing financial hardship maybe be eligible for emergency financial assistance awards of \$100 to \$500 to current scholarship recipients. This is available on-time per academic school year and based on availability of program funds.

To apply, students must provide written statement explaining current needs and circumstances, be a current scholarship recipient, and provide documentation verifying financial expenses or needs.

### **7.4.3 TCC GO**

The TCC GO (Growing Our Own) program encourages high school students to complete high school and pursue a career in a health-related or other career fields needed in rural Alaska. To assist them, TCC GO has academic advisors who help students navigate the program. Students are provided with the opportunity to participate in university level courses (in some cases for dual high school-college credit), to develop a career pathway, to receive tutoring assistance, to virtually job shadow health professionals through online resources, and to engage in paid micro-internship opportunities. These experiences, with our advisors' assistance, help students explore their interest in health-related and other careers.

The TCC GO program provides Alaska Native and American Indian students and, in rural communities non-Native students, with opportunities for career exploration through a variety of tools including the Pathful Explore online platform, career fairs, support for dual credit coursework, support for internet access and academic advising.

## **A. Eligibility**

- Alaska Native enrolled in Federally Recognized Tribe
- High School Student

- Enrolled in a high school in the TCC region

**B. Description of services**

TCC GO activities may include, and are not limited to:

- TCC GO pays for student’s tuition, books, and fees to take dual credit courses through UAF Advantage and other intuitions.
- TCC GO provides students access to various self-directed online resources (like Pathful Explore) to help them engage in career exploration and develop a career pathway once they graduate.
- TCC GO provides students with access to an academic advisor that assists that student in developing a career pathway and exploring TCC GO opportunities.
- TCC GO provides students who are active in the program with reimbursement for internet expenses as we know that internet access is limited and expensive, especially for the rural population.
- TCC GO provides students with access to an electronic device to participate in online activities.
- TCC GO provides participants with free access to tutors for any of their high school or dual credit classes at no charge. We also provide students with ACT/SAT prep at no charge.
- TCC GO provides students with stipends for completing various self-directed career exploration, completing a dual credit class with a passing grade, submitting a FASFA, and other program activities.

**7.4.4 Middle School Career Exploration**

The Middle School Career Exploration is an expansion of TCC GO, providing middle school students with access to Pathful Explore, “a K-12 exploration and planning platform that prepares students for college and/or career. With a combination of interactive tools, assessments, and real-world exploration, students can discover diverse career pathways and chart their individualized path.”

Program participants will self-select into the program, and students will be provided opportunities to explore their careers of interest. TCC GO would host career fairs and seek partnerships to bring career experiences to students. These might include STEM activities, camps, special speakers, or academic challenges.

Funding could support, but is not limited to, staff traveling to the villages, career exploration programming and training, internship or summer youth employment, access to academic programming, attend educational conference, and stipends for successful completion of program components.

**A. Eligibility**

- Alaska Native enrolled in Federally Recognized Tribe
- Enrolled in a middle school in the TCC region

**7.4.5 Emerging Leaders**

Encouraging our youth to explore careers helps our kids form visions in how they see themselves fit into the world of work. This is a critical point in time as we want to ensure our kids see how they can become roles that are foundational to our Tribes, whether it is a teacher, Tribal employee, health care professional, or even to be the governor or a member of Congress.

The Emerging Leaders was formed in 2017 during the Annual TCC Convention. The group works to provide guidance to the Youth Advisor to the Executive Board to keep them current on issues youth in

our communities are facing. The Emerging Leaders participate in tribal council meetings, trainings, and events to learn the structure of tribal governments in their region. It is important to be an Emerging Leader, because someday, it will be the Emerging Leader's sitting at the tables governing our tribes.

477 funds are used to support the leadership development of our youth through funding a position that will provide administrative support to the group.

#### 7.4.6 Cultural Program

The Cultural Program encourages and assists tribal members to practice a traditional lifestyle, subsistence, traditional medicine, and other cultural activities the support building tribal identity and community wellness. TCC will focus on providing activities and events that feature knowledge sharing of the various cultures of the TCC region that includes rural workshops, local and virtual cultural program opportunities would be included.

##### A. *Native Youth Olympics*

Native Youth Olympics (NYO) games are cultural traditions passed down for generations that build strength, life skills, and comradery that builds resiliency of youth. 477 funds can be used to provide NYO coaches at elementary, middle and high schools throughout the TCC region. Each year an annual regional competition is held in Fairbanks. Funds can be directed to support TCC region athletes to attend the state championships or World Eskimo Indian Olympics.

#### 7.4.7 Language Program

TCC supports hosting language development, practice, implementation workshops, trainings for language teachers, curriculum development, printing of materials and opportunities for travel to learn about language instruction.

#### 7.4.8 Johnson O'Malley Program

TCC Johnson O'Malley (JOM) program supports building resiliency, protective factors, and cultural identity in the tribal youth in the TCC region. These empowers Alaska Native and American Indian students from ages 3 to grade 12 to succeed in school and have a foundation of skills necessary to achieve goals in adulthood, gain and maintain employment, and achieve self-sustainability.

##### A. *Parent Committee*

###### 273.117-8

The TCC JOM parent committee is the TCC Education Council, which is comprised of six tribal representatives elected for each of the six TCC subregions. The election, terms and procedures of the Education Council are included in the TCC bylaws. Representatives must be tribal members, or Alaska Native, of the TCC region.

The Education Council provides oversight and direction on the JOM budget and implementation of programs. The Education Council will meet quarterly with meetings open to the public. Records are maintained and publically available. Staff will provide updates on the programs funded with JOM, current grants and activities available to youth to co-fund or support activities, or to create and fund new programming.

## **B. Activities**

Authorized activities funded will be contingent on the Education Council approval on an annual basis, and may include, but not limited to:

- Home school coordination
- Accredited elective classes that have a high impact on Alaska Native and American Indian students.
- Supplies, clothing, or shoes for students.
- Health or medical services.
- Native Youth Leadership group that integrate cultural values and knowledge in schools. This includes an Emerging Leaders as described in section 7.4.5.
- Before and after school care using Child Care Development Fund.
- Teen pregnancy prevention and teen parenting using tribal TANF.
- Cultural activities to involve youth, families and elders, such as culture camps, survival skill camps, drum making, drumming, dance, fish smoking and other cultural activities. Youth have a chance to learn traditional subsistence activities, explore traditional ecological knowledge, practice group dynamic and conflict resolution and develop work ethics.
- Academic camps during the summer and school breaks.
- NYO as described in section 7.4.6A.
- Career guidance and higher education planning, as described in TCC GO and Middle School Career Exploration.
- Tutoring. Priority is given to students who show an academic need for remedial services. Student based instruction is provided in language arts, math, social studies and science.

## **C. Guidelines**

- The Johnson O'Malley (JOM) program is spent on supplemental not supplanting programs.
- TCC secures applicable student counts annually for Tribes we are operating on their behalf.
- Applicants residing outside the Compact areas may be eligible based on family community of origin.
- TCC conforms to **CFR 25 Part 273**, including Indian hire and contracting preference and financial recordkeeping for Tribes that opt for TCC to manage this program. Excludes those that Tribal Organizations are not obligated to follow per 273.111, including non-compelled practices like the submission of an education plan to the Bureau of Indian Education, among others.
- Payments are paid directly to the vendor.
- TCC educational, cultural and employment services will be provided by TCC in cooperation with the local schools, school districts, other accredited institutions, and Tribal organizations and groups.

## **7.5 CASH ASSISTANCE**

Financial freedom is a necessity of self-sufficiency. In order for an individual to focus on building their own skills to gain and maintain employment, or overcome underemployment, an individual must be able to meet their basic necessities. TCC aims to not have tribal members stress about living paycheck to paycheck, and works to build financial management and employment capacity so tribal member will eventually graduate from cash assistance programs. Cash assistance programs includes intensive case

management, supportive services, burial assistance, general assistance, emergency assistance, Temporary Assistance for Needy Families (TANF), and Low Income Household Energy Assistance Program.

### 7.5.1 Intensive Case Management

TCC provides intensive case management for individuals and families who experience a variety of challenges in their lives who are not eligible to receive direct financial assistance but have immediate crisis situations (homelessness, hunger, medical problems, alcohol and drug addiction, etc.) and could benefit from resource referrals to move towards improving their situation and self-sufficiency.

Additionally, tribal members who are not successful within eight weeks of work search activities, the case manager will terminate work search and provide intensive case management to be referred to the appropriate remedial services.

Tribal members referred to intensive case management will receive short term case management, information, referral, crisis intervention, and advocacy. The case manager will provide referrals for the tribal member both internally at TCC and through other community agencies in order to meet all needs. The program goal is to alleviate the immediate crisis and barriers, and prevent future crisis and barriers for employment from occurring. The case manager will identify the individual and/or family short and long-term needs and work with them to identify next steps to meet those needs. Under the guidance of the case manager a family case plan is developed and appropriate actions begin immediately.

#### A. *Case management*

- Assessment of recipients vocational, educational and personal strengths and barriers;
- Revision of the Family Self Sufficiency Plan (FSSP);
- Planning for and provision of necessary supportive services;
- Linking with appropriate available resources;
- Monitoring client performance;
- Making good cause determinations for non-compliance;
- Recommending action to DPA to remove public assistance benefits for non-compliance; and
- Reporting client participation to DPA.

#### B. *Services*

- Basic education – Under education and indigenous learning.
- Job search– Under workforce development
- Job placement and sampling – Under workforce development
- On the job training – Under workforce development
- Financial management
- Life skills training
- Job skills and development training
- Community work services – Under workforce development
- Supportive services
- Other social services

### *C. Post-employment*

TCC will track participant activity after job placement and provide transitional support for individuals whose earnings are not high enough to end their TANF eligibility. Post-employment services are provided to address under-employment and continue to support tribal members to reach self-sustainability. Services can include work transportation, tutoring or training, clothing, equipment and supplies assistance, housing assistance, and job coaching or counseling.

#### **7.5.2 General Assistance**

The purpose of General Assistance (GA) is to provide specific, short-term financial assistance for basic, essential needs of food, housing, utilities, transportation, and shelter that will help achieve personal wellness, and economic and self-sustainability. If we want individuals to focus on building their skills and capacity to attain or maintain employments, they cannot be stressing about financial pressures.

#### *A. Eligibility*

Income eligible Alaska Native or American Indian individuals who do not qualify for other federally assisted public welfare program or state public assistance. Tribal members must be seeking self-sustainability, unless excused.

#### *B. Services*

Upon screening and intake, if an individual appears eligible for General Assistance, the participant will meet with 477 staff to complete an individual self-sufficiency plan that is an assessment of career interest, employment skills, employment readiness and barriers to employment. The plan outlines steps the tribal member agrees to take to get to a state of employability, gain employment, or participate in subsistence activities. Once the plan is completed, the tribal member will be eligible for short-term general assistance based on financial need and case management services. Tribal members will have access of services throughout this 477 plan and will work with their case worker to access them, including:

- Training, work and education services in section 7.2 and 7.4 that support clients to become self-sustainable.
- Supportive services in section 7.5.8.

#### *C. Guidelines*

- Payments for eligible tribal members will follow the TANF payment standards of the state of Alaska. All income, earned and unearned, will be calculated in the month it is received as a resource if converted into cash.
- TCC provides GA services to the TCC region, except Fairbanks and Tribes that receiving their own BIA funds to provide these services.
- GA program will make applicants aware if they knowingly and willfully make false or fraudulent information, then are subject to prosecution under 18 USC Section §1001 per 25 CFR §20.607.
- General assistance approves or denies applications within 30 days. Written notice is provided to tribal members of approval or denial within 45 days.
- Written notice is provided to tribal members notifying of any changes and the right to appeal the decision.
- In the event of incorrect payments, future payments will be adjusted to recover overpayment or provide for underpayment and written notification will be provided to the client.

### 7.5.3 Burial Assistance

Most recipients of burial assistance also receive, or are eligible to receive, other 477 services to support their self-sustainability. It is very expensive to prepare and send loved ones home, and can put a financial burden on low-income families. It is important to support low-income families to put away their loved ones in a culturally appropriate manner to help them heal and return to education, training or employment in a healthy state.

Eligibility is based on the income and resources available to the deceased. Financial assistance payments for burial assistance will be for \$2,500 or the maximum amount allowable by the Assistant Secretary. Upon approval, a payment will be made to the funeral home, minus any resources that were applied from other agencies to the funeral costs. There will be an allowable \$400 toward a funeral feast or potlatch, based on funding availability.

The burial assistance program serves all eligible Natives in the TCC service area, except for Tribes that contract to operate these funds. TCC will assist eligible Natives living in the Fairbanks North Star Borough if the Tribe or Fairbanks Native Association cannot provide financial assistance.

Recipients of TANF administered through TCC will automatically be considered eligible for burial assistance and their income and resources will not be counted.

### 7.5.4 Emergency Assistance

When tribal members and families face unpredicted emergencies, it is essential that their basic needs are met. TCC service area is remote and there are limited resources to provide immediate relief to families. It is essential for the basic needs of food, clothing and shelter are met to support families returning back to training, education and employment opportunities.

TCC assists individuals or families who suffer from a burnout, flood, or other destruction of their home and loss or damage to personal possessions. Payments are for essential needs and non-medical necessities, such as food, clothing, and utilities. Payments will not exceed the Bureau's maximum Emergency Assistance payment standard established by the Assistant Secretary.

### 7.5.5 Temporary Assistance for Needy Families

The Temporary Assistance for Needy Families (TANF) provides low-income families with up to 60 months of financial assistance to support them becoming self-sustainable in the TCC services area. The goal of TANF is to strengthen families by providing support services that assists them to practice personal and moral responsibility, and attain skills necessary for families to become self-sustainable.

#### A. Strategies

**Promote self-sustainability** – TCC promotes tribal members and families to be *safe, thriving and empowered*. In order to reach economic sustainability, an individual must be healthy, educated in both traditional and western knowledge, feel safe, have financial flexibility through employment and supportive services, and understand themselves and their culture. This way families and tribal members can attain and maintain jobs and healthy lifestyles to graduate from services provided by the 477 plan.

**Promote education** – TCC requires parents to participate in parent/teacher conference, requires school-age children to remain in school through graduation (or GED), and requires participants to complete a high school education, or equivalent. TCC encourages participants to engage in additional post-

secondary and vocational education so participants can obtain work that will produce sufficient income to support their families and contribute to their community.

**Promote culture identity** – Cultural identity is essential to building resiliency and positive mental health. It can enhance the sense of self and self-esteem, provide skills to deal with stress, and create social support networks, all that are needed in order for tribal members to gain or maintain employment.

**Emphasize work** – TCC creates opportunities to create opportunities for paid and unpaid employment.

**Discourage unwed pregnancies** – TCC will work to educate youth on teen pregnancies and out-of-wedlock pregnancies through outreach, peer counseling, workshops or conferences.

**Promote marriage** – TCC will provide financial incentives for married recipients and special support services to promote marriage, such as marriage preparation and marriage counseling.

**Promote family stability and preservation** - TCC will encourage family stability by eliminating disincentives for two parent families, require teens to remain in their parent’s or responsible adult’s home, and provide parenting skills training.

**Promote fatherhood, motherhood and parental responsibility** – TCC will require participant parents to provide moral, emotional, physical and financial support to each other and their children. Will assist parents to be present for their children, attend health screenings and immunizations, provide financial support, and attend parenting skills classes.

**Discourage dependency** – All applicants will be screened for alcohol and substance abuse, domestic violence, and mental health problems, evaluated, and follow recommendations of evaluation. The TCC 477 plan is built to build the foundation for tribal members to become self-sustainable and no longer depend on financial assistance programs. This includes requiring financial management classes.

**Minimize bureaucracy** – TCC will cooperate with the State of Alaska to create efficient pathways to access opportunities and services, like Medicaid, Food Stamps, Denali Kid Care, and Earned Income Tax Credit programs.

**Maintain a safety net** – TCC will maintain a safety net in which parents may continue to provide care for their own children in their own home whether employment opportunities exist or not through exercising the hardship exemption for up to 20% of the monthly TANF caseload, utilizing other grant funds, and offer transitional support.

**Cooperation with child support** – In compliance with 45CFR 286.155 and 45CFR 286.75 (a)(8), TANF participants must cooperate with TCC and State of Alaska Child Support Enforcement Division or their Tribe to establish paternity, and to establish, modify, or enforce a child support order for a dependent child. TANF participants will not receive benefits until he or she has assigned all rights to TCC for the period for which benefits are paid. Assigned child support collections in excess of the amount of tribal TANF assistance received by the family will not be retained by TCC. Any assigned child support received will be used in the costs for benefits and support services.

#### ***B. Service population***

TCC will serve all families in the TCC region, where the head of household is an enrolled member, or eligible for membership, in a federally recognized Tribe.

Households are defined as:

1. Two parent household – The head of a two-parent household is defined as that person who makes the application for benefits for the assistance unit. To be eligible for benefits, the person making the application for benefits must be Alaska native or American Indian.
2. One parent household – The head of a one-parent household is defined as that person who makes application for benefits for the assistance unit. To be eligible for benefits the person making the application for benefits must be Alaska Native or American Indian.
3. Child only household - A child only household is defined as one in which neither parent, or caretaker relative, is eligible to make application for benefits. To be eligible for benefits, one of the child(ren) on behalf of whom application for benefits is being made must be Alaska Native or American Indian.
4. Pregnant woman - A pregnant woman in her third trimester of pregnancy. To be eligible for benefits the pregnant woman making application for benefits must be Alaska Native or American Indian.

Documentation of Alaska Native or American Indian eligibility can include but not limited to:

1. Letter or card from the Bureau of Indian Affairs showing enrollment number, or
2. Tribal enrollment card (from Federally Recognized Tribe or Village), or
3. Birth Certificate showing Alaska Native or American Indian heritage, or
4. Letter on Tribal stationery showing Alaska Native or American Indian, giving the enrollment number or indicating that the applicant is an enrolled member or a descendent of an enrolled member of the tribe or village, or
5. Notarized statement from tribal officials stating their tribal affiliation and attesting to the fact that they know the applicant's family. (used primarily in cases where non-Native children are adopted by a Native family), or
6. Baptismal certification indicating applicant is Alaska Native or American Indian, or
7. Health services statement indicating eligibility as Alaska Native or American Indian to receive IHS services

### ***C. Eligibility***

Eligibility for TANF assistance and services is established in the Tribe's approved TANF plan. Only needy families, as defined in the TANF plan, may receive: (a) Any form of Federally or State MOE funded "assistance" (as defined in 45 CFR 286.10); (b) any benefits or services pursuant to TANF purposes 1 or 2, regardless of the purposes served. "Needy" means financially deprived, according to income and resources (if applicable) criteria established in the TANF plan by the Tribe to receive the particular "assistance," benefit or service.

Tribal members applying for TANF must meet the following requirements:

1. Be Alaska Native and/or American Indian;
  - a. Eligible head of household must provide verification as outlined above if the adult(s) are included on the TANF case.

- b. At least one of the eligible children must provide verification as outlined above, if it is a child only case.
  - c. The third trimester pregnant adult must provide verification as outlined in section 7.5.5(B).
- 2. US citizen or qualified alien;
- 3. Reside in the TCC service area;
- 4. Gross income must not exceed 185% of the needs standards for their household size (see appendix X (state of Alaska TANF needs and utility standards));
- 5. Net income must not exceed the standard for their household size (see appendix X);
- 6. Countable resources must not exceed \$2,000, if there is someone over the age of 60, the resource limit is \$3,000;
- 7. Applicants must cooperate with State of Alaska Child Support Services Division or claim good cause;
- 8. If minor parent, must attend school and live in an approved living arrangement;
- 9. Must not exceed 60 month time limit on assistance, unless qualifies for an extension; and
- 10. Caretaker relative within 5<sup>th</sup> degree of relationship if child only application.

**D. Determination of eligibility**

- 1. An applicant for assistance provide the information required in the application developed by TCC and attest to the correctness of the information, and signed by the applicant, caretaker relative, or both parents if child resided with both parents, or authorized person by state or tribal law.
- 2. The date of application is the date that TCC receives an initial request for benefits that includes a name of the applicant, name of each person in the household for whom benefits are sought, the applicant's address, and signature.
- 3. The household will include all related individuals who are eligible for TANF benefits and reside together, and parent or parents of a dependent child who is only temporarily living away from the household shall be included.
- 4. Social security number must be provided for every individual in the assistance unit.
- 5. After receiving an application, TCC case manager will interview the applicant and other household members as appropriate, in person or telephonically. The interview will provide missing information for the application, other services under this 477 plan available to the tribal members, and begin the family self-sufficiency plan.
- 6. Eligibility will be made within 30 days of the complete application for assistance, unless the applicant withdraws the application, dies or cannot be located. TCC will give written notice regarding the status and action taken on application.
- 7. Tribal members receiving TANF benefits must report any change in household circumstances that might affect their program eligibility or benefits within 10 days. If a child is expected to be absent from the home for more than a calendar month, the report must be made in 5 days.
- 8. Redetermination of eligibility may occur upon any report of change and shall occur at least once every 180 days of ASAP assistance. Tribal members must provide information requested for redetermination and cooperate in interviews.

#### ***E. 185% eligibility test***

All applicants and recipients have their eligibility determined “prospectively”. Once the income of each member of the economic unit are identified, exempt incomes are disregarded and the gross monthly earned incomes of self-employed and employed individuals are computed. The monthly income of each person in the unit is totaled and compared to the 185% eligibility needs standards listed in Appendix X. If the assistance unit has countable income equal to or less than the 185% standard for the unit, they “pass” and are considered “needy”. The 185% eligibility standards are developed by the State of Alaska. All countable and disregarded income will be written within the TCC Tribal TANF Program Manual.

#### ***F. Time limit***

TCC will follow the Personal Responsibility Work Opportunity Reconciliation Act of 1996 (PRWORA) when implementing the 60 month time limit. TCC will count all previous months of TANF block grant funds provided by any State or Tribe. TCC shall disregard any month during which the adult lived in Indian Country or an Alaska Native village if the most reliable data available with respect to the month (or period including the month) indicate that at least 50% of the adults living in the Indian Country or Alaska Native village were not employed (“Indian Country” shall have the meaning given in Section 1151 of Title 18, United States Code).

After 60 months of participation, a family may continue to receive benefits if TCC determines the family qualifies for a hardship or domestic violence exception. Hardship exemptions will be limited to 20% of the current caseload. Hardship exemptions will include:

1. Disability - Adults with a physical or mental inability to perform gainful activity, as verified by a medical authority;
2. Disabled child – Caretaker relatives who are caring for a child who is experiencing a disability, as verified by a medical authority;
3. Victims of domestic violence – Victims of ongoing or recent domestic violence, if the physical, mental or emotional wellbeing of the victim would be endangered by a strict application of the limit;
4. Other hardship – It is determined by staff and, if possible, with the input of other agencies who work with the family, the loss of TANF would result in a threat to the health or safety of the family due to circumstances beyond their control that are preventing the adult caretakers from reaching self-sustainability.

#### ***G. Work participation requirements***

Every family with a needy adult caretaker receiving Tribal TANF cash assistance will complete the Family Self-Sufficiency Plan (FSSP) that is tailored to the family’s situation. The plan outlines steps the family will take to increase independence, identify barriers to work on, and indicate services to assist the family toward their goals of independence from 477. TCC will work with the family to assess skills, work experience, educational needs, and barriers to achieve independence and employability of each adult caretaker and parent who is age 18.

##### **(1) Work participation rate and hours**

TCC will implement work and self-sustainability programs that promote job creation, provide recipients with job preparation and provide job support services designed to help the client gain and retain paid employment or community service when paid employment is not available. TCC believe the following

participation rates represent realistic and appropriate standards, in light of factors like high rate of education and training deficiencies, substance abuse, prevalence of mental health issues, and substantial long term unemployment rate among its TANF population. Child only cases are not included in the work participation rates.

<b>Federal Fiscal Year</b>	<b>All Families</b>
2024	35%
2025	35%
2026	35%
2027	35%
2028	35%

TCC believes that the following average participation hours per week standards reflect what can be reasonably expected from the TANF participant population. No program participants are required to work at an hourly rate comparable to an hourly wage which is less than the federal minimum wage. Child only cases are excluded from individual participation requirements.

<b>Federal Fiscal Year</b>	<b>All Families</b>
2024	30
2025	30
2026	30
2027	30
2028	30

TCC requires parents or caretaker relatives to participate in acceptable work activities within 12 months. Child only cases are exempt. Acceptable activities include:

- Basic education, GED, or tutoring
- College classes for degree attainment
- Community work service
- Counseling, substance abuse treatment or mental health services
- Cultural activities when reasonably tied to self-sustainability, like traditional healing.
- Education that can potentially result in employment
- Elder chores
- Financial management
- Internships
- Job sampling and work experience

- Job search
- Job readiness activities
- Job search assessment
- Job skills training
- Life skills training
- On-the-job training
- Providing child care to TANF participants.
- Subsistence hunting, fishing and gathering
- Sheltered/supported work
- Subsidized public or private sector employment
- Traditional work activities (i.e. weaving, beading, carving, etc.)
- Unsubsidized employment, including self-employment
- Vocational education training (36 month maximum)
- Other activities developed by TCC to meet general participant needs or the needs of an individual TANF participant.

(2) Work participation exemptions

TANF participants may be exempt from work activities because of certain work situations or because work would cause unreasonable hardships. These tribal members are still required to complete a FSSP. The following situations may exempt a participant from work activities:

1. They are needed in the home to care for disabled relative who has been determined to require 24 hour care, per medically certified provider, while alternate suitable care is being sought.
2. Determined by medical provider to be physically or mentally unable to perform gainful activity for a period of more than 30 days.
3. A caretaker of a child no more than 1 year of age.
4. A parent or caretaker who is experiencing domestic violence where engagement in work activities could endanger a family member, interferes with the family's ability to escape violence or its escalation, or interfere with any legal proceedings.
5. A caretaker of a child under 6 and affordable, appropriate child care or suitable informal care is not available within reasonable distance.
  - a. Affordable – Child care not above the State of Alaska child care rates
  - b. Appropriate – Child care facilities or licensed providers.
  - c. Reasonable distance – child care within one hour commuting time.
  - d. Suitable informal care – home providers approved by TCC Child Care program.

**H. TANF supportive services**

Supportive services may be made available to TCC TANF participants, directly through the program or through other program and service providers or employers, to enable them to engage in assigned TANF work activities and/or accept and maintain employment. Supportive services include those available for eligible Alaska native and American Indians through TCC's 477 plan for education, employment and training related services, which also includes transitional services, child care and welfare to work.

Supportive services for TANF participants are integrated in the TCC 477 plan, and include:

- Job readiness and placement services in section 7.2.1.

- Supportive services in section 7.5.8.

(1) Transitional supportive services

TCC TANF participants may be eligible for supportive service payments for up to 12 months after they become employed and close their TCC TANF case (i.e., income that exceeds the TCC Tribal TANF eligibility standards or close their case with employment).

*I. Enrichment*

(1) Youth

TCC 477 staff can provide supportive services and cash/gift card incentives to tribal TANF children for reaching their educational goals with the measurement of attendance, grades, or high school diploma, as determined by the Education and Indigenous Learning Manager and Workforce Assistance Manager.

TCC 477 staff can provide cash/gift card incentives to youth completing approved TANF program activities. Activities will be related to the four purposes of TANF and successful completion will be determined by the Workforce Assistance Manager.

Tribal TANF children have opportunities for subsidized employment, following the summer youth employment program guidelines in section 1.1.1A).

(2) Adults

TCC 477 staff can provide supportive services and cash/gift card incentives to tribal TANF adults for reaching their educational goals with the measurement of attendance, grades, adult basic education, GED, or college degree as determined by the Education and Indigenous Learning Manager and Workforce Assistance Manager.

TCC 477 staff can provide cash/gift card incentives to completing approved TANF program activities. Activities will be related to the four purposes of TANF and successful completion will be determined by the Workforce Assistance Manager.

*J. Penalties*

TCC applies sanctions and penalties when:

1. Adults in the family refuse without good cause to develop, sign or comply with their FSSP or participate in assigned work activities. The first refusal, the adult is removed from the TANF benefit calculation which reduces the family benefit until the adult complies. The second refusal results in a six month disqualification, and subsequent refusal result in 12 month disqualification.
2. TANF participant refuses or fails to cooperative without good cause with Child Support Enforcement in establishing paternity or obtaining child support. The penalty removes the adult from the benefit calculation until the adult complies.
3. Dependent or minor parent not attending school without good cause. A penalty is applied until the dependent is back into compliance with school attendance.

*K. Sanctions*

Families are ineligible for TANF benefits when:

1. An individual is convicted in state or federal court of fraudulent actions that misrepresented their place of residency in order to receive TANF benefits simultaneously in two service areas.
2. The family includes an adult who fraudulently misrepresented their residence in order to receive TANF funded benefits in more than one state or other TANF service area. The family is ineligible for 10 years beginning at the date of conviction.
3. The family includes individuals fleeing prosecution or imposition of sentence for a felony offense. Fugitives under an Alaska Class A misdemeanor are ineligible.
4. A caretaker refuses or voluntarily separates from suitable employment without good cause. The family is ineligible for one month for the first offense, six months for the second offense, and 12 months for any subsequent offenses.
5. The family caretaker is unmarried minor parent not living with a parent or in another approved, adult supervised setting.
6. The family includes an adult who intentionally transfers a resource to become eligible. The family may lose eligibility for up to 12 months, depending on the value of the transferred resource.
7. The family includes an adult convicted after August 22, 1996 in state or federal court of felony possession, use or distribution of controlled substance.
8. An individual incurs an administrative fraud penalty or an intentional program violation. The first offense results in a 6 month disqualification, second offense results in 12 month disqualification, and permanent disqualification for subsequent violation.

#### **L. TANF Participant Responsibilities**

##### **(1) Fiscal responsibility**

TANF benefits will provide basic needs to the family. All TANF participants will be assisted in developing a household budget to cover their family's anticipated food, clothing and shelter-related costs for the month. Upon the assessment of the program staff, TCC has the option to retain portions of the monthly assistance benefit and encumber it in vouchers up to 100% as a result of demonstrated gross negligence by the participant in the use of their benefit or because of a participant's non-compliance with specific conditions of the TCC Tribal TANF program as described in this plan.

##### **(2) Job responsibility**

Adult members of TANF households will complete interest and aptitude tests to evaluate career and job opportunities, prepare resume and job bank application for jobs relating to their skills and experience, and interview skill training. Failure to comply without good cause as indicated in section 7.5.5.G(2) will result in a penalty.

##### **(3) Parental responsibility**

Minor parent participants will be required to live in an adult supervised setting, and participate in locally available parenting skills groups, family planning, and other available counseling appropriate to their individual situations. Adult parent participants will be required to participate in similar groups and counseling. Failure to comply with any of these requirements without good cause, as indicated in section 7.5.5.G(2), will result in a penalty.

All parents receiving TANF will attend all parent teacher conferences regarding their school-age children, and assure each school aged child remains in school through high school graduation or completion of a

GED. Parents must schedule and attend regular health visits and screening for themselves and their children, and keep child immunizations up to date. Failure to comply with these conditions without good cause as indicated in section 7.5.5.G(2) will result in a monthly benefit reduction for the month following the infraction as established in consultation between the participant and caseworker. This penalty will be applied when the program determines it to be enforceable based on program resources to monitor and obtain verification of compliance.

(4) Personal responsibility

All adult and minor parent participants screened for alcohol and substance abuse and determined by program staff to be at high risk will be required to complete a drug and alcohol evaluation within 30 days from the date they file an application for assistance or from the date of request by the case manager of record. TCC Tribal TANF participants will be required to follow the recommendation(s) resulting from their evaluation within 3 months. Failure to meet these requirements will result in an appropriate reduction of their monthly benefits, established in consultation between the applicant and the TCC caseworker, which will be held in a program account to be returned to the household as an incentive if they comply with the recommendation(s) of their evaluation within six months. Failure of a participant to comply with the recommendations of their evaluation after six months will result in the forfeiture of funds withheld and 100% of the restored monthly benefit being encumbered in vouchers for the household's food, clothing, and shelter costs.

(5) Personal safety

Adult participants experiencing domestic violence in their homes are encouraged to seek counseling and other appropriate support services in their self-sufficiency plan. Perpetrators of domestic violence in the household that are receiving TANF will be required to find alternative housing and complete counseling, by issuing tribal or state protective or domestic violence order if necessary. TCC will consider leaving the home to continue counseling or treatment as good cause to allow the perpetrator portion of the assistance while not living in the same household. The perpetrator can continue to receive 50% of the adult share of the household's cash assistance if he/she does not violate an outstanding protective or domestic violence order and continues to participate in batterer education counseling. If the perpetrator leaves the home and does not continue counseling or treatment, the perpetrator shall not be considered part of the household in calculation of benefits.

*M. Activities for purposes three and four*

TCC may provide federal TANF funds to provide services and related activities that do not constitute as "assistance" (as defined in 45 CFR 286.10) to individuals and family members who are not financially deprived but who need the kind of services that meet TANF purposes 3 or 4. Objective criteria will be established for these services. TCC can use state funds to pay for non-assistance, pro-family activities for individuals, family members, or communities, regardless of financial needs.

TCC will use Federal TANF funds under purpose 3 to provide Alaska Native/American Indian youth ages 14-24 subsidized employment and employment services as described in section 1.1.1A. The youth must be Alaska Native/American Indian residing within TCC service area and do not have to be financially deprived.

## *N. Confidentiality*

### (1) Client participation information

TCC has policies and procedures designed to restrict the use and disclosure of information about individuals and families receiving assistance under the program attributable to funds provided by the federal and state government.

### (2) Information exchange

TCC can exchange otherwise confidential information in accordance with agreements entered into with the State of Alaska, other states or Tribes administering the TANF program to prevent receipt of duplicative benefits, obtain verification of information provided by the applicant or recipient, or to assist the client to obtain additional benefits.

### (3) Providing information to law enforcement

Consistent with PRWORA, TCC may provide otherwise confidential information to law enforcement officers involved in carrying out public assistance laws or any investigation connected with administering TANF benefit program. The name and address of any recipient may be provided to law enforcement officer if the officer furnishes the name and social security number of the participant and notifies TCC that the client is a fugitive felon or probation or parole violator (as defined under state law), and that the location or apprehension of such a felon is within the law officer's official duties.

## *O. Retrocession*

Upon no less than 120 days Tanana Chiefs Conference may retrocede the operation of the TANF program to the Department of Health and Human Services Administration Children and Families and the State of Alaska by providing written notice to the Secretary according to the guidelines in the Final Rule, 45CFR 286.30; or on a date agreed upon between the Tanana Chiefs Conference and the State of Alaska.

## *P. 45-day comment period*

TCC assures compliance with the 45 day comment period requirement prior to the submission of the TCC tribal TANF renewal plan. A notice of public hearing and request for comments was sent on April 28, 2023 to the 42 tribal communities in the TCC service area. The posting included the time and location of the hearing, instructions for submitting public comments in person, via phone, fax, email or mail. A public hearing was held on June 12, 2023 via Zoom from 3:00 pm to 5:00 pm. **Public comments will be taken into consideration and summarized as an attachment. If there are no public comments, then it will be noted that no comments were received.**

## **7.5.6 Family Preservation (Financial Assistance for Non-TANF)**

TCC provides information, referral, and case management and advocacy services for parents of children in state or tribal custody. Family preservation is essential to self-sustainability. Factors that affect family preservation will also affect individuals ability to participate in education and training, and to gain or maintain employment. Additionally, a strong and healthy family supports prevention and building protective factors in the children, so that they complete school and gain employment that ultimately prevents them from needing or utilizing welfare services.

Staff work with parents and children to refer to services, case management, conduct home visits in the Fairbanks area, provide supervised visits and informs Tribes to help them make the best decisions on behalf of minor tribal members.

**A. *Activities and services***

- TCC provides case management to non-custodial parents to support the reunification of the family.
- Identifies and encourages relative caregivers to apply for TANF.
- Refers identified victims to Tribal Protective Services for support.
- Collaborates with identified programs and agencies to provide prevention activities and support to at-risk families.
- Foster youth support, including back-to-school supply giveaways, TCC Annual Christmas Drive, OCS partnered potlucks, and snack boxes.
- Training and technical assistance to Tribal Family Youth Specialist.

**B. *Financial assistance to custodial parents when removal of children***

If a custodial parent on, or can qualify for, Tribal TANF has one/all of their child(ren) removed from their care by Indian Child Welfare or Office of Children’s Services, they may be eligible for financial assistance for up to six months, in order to work on their reunification plan. Participants must reside in the TCC service area and be “needy” according to eligibility in section 7.5.5C with exceptions described below, and must not have reached their 60-month lifetime limit.

(1) Parental Responsibility

Custodial parent that were on Tribal TANF, or could qualify for TANF, at the time of removal may request this financial assistance, and the parent must demonstrate they have an OCS or tribal reunification plan and making progress. This will be determined on a case-by-case basis by the case manager.

(2) Financial Assistance Payment

Parents that have been determined eligible for the financial assistance under this section will still have to be income and resource eligible per TCC 477 Plan and remain residents of the TCC service area. Payment will be equivalent to the pregnant woman standard set by the State of Alaska need standards. Monthly payments will not be automatic; parents must demonstrate their cooperation and activity compliance each month.

**C. *Subsidized Employment for Non-TANF***

Participants must reside in the TCC service area and be “needy” according to eligibility in section 7.5.5C with exceptions described below.

1. **Non-Custodial Parent of TANF Children** - Non-custodial parents of Tribal TANF children may qualify for subsidized employment. They must agree to notify Child Support Services of new employment.
2. **Families That Have Reach Lifetime Limit** - Families that have reached 60 months lifetime limit for Tribal TANF, and are no longer eligible and still have a dependent child(ren) may qualify for subsidized employment.

3. **Parents working with Office of Children Services (OCS)** - Parents of Tribal TANF children that were removed by OCS or Tribal Court can qualify for subsidized employment if they are actively working on a reunification plan for their children and are making progress. Parents are not eligible to receive both subsidized employment and financial assistance at the same time.
4. **Summer and In-School Youth Employment** - Non-TANF youth will be provided subsidized employment opportunities and supportive service directly relating to the employment opportunities, both during the school year and during the summer.

#### *D. Nonrecurring Short-term Benefits*

Subject to the availability of funds, the TCC Tribal TANF Program may provide Nonrecurring Short-term Benefits, i.e. emergency or crisis assistance, to needy families as provided at 45 CFR 286.10 (b) (1).

Nonrecurring Short-term Benefits are benefits that:

- (i) Are designed to deal with a specific crisis situation or episode of need;
- (ii) Are not intended to meet recurrent or ongoing needs; and
- (iii) Will not extend beyond four months.

##### (1) Applicants Eligible for Nonrecurring Short-term Benefits

Applicants must meet the definition of “needy” as defined in section 7.5.5D, reside in the TCC service area, be Alaska Native and/or American Indian with verification outlined in section 7.5.5B, and have a specific crisis or need.

##### (2) Limitation of Nonrecurring Short term Benefits

TCC Tribal TANF program will develop internal policies to identify specific crisis and needs that will be approved, examples include utility shut off and furnace/water heater repair. Requests will have to be limited to four times per family per lifetime. Recipients of on-going Tribal TANF will not be able to request nonrecurring short term benefits.

### **7.5.7 Energy Assistance**

TCC 477 services are successful because of the wrap around services approach and whole family services. For American Indian and Alaska Native people, who often live in some of the most inhospitable environments in our nation, to be able to concentrate on work, training, or classes for their GED requires confidence that the heat will go on and the pipes won’t freeze. Like other supportive services that help people get from cash assistance to self-sufficiency, Low Income Household Energy Assistance Program (LIHEAP) is temporary, stopgap to carry a family over until income stabilizes and the need no longer exists. Per the LIHEAP assurances, Section 16 states utilizing funding to educate and counsel households on reduction of home energy costs which in turn can help reduce the need for energy assistance is in direct alignment with TCC’s mission of creating and maintaining a comprehensive program to provide opportunities to our participants to become self-sustainable through the provision of education and training.

#### *A. Program components*

The following services will be provided for heating assistance:

(1) Heating assistance

Dates of operations: October 1 to September 30

November through March are the coldest months in Interior Alaska, where temperatures can drop to negative 60 degrees. Cooler temperatures can start in August and continues through May or the beginning of June. TCC will provide wood and oil throughout the whole fiscal year.

(2) Cooling assistance

Dates of operations: October 1 to September 30

Cooling assistance is offered to elders and vulnerable population as defined in section 7.6.4 in each village as the temperatures can reach 90 degrees at the end of May, June, July, July, or August, which is dangerous for overheating and dehydration without help.

(3) Crisis assistance

Dates of operations: October 1 to September 30

This will be utilized on a case-by-case basis throughout the fiscal year with direction from the Tribe to eligible households, serving elders and vulnerable populations as defined in section 7.6.4 first and foremost.

(4) Weatherization assistance

Dates of operations: October 1 to September 30

Available to eligible households throughout most of the year, tribal members will request weatherization on their initial application for energy assistance and the bulk of this assistance is in summer months as it is easier for repairs. As heating fuel prices have dramatically increased in the past few years, TCC encourages weatherization to support households lower energy costs.

***B. Eligibility***

In order for families to be eligible for assistance under this section they must meet the 60% threshold of the State Median Income.

Families that are receiving SSI, TANF, or SNAP will be considered categorically eligible for all energy assistance categories. TCC will use gross income to determine a household's income eligibility. Countable income used to determine eligibility include wages, self-employment net income, contract income, unemployment insurance, general assistance, TANF, loans that need to be repaid, cash gifts, on-time lump-sum payments, rental income, income from employment through Workforce Investment Act, income from work study programs, alimony, child support, interest, dividends, royalties, veterans benefits, and Ameri-corp program payments.

Income received the month prior from the application signature date will be used to determine eligibility.

TCC will exempt income from the Alaska Permanent Fund Dividend, Old Age Benefit, Senior Assistance Program, and interest payments from Alaska Native Claims Settlement Act up to \$2,000, per capita payments from Federally recognized Tribes, ANCSA corporations or tribal organizations up to \$2,000, economic impact payments, such as Child Care Credits, and retirement/pension for elders, 60 years and older.

(1) Heating assistance eligibility

Renters whose home heating costs are included as an unidentified part of their rent, single, two and three-unit dwellings will receive 100% of the home heating benefit for their income/single family household size paid directly to the landlord to be applied to their rent. Renters whose dwellings with four or more units will receive 75% of the total home heating benefit for their income/single family household size paid directory to the landlord to be applied to their rent.

Elders (at least 60 years of age), disabled (with certified medical condition), and households with young children (under the age of 6 years old) are given priority in eligibility. Energy assistance applications are mailed out two weeks earlier to households with elders, disabled and young children. As energy assistance applications are received, vulnerable household applications are placed ahead of all other non-vulnerable household applications.

Determination of benefits will review income, family size, home energy cost or need (individual bill). Applicants will be asked to submit a copy of their most recent heating bill from the local heating vendor. If paper application is not available, staff will call the heating vendor for verbal verification.

Benefits Levels: Minimum \$448, Maximum \$2,259

TCC will provide supplement benefit payments made to household if additional heating assistance funds are available at the end of the season. Supplement benefit payment is calculated as a percentage of what they received in their original benefit payment to the household. May change to higher percentages if additional funding is received.

(2) Cooling assistance eligibility

Elders, disabled, and households with young children are given priority in eligibility. Vulnerable populations are not often prepared for extreme hot temperatures. TCC will assist with fans, window screens for airflow and keep bugs out, and air conditioners for local gathering places, such as tribal halls, tribal office or elder meeting room. Elders will be assisted with electricity relief under this component.

Determination of benefits will review income, family size, and requests form tribal offices for assistance with vulnerable populations will be given priority, than assistance to other household requests.

Benefits Levels: Minimum \$100, Maximum \$350

(3) Crisis assistance

A crisis is when a households who have a sole source heating unit and they are in jeopardy of running out of heating fuel source within five days, or households with dual source heating units and they are in jeopardy of running out of both heating fuel sources within five days.

A life-threatening crisis is when a (1) household is in jeopardy of having services discontinued within two days by their identified vendor because of the applicant's inability to pay for service and there is no other heating fuel source available to heat their home; (2) a household that has a non-functioning heating unit and does not have another heating source available in order to heat their home; or a (3) household is out of fuel source or will be out of fuel source within 48 hours.

Crisis and life-threatening crisis assistance will be provided within 48 or 18 hours, respectively, after eligibility is determined. If after the original grant award benefit is exhausted and the home faces a

heating crisis or electricity disconnect, additional assistance up to 25% of the original grant will be paid to household's vendor. If there is a supply shortage by exhaustion of bulk fuel storage, natural disaster or vendor mismanagement, additional payments will be made if no other agency will provide for the applicant's energy and fuel sources needed and transportation cost. The maximum amount payable will be 50% of the original grant award.

Elders, disabled, and households with young children will be prioritized for crisis assistance services. To verify energy crisis, a phone call or email from the Tribe that verify the household's situation when a disconnect notice is not attainable.

For crisis situations where an original grant award has not been given for renters whose household dwelling has four or more units will receive 75% of the benefit amount that a single household would receive. If after the original grant award has already been given, then an additional 25% of the original 75% grant award will be paid.

Each Tribe has a tribal office with staff to assist when household needing to complete an application requesting crisis assistance, which can be sent to TCC offices by fax or email to be processed. If there is not tribal office, over the phone applications are accepted and obtaining income verification and signatures will be done through postal mail.

No more than 100 gallons of fuel or 1 cord of wood will be approved until income has been verified.

Benefit levels: \$750 maximum benefit

(4) Weatherization assistance

When a home is rented by an applicant that needs weatherization, we assist where the landlord cannot.

Households consisting of elder, disabled, young children, and very large families residing in the same household will be prioritized for weatherization services provided through the program. Eligibility will be determined using the household income and assistance level parameters.

Benefit levels: \$2,500 maximum benefit

Weatherization measures include weatherization needs assessment and audit, caulking and insulation, storm windows, furnace or heating system modifications or repairs, furnace replacement, windows or sliding glass doors, doors, leaking or damaged fuel tank, visqueen for windows, or LED lighting.

*C. Outreach*

TCC will place flyers at TCC office and tribal offices, mail applications to prior year recipients, be included in 477 application intake process as an available service, share services in TCC newsletter, and made available on TCC's website [www.tananachiefs.org](http://www.tananachiefs.org).

*D. Coordination*

TCC has a single application that allows tribal members to apply for multiple services at one time. Intake screens potential applicants to conduct a brief assessment of services needed to ensure that all eligible participants are directed to the maximum number of services. TCC has TWDS in villages help with outreach to the community. The State of Alaska refers applications to TCC if they live in the TCC service area.

#### *E. Agency designation*

TCC is a tribal non-profit organization. TCC provides all of the benefit determinations and eligibility for this service. TCC finds appropriate partner/vendor for the weatherization installation services, whether it is partnering with other 477 activities, other programs in TCC, or outside vendors and partners.

#### *F. Energy suppliers*

TCC will provide payments directly to vendors for heating, cooling, crisis and weatherization assistance. In the absence of vendor availability, as in the case of individuals requesting assistance to purchase wood for home heating, payments will be made directly to eligible heads of households.

Participants will be mailed notices of approved award amounts that are sent to any vendor. Payments will be made to the vendor in the amount that the household is eligible to receive along with a copy award letter. A copy of the amount approved is sent to the authorized signer at the Tribe.

Vendors will send monthly statement or delivery receipt on the usage of the funds received on approved households. Vendors sign an agreement that includes the recipient will be treated uniformly with other customers and the vendor shall not otherwise discriminate against the recipient.

#### *G. Program, fiscal monitoring and audit*

To ensure good fiscal accounting and tracking of 477 he funds:

- TCC has an automated accounting system and complies with State and Federal grant and contract reporting requirements.
- External auditing firm audits TCC annually. There are no current findings.
- Random samples of application paid will be reviewed for accuracy and compliance.
- Staff process applications and calculate grant amounts .
- Program manager reviews each grant prior to grant being approved.
- The program manager and director monitors spending.

#### *H. Timely and meaningful public participation*

TCC receives public comment through meeting with individual communities, listening to feedback at subregional meetings, and the annual meeting. All tribal offices have toll free contact numbers to provide public comment throughout the year. TCC emails Tribes LIHEAP information and offer assistance with the application process or energy assistance related issues.

A notice of public hearing and request for comments was sent on April 28, 2023 to the 42 tribal communities in the TCC service area. The posting included the time and location of the hearing, instructions for submitting public comments in person, via phone, fax, email or mail. A public hearing was held on June 12, 2023 via Zoom from 3:00 pm to 5:00 pm. **Public comments will be taken into consideration and summarized as an attachment. If there are no public comments, then it will be noted that no comments were received.** The final 477 Plan will be mailed to all tribal communities and posted on the TCC website at [www.tananachiefs.org](http://www.tananachiefs.org).

#### *I. Fair hearings*

Upon application and in correspondence, applicants are notified of the following fair hearing process. The policy is attached on **appendix X**.

***J. Reduction of home energy needs***

TCC Housing program and Energy Program educates on how to reduce the cost of energy for households and communities. There are numerous projects throughout the TCC region for solar projects, batteries and bulk fuel plants to lower the community cost of energy. Energy Assistance coordinates with these programs to provide low energy cost items, like LED light bulbs. TCC also drafts energy tips in the TCC newsletter.

***K. Leveraging incentive program***

Maintaining a ceiling on the price of a cord of wood with all wood vendors of \$5 less than market value.

The state Power Cost Equalization program helps to keep rural village cost of power at a reduced rate.

***L. Training***

TCC 477 staff is provided training on an annual and as needed. The 477 national committee also provides training on an annual basis, which usually includes over 100 organization/tribes each year. Employees are provided an operational manual. TWDS that are village employees receive bi-annual training that includes Energy Assistance.

***M. Performance goals and measures***

N/A for tribes.

***N. Program integrity***

The public can provide reports of suspected waste, fraud and abuse through reporting to TCC staff, TWDS or Tribal Administrators in each community. This is advertised through printed outreach materials, in the application, and on the TCC website [www.tananachiefs.org](http://www.tananachiefs.org).

TCC has Energy Assistance policies and procedures in a manual so staff know what information is required to be submitted and/or verified. TCC has access to the State of Alaska Eligibility Information System (EIS) to verify social security number for household members, SNAP, TANF, proof of unemployment benefits, and place of residency.

TCC prohibits release of information without written consent, annual training on HIPAA, files are secured, and the database has privacy safeguards.

All vendors are required to have and provide a State of Alaska business license with their vendor contract. TCC tracks payments and relies on clients to verify delivery. TCC has procedures in cases if vendor was paid improper payment.

If clients are found to commit fraud, they are banned from energy assistance for 1 year. Vendors found to commit fraud may no longer participate in the program.

**7.5.8 Supportive Services**

Supportive services helps tribal members overcome personal or environmental barriers that inhibit employability, supporting the individuals to gain and maintain employment. Supportive services are available to all income eligible tribal members participating in any activity administered under this plan. Alternative funding and resources will be maximized and requests will be funded depending on availability of funding.

Supportive services will vary, depending on the needs of the tribal members and conditions of the individual's environment. Tribal members applying for supportive services and are determined income eligible will be approved for the first supportive services without an EDP. Any additional requests will require an EDP, demonstrating the need for the service in order to gain or maintain employment.

The services include, but are not limited to:

- Child care –See Section 7.6 Child Care Assistance.
- Education and Training – dues, initiation fees, tuition, books or other materials.
- Driver license
- Housing and utility referrals or assistance
- Interview preparation services – interview clothing, grooming, etc.
- Licensing or professional fees
- Medical, dental, optical, and health care – Health services to necessary or to enhance self-esteem for employment.
- Relocation assistance for employment
- Startup expenses
- Substance abuse and treatment
- Tuition payments
- Transportation – mileage, bus passes, taxi voucher or vehicle repair for job search, interviews or employment before the first paycheck.
- Travel – lodging and meals to attend education and training.
- Work clothing, tools and special equipment
- Other supportive services as necessary to identify or remove barriers and/or essential for participation in employment.

## 7.6 CHILD CARE ASSISTANCE

Tanana Chiefs Conference (TCC), as the lead agency, will provide child care assistance through a holistic service delivery system, referred to as Child Care Assistance, administered as part of its P.L. 102-477 Plan (477 Plan). TCC receives a large size allocation based on the CCDF Final Allocation Table.

Child Care Services support tribal members to be **safe, thriving and empowered** through ensuring eligible families have access to child care services to support them in opportunities to build capacity in education and self-sustainability, attain ongoing support, work on wellness goals, and maintain cultural identity. This holistic approach recognizes in order to reach economic sustainability, an individual must be healthy, educated in both traditional and western knowledge, feel safe, have financial flexibility through employment and supportive services, and understand themselves and their culture.

### 7.6.1 Delivery of Child Care Assistance

Family Services and Support Division will administer Child Care Assistance under this plan. The Child Care Coordinator will organize the delivery of direct child care services in Fairbanks, and will coordinate with village staff or Tribal Workforce Development Specialists in each of the villages within our service area, who elect to receive services under TCC's 477 plan by a Tribal Resolution. TCC's Child Care Coordinator will be the contact person for submission of activity reports, programmatic and financial.

Information on Child Care Assistance will be available on the TCC website, flyers shared with tribal offices, outreach opportunities, and village visits. Information on services is shared with partner organizations, resource and referral agencies, schools, Head Start programs, clinics, and tribal offices.

### 7.6.2 Eligibility

Child Care Assistance provides financial assistance to Alaska Native and American Indian families that reside in the TCC service area who are in need of child care services for children under the age of 13, or under the age of 19 if the child has a documented disability requiring services. TCC Family Services and Support Division has a central intake process that allows tribal members to access all programs and services from a central location, is provided an assessment for services and direct referral.

Child Care assistance covers activities for eligible families when tribal members are working and attending functions to build their capacity for self-sustainability, like personal development, education or trainings, and activities to gain a job.

*Training, personal development and education:* The process of increasing the knowledge and skills of a tribal members that supports them becoming self-sustainable. This includes, but is not limited to, gain employment, progress in education level, tutoring, improve job performance, personal development, gain life skills and protective factors, and participate or learn cultural skills and traditional knowledge to enhance cultural identity. This includes, but is not limited to, attending healing gatherings, language preservation, and crafting.

*Work:* Engaging in an activity with the intention of making a profit economically or benefiting the household to become self-sustainable. This includes activities to gain, maintain or advance employment, like job search, resume building, interviews, subsistence activities that support gaining food, clothing or shelter, like fishing, hunting, trapping, gathering, woodcutting, and preparation, and volunteering that provides a benefit for the community or elders.

TCC Child Care Assistance may temporary extend to any U.S. community outside the TCC service area (*See Section 4*) if the qualified program participant physically resided in the TCC service area for a minimum of 30 days prior to the application for services, and is attending school, training or is employed in seasonal work, and is not eligible to receive timely assistance from a comparable program. This temporary assistance will not exceed three months, or until the participant starts receiving assistance in a similar program, and the child care provider must be licensed and monitored by the state.

### 7.6.3 Collaboration

Child Care Assistance will work in coordination with programs and partner agencies to ensure optimum level of coordination in child care services and fundamental needs for tribal members.

*Health:* Alternate Resource Coordinators and Social Workers screens families for additional resources both within TCC and outside partners. Child Care Assistance refers all children eligible for Indian Health Services (IHS) to TCC's Chief Andrew Isaac Health Center (CAIHC) to ensure immunizations are current. CAIHC also provides families early learning and developmental guidelines, which follow suite the State of Alaska's early learning and development guidelines.

*Temporary Assistance for Needy Families (TANF):* Coordinates with the TCC (ASAP) and state TANF programs to receive referrals to ensure all TANF clients have access to child care services.

**Education:** Child Care Assistance coordinates to ensure all tribal members pursuing Education services have access to child care services.

- TCC's Prenatal to Five Head Start program shares child numbers and opportunities for education and training to provide higher quality of care. Child Care Assistance refers families for after-school or summer programs. Both programs collaborate to develop age-appropriate materials for children and child care providers.
- Partners with the Nenana City school Pre-K Literacy Program to graduate students with Child Development Certificates through Thread Alaska

**Employment:** Child Care Assistance coordinates with Employment and Training services to ensure all clients have access to child care services.

**Economic Development:** Coordinates with Rural Economic Development to aid in the creation of new employment opportunities as child care providers in rural communities.

**Child Welfare:** Child Care Assistance coordinates with State of Alaska Office of Children Services and TCC Tribal Social Services, our child welfare program, to provide child care services to children under, or at risk for, State or tribal court supervision, and children in foster care.

**Thread Alaska:** Discuss training for improved quality of care for providers.

#### 7.6.4 Child Care Assistance Definitions

**Homeless:** A child that is homeless as defined in section 725 of Subtitle VII-B of the McKinney-Vento Act, includes children living in emergency. Children of migrant or seasonal workers who qualify as homeless because they are living in circumstances described in the McKinney-Vento Act definition.

**Household:** One or more custodial adults and children related by blood or law, or other person standing in loco parentis, residing in the same household. Custodial adults that reside together and are over the age of 18, other than spouses or biological parents of the children needing services, are considered a separate household.

**Indian child:** An individual through the age of 12, who is an enrolled member, eligible for enrollment, or the biological descendant of an enrolled member of a federally recognized Tribe or tribal entity and who resides within the geographic boundaries of the TCC service area as defined in this plan.

**In loco parentis:** An individual who assumes parental status and responsibility for a child without the formalities of legal guardianship or adoption, such as a foster parent, relative, friend or other guardian.

#### **Protective Services:**

Co-payment and income eligibility requirements are waived for protective service cases and protective services care in excess of 24 hours up to 72 hours on a case-by-case basis. Protective services includes:

- Children that are suspected of being abused, neglected, or abandoned, determined by a State social worker or Tribal Family Youth Services worker to be at risk, in state or tribal custody, in foster care, or are homeless. Need and financial eligibility requirement will be determined for in loco parentis to provide child care services or respite care.
- Families facing disasters, such as flood and fire.

- Parents facing leave of absence, including but not limited to, maternity leave, medical leave, medical emergencies or bereavement leave. Child care services will be determined on a case-by-case basis.
- Parents attending substance abuse treatment or behavioral health services.
- Parents providing respite care to elders needing end of life care.
- Parents with a disability or medical condition that inhibits their ability to physical care for the children.

**Residing with:** Living, taking meals, and sleeping in the same residence at least 50 percent of the time that child care is requested.

**Relative Provider:** Child care provider in the TCC service area that is 18 years or older and is related to the child, such as grandparents, great-grandparents, siblings if living in a separate residence, aunts and uncles and provides family care or in-home care.

**Special needs child:** Special Needs Child will be used for priority determination:

- A child with a documented physical, developmental, or cognitive disability (20 U.S.C. 1401), is eligible for early intervention services (20 U.S.C. 1431), or is eligible for services under section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794).
- A child who has a physical or mental impairment that substantially limits one or more major life activities, a person who has a history or record of such an impairment, or a person who is perceived by others as having such an impairment.
- A child with documented Special Nutritional Needs.

**TCC Approved Provider:** A non-relative provider approved by TCC to provide family care or in-home care. Approved providers are only available for rural clients, as there are limited access to child care services. These providers submit an application to the Child Care Assistance Program and are approved by the Child Care Assistance Coordinator.

**Very low income:** A child in a household that has income of less than 130% of HHS Poverty limits (based on most recent year). Co-payment is waived for families at or below the poverty level.

### 7.6.5 Types of Child Care Assistance

TCC authorizes the following types of child care. TCC may contract with child care providers in the TCC region to reserve slots for eligible Child Care Assistance children. TCC does not operate its own tribally operated child care center. There are currently no licensed center-based child care facilities in the rural TCC service area. TCC will utilize 477 plans to promote the growth of child care licensing opportunities to develop high-quality care throughout the region.

**Center-based:** A provider licensed by the State of Alaska for child care services in a non-residential setting as defined by the guidelines <https://health.alaska.gov/dpa/Pages/ccare/licensed-providers.aspx>.

**Group Home:** A provider licensed by the State of Alaska for child care services in the provider's private residence as defined by the guidelines <https://health.alaska.gov/dpa/Pages/ccare/licensed-providers.aspx>.

*Family Home:* A provider is the sole caregiver that provides child care services in the provider's private residence.

*In-Home:* A provider, related or unrelated, that provides child care services in the child's own home.

#### 7.6.6 Eligibility Process

Parents can apply for services in person, by mail or fax and email to the TCC Fairbanks office. The TCC Tribal Workforce Development Specialist (TWDS) positions or Tribal Administrators in the tribal council office in the rural TCC service areas support tribal members applying for services, and sending applications or documents to the Fairbanks Office. At the time of application, verification of work, education or training is required. TCC uses release of information to access the Department of Labor Social Security Administration and other federal or state agencies to verify the work status of tribal members.

If an application is marked as special needs or homeless, TCC will prioritize by temporary approve for services for the month of application and the following month until receiving required documentation to complete the verification and approval process.

TCC makes eligibility determinations within 30 days of a complete application, and allows 60 days for rural applicants to provide more time in turning in required documentation, and account for barrier with the post office, broadband, telephone systems, etc.

Eligibility will be redetermined every 12 months via in person or telephone, and documentation can be provided via in person, mail, fax or email.

Changes in work, training or education status must be reported within 10 days. Temporary changes that do not change the eligibility of parents include absence from work due to caring for family member or illness, seasonal worker, education or training holiday or breaks, reduction in work, training or education hours, cessation of work, training or education program that does not exceed three months, any change in age, including turning 13 years old during the eligibility period, and any change in residency within the TCC service area.

#### A. Income calculations

Income is defined as earned in cash or in-kind that is paid directly to the family from receipt of wages, salary or commission in exchange for performance of services. Earned income is the total gross amount of payment, excluding amounts cost of doing business for self-employment, TANF work incentive, and deductions for personal or no-personal expenses of earning income. Earned income includes one-time payments for services performed over a long period of time. Income generated from a business means earning a wage that is equal or more than the State of Alaska minimum wage. Seasonal income will be averaged over the period of time engaged in eligible work, not to exceed 12 months.

TCC excludes the following income: Alaska Permanent Fund Dividends, federal income tax refunds, tribal per capita payments up to \$2000, social security disability, education loans, overtime income received on an inconsistent basis, adoption subsidy payment up to \$2000, and federal government payments, like IRS relief and federal unemployment that are inconsistent.

TCC will deduct child support payments paid to someone outside the household, on-going medical or dental expenses.

Income is verified by four most recent paystubs, an employer statement if it is new employment, or the most recent tax return documents.

**B. Improper payment**

If improper payments is discovered, TCC will recover through repayment plans or reduce payment in subsequent months.

**7.6.7 Child Care Assistance Payment Rates**

To establish TCC payments rates, Child Care Coordinator reviews the State of Alaska’s most recent Market Rate Survey, provider billings for the most recent six-month period, and set rates at the 75% percentile. If the rate is lower than the state, the state rate is used to give equal access to care. All child care providers in the service area accepts TCC Child Care Assistance payment rates. To date, there are no families reporting challenges securing child care due to cost, but in our rural communities, the State of Alaska rates do not meet a minimum cost of living. So, relative and approved provider rates were increased to State of Alaska minimum wage to incentivize becoming a provider and ensure rate covers a higher cost of living, thereby increasing the access to child care services, as shown in the table below.

A child must attend at least one day in a month in order for a provider to be paid for services. TCC pays the providers based on attendance for child care services, and can pay up to \$50 per child per provider per calendar year for registration fees. Payments are issued within 21 days of services. Full-time care is defined as a child attending child care more than 13 days in a calendar month with at least one full day (more than 5 hours of care in a single day). Part-time care is defined as a child attending child care 12 or less days in a calendar month, or 13 to 23 partial days (up to 5 hours of care in a single day) of care during a calendar month.

Child Care Assistance uses a tribally-defined differential supplement rates of 20% for non-traditional work hours (between 6 pm and 7 am and on holidays and weekends), 75% for children with special needs, and 75% child care services in rural communities in the TCC service area.

Age Group	Licensed Center		Licensed Group Home		Licensed Home		Relative/ Approved	
	FT	PT	FT	PT	FT	PT	FT	PT
<b>Infant</b> (0-12 mo)	1,401	800	1,401	800	1,232	600	2,099	1,166
<b>Toddler</b> (13 mo-35 mo)	1,223	750	1,223	750	1,175	560	2,099	1,166
<b>Preschool</b> (3 yrs-5yrs 11 mo)	1,022	710	1,022	710	880	500	2,099	1,166
<b>School Age</b> (6 yrs-12yrs)	828	495	828	495	770	475	2,099	1,166

### 7.6.8 Grantee Median Income

TCC uses the 2023 State Median Income (SMI). The limits cannot exceed 85% of SMI. Children in foster care are considered a “family of one.” A cost of living adjustment will be applied to families living in rural areas.

Family Size	(a) 100% of SMI	(b) 85% of SMI
1	\$4,758	\$4,044
2	\$6,222	\$5,289
3	\$7,686	\$6,533
4	\$9,150	\$7,778
5	\$10,614	\$9,022
6	\$12,079	\$10,267
7	\$12,353	\$10,500
8	\$12,628	\$10,735

### 7.6.9 Sliding Fee Scale

See **Appendix XX** for TCC Sliding Fee Scale, which shows how much parents and guardians are required to contribute to their child care rates.

### 7.6.10 Health and Safety

All State of Alaska licensed providers meet the State of Alaska health and safety standards, training and monitoring, found here:

<https://health.alaska.gov/dpa/Documents/dpa/programs/ccare/Documents/Manuals-Brochures/Child-Care-Licensing-Policy-and-Procedure-Manual.pdf>

**Below are health and safety standards for TCC approved providers. Relative providers are exempt from health and safety standards.**

#### A. TCC Health and Safety Standards

(1) Prevention and control of infectious disease

- Up to date immunizations are required to all children receiving TCC Child Care Assistance with the following exceptions:
  - Immunizations are not required for relative providers or children receiving care by a relative provider.
  - Approved providers are not required to have immunizations, however, the children are required to be immunized.
  - Homeless or foster children have 90 days to provide immunization records.
- Diaper changing procedure is posted in the changing area for family care, if applicable.
- Providers and children will wash their hands at arrival, before and after handling food, brushing teeth, changing diapers, giving medications, using the toilet, handling bodily fluids, cleaning or playing outside.

- Routine cleaning, sanitizing, and disinfecting, and products will be inaccessible for children.
  - Prevention of exposure to blood or bodily fluids by covering cough, hand wash after potential contact, and carefully handle soiled laundry. Relative provider have some exclusions if engaging in cultural or subsistence activities.
  - Parents are notified if a child develops symptoms of an illness, and if the child must go home due to a fever or if contagious. Children can return to care after being 24 hours fever free.
- (2) Prevention of Sudden Infant Death Syndrome (SIDS) and the use of safe sleep practices
- Cribs and pack ‘n’ plays must follow current U.S. Consumer Product Safety Commission and ASTM International Safety Standards. Cribs are only used for sleep purposes. Items that pose a choking risk are not placed in the crib and cribs are not located by blinds or draperies.
  - Supervised rest or sleep for each child younger than five (5) years of age. Provide supervised time and space for quiet play for child who is unable to sleep.
  - Providers must place children on their backs, use a firm sleep surface, and room sharing without bed sharing. Providers will avoid objects, loose or soft bedding and overheating in the sleep area.
- (3) Administration of medication, consistent with standards for parental control
- Parents provide written permission for provider to administer medication, including prescription and non-prescription.
  - Medication is labeled.
  - Medications prescribed to one child is never administered to another.
  - Maintain documentation of administration of medication.
  - All medications have child-resistant caps, stored at proper temperatures, and inaccessible to children.
- (4) Prevention of and response to emergencies due to food and allergic reactions
- Parents disclose allergy and sensitivities, and a care plan is written for child to minimize exposure to allergens and treatment in the event of an allergic reaction, as applicable.
  - In the event of an allergic reaction, provider will follow care plan, document incident, notify parents, and call emergency services if necessary.
  - Clean drinking water is accessible.
  - Human milk and formula handling procedures sent to all providers caring for infants.
  - Children are supervised while eating.
- (5) Building and physical safety
- Identification and protection of potential hazards.
  - Active supervision maintained when child is in or around water.
  - Provider does not use and is not impaired by alcohol, tobacco, marijuana, illegal drugs or prescription medication during hours of care. These items are inaccessible to children.
  - Receive permission to apply sunscreen.
  - Family Care premise has a communication device, fire extinguisher and carbon monoxide detector, guardrails protect younger children from hazards, and safety covers for accessible electrical outlets.
  - Weapons are inaccessible to the children.

- Children only can be released to individuals authorized by the parent or guardian.
- (6) Prevention of shaken baby syndrome, abusive head trauma and child maltreatment
- Knowledge to recognize and prevent child abuse and neglect, shaken baby syndrome, head trauma.
  - Caregivers understand prohibited behaviors. TCC prohibits shaking, jerking, pushing, spanking, and pushing children. Disciplinary practices are prohibited where children are punished by being locked in a room or withheld necessities.
  - Caregivers know age appropriate responses to address various behaviors in healthy and safe manners, such as rocking, holding the child, singing, soothing, turn on music or noise, taking a walk or alter the attention of the child with other toys or activities.
- (7) Emergency preparedness and response planning for emergencies
- Providers have a plan on what they will do in the case of a fire, flood, earthquake or lockdown. Providers will document any emergency events.
  - Providers are given the Tribe's or Community's emergency response plan on what to do when various community emergencies, threatening incidents or disasters.
  - Providers have the phone number for medical emergencies and public safety.
  - In face of a natural disaster, the Tribe maintains communication with the TCC Emergency Response Team to ensure safety of the community members, provide necessary food and supply, and evacuate the medically fragile as necessary.
  - Providers have first aid kits that are inaccessible to kids.
  - Child Care Coordinator maintains confidential files for each child in care.
- (8) Handling and storage of hazardous materials and the appropriate disposal of biocontaminants
- Toxic substances are inaccessible to children. If a provider needs to clean, sanitize or disinfect, the appropriate cleaner will be used, follow the usage instructions, and children do not have access to the area while being cleaned. The product will be stored immediately after use.
  - Prevention of exposure to blood or bodily fluids by covering cough, hand wash after potential contact, and carefully handle soiled laundry.
- (9) Appropriate Precautions in Transporting Children
- Approved and Relative providers are not allowed to transport children in vehicles while under care.
- (10) Pediatric first aid and cardiopulmonary resuscitation
- Providers have pediatric first aid and CPR training.
- (11) Recognition and reporting of child abuse and neglect
- Providers will be trained on recognizing child abuse and neglect, and be mandated reporters following the State of Alaska procedures:  
<https://dfcs.alaska.gov/ocs/Pages/childrensjustice/reporting/report.aspx>

## ***B. Health & Safety Training***

### Preservice Training

TCC approved providers complete the Better Kid Care Healthy & Safety Basics (<https://extension.psu.edu/programs/betterkidcare/lessons/ccdbg>), pediatric first aid and CPR, and SIDS training if caring for a child under the age of 14 month within 90 days of approval.

Relative providers complete pediatric first aid and CPR training within 90 days of approval.

TCC will make exceptions to deadlines on a case-by-case basis due to the ability to access the internet, travel, or availability of courses.

### Ongoing Training

Approved and relative providers take five (5) hours of training on health and safety standards on Alaska's approved training list

(<https://health.alaska.gov/dpa/Documents/dpa/programs/ccare/Documents/Resources-Reports/Alaskas-Approved-Health-and-Safety-Training-by-Organization.pdf>).

## ***C. Health & Safety Monitoring and Enforcement***

**TCC monitors the public posted reports for state licensed providers.**

Approved providers will have an annual announced health and safety standard and fire safety compliance visit by the TWDS worker or Child Care Coordinator. Issues found will be discussed and mutually agreed on plan of action to ensure compliance in 90 days.

TCC exempts relative providers from home inspections to prevent barriers from becoming a provider when there is little access to child care services. Relative providers are encouraged to participate in a home inspection and offered the same opportunities for trainings.

Individuals that inspect and monitor providers home will be a TCC employee, tribal employee or contractor that is knowledgeable of health and safety standards listed in this plan, received annual training, and has a checklist for the inspection. An inspector can be responsible for up to 40 providers in their communities.

## ***D. Child Ratios***

Child ratio numbers include children under care and the provider's children at any one time during hours of care.

- **Family Care:** 1:4 with no more than 3 children under 3 years old.
- **In-Home Care:** 1:8 with no more than 3 children under 3 years old.
- **Relative Provider:** 1:8 with no more than 3 children under 3 years old. Relative provider are limited to 8 children under the age of 13 in the household during hours of care. Child ratios may need to be reconsidered for children with documented special needs.

## ***E. Provider Qualifications***

Providers must be 18 years or older, meet TCC health and safety standards and training, and pass a comprehensive background check.

#### ***F. Background Check***

TCC requires the provider and anyone age 18 or older that is residing in the home during child care hours is required to complete a background check. Background checks are processed before approving a provider.

Approved providers and non-relatives in the household over the age of 18 during the time of care have the following background check requirements:

- State criminal registry or repository with fingerprints
- State sex offenders registry or repository
- CourtView public access website (<https://records.courts.alaska.gov/eaccess/home.page.2>)
- State child abuse and neglect registry and database

Relative providers and relatives in the household over the age of 18 during the time of care have the following background check requirements:

- State sex offenders registry or repository
- CourtView public access website (<https://records.courts.alaska.gov/eaccess/home.page.2>)
- State child abuse and neglect registry and database

CourtView will be reviewed during each annual renewal for approved and relative providers.

#### ***G. Disaster Continuity Planning***

TCC will ensure continued Child Care Assistance services through a declared tribal, local, state or federal declaration of disaster.

To ensure services are continued in an affected area:

- Copayments may be waived for families impacted or displaced.
- Postpone annual home visit inspection and annual child care renewals for six months.
- If family is displaced or provider is impacted, TCC will expedite the approval of another provider for the child.

#### **7.6.11 Quality Improvement Activities**

TCC offers support, training and technical assistance to support, provide and improve quality of child care service in underserved populations, which includes infants and toddlers, special needs children, children in rural areas, and children that receive care in non-traditional hours. Professional development opportunities are made available for providers and staff on are on health and safety, child care material and curriculum, and culturally relevant activities.

TCC provides no less than 9% towards quality improvement, cultural activities and grants for the purpose of improving child care services and activities with an additional 3% devoted to infants and toddlers, for a total of 12%.

Some of the improvement activities provided include:

- Safety improvement grants to providers that include, but not limited to:
  - Repairing stairs, walkways, windows, carpeting or other safety issues where children have access;

- Providing child safe play areas;
- Supply fire extinguisher, carbon monoxide detectors, first aide kits, disaster kits, window ladders, child safety gates/locks.
- Staff and provider development grants to cover trainings for:
  - Certificate, associate or bachelor’s degree in early childhood development or related degree;
  - Approved and Relative Provider’s required training hours;
  - Any training that is determined to promote knowledge in early childhood development, health and safety requirements or quality improvement activities.
  - Child care career development pathway that assists in training, licensing fees, and other costs to support approved/relative providers to become licensed providers.
- Purchase developmental or education materials:
  - That enhance learning opportunities for children and promote kindergarten readiness;
  - Promote cultural awareness and identity that includes Alaska native language and cultural activities.
- Grants to implement a quality improvement rewards program.
- Distribute information to providers on health and safety standards, like SIDS, child abuse, first aid and CPR or other safety tips.

#### 7.6.12 Parental Rights

The Child Care Assistance application includes parental rights and that parents have the right to discuss any action taken on the application or case with their caseworker or caseworker supervisor.

TCC attempts to make it easy for parents and tribal members to provide feedback on child care services. Parents share comments in person, via phone, fax or email to the Child Care Coordinator. Additionally, TCC has a Customer Experience Coordinator that ensures effective customer feedback and supports tribal members in navigation of programs ([customerexperience@tananachiefs.org](mailto:customerexperience@tananachiefs.org)).

Substantiated parent complaints of child care providers are investigated by the State of Alaska if a licensed provider, and by TCC if a relative or TCC approved provider for violations of state statute and regulations, or of the TCC Health and Safety standards. Records are maintained in a secure filing system for 7 years. Parental complaints are made available upon written request, via mail or email, to the Workforce Support Manager at 122 1<sup>st</sup> Ave, Suite 600, Fairbanks, AK 99701.

TCC’s monitoring and inspection reports can

- Please describe how TCC provides information to parents, general public, and child care providers that discusses TCC’s monitoring and inspection reports, quality information of each provider, aggregate data on deaths, serious injuries, # of substantiated cases of child abuse/neglect. PI# 37

#### 7.6.13 Public Notice and Comment Period

A notice of public hearing and request for comments was sent on April 28, 2023 to the 42 tribal communities in the TCC service area. The posting included the time and location of the hearing, instructions for submitting public comments in person, via phone, fax, email or mail. A public hearing was held on June 12, 2023 via Zoom from 3:00 pm to 5:00 pm. Public comments will be taken into consideration and summarized as an attachment. If there are no public comments, then it will be noted

that no comments were received. The final 477 Plan will be mailed to all tribal communities and posted on the TCC website.

TCC receives continual feedback from Tribes on services through village visits, bi-annual subregional meetings, and the annual convention, where Tribes pass resolutions to direct TCC and provide recommendations on program improvement.

#### 7.6.14 Child Care Tribal Resolutions

Appendix XX

#### 7.6.15 Child Count Declaration

Appendix XX

#### 7.6.16 CCDF Assurances

Appendix XX

### 7.7 COMMUNITY SERVICES

#### 7.7.1 Plan Overview

##### A. Goal

Pursuant to 676 (b)(A)(1), the goal of the TCC Community Services Block Grant (CSBG) program is to support activities that assist low-income families and individuals, homeless families and individuals, and elderly individuals and families in a wide variety of ways to build capacity and lead to self-sustainability. This goal aligns with the mission of TCC, which is to promotion of physical and mental wellness, education, socioeconomic development, and culture of the Interior Alaska Native people.

The services and initiatives described in “Objectives” will improve the lives of the Native people of the TCC region, particularly those in the low- to very low-income categories. By supporting these functions, the CSBG program enhances TCC’s ability to address issues of poverty among the Alaska Native people of this region.

##### B. Objectives

1. To improve meaningful employment that supports our participants and mission, through collaboration and support of their community projects and goals. This includes, but is not limited to:
  - a. TCC summer youth employment opportunities as described in section 1.1.1A. In partnership with the TCC Tribes, these youth positions conduct community service projects in the villages, help with elder chores, engage in the tribal governments, engage in cultural activities, among other opportunities.
  - b. Emerging Leaders in section 7.4.5. Emerging Leaders provides leadership development opportunities to learn how to advocate and lead, thereby preparing them to take vital positions within the tribal governments. This supports the youth achieve greater participation in the affairs of the tribal communities.
  - c. Support job fairs in the schools, so local members and students know about local career opportunities.

2. To improve tribal members in attaining adequate education and be literacy proficient, which is the foundation to further education, attain and maintain job, thereby supporting self-sustainability. This includes, but is not limited to:
  - a. Middle School career exploration in section 7.4.4. Middle school is a critical time when students are decided if they want to graduate high school. Providing these students support services and career exploration will support students through their education career and works to increase graduation rates and expand career opportunities.
  - b. Mobile libraries. For all TCC Tribes interested, TCC will purchase a library cart and partner with local organizations to send out books or magazines monthly to increase the availability of new reading material in the communities.
3. To provide coordination and outreach in the TCC villages.
  - a. Tribal Workforce Development Specialists (TWDS) that support low income individuals in TCC villages access and apply for services within this plan and others available at TCC.
  - b. Flying TCC staff to the villages to provide outreach services and support tribal members apply for and receive services.
  - c. The Elder Navigator promotes the health and wellbeing of tribal Elders and family caregivers by ensuring there are no wrong door for elders and make appropriate referrals to help an Elder maintain an independent lifestyle. The Elder Navigator will advocate by making service referrals, assisting in the completion of applications and forms, conduct reports of elder abuse, neglect, or financial exploitation, and Elder and Youth engagement.
4. Provide emergency rental, utility, and food assistance for low-income tribal members, families and elderly in TCC villages as funds allow. This is one-time assistance per fiscal year and is dependent on the availability of funding.

### 7.7.2 Assurance of Public Hearing

A notice of public hearing and request for comments was sent on April 28, 2023 to the 42 tribal communities in the TCC service area. The posting included the time and location of the hearing, instructions for submitting public comments in person, via phone, fax, email or mail. A public hearing was held on June 12, 2023 via Zoom from 3:00 pm to 5:00 pm. Public comments will be taken into consideration and summarized as an attachment. If there are no public comments, then it will be noted that no comments were received

### 7.7.3 Use of Funds and Fiscal Controls

The 102-477 plan includes TCC's most recent negotiated indirect cost rate agreement.

#### *A. Limited on the use of funds*

TCC acknowledges and assures that we will abide by the CSBG limitations outlined in Section 678F of the CSBG Act.

#### *B. Single Audit*

TCC strives to ensure continued high standards of fiscal governance and accountability through sound decisions. Policies and procedures are reviewed regularly to ensure an appropriate mix of preventative and detective internal controls. We are audited annually in accordance 2 CFR 200 (formerly OMB circular A-133) and have received unmodified (clean) opinions and no findings for FY2022 and for the past six years.

#### 7.7.4 Program Implementation

##### *A. Service delivery system*

The 102-477 Plan in section 7.1 describes the intake process for services.

##### *B. Geographical areas and individuals*

The geographical service area is described in section 4. The individuals served with community service funding will be predominately elders, high unemployment, low literacy, and high level of poverty. Details of the TCC region economics are in section 6.1.

##### *C. Distribution of funds*

See section 9 for P.L. 102-477 budget. Programs and services throughout the TCC plan describe the method of distributing funds for tribal members, which can include direct payments to tribal members, payments to vendors, and stipends.

##### *D. Purposes of funds*

Described in TCC community service objectives in section 7.7.1B.

##### *E. Linkages*

In addition to Tribal and Tribal member services, TCC also manages the Chief Andrew Isaac Health Center that provides health and behavioral health services for the Interior Region. TCC partners with its sister organizations (Doyon, Limited, Fairbanks Native Association, Interior Regional Housing Authority and Denakkanaaga, Inc.), and TCC Tribes to ensure the Alaska Native and American Indians in the TCC region receive services that improve their quality of life and builds capacity to self-sustainability. TCC collectively works internally, with partner organizations and the Tribes to understand the needs and gaps, and work towards creative solutions.

##### *F. Coordination with other public and private resources*

TCC is often described as a technical assistance organization. Our services are designed to support Tribes and tribal members access various resources and services within TCC and with partners to build their capacity and reach their self-determination goals. When working with Alaska native and American Indian elders, families, and individuals, staff work to maximize resources available to help meet their needs and build self-sustainability to ultimately improve their lives.

##### *G. Innovative community and neighborhood-based initiatives*

The core of TCC's mission is self-determination. These means getting direction from Tribes and tribal members on what services and how services will best work in their communities. Therefore, services are innovative as they are catered to each community's people, environment and needs. A solution for one community will often not be the solution for another. Therefore, TCC continues to strive to meet our communities and develop innovative solutions based on their needs and self-determination goals.

##### *H. Emergency services*

TCC will provide emergency rental, utility, and food assistance for low-income tribal members, families and elderly in TCC villages as funds allow.

Food assistance is a broad term, and can include:

- Teaching traditional subsistence skills to youth, such as fish processing, edible plant recognition and wild game harvesting.
- Equipment for traditional subsistence.
- Food preservation needs, such as canning, freezer or refrigerator.
- Food vouchers for groceries and fresh foods.

Tribal members will have access to other emergency services listed in this 477 plan that includes tribal TANF and heating assistance.

***I. Performance management and accountability***

TCC will assess progress towards the CSBG goals and objectives utilizing the 477 statistical and narrative report. Specifically, TCC will track:

- Improve meaningful employment
  - o # of youth participating in summer youth employment
  - o # of job fairs
  - o # participants gain employment
- Community engagement
  - o # of Tribes contracted with
  - o # of businesses and organizations partnered with
- Adequate education and proficient literacy
  - o # of participants achieving a high school degree, GED or college degree
- Enhance cultural identity
  - o # of tribal members participated in funded cultural activities
- Coordination and outreach
  - o # of 477 participants
  - o # of elders assisted
- Emergency assistance
  - o Amount emergency assistance provided
- Family stability
  - o # of children in Tribal or State custody

**7.7.5 Fiscal controls, administrative, financial assurances and certifications**

***A. Anti-lobbying, drug abuse, debarment and suspension and the environmental tobacco smoke***

Assurance are signed in the appendix **xx**.

***B. Fiscal controls, procedures and plans***

TCC will permit and cooperate with all Federal investigations undertaken in accordance with the CSBG Act.

TCC strives to ensure continued high standards of fiscal governance and accountability through sound decisions. Policies and procedures are reviewed regularly to ensure an appropriate mix of preventative and detective internal controls. We are audited annually in accordance 2 CFR 200 (formerly OMB circular A-133) and have received unmodified (clean) opinions and no findings in FY2022 and for the past six years.

## 8. REGULATORY WAIVERS

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- TCC requests a waiver of the regulatory wage limitation for Supplemental Youth Services (SYS) found at 20 CFR 668.430 under authority for the general waiver provision of the Workforce Investment Opportunity Act (WIOA) Section 166 program regulations found at 20 CFR 668.900.
- TCC requests a waiver to the 15% cap on administrative costs to allow a 20% cap on administrative costs for WIOA. This is due to the higher costs associated with providing services to 37 separate federally recognized Tribes in isolated and remote communities that are spread out over a service area of 235,000 square miles (slightly smaller than the state of Texas). TCC needs minimal staffing locally based at each of the 37 tribal offices creates offsite indirect costs and costs of the positions, increases the actual administrative costs. Though the TCC region population is modest, the geographic scale created the need for more staff to provide readily, accessible services to tribal members living in rural interior Alaska communities.

## 9. BUDGET

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### 9.1 PROJECTED REVENUE

TCC FY2024 – FY2028 P.L. 102-477

Source	Amount
DHHS/ACF-TANF	\$2,443,973
DHHS/ACF-CCDF	\$2,589,600
Job Placement and Training	\$146,891
WIOA (Comprehensive Services)	\$279,554
WIOA (Youth Services)	\$111,242
WIOA (Dislocated Workers)	\$491,000
Native Employment Works	\$159,115
Adult Basic Education	\$3,070
Welfare Assistance	\$711,215
Higher Education	\$123,987
Johnson O'Malley	\$25,537.79
Ed. Tech Support	\$5,888
<b>TOTAL FEDERAL</b>	<b>\$7,091,072</b>

### 9.2 ESTIMATED EXPENDITURES

TCC FY2024 – FY2028 P.L. 102-477

Expenditure Category	Amount
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Administrative	\$1,886,271
Non-Administrative	\$5,204,801
<b>GRAND TOTAL</b>	<b>\$7,091,072</b>

## 10. ANNUAL REPORTING REQUIREMENTS

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TCC will comply with annual 477 reporting with statistical, narrative and financial reports.