

**CONFEDERATED TRIBES OF SILETZ INDIANS**

PROPOSAL TO CONSOLIDATE  
VARIOUS FEDERAL PROGRAMS

UNDER P.L. 102-477  
INDIAN EMPLOYMENT TRAINING  
AND RELATED SERVICES  
DEMONSTRATION PROJECT

PROGRAM YEARS 2019 - 2021

SUBMITTED BY:

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Date

**OPEN PUBLIC COMMENT 6/1/18 – 7/6/18**

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# **P.L. 102-477: Indian Employment Training and Related Services Program**

## **EXECUTIVE SUMMARY**

### **A. BACKGROUND**

In 1992, Congress passed P.L. 102-477, enabling Indian Tribes to consolidate various grants that are employment and training related into a single plan and program with the Bureau of Indian Affairs (BIA). The intent of Congress was to test the concept that by consolidating various grants from different Government agencies into a single program, Tribes would be able to streamline the administration and management of those grants.

In 2017, Congress amended P.L. 102-477, making it a permanent program and expanded grants eligible to be consolidated into a single plan. Since the consolidated funds lose their identity from the original funding source, it's envisioned that Tribes would be creative in designing programs to meet their own needs.

The Siletz Tribal Council approved its original resolution on August 24, 1993, notifying the BIA of its intent to prepare a proposal to consolidate programs under P.L. 102-477. This proposal is intended to extend and fulfill the Tribal Council resolution approved on DATE for program years 2019-2021.

### **B. MAJOR ADVANAGES**

The consolidation of various grants into a single program will allow the Siletz Tribe to operate with a single report format, single budget, one set of policies, one data management system and one management structure. This will simplify the administration and management of these programs, increase accountability and result in significant cost savings due to simplified reporting.

The P.L. 102-477 (477) legislation authorizes Tribes to seek waivers from applicable statutory, regulatory, administrative requirements or of Federal agency policies or procedures that prevent us from effectively or efficiently implementing the plan. The Siletz Tribe seeks approval of two waivers with this proposal.

### **C. CONCLUSION**

The Siletz Tribe has successfully operated a 477 Program for over twenty plus years. This proposal is vital to the Siletz Tribe so that we can develop programs that meet our needs and continue providing needed services to Native Americans residing within our service area.

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## **A. FEDERAL PROGRAMS TO BE INTEGRATED**

- Workforce Innovation & Opportunity Act (WIOA). Section 166, Comprehensive Services, Department of Labor;
- Workforce Innovation & Opportunity Act (WIOA). Section 166, Supplemental Youth Services, Department of Labor;
- General Assistance, Bureau of Indian Affairs (BIA);
- Temporary Assistance for Needy Families, Department of Health & Human Services.

The funds allocated with the above listed programs will be included in the budget at the end of this Plan.

## **B. START DATE OF INTEGRATED PROGRAMS**

The Confederated Tribes of Siletz Indians (CTSI) began operation of the integrated Siletz 477-Self Sufficiency Program on July 1, 1997. This Plan is for program years 2019-2021.

## **C. CONSISTENCY WITH THE ACT**

The CTSI, 477-Self Sufficiency Program (SSP) will operate with the intent of P.L. 102-477 which is to integrate employment, training and related services into a single plan and budget. This will improve the effectiveness of the integrated programs and services by reducing joblessness in our Indian communities and meet Siletz tribal goals consistent with the policy of self-governance.

## **D. CTSI ELIGIBILITY – LEGAL STATUS**

The CTSI were restored to federal recognition on November 18, 1977 (P.L. 95-195). Shortly thereafter, elected officials adopted a tribal constitution and bylaws, establishing a government-to-government relationship between the CTSI and the United States of America.

The ancestors of the CTSI were brought together according to treaty agreements (7 ratified / 1 un-ratified) beginning in 1856. The reservation was reduced through illegal means and forced agreements to the point where the CTSI was terminated as a federally recognized tribe in 1956.

In 1980, Congress restored to CTSI a small portion of the original coast reservation once owned by the Tribe. The reservation included 36 acres located in the town of Siletz Oregon. This property is known as Government Hill, and is the site of the original Bureau of Indian Affairs – Siletz Agency. It's the historic headquarters of the Coast/Siletz Reservation.

By Congressional mandate at the time of restoration, CTSI was given a service area, with the legal understanding that the Tribal service area was to serve the same purpose and intent as a reservation. At the time, the service area consisted of eight counties: Benton, Lane, Lincoln, Linn, Marion, Polk, Tillamook and Yamhill. In 1986, The United States Department of Interior, Bureau of Indian Affairs authorized the Siletz Tribe to extend the Tribe's service

area into the tri-county Portland metropolitan area that included Clackamas, Multnomah and Washington counties.

Currently, all Tribal programs are administered in Siletz. All programs integrated into SSP are equally available to those who reside within our 11-county service area. We have satellite offices located in Portland, Salem and Eugene Oregon.

#### **E. FORMAL REQUEST**

A formal resolution from the Siletz Tribal Council can be found as Appendix A.

#### **F. GOVERNING BODY**

The Siletz Tribal Council governs CTSI and it consists of nine members who are elected to three year terms on a rotating basis. The Tribal Council is elected by the General Council, composed of all enrolled Tribal members 18 years of age or older. The Tribal Council selects its own officers whose tenure is for one year.

The Tribal Council is responsible for the governmental functions of the Tribe and that includes: setting tribal policies and goals, cultural and spiritual leadership, political activities and the selection of the General Manager. The General Manager is responsible for the administration of tribal programs.

#### **G. PROGRAM MANAGEMENT**

The Tribe is considered a mature contractor by both BIA and Indian Health Services. The Tribe has administered the programs included in this 477 Plan for more than 20 years and has a reputation for excellence. The CTSI was one of the nation's first tribes to elect for self-governance. The Administration building and each field office meet The American Disability Act (ADA) requirements. Each facility is owned and operated by the Tribe and each office is accessible to the physically impaired, this includes off street and handicapped parking.

The Program utilizes a centralized information system for case management that is provided by Eaglesun Systems Products, Inc. It is specifically designed to manage 477 consolidated programs and is flexible to manage non-477 programs. Utilizing scanners and software, client files are created, collected and stored electronically. The Program strives to be paperless as possible while still following the required guidelines for file record management. The data on the Eaglesun database is available in each of the field offices and allows management to monitor and approve cases/expenditures electronically. Case management reports are available at the staff level and safeguards are in place to protect client data. It is a continual process to maintain, modernize and train staff on data management programs.

#### **H. TRIBALLY INITIATED PLAN MODIFICATIONS**

The Tribe reserves the right to modify this Plan as needed to meet tribally specific goals and objectives. Amendments may be made to add or remove programs, comply with

approved waivers or adjust the scope/service delivery methods identified in this Plan. Once submitted to the appropriate BIA representative, the Tribe expects the Agency to comply with Section 8 of the Act. If federal approval is not received within 90-days, the Tribe will assume that this Plan has been approved and begin or continue implementation.

## **I. EXPECTED RESULTS**

It's been a long-term goal of the Tribe to operate a comprehensive human services program that's fully integrated. The advantage is to simply serve more Native Americans at lower costs and with better outcomes. The Program's goal is to streamline administrative processes, and reduce front-end and unnecessary paperwork. The expected results are a reduction in pending time for applicants, reduced administrative costs and prevention of duplicative services. We strive to utilize staff more effectively and maximize technology to increase efficiencies. The benefits are a better quality service delivery system that provides fewer burdens on applicants/clients as we work to assist them in overcoming barriers to employment and self-sufficiency.

The Tribe is realistically expecting a continuing trend of reduced funding for programs operated by the Tribe. The results of this consolidation Plan will be to maintain our ability to deliver quality services and apply administrative cost savings directly to participant services.

## **J. COMPREHENSIVE STUDY**

The 477-Self Sufficiency Program operates within an 11-county service area. The service area contains the strongest labor market in Oregon. It also contains rural areas with very limited employment opportunities. It is this labor market dichotomy that provides many challenges in planning and delivering effective services. The labor market can be divided into four distinct areas: Portland, Salem, Eugene and rural Coast. The following information was published from the Oregon Employment Department.

### **1. Portland Area:**

The Portland area is Oregon's largest population center and is home to roughly half of the state's residents. The area includes three counties, which are within the Siletz Tribal Service Area. The counties are Clackamas, Multnomah and Washington. This area has and will continue to experience population growth. A recent study showed that Oregon was the second "most moved to" state in the country. While the population and jobs are growing in the area, so is the cost of living. Many low income families are moving away from the main Portland area to reside in suburbs with slightly more affordable housing. Large and international corporations such as Nike and Intel have created housing situations not favorable to low income families.

Portland is the most diverse labor market in our Service Area. There is a growing demand for workers of all skill levels and in many occupational groups. The fastest growing fields this past year have been construction, trade, transportation and utilities, education and health services. Government positions also experienced



healthy growth in the past year. The unemployment rate for the Portland area declined to 3.9%, a significant decrease from 4.5% a year ago.

The Program is essential to meeting the basic needs of those who are struggling to enter the competitive job market. We often see transportation as a significant barrier in this area. While the area has a great transportation system that is diverse and reaches many outlying areas, it is expensive. It can also take a significant amount of time to reach longer distances. The need to develop effective support services, especially transportation solutions, will be very important.

The Portland area will continue to be the strongest labor market to operate employment and training services. The diverse economy, the mix of occupations and the educational opportunities will enable clients to choose careers with fewer obstacles. The Program will assist them in gaining the necessary education, training and job skills to achieve self-sufficiency.

2. Salem Area:

The Salem area includes Marion, Polk and Yamhill counties. Labor reports show that the fastest-growing, major private-sector industries included construction, manufacturing, education and health services. The unemployment rate decreased to 4.2% from 4.8% twelve months ago. The recent employment gains for the Salem area have been higher than normal. In fact, this areas growth has outpaced the rest of the state and the nation. The Salem area has a high concentration of government jobs, as it's the State Capital, but it also has a significant high number of season/farm/cannery jobs. Many of our participants become employed during the summer months and then seek services again during the winter months. Our goal is to increase the number of permanent hires by increasing education/training in this geographical area. We also plan to address transportation needs, which often times prevents participants from seeking employment more than a couple miles from their residence.

3. Eugene Area:

The Eugene area includes Linn, Lane and Benton counties. This is a very diverse labor market as it includes growing urban areas and very rural ones as well. This service area covers several large cities in the Willamette Valley and it also reaches the coastal cities in Lane County.

The largest gains in the private sector were in private education, health services, retail trade and construction. The unemployment rate was 4.3% as of November 2017, significantly lower than the rate of 4.8% in November 2016. This service area has two of the largest colleges (Oregon State University, Corvallis; University of Oregon, Eugene) and two significant community colleges (Linn Benton Community College and Lane Community College). This area also has a high number of call centers.

Providing employment and training services in this area can be challenging. The transportation needs are significant and clients are often times unable to attend

trainings or events in the Eugene office due to the long distance and lack of public transportation between cities. We continue partnering with colleges, growing companies and non-profits to provide the necessary employment, training and education needs of our participants so they can compete in this labor market.

4. Rural Coast/Siletz Area:

The Siletz area includes Lincoln and Tillamook counties. Both of these counties are along the central/northern coast and have an entirely different labor market than the other areas listed above. Historically, this labor market was dominated by the fishing and timber industries. Those industries still exist but have significantly been reduced over many years. The labor market is now dominated with tourism (hotels, restaurants). We have several large employers in the area such as: Georgia Pacific, The National Oceanic and Atmospheric Administration (NOAA) and Oregon State University have announced plans for a large expansion in the area. These employers bring high skilled and high paying jobs to this labor market.

The Siletz Tribe is the largest employer in Lincoln County when combining the government and Chinook Winds Casino Resort. The casino, hotel and golf course employs 800 plus individuals. These entities are the most significant partners for the employment and training program. Chinook Winds Casino Resort is located in Lincoln City, OR and this area lacks affordable housing options. Our participants are often times reluctant to seek employment with the Resort due to the travel times from Siletz, where the majority of tribal housing exists. The travel time to the resort is 45-minutes, one way. There is also an issue of safe transportation to the Resort. Residents in Siletz, most often use Highway 229, because it's the shortest and most convenient, but it's often times considered unsafe. The road is very curvy, lacks guardrails in dangerous sections and follows the Siletz River the entire way. During the winter, this highway can be covered in ice, water and debris. Road closures can be costly for workers who are unable to get to work and it can affect their ability to maintain employment.

The key to successful employment on the Oregon Coast is flexibility, not only in preparation for job opportunities, but also the development of alternative travel routes. One must do what is necessary to prepare and compete for the limited jobs available, as the better paying jobs go to the best educated, experienced and trained. The Program will address the employment needs in all of these areas with services described in this Plan.

## **K. PERSONS IN NEED OF SERVICES**

The 2010 Census count for American Indians in Oregon reported a population of 53,203 or 1.4% of the state population. The 2017 prediction according to Census.gov indicates this same population may now be 1.8% of the state population. The Native Hawaiian and Pacific

Islander population was 13,304 or .3% of the population. The latest estimates now bring that to .4% of Oregon's population. This indicates a growing target population of those may be eligible for services identified in this Plan. According to a 2016 Bureau of Labor Statistics report, the American Indian and Alaska Native unemployment rate was 8.9% compared to that of the U.S. which was at 4.9%. The unemployment rate for our target population is consistently higher than the national average. This shows a need for employment, training and education services.

As of 1995, the Siletz membership requires documented one-sixteenth share of Indian blood traceable to one or more than 30 recognized Siletz member tribes. The Tribe's total enrollment has increased from 3199 in 2000 to 5237 in March 2018.

#### **L. SERVICE DELIVERY SYSTEM**

The CTSI maintains field offices in Portland, Salem, Eugene and the central Administration Office located in Siletz. The offices are staffed according to funding requirements and demand for services. Each satellite office is managed by an Area Office Supervisor who provides day-to-day supervision of staff. Most of the services offered in the central office are available in each area office. The SSP has staff located in each area to provide all the services identified in this Plan.

The SSP currently budgets for ten (10) full-time staff that includes: (3) Intake Specialists/Job Coaches (Siletz, Salem, Eugene); (6) Tribal Services Specialists (2 Portland, 1 Salem, 1 Eugene, and 2 Siletz); (1) Director, located in Siletz. The Intake Specialists/Job Coaches are primarily responsible for the following: Eligibility/referrals, case management of job training/education components, workshops, and activities supported by TANF Purposes 3 and 4. The Tribal Services Specialists are responsible for the on-going case management and recertification of clients utilizing cash assistance services.

The application and initial intake process is designed to be culturally supportive and efficient. The intake process is supported by an electronic case management system. The Program strives to minimize the amount of time applicants are pending services. We have established access agreements with the State of Oregon Employment Department and Department of Human Services. Program staff can access state systems to provide appropriate referrals and gather documents to expedite the application approval process.

After the completion of the initial intake, the Intake Specialist/Job Coach or Tribal Services Specialist will develop a case plan with the client as the final step of eligibility determination. The Program will then begin implantation of services, update the case plan as needed and determine on-going eligibility at appropriate recertification periods. Applications are not held in pending status for more than 45-days unless approved by the Director.

#### **M. SERVICES TO BE PROVIDED**

The SSP will provide the following services to eligible participants in each of our four offices.

1. Referral Services:

All applicants and clients will receive referral services. Prior to eligibility determination, all applicants will be referred to apply for outside resources they may be entitled to receive. These services include but are not limited to: Unemployment Insurance Benefits, Supplemental Nutrition Assistance Program (SNAP) and subsidized housing options. Applicants found not eligible for services will be referred to tribal or other resources that may meet their needs. Current participants will receive on-going referrals as part of their case plan.

2. Eligibility Determination:

All persons entering the Program will be required to establish eligibility for the various services provided. Applicants will receive basic intake services including eligibility determination and referrals to potential resources. Those found eligible for SSP will participate in an assessment and develop a case plan.

3. Assessment:

All applicants will participate in an assessment prior to the development of their case plan. The assessment is a tool to draw out strengths and barriers the client may be facing. It will include a brief overview of goals, education/work history, education status, living situation, personal information, childcare needs, transportation, financial status and a monthly budget. The assessment could be in the form of a questionnaire, tests or other tools deemed appropriate by the Program.

4. Self-Sufficiency Case Plan:

The Case Plan will be developed with the client before services will commence. The Plan will include a brief description of the individual/family strengths and skills, barriers to self-sufficiency, short and long term goals, services to be provided, estimated length of time on services, estimated cost of services, steps towards self-sufficiency and a brief description of the desired outcomes. The Plan is considered a non-legal working agreement between the participant and the Program. The Plan will be updated as the client progresses through the Program or as needed.

5. Case Management:

The 477 Program will employ an integrated case management approach to service delivery. The case management model utilized is known as Targeted Intensive Case Management (TICM). Some of the more important features of TICM are: (1) Participants are assessed through self-reporting of skills, needs and barriers, coupled with professional mental health/substance abuse, vocational and educational evaluation; (2) Individual case plans are developed that take into account both the participant's and his/her families situation. And circumstances; (3) Reassessments are done on a regular basis to ensure that participants continue to progress towards their case plan goal(s). The case managers will conduct, at minimum, monthly assessment interviews with their clients, some of which will be done during home visits.

6. Education Assistance:

The Program will provide education assistance that will be broken into three distinct categories. Participation in all activities will be justified in the case plan and expenditures will not exceed yearly budget caps. Siletz tribal members participating in educational programs may be dually enrolled with the Siletz Education Department and AN/AN with disabilities will be referred to the Siletz Vocational Rehabilitation Program. Our educational components include:

a. Adult Basic Education/GED Completion:

- *Adult basic education*- will assist participants who need to improve reading, writing and/or math skills to increase employability and compete in the job market or participate in one of the following education components.
- *GED Completion*- will be required for all participants without a GED or high school diploma. Classes will be provided by local community colleges or qualified agencies.
- Services can include payment of necessary placement fees, tuition, books, supplies, fees, testing, stipends and other support services.

b. Higher Education:

The Program can assist eligible clients who are enrolled in degree programs that will result in an Associates, Bachelor of Science/Arts, Masters or Doctorate Degree. This service will be limited to one term of higher education in a 12-month period. Eligible expenditures can include but are not limited to the following: Enrollment, tuition, books, fees, placement testing, stipends and related support services.

c. Vocational Education/Occupational Training:

- *Vocational Education*- can include but is not limited to the following: Vocational degrees/certifications from accredited institutions, employment related workshops, seminars and short term trainings. Generally, participation in these activities will be short term and occupation specific, not to exceed six months.
- *Occupational Training*- can include but is not limited to the following: Pre-apprenticeship/apprenticeship programs from qualified agencies, and occupation specific certifications and/or trainings not exceed twelve months.
- Services for either category can include but is not limited to: enrollment, tuition, books, fees, testing, stipends, per-diem, tools and related support services. WIOA emphasized training that leads to industry recognized post-secondary credentials. This will be a priority for this component.

7. Employment & Training Assistance:

The Program will provide employment and training assistance. Participation in all activities will be justified in the case plan and expenditures will not exceed yearly budget caps.

a. Core Services: Employment Counseling/Job Search Assistance:

Core Services provides employment enhancement services to individuals who are not enrolled in other components. Typical services may include: Resume assistance, job referrals, development of cover letters and attendance at SSP sponsored events/workshops. The main resource for clients is the assistance of an SSP staff person. The Program will not provide financial assistance directly to a client enrolled in Core Services. The Program may provide limited support services that are directly tied to an imminent job opportunity. An imminent job opportunity is defined as verified job interviews or pending employment offers. Support services include interview clothing and transportation assistance to that interview. The Director may approve additional support services.

All eligible clients will receive employment counseling/coaching as a Core service. Staff will maintain current information regarding local labor markets and job opportunities. The Oregon Employment Department (WorkSource centers) will be utilized to their full potential in assisting participants with skills development and obtaining employment. Staff will also utilize local employment service providers such as Goodwill Job Connections and others. Eligible participants will be referred to participate in employment related workshops and job fairs.

b. Unpaid Work Experience:

This service involves unpaid, short-term training at a non-profit organization, public agency, tribal enterprise/government office or private employer. The intent of the activity is to enhance participants' employability by providing them with current work experience, employer references, suitability for paid placements and an opportunity to develop specific job skills.

c. Paid Work Experience (WEX):

This service will be available to all eligible participants when justified in the Case Plan. The Program may utilize public, private, non-profit and Tribal employers. Generally, this service will consist of training, twenty-four (24) months or less and not to exceed 1000 hours. The service may be nonconsecutive and is for those lacking work history, transferrable skills, those who have little to no employment skills and those needing employment references. The service may be offered in conjunction with other services such as Classroom Training. Specific details for each participant will be included in a standard agreement and job description. CTSI will provide all payroll services. Participants will be required to utilize the Relia-Card payment distribution system for payments. Support services may be provided as justified in the Case Plan. Participation in pre-apprenticeship/apprenticeship programs will not qualify for paid work experience.

d. On-The-Job Training (OJT):

This service will be available to all eligible participants when justified in the Case Plan. The Program may utilize public, private, non-profit and Tribal employers. The purpose is to provide additional skills development for participants who are directly hired. Employers will hire participants for permanent employment and treat them as any other employee in the same or similar position. The employer will cover payroll and the Program will subsidize up to 75% of the starting hourly wage. Support services may be provided as justified in the Case Plan. Specific details for each participant will be included in a standard agreement and job description.

e. Direct Job Placement (DP):

This service will be available to all eligible participants who have the opportunity to become employed before or soon after application for services. Once the job has been secured and verified, support services may be provided as necessary and justified in the Case Plan to ensure successful employment. Further details regarding eligibility will be established in the Policy Manual.

f. Supplemental Youth Services:

The Program will prioritize youth that are academically at risk or out of school as documented by school records. Eligible youth are those that are the ages of 14-24 and fall below income levels set annual by the Director. All applicants must complete an Application for Assistance signed by a parent or guardian if under the age of 18 (not applicable if youth is emancipated). If applicant is homeless and the parent or guardian is not available, a letter from a counselor or caseworker will document the applicant's situation and need for services. The Program will expend most funds after the school year has ended but may solicit and advertise services as early as April 1<sup>st</sup> and close-out activities by August 31<sup>st</sup> of each year. The SYS Program may provide services that include but are not limited to: Tutoring, life skills, incentives, sporting/summer camp fees. The main focus of SYS will focus on the following two programs:

- *Paid Work Experience*- Similar to the adult WEX component, income eligible youth will be placed in job training sites to develop early employment skills. Services will be prioritized to out-of-school youth. Support services may be provided as justified in the Case Plan. Specific details for each participant will be included in a standard agreement and job description. Further details regarding eligibility will be established in the Policy Manual and annual budget.
- *Classroom Training*- Similar to the adult CRT (Basic Education) component, income eligible youth who are lacking educational credits or GPA may receive assistance with basic education. Services may include assistance with tuition, fees, books, stipends and support services as justified in the Case Plan.

Further details regarding eligibility will be established in the Policy Manual and annual budget.

8. Other Related Services:

a. Support Services:

This service is available to eligible participants as justified in the Case Plan. The purpose is to assist participants in maintaining on-going compliance with their Plan. Services may include but are not limited to:

- Childcare;
- Clothing, tools/equipment;
- Relocation assistance for employment;
- Transportation;
- Fines/Fees;
- Utility/rental assistance;
- Required union fees (prior to first pay check)
- Grooming and cosmetic expenses (i.e. dry cleaning, laundry supplies, haircuts, personal care items) when related to employment, training or job related education;
- Substance abuse and mental health counseling (if not otherwise covered through Tribal health services, insurance or provided by other state or public health services);
- Dental services (if not otherwise covered through Tribal health services, insurance or provided by other state or public health services) when related to employment, training or job related education;
- Eye glasses (if not otherwise covered through Tribal health services, insurance or provided by other state or public health services)

Support services are based on the individual needs of each participant and are not entitlements. Eligibility, expenditure guidelines and limits are set by the Director and may change periodically based on available funds, cost of services and client demand.

b. Diverted Services:

This service is available to eligible participants who have been employed for a minimum of 45 calendar days and are at risk of losing their employment. Applicants must provide documentation of need and evidence how this service will assist them in retaining employment or prevent job loss. Applicant's income must not exceed 185% of the FPL and this service can be utilized no more than five times in a lifetime. This service will not pay traffic fines, bills incurred prior to employment, or costs incurred from illegal activities. Further details regarding services and eligibility will be established in the Policy Manual.

c. Re-Entry Services:



This service is available to incarcerated and recently released persons of the target population. The Program will provide Core Services to individuals still incarcerated. These services may include, but are not limited to: employment preparation (resumes, interview skills, etc.), coaching, referrals to mental health, behavioral health, permanent/transitional housing, and/or other agencies that support self-sufficiency and re-entry. The Program will provide cash assistance and expanded support services to Siletz Tribal members once released if they meet eligibility criteria established in this Plan and Policy Manual.

9. Emergency Assistance:

This service is only available to Siletz Tribal members that have income below 100 % of the FPL. The purpose is to prevent eviction/homelessness or utility shut off. The Program may assist with move-in costs and deposits. The Program will make direct payment to third parties. Further details regarding eligibility will be established in the Policy Manual and annual budget.

10. Incentives:

All participants will be eligible for incentives based on achievements met on their case plan. Incentives can include but are not limited to: Fred Meyer gift cards, gas cards, and CTSI merchandise. The Program may provide door prizes to events funded under TANF Purpose 3 and 4. Further details are provided in the Policy Manual.

11. General Assistance (GA Redesign):

CTSI has an approved GA Redesign Plan (2018) that is fully incorporated into this 477 Plan. This service is only available to enrolled Siletz Tribal members. Cash assistance and support service payments are provided to eligible Tribal members to assist in meeting basic needs and remove barriers while seeking employment or other forms of self-sufficiency. Individuals can apply for services if they believe they are eligible and individuals can apply on behalf of another person if they are unable to do so themselves. This can be done by (1) in person by completing an application and/or (2) through an oral interview and assessment process with staff.

A. Basic Eligibility:

1. The applicant/client must not have sufficient resources to meet any one of the essential items including: food, clothing, shelter, and/or utilities.
2. The applicant/client must reside within the CTSI eleven county service area as established by the Assistant Secretary-Indian Affairs (25 C.F.R. §20.300 (c)).
3. The client will establish an Individual Self-Sufficiency Plan (case plan) in coordination with their caseworker identifying the following: strengths, barriers to employment, short-term/long-term goals, services to be provided, step-by-step activities that address barriers and increase likelihood of self-sufficiency. The case plan will be established after an assessment is completed and prior to eligibility determination. The case plan will identify if the client is unemployable and/or exempt from the employment policy outlined in 25

C.F.R. §20.315. Unemployable clientele will be referred and provided assistance applying for Supplemental Social Security and Social Security Disability.

4. Eligibility determinations must be made within 45-calendar days from the date of request unless approved by the Director.

**B. Income Eligibility:**

1. The Application for Services will document need and income to determine eligibility for General Assistance. Six months of income and resources, prior to application date are required for eligibility determination.
2. The applicant/client cannot have income that exceeds the Federal Poverty Level (FPL), Oregon countable income limits for the appropriate household composition, or resources that exceed \$2000.
3. All income (earned/unearned) will be calculated the month it is received when determining initial eligibility. Calculating income for approved clients will be established in the Policy Manual.
4. Income disregards are attached as Appendix A. Income Disregards/Asset Review Chart.

**C. Payment Standard:**

The payment standard for General Assistance is based on the Oregon TANF payment standard and any associated ratable reduction that exists in the State or designated service area where the client resides (25 C.F.R. §20.306 (a)(b)).

**D. Case Plan / Redeterminations:**

Clients must make satisfactory progress on their case plan to remain in compliance and eligible for services. A complete set of non-cooperation and ineligibility procedures are included in Section O of this Plan.

Redeterminations for all General Assistance cases will take place every six months from the date of eligibility. The redetermination will include a new application for assistance, home visit, verification of residency, income, evaluation of living circumstances and household composition. There will be a monthly review of eligibility based on client monthly reports, in-face meeting and submission of any income received. The monthly report forms inform the caseworker of income received, employment gained, household changes (residency, contact information, additions/reductions), and incarceration during the reporting month. On-going eligibility is determined after review of the monthly report forms and in-face meeting. The caseworker will make appropriate changes to the case plan as needed.

**E. Non-Cooperation / Disqualification:**

Clients that are non-compliant will face progressive sanctions against their grant. The third sanction will result in disqualification for a period of 60-days. A complete set of reductions and procedures is included in Section O of this Plan

and Policy Manual. Sanctions will be implemented towards the benefit group and the disqualification period will not be reduced for any reason.

Clients can appeal decisions by following the timelines and procedures outlined in the Appeals Rights Policy, included in Section Q of this Plan. Clients may continue to receive financial assistance while an appeal is pending. The program provides vendor payments to third parties while in sanction status; this will be considered financial assistance. Clients experiencing a third sanction will not receive assistance while pending as the case will be closed for 60-days. The client will not receive cash while pending or in sanction status.

F. Notification to Client:

The Program will provide a Letter of Notification (LON) to the applicant for approval or denial of an application within 45-days from the date of request. The LON will include the client appeal rights per 25 C.F.R. §20.603.

The Program will provide an LON if there is a change in client benefits or services ten (10) days prior to change occurring. The LON will include the client appeal rights per 25 C.F.R. §20.604. The Policy Manual will outline exemptions to the ten day policy.

Should an applicant/client knowingly and willfully provide false or fraudulent information, they are subject to prosecution under 18 U.S.C. Section §1001 per 25 C.F.R. §20.607. The client will receive an LON including appeal rights.

Clients with incorrect payments either due to client or administrative error and incur an overpayment will receive an LON stating the procedures for recovery, including appeal rights. Clients with incorrect payments, resulting in an underpayment, will receive an LON with supplemental payment within 30-days of the discovery or on the next eligible monthly cash grant, whichever is first.

12. Temporary Assistance for Needy Families (TANF):

The 1996 Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA), Section 412, authorizes Indian tribes to operate Tribal Family Assistance Programs. CTSI, in accordance with such granted authority, intends to renew the TANF Program effective October 1, 2018 through September 30, 2021. The previous TANF Plan is fully incorporated into this 477 Plan.

A. Program Mission:

The primary mission of the Siletz TANF will be to assist needy families in moving forward and achieve self-sufficiency through gainful employment. Parents and caretakers will be required to engage in assigned activities, the intent of which is to prepare them for gainful employment. Such activities will include but is not limited to: job readiness, job placement, employment and training activities, and other services provided by 477. In addition, services will be available, and in some cases mandated, to address significant barriers such as educational deficiencies, mental health disorders and substance abuse issues.

While engaged in such activities and/or receiving such services, participants will be provided both cash assistance grants and support services.

B. Program Goals: Per §286.75 (a)(5)

The primary goals for the Siletz TANF will be to enhance the employability skills of needy families. We plan to accomplish this by providing program orientation to all new TANF families, provide monthly workshops that focus on budgeting, job search skills, resume/cover letter development, dress for success, job retention skills, etc. Our second goal is to provide diverted services / Pre-TANF to reduce the chance that families need regular TANF services. Our third goal is to increase job retention rates for those that gain employment and exit the Program. We plan to accomplish this by providing more transitional services and follow-up case management.

C. Retrocession:

In the event that the Tribe elects to retrocede the Siletz TANF back to the State of Oregon, the Tribe will comply with all applicable TANF regulations and related laws as specified in 45 C.F.R. 286.30 related to retrocession.

D. Eligibility: Related To The Purposes of TANF

Eligibility for TANF assistance and services is established in this Plan. Only needy families, as defined in this Plan may receive: (a) any form of Federal or State Maintenance of Effort (MOE) funded “assistance” as defined in 45 C.F.R. 286.10; or (b) any benefits or services pursuant to TANF purposes 1 or 2. “Needy” means financially deprived, according to income and resources (if applicable) criteria established in the Plan by the Tribe to receive the particular “assistance,” benefit or service.

The Tribe may use segregated Federal TANF funds to provide services and related activities that do not constitute “assistance” as defined in 45 C.F.R. 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. Further eligibility criteria will be established in the Policy Manual.

Unless the State instructs otherwise, the Tribe may use MOE funds to support non-assistance, pro-family activities for individuals and family members regardless of financial need.

E. Eligibility Criteria:

This service is available to enrolled Siletz Tribal members with dependents and non-enrolled head of households with enrolled Siletz dependents. Cash grants are provided to eligible families to assist in meeting basic needs. Persons receiving TANF must participate in self-sufficiency activities as outlined in their case plan, unless found to be exempt by guidelines set forth in this Plan.

1. Temporary Assistance for Families components include:

- Pre-TANF: Short-term diverted services.

- Cash Assistance: 1 and 2 parent households (same sex couples included).
  - Cash Assistance: Non-Needy Caretaker Relative (NNCR).
  - Temporary Assistance for Needy Families Work Experience (TWEX).
  - Childcare: TANF and TWEX participants.
  - Teen parents: Emancipated and non-emancipated minors.
  - Emergency Assistance.
2. The following individuals may apply for TANF:
- One or two parent Siletz tribal household with a shared dependent.
  - Non-tribal one parent household with Siletz enrolled child.
  - Two parent household with at least one shared dependent. At least one person in the benefit group must be enrolled with Siletz.
  - Two parent household with at least one Siletz child.
  - A pregnant enrolled tribal member in the 8<sup>th</sup> month of pregnancy.
  - Emancipated & non-emancipated minor with a dependent child.
3. General eligibility criteria include the following:
- Enrolled Tribal member: A person who is an enrolled member of the CTSI, including dependent children who are enrolled members even though a custodial parent may not be enrolled.
  - Residency: The tribal family must reside within the eleven (11) county service area (Benton, Clackamas, Lane, Lincoln, Linn, Marion, Multnomah, Polk, Tillamook, Washington, Yamhill). Subject to the availability of funding and approval from the CTSI Tribal Council, the Program may serve any eligibility family residing within the United States.
  - Citizenship/Alien Status: Client must be a U.S. citizen or qualified legal alien as defined at 8 U.S.C. 1641.
  - Social Security Number: Client must supply or provide proof application for a Social Security Number (SSN).
  - Pursuing and Assigning Benefits/Assets: Except for pregnant females and SSI recipients, clients must pursue and assign child support, unless there is good cause per §286.75 (a)(8). A client may claim good cause for not cooperating with the Program or the Oregon Support Enforcement Division to establish parentage or collect child support.
- Good cause for non-cooperation exists when:
- The child was conceived as the result of rape or incest.
  - The child was a victim of child sexual abuse or severe emotional or physical abuse.
  - Cooperation is reasonably expected to result in serious emotional or physical harm to the dependent child or adult.

- Determination that continuing efforts to obtain support or establish parentage would be detrimental to the dependent child or adult.
  - The Program may determine good cause on a case by case basis. Further details will be included in the Policy Manual.
  - Age/School: Dependent children must be one of the following:
    - Under age 18; or
    - Under age 19 and is a full-time student in high school, high school equivalency or GED classes.
4. Financial eligibility criteria include the following:
- Resource Limit: The resource limit is \$2,500 for the entire TANF family. Resources that exceed \$2,500 will be counted as income or a resource based on the Asset Review Chart included in this Plan.
  - Income Limits:
    - Pre-TANF: Countable income (combined gross earned and unearned) cannot exceed 185% of the Federal Poverty Level (FPL).
    - TANF: Countable income (combined gross earned and unearned) cannot exceed 100% of the FPL.
    - TANF Purpose 3 & Purpose 4: Services will be targeted to those that fall below 200% of the FPL.
  - Calculation of Benefits: The Program has adopted the Oregon State Countable Income Standards.
    - Earned Income: Benefits for participants with countable earned income are adjusted by applying a 50% reduction of the total gross income. The adjusted income is subtracted from the regular payment standard.
    - Unearned Income: Benefits for participants with countable unearned income are adjusted by applying a 100% reduction of the total unearned income. The adjusted income is subtracted from the regular payment standard.
  - Treatment of Assets: The financial eligibility requirements include meeting the income and resource limits. Income and resources are assets. An asset that is counted as income is excluded as a resource in the budget month. Any remaining amounts are counted as resources the following month. The Asset Review Chart that applies to the Program is included at the end of this Plan.
5. The following persons may be included in the family unit:
- Applicants who meet all the general eligibility criteria;
  - The following household members:

- Parents of a dependent child who is in the assistance unit (spouse/partner of a parent included)
- Dependent of a Non-Needy Caretaker Relative (child only cases)
- Unless otherwise stated, include blood-related siblings of a dependent child if the siblings meet all of the following non-financial eligibility requirements:
  - Age (see general eligibility 6)
  - Living with a parent or Non-Needy Caretaker Relative
  - Citizen status verified with appropriate documentation
- Minor parents are allowed to apply separately with their dependent children when the minor parent lives with an adult relative who is not their parent. Under extreme circumstances that are detailed in the Policy Manual, minor parents may apply when homeless.
- Parents: Dependent children must live with a parent. A parent is the person, regardless of age, who is responsible for the care, control and supervision of the dependent child and is related to the child in one of the ways listed below. If any of the following relationships are established through marriage, the relationship remains the same even if death or divorce terminates the marriage.
  - Biological parent. The following applies when determining the alleged father may be the parent when the mother is absent:
    - If there are documents that verify the alleged father is the father of the child, he will be the head of household. If at a later date, the Tribe proves that he is not the father, he can no longer be in the benefit group.
    - If there are no documents that verify the alleged father is the father of the child, he cannot be in the benefit group until the Tribe legally establishes that he is the father.
  - The biological parent or other blood relative can be included in the benefit group, even if a legal adoption exists in the following circumstances: (other blood relative would be a child only case)
    - The biological parent can be in the benefit group if the child lives with them and the legal parent (the adoptive parent) has given the care, control and supervision of the child.
    - People who are related to the child through the biological parent may be the Non-Needy Caretaker Relative if the child lives with them; the adoptive parent has given up care, control and supervision of the child. The person must also meet the degree of relationship specified in the rule before the adoption.

- The adoptive parent and any people related to the child through the adoption who meets the degree of relationship specified in this rule.
  - Blood relative or half-blood relative (sharing one common natural or adoptive parent), this includes:
    - o Siblings, aunts, uncles, first cousins, first cousins once removed, nephews, or nieces; AND
    - o Persons of receding generations denoted by the prefixes of grand, great, great-great, or great-great- great.
  - Step fathers, stepmothers, stepbrothers or stepsisters.
  - The spouse or significant other of anyone listed in this section of this rule.
  - Essential person, a person recognized by the Tribal community as a relative to the dependent child is given to, or accepted by, another person for thirty (30) days or more.
6. The following individuals are not included in the family unit:
- Ineligible non-citizens (income/resources still apply to benefit group). The individual is listed on the Application for Assistance and is required to complete a case plan and participate in all required program activities. They are not eligible for grant assistance or support services.
  - People receiving adoptive assistance or foster care
  - People receiving SSI

F. Child Support Collection:

All child support amounts generated under an assignment and retained by the Program will be used to further the TANF Program, consistent with §286.45 (f). The Program will return assigned child support received in excess of the total TANF benefits provided; the amount may not be determined monthly. The Program will notify the State of Oregon Child Support Division each instance a TANF case is approved and closed to ensure revenue assignments are completed timely per §286.155 (b). The Siletz TANF Program does not offer a pass through.

G. Pre-TANF:

The Program may provide Pre-TANF or diverted services to families whose income is between 100% - 185% of the FPL. The service will not exceed 90 days and may include cash grants based on household size and support services. The intent is to divert families from becoming TANF participants by meeting short term needs for those that we expect to have gainful employment within the 90 days. The intent is not to delay TANF benefits.

H. TANF Purpose 3 & 4:

Several types of programs and expenditures will be supported under these purposes. HHS specifically states that programs that help young people stay in



school, those that keep them supervised after school, and those that increase their motivation and self-esteem, can all be funded under Purpose 3. Expenditures under Purpose 4 may include but will not be limited to: interpersonal skills development, anger management, sex education, budgeting, family counseling, parenting classes and positive relationship building. These programs are considered non-needy; however, the primary target population will be youth already on TANF assistance or the Indian Child Welfare Program, with a focus on those youth ages 10-17. When a TANF case closes, SSP may continue providing youth services for a period of 6 months, and not to exceed the age of 18.

I. Transitional Services:

Participants may be eligible for vendor payments for up to 180 days after they become employed and lose TANF eligibility due to income that exceeds the Countable Income Limits. The monthly limit will not exceed the regular TANF grant for the size of family based on the State of Oregon Payment Standards. Vendor payments will be limited to basic needs of rent and utilities only. Participants may be eligible for support services for the first 90 days of Transitional Services and childcare assistance for the full duration. Additional eligibility requirements are outlined in the Policy Manual.

J. Individual Development Accounts:

Subject to the availability of funds, the TANF Program may use TANF funds to fund Individual Development Accounts for individuals eligible for TANF assistance as per 45 C.F.R. 286.10(b)(5) and 45 C.F.R. 286.40. Additional eligibility and budget limitations will be included in the Policy Manual and annual budget.

K. Job Training- Non-Custodial Parents:

The Program may provide job training services similar to TANF Work Experience or On-the-Job Training to non-custodial parents of TANF families. The goal is to help non-custodial parents find employment so that they can pay their child support. The Program will prioritize those parents that are unemployed or underemployed. Additional eligibility requirements are outlined in the Policy Manual.

L. Time Limits:

1. Basis for Modified Time Limits: The Siletz Tribe has adopted the State of Oregon's time limits on receipt of TANF benefits. To avoid disadvantaging Tribal TANF participants relative to State TANF participants, and to have comparable services with the State, the Tribe believes that it is reasonable to implement the State's time limit provisions. However, in the event the State of Oregon should lose any time limit waiver or reduce their time limits to less than the federal time limits, the Tribe will convert to the federal time limits of 60-months.

2. Prior months of TANF assistance funded with TANF block grant funds provided by any state or tribe must be counted toward the lifetime limit, except for any month that was exempt or disregarded by statute, regulation or any experimental pilot or pilot demonstration project approved under Section 1115 of the Act.
3. The Tribe must not count any month of receipt of assistance by an adult during which the adult lived in Indian country or in an Alaska Native village in which at least 50 percent of the adults were not employed. Indian country has the meaning given by the term at 18 U.S.C. 1151. The Tribe considers an individual to meet the requirement of this subsection if-
  - The individual resides on an Indian reservation, tribal allotment, or Dependent Indian Community as defined by the Bureau of Indian Affairs; or
  - The individual is an enrolled Siletz Tribal member that resided in Lincoln County from October 1, 2016 to September 30, 2017.
4. The following months do not count towards the accrual of time limits:
  - Months prior to July 1, 2003 in which a minor parent head of household or an adult received a TANF grant in Oregon or another state.
  - Months between July 1, 2003 and September 30, 2007 in which a minor parent head of household or adult received TANF in Oregon; and
    - Participated in required TANF Work Experience/JOBS activities or other education, employment or job training programs; or
    - Was not required to participate in TANF Work Experience/JOBS activities or other education, employment or job training programs.
  - Months beginning October 1, 2007 in which a minor parent head of household or adult received TANF in Oregon and is a participant in a degree completion program and is enrolled in an educational institution.
  - Months between October 1, 2007 and March 31, 2016 in which the individual is unable to obtain or maintain employment for a sufficient number of hours in a month to satisfy the Tribally required participation rates because the individual:
    - Was a victim of domestic violence;
    - Had a certified learning disability;
    - Had a verified alcohol and drug or mental health condition;
    - Had a child with a disability, which prevented the parent from obtaining or maintaining employment;
    - Was an individual with a disability;
    - Was providing care for a family member who lived in the home and was an individual with a disability;
    - Was deprived of needed medical care; or

- Was subjected to battery or extreme cruelty. For purposes of this rule, an individual was subjected to batter or extreme cruelty if they individual was subjected to one or more of the following:
  - Physical acts that resulted in, or threatened to result in, physical injury to the individual.
  - Sexual abuse.
  - Sexual activity involving a dependent child.
  - Being forced as the caretaker relative of a dependent child to engage in nonconsensual sexual acts or activities.
  - Threats of, or attempts at, physical or sexual abuse.
  - Mental abuse.
  - Neglect or deprivation of medical care.
- Months in which a minor parent head of household or adult participated in Pre-TANF or Post TANF (transitional services).
- Months between July 1, 2008 and April 30, 2012 in which the individual did not qualify for any other TANF time-limit exemption under this rule, and was unable to obtain or maintain employment for a sufficient number of hours in a month to satisfy the Tribally required participation rates when Oregon's statewide average unemployment rate as published by the Oregon Employment Department was equal to or greater than seven percent. For purposes of this rule, this determination-
  - Through December 31, 2011 is calculated based on a six-month period as follows:
    - The time period during July 1, 2008 through June 30, 2009 was based on Oregon's statewide average unemployment rate as published by the Oregon Employment Department for the period July 1, 2008 through December 31, 2008.
    - In each six-month period, starting July 1, 2009 and ending December 31, 2011:
      - The time period during January 1 through June 30 was based on Oregon's statewide average unemployment rate as published by the Oregon Employment Department for the period April 1 through September 30 of the preceding year.
      - The time period during July 1 through December 31 was based on Oregon's statewide average unemployment rate as published by the Oregon Employment Department for the period October 1 through December 31 of the preceding year and January 1 through March 31 of the current year.

- From January 1, 2012 through April 30, 2012 was based on Oregon's statewide average unemployment rate as published by the Oregon Employment Department for the period April 1 through September 30, 2011.
5. The Tribe will not count any month of assistance towards the Federal Time Limit for those cases that:
    - Any month of receipt of assistance to a family that does not include an adult head of household.
    - A family that does not include a pregnant minor head of household, minor parent head of household or spouse of such a head of household.
  6. No person may continue to receive Tribal TANF benefits in their lifetime to exceed 60 months whether consecutive or cumulative unless found to meet the conditions of a hardship exemption. The Tribe will not permit the number of hardship exemptions, as listed in this section, to exceed 60% of the average monthly caseload.
    - Justification: 82% of the May 2018 caseload is considered unemployable. These head of households are facing significant barriers to employment and self-sufficiency. These barriers include but are not limited to: Behavior health, mental health, lack of basic education and those actively seeking Supplemental Social Security or Disability benefits. Should the percentage fall below 35%, the Program will limit hardship exemptions to 20% of the average monthly caseload.
  7. Individuals that have reached the 60 month time limit may continue to receive TANF benefits if they meet one of the following:
    - For victims of documented domestic violence or assault and are in the process of seeking victims assistance, a hardship exemption will be allowed and will not exceed a total of six months. Valid documentation can include: Police report, restraining order, and/or documentation from a medical provider.
    - For families that have a short-term documented medical claim making employment not possible, a hardship exemption will be allowed and will not exceed a total of six months.
    - For families that are in the process of actively seeking a disability claim for either an adult or child in the benefit group, a hardship exemption will be allowed until their claim is approved. Should a disability claim be denied, the individual can remain in the appeals process or file a new claim for a period not to exceed four years from the original denial date.
    - For families that are in process of actively seeking assistance with mental health counseling for either an adult or child in the benefit group and are found by a medical professional to be incapable of employment during

this time and are in the process of seeking Supplemental Social Security (SSI), a hardship exemption will be allowed until they are approved for SSI as long as they continue their mental health counseling. Should a disability claim be denied, the individual can remain in the appeals process or file a new claim for a period not to exceed four years from the original denial date.

Note: Families within the four exemptions listed above do not apply towards the 60% or 20% hardship cap. Participants who exceed 60 months of TANF assistance and are on an exemption will still be required to complete program requirements. These can include but are not limited to: Monthly contact with their caseworker, submission of a monthly report form, submission of a self-sufficiency timesheet, and attendance at mandatory trainings deemed appropriate by staff and they are still required to notify their caseworker of any change that may impact program eligibility.

#### 13. Economic Development:

The Program may allocate up to 25% of program funds for economic development activities. The Program will partner with the Tribal Administration and the Siletz Tribal Business Corporation when determining appropriate uses of funds. Additional details will be included in the Policy Manual.

## **N. GENERAL REQUIREMENTS FOR CLIENTS**

The Program has general requirements that may apply to all clients. Those can include policies regarding work requirements, and good cause. Those will be outlined in this section.

### 1. Participation Requirements:

Adults receiving cash assistance (TANF/GA) will be required to participate in work and employment barrier removal activities unless they meet exemption criteria specified in this Plan and Policy Manual. Caretaker Relatives of child-only cases will not be required to fulfill work requirements but may be required to engage in other self-sufficiency activities as deemed appropriate.

### 2. Participation Rates:

The participation rate represents realistic and appropriate standards in light of such factors as high rates of education/training deficiencies, prevalence of mental health barriers, substance abuse, and substantial long term unemployment of cash assistance clients.

### 3. Minimum Average Weekly Participation Hours:

The following average weekly participation hours reflect what can reasonably be expected from cash assistance participants. A significant number of cash assistance participants have been out of school and/or unemployed for a substantial period of time. To require each person to immediately acquire and/or exercise the discipline needed to participate in a full week of activities would be unrealistic. The minimum

weekly participation hours for single head of households in the fiscal years 2018-2021 will be 26 hours. The minimum weekly rate for two parent families will be a combined 26 hours. Two adult general assistance cases are required to complete 26 hours individually.

One & Two Parent Participation Hours Per Week Average Monthly Rate		
Federal Fiscal Year	Hours Per Week	Monthly Rate
2018	26	35%
2019	26	35%
2020	26	35%
2021	26	35%

4. Countable Work Activities:

The Program will make available the following employment and training activities for participants. Some of the activities will be provided directly by the Tribe while others will be delivered through contracts with local service providers. The list is not expected to remain static. Services will reflect participants’ needs and barriers.

- a. Education/Training: Involves high school, adult basic education, GED, higher education or any vocational training/coursework. The intent of the activity is to assist participants in achieving a proficient competency level to engage in the workforce.
- b. Job Search/Job Readiness: Involves interview skills, resume development, application completion, life skills, job search skills, job retention. The intent of these activities is to assist participants in effectively searching for and obtaining unsubsidized employment and retaining employment. Job search/job readiness activities will be limited as per 45 C.F.R. 286.105 (b)(c). Children ages 16-18, who are not in school, will be required to seek employment. Additional requirements are outlined in the Policy Manual.
- c. Cultural Activities: These activities may include education on tribal history, language classes, making regalia, elder’s chores, participation in tribally sponsored events and attendance at other cultural classes. Participation in these activities is intended to develop an understanding and encourage pride in Native American and Siletz Tribal heritage. This is an important factor in psychologically preparing Native Americans for sustained and gainful employment.
- d. Job Skills Training: Involves classroom training in vocational and technical skills, or equivalent knowledge and abilities in specific employment areas. The intent of the activity is to enhance the employability of participants by developing marketable skills.

- e. On-the-Job Training: The intent of OJT is to enhance the training and employability of clients so they can compete in the job market. This component also provides an incentive for local employers to hire participants directly and provide the needed training. The Program may reimburse employers up to 75% of the starting hourly wage for a period not to exceed six months. The client will be considered an employee of the employer and be entitled to the same benefits and be held to the same expectations as any other employee of the employer.
- f. Sheltered/Supported Work: Involves worksite skills and job readiness training coupled with intensive supervision and counseling. The intent is to assist participants that lack basic job experience to develop skills at their own pace in a supportive environment.
- g. Unpaid Work Experience/Volunteering: Involves unpaid, short-term worksite training in a non-profit, public/tribal agency or private employer. This will enhance employability by providing participants with current work experience, employer references and an opportunity to develop specific job skills. It will also assist the Program to determine if a paid work experience is appropriate.
- h. Paid Work Experience: Involves paid, subsidized training in a non-profit, organization, public/tribal agency or private employers. The intent is to increase employability of participants by placing them directly in the workforce. This will ultimately provide them with current work experience, employer references and opportunities to develop specific job skills. Work experience contracts will not exceed a period of twelve months in duration or 1000 total hours.
- i. Subsistence Activities: This may include such activities as: wood cutting/gathering, hunting, fishing, eeling, clam digging, fern picking, brush gathering, beading, basketry, etc. These activities are intended to assist individuals and families in becoming self-sufficiency by meeting household needs.
- j. Substance Abuse Treatment: This activity is necessary for a number of individuals before they can effectively engage in education, vocational training or job search.
- k. Mental Health Counseling: This activity is necessary for a number of individuals before they can effectively engage in education, vocational training or job search.
- l. Domestic Violence Activities: Families and individuals that that experience domestic violence could be referred to the Siletz Tribal CARE Program for advocacy and resources. The Program may also refer victims to the State of Oregon Domestic Violence Program for relocation assistance and other resources. This activity is necessary for a number of individuals before they can effectively engage in education, vocational training or job search. Victims of documented domestic violence will be exempt from meeting the required 26 hours of self-sufficiency activities but the activities they do complete will be countable.

- m. Barrier Removal Activities: This activity is necessary for a number of individuals before they can effectively engage in education, vocational training or job search. Activities can include but are not limited to: Court hearings, work crew, parole/probation requirements, driving tests, wellness/betterment activities, etc.
- n. Transportation Time: Reasonable transportation time will be included in an adult's weekly hours in accordance with C.F.R. 286.80 (b)(2)(1). Reasonable as defined as the realistic length of time that it would take an individual to travel from their home to their worksite or other approved activity, including any necessary stops along the way (i.e. childcare). Travel times will vary on a case-by-case basis. A client who takes the bus will have a considerably different travel time in comparison to an individual who has access to a car.

The Siletz service area covers 11 counties in Northwest Oregon. Many of the rural areas do not have access to public transportation or it may come to the area once or twice a day. The Siletz Administration Office is located 45 miles, one way from where many of our clients reside. The local bus system is free for Tribal members but the travel time round trip could be eight hours or more. When considering the length of time and cost of gasoline, it is only reasonable to credit clients who have the motivation to overcome this barrier.

5. Exemption From Work Requirements:

Unless exempted per the provisions of this section, all adults and minor parents will be required to participate in self-sufficiency activities included on their case plan. Many of those activities are listed in the previous section of this Plan.

a. Exemption Criteria: While the Program requires adults and minor parents to engage in activities intended to move them towards self-sufficiency, it recognized that some conditions and circumstance may limit or prevent persons from benefiting from such engagement. The following is a list of conditions that will exempt participants from work requirements.

- Dependent children age 18 or under who are attending high school or its equivalent (dependent children 16-18 and not attending school and have not attained a high school diploma or GED will be required to seek employment);
- Pregnant females who are:
  - In their last trimester of pregnancy and age 18 or over; or
  - Experiencing medical complications due to pregnancy that prevents active participation. Verification from a medical professional is required.
- Females during the first 12 months after giving birth to a child if there is no other adult in the household to provide childcare. The mother will be required to seek childcare assistance and activities may be added to the case plan starting month 4 after giving birth. Childcare assistance will be provided for all activities required by the Program;
- Persons who must do the following to participate in activities:



- Travel an unreasonable distance from their home, generally classified within a 60-minute commute time or determined by their caseworker; or
  - Remain away from their home overnight (the Program may require overnight attendance if lodging and meals are provided);
  - Person's age 60 or older;
  - Persons determined by their caseworker and approved by the Director to be unable to participate in activities due to their individual conditions or circumstances (i.e. caring for a disabled child, elder care, etc.). Any circumstances involving determinations of disability, physical incapacity or medically related issues will be verified by qualified medical authorities;
  - Victims of documented domestic violence.
- b. Good Cause Criteria for Non-Cooperation of Work Requirements:
- Participants who fail to participate in assigned activities or who fail to accept and/or maintain employment will be subject to disqualifications and receive reductions to their grant amount. They may also be disqualified from participation in other program related activities or components. Good cause for failure to participate in assigned activities includes:
- Transportation failure or is unavailable for a period of time until the situation is remedied. This will be limited to two instances in a one year period;
  - Childcare arrangements are unavailable;
  - Mental or physical illness as verified by a qualified medical professional;
  - Conflicts with required court appearances;
  - Inclement weather of such severity that it prevents travel or that constitute a threat to health and safety;
  - Parole/Probation limitations
  - Family circumstances or issues preventing participation;
  - Misunderstanding of participation requirements (one time only);
  - Single custodial parent with a child under 6 and childcare unavailable. The family must demonstrate an inability to obtain the needed childcare for one or more of the following reasons:
    - Appropriate childcare with a reasonable distance from home or worksite is unavailable;
    - Informal childcare by a relative or under other arrangements are unavailable or unsuitable; or
    - Appropriate and affordable formal childcare arrangements are unavailable.
- The caseworker will determine if the family has applied every effort to secure the childcare in order to engage in work activities. The caseworker will make the referral(s) to the following: formal childcare facilities if appropriate, provider listings from Oregon Department of Human Services, Siletz tribal childcare

provider listings as well as listings available through this Program. The caseworker will make the determination that every effort was made for informal childcare by documenting the family's availability for informal care in the case plan prior to requiring the activities. The caseworker will also make a determination of reasonable distance based on: are they a licensed/insured driver, do have access to a vehicle and is the activity within walking distance to/from public transportation.

Definitions as they relate to childcare:

- Affordable: Classified as rates not higher than the Program childcare rates established in the yearly budget.
- Appropriate: Classified as licensed childcare facilities, licensed homes by the State of Oregon, Childcare Assistance Program or this Program.
- Suitable Informal Care: Classified as in-home providers who must meet the Tribes standard of no felony convictions within the last three years (violent crimes, fraud, theft, crimes against children or sexual crimes). Certain offences may permanently disqualify home providers.
- Reasonable Distance: Classified as within a 60-minute commute time to an activity or as determined by the caseworker.

c. Good Cause Criteria for Failure to Accept or Maintain Employment:

- The work adversely affects the persons health as verified by a qualified medical professional;
- The worksite violates health and safety standards;
- The wage does not meet minimum wage or piecework standards;
- Required hours of work are in excess of what is customary for the job and individual was not compensated appropriately;
- The job is vacant due to strike, lockout or other labor dispute;
- Joining a union is required and the participant has religious objection;
- The job conflicts with the participants current union membership;
- The job referral or employer is discriminatory;
- The job is not approved by a Parole/Probation Officer.

6. Payment of Benefits:

The Program issues on-going cash assistance payments once per month. New grants are issued normally within two weeks of the approval date. Grants are issued on the first of each month or the prior business day if the first falls on a weekend or holiday. Clients are issued their grants on VISA Relia-Cards operated by US Bank. The Tribe has adopted the State of Oregon Income Limits and Adjusted Income/Payment Standards.

7. Underpayments:

In the event the Program determines a client was underpaid benefits they were entitled, we will issue a supplemental payment within two weeks or on the next cash grant, whichever is sooner.

8. Overpayments:

When an overpayment is detected, a Letter of Notification will be sent to the client detailing the amount and cause. Program staff will initiate a Repayment Agreement prior to issuing additional services. Overpayments as a result of administrative error will include terms that do not create undue hardship on the client. If the client is still on services, adjustments will be made in accordance with the Agreement, to grants, stipends and/or payroll until the balance is paid in full. Should a client end services, they will be required to make personal payment until the balance is paid in full. Failure to make payments may result in garnishment of future CTSI per-capita distributions. For non-Siletz members, the Program will write off overpayments if we are unable to recover or the client has not received services for five consecutive years. Additional procedures are outlined in the Policy Manual.

9. Recertification:

The Program will recertify all participants every six months. This will include: New Application for Services, residency verification, home visit (when applicable), income verification, updated case plan / assessment and other items outlined in the Policy Manual. Clients that are engaged in contracts (WEX, OJT and CRT) or Transitional Services will not be required to complete the recertification process when a contract or eligibility period exceeds recertification deadlines.

10. Drug Testing:

In an effort to identify barriers to employment, the Program will conduct drug testing for most components prior to the development of a case plan and services. The State of Oregon has legalized the use and possession of recreational marijuana. The Program will test for marijuana but will have the ability to determine if it causes significant barriers to employment and self-sufficiency.

**O. NON-COOPERATION / DISQUALIFICATIONS**

Disqualifications are intended to induce cooperation with program requirements. A grant disqualification will lead to monetary grant sanctions and eventual termination from the Program. Disqualifications are progressive and the Program has established two separate criteria for clients enrolled in TANF and General Assistance.

<b>TANF Disqualification Levels (Includes child-only)</b>	<b>Course of Action</b> <i>Only vendor payments for rent and utilities can be made during a sanction period. The Program may provide basic needs for the children as needed.</i>
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<b>cases)</b>	A Letter of Notification along with Appeal Rights must be provided to the client within ten (10) calendar days of the proposed sanction.
<b>Level One</b>	Grant reduction of \$50.00
<b>Level Two</b>	Grant reduction of \$100.00
<b>Level Three</b>	Grant reduction of \$200.00. Clients that fail to cooperate by this level will be scheduled for a one-on-one evaluation with Program Staff to determine any additional barriers to address non-compliance issues.
<b>Level Four</b>	Will result in termination of the grant and a 60-day disqualification of cash assistance services for subsequent and continued failure to cooperate with their case plan.

<b>General Assistance Disqualification Levels</b>	<b>Course of Action</b> Only vendor payments for rent and utilities can be made during a sanction period. A Letter of Notification along with Appeal Rights must be provided to the client within ten (10) calendar days of the proposed action.
<b>Level One</b>	Grant reduction of \$50.00
<b>Level Two</b>	Grant reduction of \$100.00. Clients that fail to cooperate by this level will be scheduled for a one-on-one evaluation with Program Staff to determine any additional barriers to address non-compliance issues.
<b>Level Three</b>	Will result in termination of the grant and a 60-day disqualification of cash assistance services for subsequent and continued failure to cooperate with their case plan.

If a grant assistance client received a 60-day disqualification from services and reapplies within 120 calendar days, they will come back on services at the previous sanction level. Failure to comply with the new case plan, referrals or Program requirements will result in another 60-day disqualification. Clients that are off services for longer than 120 calendar days and reapply will come back on with no previous sanctions. The client must have no instances of disqualifications (sanctions) for 12-consecutive months in order to return to the first disqualification level. Disqualifications follow the client if they change program components.

**P. FRAUD**

Applicants or clients who knowingly and willfully provide the Program with false, fictitious or fraudulent information are subject to prosecution under 18 U.S.C. 1001, which carries a fine of not more than \$10,000 or imprisonment for not more than five years, or both.

Examples of fraud include but are not limited to: Collecting benefits for children that are not in the home, failure to report income or resources, failure to report employment or any other situation that may cause ineligibility. The Program may use the following to determine “willful”: Length of time on services, signed Rules, Rights and Responsibilities Form, attendance at orientation, previous instances of disqualifications or fraud, and testimony by third parties. This list is not all inclusive.

The Program will have progressive consequences for fraud determinations. During an investigation, should multiple instances of fraud be identified, it will be combined into one level of fraud. Once the first level of fraud is determined and at a later time another instance of fraud is determined, it will elevate to the second level. The different levels of fraud do not expire and will remain with each adult identified in the household at the time the fraud was determined.

<b>Fraud Disqualifications Levels</b>	<b>Course of Action</b>
<b>Level One</b>	Client and all other adults in the benefit group: One year disqualification from all program components. Clients with children may apply for a child only TANF grant if they meet all other eligibility criteria. Only vendor payments for rent, utilities and basic needs for the children will be approved. Clients will be required to comply with their case plan and program requirements. Failure to comply will result in disqualifications. See TANF disqualifications.
<b>Level Two</b>	Client and all persons in the benefit group: Five year disqualification from all program components. No child only grants will be approved. Should the children be under the care and control of another adult that was not in the household during the instance of fraud, they can apply for a TANF grant if they meet all other eligibility criteria.
<b>Level Three</b>	Client and all persons in the benefit group: Permanent disqualification from all program components. No child only grants will be approved. Should the children be under the care and control of another adult that was not in the household during the instance of fraud, they can apply for a TANF grant if they meet all other eligibility criteria. Fraud determinations will not follow the children.

Fraud determinations must be approved by the 477-SSP Director and Programs I Manager. If the fraud created an overpayment, an Overpayment Agreement must be in place to recover the balance at a minimum of \$100 per month by personal payment or garnishment of future CTSI per-capita distributions. Should the duration of ineligibility end and the applicants have failed to repay the balance in full, an Overpayment Agreement must be completed with the adult(s) prior to being approved for any program component. The minimum payment for reduction on all programs as a result of fraud is \$100 per month.

**Q. APPEAL RIGHTS & DUE PROCESS**

All applicants or clients have the right to make a written request to appeal decisions or actions regarding all matters of their case. All appeals must be submitted in writing and received by staff within ten (10) working days from the date of the Letter of Notification (LON). The LON will state the reason for determination/action and the deadline to submit an appeal. Failure to submit a written appeal by the deadline will render the original decision final and no further appeals will be available. The Program will mail all LON's to the address listed on the Application for Services. Each written appeal must contain the reason for the dispute and why the client disagrees with the decision/action or findings of the staff. Serious instances, such as fraud, will be appealed to the Program Director and not the staff who made the original decision. The Director will determine if an appeal request will bypass the Level One Appeal Policy.

Appeal Levels	Course of Action
<p><b>Level One: Appeal to front line staff</b></p>	<ul style="list-style-type: none"> <li>• Should the client disagree with the decision/action of the staff that made the determination, they must make a written appeal to that staff to reconsider the decision/action. This must be accomplished before the decision becomes final. At any time the client can request that the Director review the action/decision and see if it was caused by administrative error. If found to be administrative error, the original decision/action will be overturned.</li> <li>• Staff must respond to the request and set a conference to be held within five (5) working days from the receipt of the appeal. The client will receive an LON specifying the appointment date, time and location. The LON will not be required if the appeal conference is the same day the appeal is received.</li> <li>• Staff must document the conference and render a decision within five (5) working days. A LON will be mailed to the client detailing the outcome and a copy will be placed in the client file. The decision will include a ten (10) working day appeal period to the Director and include these Appeal Rights.</li> </ul>
<p><b>Level Two: Appeal to Director</b></p>	<ul style="list-style-type: none"> <li>• In the event the client should continue to disagree with the decision/action, the client may appeal to the Director. This must be accomplished before the date of decision becomes final.</li> <li>• The Director shall set an appeal conference within five (5) working days in a location that is convenient for the client. The client will receive an LON specifying the appointment date, time and location. The LON will not be required if the appeal conference is the same day the appeal is received. The conference will be held within ten (10) working days from the appeal request date.</li> <li>• The Director must document the conference and render a decision</li> </ul>

	<p>within five (5) working days. A LON will be mailed to the client detailing the evidence, rules relied upon and the reasons for the decision. A copy will be placed in the client file. The decision will include a ten (10) working day appeal period to the Programs I Manager and include these Appeal Rights. Note: Some appeals may not be appealed further.</p>
<p><b>Level Three: Appeal to Program Manager</b></p>	<ul style="list-style-type: none"> <li>• There are specific adverse actions that will be allowed to be appealed to the Programs I Manager. These are limited to: suspensions, reductions in benefits, overpayments and eligibility determinations.</li> <li>• In the event the client should continue to disagree with the decision/action, the client may appeal to the Programs I Manager. This must be accomplished before the date of decision becomes final. The appeal shall be based upon specific detailed reasons as to why the Director’s decision was incorrect.</li> <li>• The Programs I Manager shall set an appeal conference within five (5) working days in a location that is convenient for the client. The client will receive an LON specifying the appointment date, time and location. The LON will not be required if the appeal conference is the same day the appeal is received. The conference will be held within ten (10) working days from the appeal request date.</li> <li>• The Manager must document the conference and render a decision within five (5) working days. A LON will be mailed to the client detailing the evidence, rules relied upon and the reasons for the decision. A copy will be placed in the client file. The decision will include a ten (10) working day appeal period to the General Manager and include these Appeal Rights.</li> </ul>
<p><b>Level Four: Appeal to the General Manager</b></p>	<ul style="list-style-type: none"> <li>• In the event the client should continue to disagree with the decision/action, the client may appeal to the General Manager. This must be accomplished before the date of decision becomes final. The appeal shall be based upon specific detailed reasons as to why the Program I Managers decision was incorrect.</li> <li>• The General Manager will not hold a hearing but perform a written review of the case record, and evidence presented throughout the appeal process.</li> <li>• The General Manager or designee will perform a review of the records within ten (10) working days of the client request. The reviewer will render a decision within five (5) working days of the review. A LON will be mailed to the client detailing the evidence, rules relied upon and the reasons for the decision. A copy will be placed in the client file.</li> <li>• The decision of the General Manager or designee is final. No further appeal is available to the client within the Tribe.</li> </ul>

## **R. PERFORMANCE STANDARDS / BASELINE MEASURES**

The Program has established baseline measures that include: participant enrollment levels, outcomes, cost standards for programs, report management and budget maintenance. The Tribal Administration has standards that are designed to monitor their responsibilities. This includes maintenance of computerized information systems and subsequent reporting, evaluation and training of staff. The department performance is measured both quarterly and annually. Most reports are prepared by the Director and forwarded to the Programs I Manager for review.

The key advantage of 477 is the ability to greatly reduce and simplify the administrative burden related to the operation of various programs and their respective administrative policies, reports and standards. The more elaborate the range of measurable performance goals become, the more costly the administrative structure, data collection and reporting systems must become. The following goals were selected carefully to ensure that the Tribe continues to manage programs effectively and responsibly while still taking advantage of the opportunity to streamline and simplify administrative systems, reduce costs and expand services to clients.

1. Program Enrollment Levels:

The annual budget will establish projected enrollment levels for each program component detailed under “services to be provided” section of this Plan. Enrollment levels will be monitored internally on a quarterly basis and funds adjusted to meet the need and demand for services.

2. Minimum Average Participation:

The minimum average participation rates for cash assistance clients are included in the “General” section of this Plan. The Program believes that the average participation standards reflect what can reasonably be accomplished by our participant population. Predictably, a significant number of participants will have been out of school and/or employment for a substantial period of time. The Program is also serving a large number of participants with physical, mental and behavioral health barriers. The Program has experienced a significant decrease in the number of TANF families; therefore, keeping the standards the same will require more participation from a smaller population.

3. Entered Employment Rate:

The goal will be for 30% of all participants who have exited the Program to have entered unsubsidized employment by the end of each grant year. This standard is based on the following assumptions and trends: (1) Approximately 65% of participants will require a longer timeframe to complete their respective employment activities and become job ready; (2) Fluctuation of unemployment rates within the 11-county service area. The standard will be measured internally on a quarterly basis. Strategic planning will take place if performance deviates more than 10% of our stated goal.



5. Positive Termination Rate:

The goal is for 35% of all participants who have exited the Program positively at the end of each grant year. The standard will be measured internally on a quarterly basis. Strategic planning will take place if performance deviates more than 10% of our stated goal.

6. Applicant Service Standard:

Applicants will know within five (5) days after submitting a complete application and supporting documentation if their eligibility is approved, denied or pending further documentation. All applicants are provided referrals for other resources and no application is held pending for longer than 45-days unless approved by the Director.

7. Reporting Standard:

All reports required by the incorporated funding agencies or from the Tribal Administration shall be submitted in a complete, accurate and timely manner. The Programs I Manger shall coordinate with the Accounting Department to properly divide the responsibility for the preparation of fiscal reports. Required federal reports are the responsibility of the Director.

8. Audit Standard:

The Tribe hires an independent Certified Public Accounting firm to conduct an agency-wide audit, to the standards of the Single Audit Act. The annual audit is completed and delivered to the General Manager within 45-daus for review. This report includes fiscal and programmatic reviews. Each department director is responsible for the activities under his/hers program. The performance standard of measurement is that no audit findings are attributed to department activities. Additionally, corrective action plans for minor findings shall be developed by the Director and approved by Administration for subsequent implementation. The Tribe also has an Internal Audit Department and these measurable objectives will apply to any audit conducted by that department.

## **S. CONFIDENTIALITY**

All 477-SSP client information is confidential. The Program will take such steps it deems necessary to restrict the use and disclosure of information about individuals and families receiving assistance under the program attributable to funds provided by the federal or state governments. The Program will not release or disclose client information unless authorized by CTSI policy, state data sharing agreements, state funding agreements, administrative rule or by court order.

Confidential information includes but is not limited to all verbal, written, printed and electronic display of data that can identify any specific name or social security number. Confidential data cannot be released in any format, including computer downloads, spreadsheets, or other printed documentation unless specifically authorized by the Director or Programs I Manager, having administrative responsibility of the Program.

All Tribal employees receive training on the CTSI confidentiality policy. All verbal and written information related to a client's eligibility and case is kept in a secure file location. The case narratives and other supporting documentation is also scanned in our case management database that is secured by user log-ins. The content of files is handled by program staff, the Director and Programs I Manager. Other Tribal employees may receive necessary information for the administration of services.

## **T. INFORMATION ACQUISITION AND EXCHANGE**

The Program has various partners and it may require agreements to acquire and exchange information for the successful operation of the Program.

- a. State of Oregon: The Program has established Intergovernmental Agreements with the Oregon Employment Department for access to confidential information. The information we access is necessary for the implementation of job training programs. We also verify employment data to prevent duplication of services and prevent fraud. Further details regarding staff access will be included in the Policy Manual.
- b. State of Oregon: The Program has established a Data Share Agreement with the Oregon Department of Human Services for access to confidential information. The information we access is necessary for the implementation of cash assistance programs. We verify SNAP benefits as well as other services offered by the State. This reduces duplication of services and prevents fraud.
- c. State of Oregon: Through the TANF Maintenance of Effort Funding Agreement, the Program supplies the Oregon Department of Human Services and the Division of Child Support with caseload data and quarterly reports on expenditures. This is imperative to ensure child support assignments are accurate.
- d. Law Enforcement Agencies: The Program will provide information to law enforcement agencies involved in carrying out public assistance laws, investigations, criminal or civil proceedings with approval from CTSI Administration. When notified by law enforcement that a client is a fugitive felon or a probation/parole violator, as defined by the State, and the location or apprehension of the client is within the law officer's official duties, the Program will provide the current address of a client. Otherwise, no information is provided to law enforcement on client case records, conversations or sources obtained because the person is or has been a client of the Program.

## **U. FISCAL ACCOUNTABILITY ASSURANCE / DATA COLLECTION & REPORTING**

For each fiscal year during which the Tribe received or expends funds pursuant to a block grant under Section 412 of Title VI-A Block Grants for Temporary Assistance for Needy Families, the fiscal accountability provisions of Section 5(f)(1) of the Indian Self Determination and Education Assistance Act (25 U.S.C. 450c(f)(1)), relating to the

submission of a single agency audit report required by Chapter 75 of Title 31, United States Code, applies.

The Tribe shall comply with all statutory and regulatory reporting requirements pertaining to all funding sources included in this Plan, unless otherwise waived in accordance with the Indian Employment Training and Related Services Act of 1992, Section 7(c)(d).

## V. BUDGET

The funding included in this budget is from the programs the Tribe has elected to incorporate in this Plan. It includes the following funding sources: Social Services (General Assistance), Workforce Innovation and Opportunity Act (Adult and Youth) and Temporary Assistance for Needy Families (TANF). The State of Oregon provides additional TANF funding and reimbursable expenses for childcare assistance, non-needy caretaker relatives, and TANF work experience. The 2018 budget of available funding is summarized below.

BIA Self-Governance (Social Services)	\$612,185
WIOA Adult	\$395,771
WIOA Youth	\$1,006
TANF-Federal	\$661,625
<b>Total Funds</b>	<b>\$1,670,587</b>

The above calculations reflect an annual budget of \$1.67 million that will be available for services described in this Plan. State TANF funds are not eligible to be included in the Plan but they are a very important to our overall budget. The total of the combined State TANF funds is \$488,054 annually. We included the state portion of funding to give an overall picture of available funding for programming. Notwithstanding any other provision of law, any funds included in this Plan shall be treated as non-Federal funds for the purposes of meeting matching requirements under any other Federal law, except those administered by the Department of Labor and Health and Human Services.

The Tribe recognizes that funding levels are established by a budgetary process that is outside the control of the Tribe and administering federal agencies. Funding formulas are written into grantee guidelines that result in mathematical formal allocation. The Indian and Native American programs receive a certain percentage of available federal funding. Funding may also be allocated based on U.S. Census population data. The Tribe administers its funds by means of a Budget Committee. The Committee is comprised of administrative staff, tribal members who make an application for a volunteer position. The Siletz Tribal Council approves the members of the Committee for terms outlined in policy. The Committee allocates funding for self-governance programs and their recommendation is later approved by Tribal Council.

The carryover of funds from one program year to the next is generally allowed. The Tribe has established performance standards that speak to the proper expenditure, at planned levels,

of 477 funds throughout the year. The Tribe reserves the right to carry funds forward from year to year. Carryover funds will be considered “first in, first out” assuring that funds will not be carried forward for more than two fiscal years.

Individual line items include the following:

- a. Salaries: The Program will be regularly staffed with: (1) Program Director, (5) Tribal Services Specialists, (4) Intake Specialists / Job Coach’s, (1) Compliance Officer.
- b. Cash Grants: Will be provided to clients on a monthly basis to cover basic needs. Clients will receive grants based on their need for services while completing education and/or training activities.
- c. Work Experience: Will be available to any Native American, Alaskan or Hawaiian. Participants will be paid according to the amount of hours they have worked within a two-week period. The positions will be based within non-profit, public and tribal entities.
- d. On-the-Job Training: Will be available to any Native American, Alaskan or Hawaiian. An employer will hire participants and then be reimbursed up to 75% of the participant’s wages.
- e. Classroom Training: Will be available to any Native American, Alaskan or Hawaiian. Participants may utilize this component for assistance with basic education, GED preparation, computer literacy, basic skills development, and higher education or vocational/certificate training.
- f. Supplemental Youth Services: This Program will operate in the summer months and will provide education and employment skills to youth that are Native American, Alaskan or Hawaiian. The Program will target youth that are economically disadvantaged.
- g. Support Services: This shall include but is not limited to the following: work attire, tools/equipment, transportation, shelter, utility assistance and other items needed to remove barriers to employment or self-sufficiency.
- h. Childcare: This service is provided to eligible TANF participants and employed persons who have custody of foster children.
- i. Emergency Assistance: Will be available to Siletz tribal members who qualify. This is a designed to provide one-time assistance to deal with a specific crisis situation or episode of need.
- j. Client Workshops: Expenditures associated with a yearly client conference, monthly workshops in each area office and contract fees for such workshops/trainings.
- k. Incentives: The Program will provide incentives to clients that achieve a significant goal on their case plan. The staff nominates clients and is approved by the Director.
- l. Diverted Services: Funds are made available to prevent eligible participants from coming on assistance.
- m. Direct Placement: Short term support services to assist recently hired individuals address barriers to employment.
- n. Economic Development: Assist local businesses expand or start-up.
- o. Indirect: Charged to wages and salaries only.

## W. PUBLIC COMMENT PERIOD

The Program held a public comment period for the Plan from June 1, 2018 – July 16, 2018 per § 286.75(a)(6). The Plan was made available on the CTSI website, lobby of each area office and publication made available in the CTSI newspaper. The Plan was also made available to all CTSI staff with solicitation sent via email.

## X. LEGISLATIVE REQUIREMENTS

This section will address and identify legislative items found in authorizing laws or regulations that must be complied with in this Plan.

- a. Definitions: Generally accepted terms listed in legislation. All terms defined within the Act will be complied with for determining eligibility.
- b. Performance Standards: Performance standards are required for program activities. Tribal baseline measures are included in this Plan.
- c. Funds for Restriction: All funds will be used solely for the purpose and intent of the Act.
- d. Plant Relocation Prohibitions: No funds will be used for any form of plan relocation.
- e. Training and Tuition Limitations: All training, tuition payments and assistance will not exceed prevailing Tribal minimum wage, nor will any payments for tuition be excessive in nature.
- f. On-the-Job Training Requirements: All OJT contracts will contain the following: outline of training, method and amount of training costs, name of participant, job description, wage rate, reporting requirements, administrative review of the contract, termination clause for non-performance and assurances from the employer they will comply with the Act.
- g. Duplication of Services Prohibition: All eligible clients will be reviewed for duplication of services. Participants will be required to reveal other services they have received or are currently receiving for purposes of avoiding duplication.
- h. Prevention of Program Abuses: Administrative review of all client files will be conducted to ensure program use is appropriate and timely. Internal program controls are in place to ensure compliance.
- i. Fee Charging Prohibition: No fees shall be collected from clients for the enrollment, testing or participation in any and all services provided.
- j. For Profit Limitations: For profit employers will be used solely for the purpose of employing OJT and training WEX participants.
- k. Political Activity Prohibition: No person associated with the Program shall participate in any political activity while performing the duties of their job or program activity. This includes the placement of any participant within sectarian establishments.
- l. Program Income Limitations: All participants must meet the income criteria within the Act to be eligible for services. Participants shall provide income verification for eligibility determination.

- m. Property / Equipment Requirements: No property or equipment will be acquired that exceed designated maximums according to legislative authority.
- n. Benefits: Will be provided to personnel in the administration of the Program. All benefits will be consistent with Tribal standards and will be calculated based upon those standards.
- o. Labor Standards: All labor standards will be applied in the administration of the Program as well as to program participants. All federal, state and local labor standards will be adhered to by staff and administrators.
- p. Grievance Procedure: All participants and staff will be made aware of the grievance procedures outlined in this Plan.
- q. Program Year / Funding Period: All funds will be allocated on a program year beginning October 1 and ending September 30.
- r. Fiscal Controls: All fiscal controls will be operated under the Generally Accepted Accounting Principles. All fiscal accountability will be monitored by the Controller and Administrative Manager for allowable costs and procurement.
- s. Sanctions: Any and all sanctions will be complied with and adhered to according to enacted legislation.
- t. Reports, Record Keeping and Investigations: All reports, record keeping and investigations will be administered through the Central Accounting Office in the Administration Building. Reports will be generated and client records will be monitored by the Director. Investigations will be administered according to the Tribe's Operations Manual.
- u. Nondiscrimination: No person shall be discriminated against because of tribal affiliation, race, sexual orientation, creed or religious conviction.
- v. Criminal Provisions: Any person who knowingly allows another person to commit a criminal act against the Tribe shall be reported to the authorities. A report will also be available to the 477 Division Director and Secretary of Labor.
- w. Grant Procedures: All grant procedures will comply with the Single Audit Act and OMB Circulars A-8 and A-102. Application for grantee status will be maintained and follow the above circulars with regard to regulations and requirements.
- x. Enforcement of Military Selective Service Act: Registration for Selective Service is required for all applicable participants in activities funded under the Act. The Tribe will require all appropriately aged individuals to register or provide proof of registration before services are provided.
- y. DOL Priority of Service Act (Jobs for Veterans Act): The Tribe will comply with the P.L. 107-288 and 20 C.F.R. Part 1010 in regards to the priority of services for veterans and eligible sources utilizing DOL programs. Staff will utilize the handbook issued by the Division of Indian and Native American Programs to ensure compliance with regulations.

## Y. 477-SSP Asset Review Chart

Type of Assets	Income			Resources	
	Exclude	Countable		Exclude	Countable
		Earned	Unearned		
Adoption Assistance <i>(Child is excluded from benefit group)</i>	X				
Alaska Permanent Fund Dividend					X
Animals <ul style="list-style-type: none"> <li>Pets raised for food</li> <li>Income-producing</li> </ul>	X X				
Bank Accounts					X
Foreign Currency <i>(can be converted to U.S. currency)</i>					X
Cash & Cash Contributions			X		
Census Earned Income <ul style="list-style-type: none"> <li>TANF</li> <li>GASA</li> </ul>	X	X			
Child Support Payments <ul style="list-style-type: none"> <li>Tribe as payee</li> <li>Third party payee</li> <li>Applicant / Client</li> </ul>	X	X X			
Disaster Relief	X				
Domestic Violence <i>(State and Tribal)</i>	X				
Earned Income by Minor	X				
Elder Stipend <i>(Siletz Tribal)</i>	X				
Educational Income Direct to Client <ul style="list-style-type: none"> <li>Title IV / BIA Work Study</li> <li>Other work study/fellowships</li> <li>Other grants / loans</li> <li>Pell/Oregon Opportunity grant</li> </ul>	X  X	X	X		
Foster Care Reimbursement <i>(Child is excluded from benefit group)</i>	X				
Gifts / Winnings <i>(Casino prize/cash)</i>			X		
Home and Contiguous Property <ul style="list-style-type: none"> <li>Primary residence</li> <li>Non-primary residence</li> </ul>				X	X
Inheritance <i>(Cash)</i> <ul style="list-style-type: none"> <li>Month received</li> <li>After month received</li> </ul>			X	X Up to \$2500	X Over \$2500
In-Kind Income	X				
Life Insurance – To Beneficiary			X		

Type of Assets	Income			Resources	
	Exclude	Countable		Exclude	Countable
		Earned	Unearned		
Loans ( <i>Cash on hand</i> )			X		
Lodger Income ( <i>tenant income</i> )			X		
Per-Capita Payments <ul style="list-style-type: none"> <li>TANF</li> <li>GASA</li> <li>Other Tribe's Per-Capita</li> <li>Dependents on TANF</li> </ul>	X		X	X Up to \$2500	X Over \$2500
Personal Injury Settlement <ul style="list-style-type: none"> <li>Monthly Payments</li> <li>Other</li> </ul>			X		X
Recreational Vehicle Equity					X
Refunds from Rental Deposits					X
Royalties			X		
Sale of Primary Home <ul style="list-style-type: none"> <li>Reinvest in home (3 months)</li> <li>Proceed not reinvested (periodic)</li> <li>Proceed not reinvested (lump-sum)</li> <li>Interest not reinvested (periodic)</li> <li>Interest not reinvested (lump-sum)</li> </ul>	X		X		X
Sale of Resource (not home) <ul style="list-style-type: none"> <li>Excluded resource</li> <li>Not reinvested in excluded resource (3 months)</li> <li>All other resources</li> </ul>	X				X
Self-Employment ( <i>less costs</i> )		X			
Social Security Disability ( <i>SSD</i> ) <ul style="list-style-type: none"> <li>TANF (<i>included in ben. group</i>)</li> <li>GASA</li> <li>Representative payee fee</li> <li>Retro payment to eligibility</li> </ul>	X		X		X
Spousal Support			X		
Supplemental Social Security ( <i>SSI</i> ) <ul style="list-style-type: none"> <li>TANF (Inc. in benefit group)</li> <li>GASA</li> <li>Representative payee fee</li> <li>Retro payment to eligibility</li> </ul>	X		X		X



Type of Asset	Income			Resources	
	Exclude	Countable		Exclude	Countable
		Earned	Unearned		
Stocks, Bonds, CD's, Other Securities					X
Strikers' Benefits				X	
Tax Refunds <ul style="list-style-type: none"> <li>Federal/State: income/property</li> <li>Earned income credit (EIC)</li> </ul>	X		X		
Unemployment Insurance Benefits			X		
Utility Allowance Paid to Client			X		
Vehicle: Equity Value (one vehicle only)				X Up to \$10,000	X Over \$10,000
Veterans Benefits	X				
Spinal Bifida Payments for Children <ul style="list-style-type: none"> <li>Other monthly payments</li> <li>Other periodic payments</li> <li>Other lump-sum payments</li> </ul>	X X			X	X
Vocational Rehabilitation Payments <ul style="list-style-type: none"> <li>Payment: Food/shelter/clothing</li> <li>Stipends: Cash-in-hand</li> <li>Wages</li> </ul>		X	X X		
WIOA <ul style="list-style-type: none"> <li>Adult WEX/OJT</li> <li>Summer Youth WEX/CRT</li> </ul>	X	X			
Workers Compensation <ul style="list-style-type: none"> <li>Monthly or periodic payments</li> <li>Lump-sum</li> </ul>			X		X
Work related equipment & inventory Equity & wholesale value of inventory					X