

Spokane Tribe of Indians 477 Master Plan

October 1, 2021 – September 30, 2024

DRAFT

Spokane Tribe of Indians
477 Master Plan
Employment and Training

Section One – Programs to be integrated

The Spokane Tribe of Indians proposes to integrate the following programs under this Indian Employment, Training and Related Services Consolidation Act of 2017, referred to as the Employment and Training Mast Plan (ETMP). Unless otherwise indicated, all programs were integrated as of January 1, 2006. The provision of services are blended and complemented, without duplication, by other non-federal funds whenever possible.

Department of Labor

- Workforce Investment Act (WIOA) – comprehensive adult services
- Workforce Investment Act (WIOA) – supplemental youth services

Bureau of Indian Affairs

- Higher Education
- Johnson O'Malley
- Job Placement & Training
- General Assistance and portions of BIA Social Services

Health and Human Services

- Tribal Temporary Assistance to Needy Families – employment, education and training services
- Child Care and Development Fund—Both Mandatory and Discretionary

Implementation Date and Duration of Plan

Plan's duration will be October 1, 2021 through September 30, 2024

The Spokane Tribe will also pursue incorporating other programs as they become available.

Section Two – Consistency with Act

The STOI's mission is to create and maintain a comprehensive program to provide opportunities to our participants through the provision of education, training, and employment services for Native Americans residing within the Tribe's service delivery area. Our mission is carried out through the consolidation of federal funding, training and employment programs, and related services included in our ETMP. This plan demonstrates how we, as a tribal organization, integrate these federal program activities and services to improve their effectiveness by reducing unemployment in our communities while exercising

organizational, goals that are in accordance with our vision statement and the policy of self-determination.

Section Three – Eligibility – Tribal Authority

Through P.L. 93-638 of the Indian Self-Determination and Education Assistance Act defines this Tribe as eligible to receive benefits under such act. Therefore, the Spokane Tribe of Indians is recognized as the appropriate Tribal Authority and governing body for the services. Through P.L. 102-477 of the Indian Employment, Training and Related Services Demonstration Act, which authorize the integration of employment, training, and related services provided by Indian tribal governments.

Section Four – Geographic Service Area and Economic Description

The Spokane Tribe of Indians is a federally recognized Indian Tribe located on the 159,000 acre Spokane Indian Reservation in a remote portion of northeast Washington State. The Spokane Reservation is rural in character located 50 miles away from the nearest urban area of Spokane, Washington. There are three distinct communities on the 35-mile wide Reservation: West End, Ford, and Wellpinit. The on-Reservation population is 2,094, of which 1,661 are enrolled Tribal members (2012 U.S. Census). Total tribal member enrollment as of March 2013 was 2,839. There is a significant off-reservation population of Tribal members who reside in the City of Spokane.

The Reservation was established in 1881 by Executive Order of President Rutherford B. Hayes. As established, the Reservation contained 159,000 acres. As in the past, natural resources are protected by the Spokane Indians. The Spokane Indian Reservation consists of 108,874 acres of forest, 8,552 acres of agricultural land, and 10,328 acres of lakes. The town of Wellpinit is the main population center and the seat of Tribal government. The terrain of the Reservation is generally forested mountains, with water forming three of its boundaries. Tshimikin Creek is the eastern border, the Spokane River is the southern border, and the Columbia River is the western border. Until Grand Coulee Dam was completed on the Columbia River in 1940, the Spokane people relied on migrating salmon runs as the mainstay of their diets, and indeed, as a central focus of their cultural practices, and their economy.

According to written history, the Spokane Tribe originally lived on three million acres of land in eastern Washington. The Spokane Indians fished the Spokane River used the grand Spokane Falls as a gathering place of family and friends. The Spokane's lived along the river in three bands known as the Upper, Middle and Lower Spokane Indians. In January of 1881, President Rutherford B. Hayes, by executive order, formally declared the Spokane Indian Reservation as the new and much smaller home of the Spokane Indians. The three bands of Spokane Indians were split up and some found new homes in other areas, such as the Coeur d'Alene Indian

Reservation, the Flathead Indian Reservation, and the Colville Indian Reservation.

At present, there are several indicators that portray significant distress among tribal members and in the community. The tribal unemployment rate is 58.1%. The poverty rate is 32.7%, and per capita income is only \$14,287. In contrast, the unemployment rate in Washington State is 10.8%, and the poverty rate is 13.4% (U.S. Census, 2012). These family stressors have deleterious effects on family functioning and cohesiveness, leading to increased rates of domestic violence, poor learning skills and school attendance among children, intensified use of drugs and alcohol, and increased incidence of crime.

However, Spokane Indian tribal members and families remain resilient and continue to maintain close family ties and cultural connections. In order for the Tribe to thrive and survive there must be a strong and enhanced infrastructure of support services, social and economic development to create to support healthy families with access to living wage jobs and support services.

Service Area

The STOI ETMP Program service area and population continues to be defined as American Indian/Alaska Native families living on the STOI reservation and Stevens, Lincoln, Adams, Whitman, Spokane and Pend Oreille Counties, excluding the Kalispel Reservation and Kalispel tribal members in the service area, and Colville Tribal members residing in Stevens and Lincoln County.

Section Five – Goals of the Employment and Training

The Tribe establishes the following goals for its Employment and Training program:

1. Integrate the Tribe's employment, education and training related services in order to improve the effectiveness of those services and maximize available resources.
2. To reduce joblessness among Indian people within the Tribe's service delivery area.
3. To serve Tribally determined goals consistent with the policy of Tribal self-determination and self-governance.
4. To provide priority of services in job training and placement services to all eligible Veterans and Spouses according to the Public Law 107-288, Job for Veterans Act.

Each of these goals is consistent with the intent of Public Law 102-477.

The Tribe also intends to incorporate the following special objectives in the 477 plan:

1. To facilitate the growth of existing and creation of new business, jobs and economic development within the Tribe's service delivery area so as to bring jobs to the Spokane Indian Reservation, and job opportunities to those on public assistance. Resources will be used in ways allowable under this plan while adhering to applicable federal rules and regulations to support this objective.
2. To build on client strengths leading to a successful, self-sufficient way of life within the local workforce, and encouraging and assisting in building healthy families by reducing dependency on tribal/government subsidies.
3. To address the needs of Indian families within the Tribe's service area/population that is currently dependent on public and tribal assistance. The Tribe will provide program services to assist Indian families in obtaining higher education, training, job placement and support to reduce dependency on government subsidies.

The Spokane Tribe has a long successful history of using all available resources from Federal, State, and Tribal funding sources to support the development of its' people and their success in the workforce.

The Spokane Tribe's history of employment and training services dates back to 1975 with the implementation of the U.S. Department of Labor's (DOL) Comprehensive Employment and Training Act (CETA) program. It has successfully operated DOL-funded Indian employment and training programs since. The Workforce Investment Act (WIA) adult and youth programs are under the American Indian Community Center's program and the Tribe's portion will be moved directly to the Spokane Tribe through this 477 plan. The current WIA program serves adults and youth on the Spokane Indian Reservation or within a 55 mile radius of the reservation. Eligibility for adult services in the comprehensive plan for 102-477 when WIA funds are applied will comply with 20 CFR Part 652 et. al., Part 668, subsection 668.300, eligibility for youth services in the comprehensive plan for 102-477 when WIA funds are applied will comply with 20 CFR Part 652, et al, Part 668, subsection 668.430.; clarification of economic development: economic development funds of WIA, will be used for training activities related to microenterprise development services; WIA administrative expenses will not exceed the limitation of 15% as set forth, and the Tribe will comply with that cap.

The Spokane Tribe currently operates Tribal Temporary Assistance to Needy Families program which encompasses six counties in northeast Washington State. The six counties served consist of Stevens, Lincoln, Adams, Whitman, Spokane and Pend Oreille Counties, excluding the Kalispel Reservation and Kalispel tribal members in the service area, and Colville Tribal members residing in Stevens and Lincoln County. The average client caseload for 2013 was 123 assistance units served out of the Wellpinit Office and 359 units served out of the Spokane Office. We are in our eleventh year of operation. The Spokane Tribe will provide quality services to the clients in the areas of cash assistance, barrier

removal, support services, workshops, and promotion of healthy families. In addition to the named services being transferred, the Tribe will also include services for youth in prevention, promoting education, and Employment & Training. In calculating Tribal TANF administrative costs under the 102-477 demonstration, The Spokane Tribe of Indians will use the definition in 286.5 and follow the limitations under 286.50 of the Tribal TANF regulations. Indirect costs are subject to the cap and provisions of the approved indirect cost negotiation agreement. The Spokane Tribe of Indians will provide budget breakdown in service categories which makes up how the TANF funds are spent subject to the four purposes of TANF. Under the 102-477 demonstration, TANF funds may be used for economic development activities which must be approved in advance by ACF.

The Tribe currently operates the Child Care and Development Funds, both mandatory and discretionary. See section twelve for further details regarding that program.

The Tribe contracts the Bureau of Indian Affairs Adult Vocational Training, Higher Education and JOM programs under Public Law 93-638. The programs are administered through the Tribe's Higher Education Program. Services available for higher education are earmarked for Spokane Tribal members. The Employment and Training will link AVT and JOM programs to serve additional Indian people.

This plan also includes the BIA General Assistance program. The Spokane Tribe will integrate the GA program into the current employment and training programs to maximize resources by making employment preparation services along with various support services available to eligible clients, and as funding permits. The program is currently administered by the Bureau of Indian Affairs – Spokane TANF Program. The Tribe will comply with the requirements in 25 CFR Part 20, which addresses the General Assistance program. We also recognize there are unemployable individuals, and their needs will be addressed through activities within Employment & Training services. The Spokane Tribe will serve only those clients that are not eligible to receive services from any other federal, state or local service agency, and proof of ineligibility will be included in the client file. Clients served under Employment and Training will be given access to services for which they are eligible. The Tribe's GA service delivery area includes Spokane, Lincoln, Stevens and Pend Oreille Counties of Washington State. The funding associated with the administration of the GA program will also be included in the plan. The policy on GA employment will be as follows;

- Employable clients must actively seek employment including the use of available state, tribal, county, local or Bureau funded employment services unless otherwise exempt under the authority of (Section 20.315).
- Employable clients must make satisfactory progress in an ISP.
- Case reviews for General Assistance eligibility will be completed every 3 months for employable and unemployable General Assistance clients.

- Case reviews for General Assistance eligibility must be completed every 6 months for all recipients and whenever there is a change in status that affects a client's eligibility or amount of assistance.
- Redetermination for GA includes (1) a home visit (2) an estimate of income, living circumstances, and household composition; and (2) appropriate revisions to the client's case plan and ISP.
- The payment standard for General Assistance is based on the STOI TANF payment standard for a one or two person grant (made up of cash and housing assistance if eligible) and may include any associated ratable reduction that exists in the State or designated service area where the client resides.
- A determination of Need and Income for General Assistance will consider all income and resources. In addition, all income, earned and unearned must be calculated in the month it is received and as a resource thereafter if converted to cash.

Section Six – Comprehensive Strategy

The strategy is based on the Spokane Tribe of Indian Vision Statement, "Our vision is to achieve true sovereignty by attaining self-sufficiency. We will preserve and enhance our traditional values by living and teaching the inherent principles of respect, honor and integrity as embodied in our language and life-ways. We will utilize effective stewardship of our human, financial and natural resources. We will develop strong leadership through education, accountability, experience and positive reinforcement."

The Spokane Tribe of Indians' home is located on the Spokane Indian Reservation in northeast Washington State. The Tribe's ceded territory spans one quarter of the northeastern part of the State. The Tribe's main office is located in Wellpinit, Washington, approximately 45 miles northwest of Spokane. The Spokane Indian Reservation is bordered by the Spokane River to the south, and Lake Roosevelt to the west. The city of Spokane is the nearest metropolitan area with an airport, train station, bus depot and major interstate highways. The Tribe's remote location is beautiful and pristine.

The Tribe's service area has traditionally been a 50-mile radius of the exterior boundaries of the Reservation. The Tribal TANF program operates in six counties of northeastern Washington. Because of the remoteness of the Spokane Reservation, access to childcare, transportation and education services has limited local residents' ability to pursue work off the Reservation. The local labor market is made up of Tribal government, small Tribal enterprises, Indian Health Service clinic, Bureau of Indian Affairs Agency, Wellpinit School District, and two Tribal casinos.

Section Seven – Services and Expected Outcomes

The Spokane Tribe's services included in this 477 plan will be fully integrated. There will not be any distinction on how Indian people are treated on the basis of the source of funding for services. All Indians in similar situations will receive access to the same services on the same terms.

The client services process will include the following steps in the flow of clients through the program:

1. Introduction to umbrella of services and eligibility standards for the purposes of fulfilling program requirements.
2. Intake
3. Assignment to Caseworker/Career Development Specialist
4. Assessment/Wellness Review
5. Individual Success Plan Development
6. Establish expected outcomes leading to employment, and self-sufficiency.

The Single Intake

The Spokane Tribe's Welfare programs and Employment and Training will use a single intake system for all clients. It will collect the necessary documentation and information to determine eligibility.

The intake will be used to establish eligibility for program services available. Once the initial intake is complete, the Intake or Customer Support Specialist will assign the client to the Caseworker/Career Development Specialist who will then be responsible for establishing the Individual Success Plan with the client.

All adults and youth served through the Tribe's Employment and Training must meet the following general requirements:

- Be an enrolled member of this Tribe, a member of another federally recognized Tribe or an Alaskan Native.
- In the case of serving youth ages 7-24 through summer and annual Youth Activities, the youth or child must to be within a Tribal TANF assistant unit and/or a Spokane Tribal member, member of a federally recognized Tribe or Alaska Native, or a first line descendant of any federally recognized Tribe. Income eligibility may apply depending on the source of funding and through TANF funding must demonstrate meeting purposes 3 and 4.
- In the case of serving youth ages 14-18 (in High School) for education, training and employment (summer and yearly), the youth or child must to be within a Tribal TANF assistant unit and/or a Spokane Tribal member, member of a federally recognized Tribe or Alaska Native, or a first line descendant of any federally recognized Tribe. Income eligibility may apply depending on the source of funding.
- In the case of serving youth ages 14-21 for education, training and employment living on the reservation would qualify for WIA youth funding.

Eligibility requirements for General Assistance:

The applicant does not have sufficient resources to meet the essential need items of food, clothing, shelter, and/or utilities based on Federal Poverty income guidelines. The applicant must apply concurrently for financial assistance from other state, tribal, county, local, or other federal agency programs for which he/she is eligible before receiving General Assistance. Upon receiving denial verification from other agencies and unemployment, GA eligibility is determined. The employee policy does not apply to persons who meet the following criteria:

- Anyone younger than 16
- A fulltime student under the age of 19, He/she is attending an elementary or secondary school or a vocational or technical school equivalent to a secondary school and is making satisfactory progress.
- A person enrolled at least half time in a program of study under Section 5404 of PL 100-297 and is making satisfactory progress, he/she was an active General Assistance recipient for a minimum of 3 months before determinate/redetermination of eligibility.
- A person suffering from a temporary medical injury or illness, it is documented in the case plan that the illness or injury is serious enough to temporarily prevent employment, the assessment is documented in the case plan
- An incapacitated person who has not yet received Supplemental Security income assistance, A physician, psychologist, or social service worker certifies that a physical or mental impairment (either by itself, or in conjunction with age) prevents the individual from being employed.
- A caretaker who is responsible for a person in the home who has a physical or mental impairment. A physician or certified psychologist verifies the condition. The case plan documents that: the condition requires the caretaker to be home on a virtually continuous basis; and no other appropriate household member is available to provide this care.
- A parent or other individual who does not have access to child care. He/She personally provides full-time care to a child under the age of 6.
- A person for whom employment is not accessible. There is a minimum commuting time of one hour each way.

Eligibility requirements for specific services are included in the Spokane Tribe of Indians' designated policy and procedures manual which may include: TANF Policy and Procedures, WIA Youth and Adult, General Assistance, Higher Education Policies and Procedures, which include Vocational Services and JOM, Childcare and Youth services.

General Assistance applicants have an option to apply for services if he or she believes they are eligible; or a person can apply on behalf of another person. This can either 1) be completed in person by completing an application and/or through an oral interview with the case worker. All applications will be approved or denied based on eligibility information within 30 days from the date of the application. A written notice to the applicant of approval or denial within 45 days from the date of application date will be mailed. The written notice will provide a reason for the decision and provide the applicant/clients with instructions on how

to appeal the decision. If there is a change in the clients' benefits or services, the program must notify the client of the change as well as his/her right to appeal the decision.

Corrective underpayments will be made for the total General Assistance cash grant entitlement for the payment month determined eligible and will be distributed the month following determination. Overpayments will be taken out of the next 6 consecutive payments as to not create undue hardship on the client when the overpayment is a result of an administrative error. When the overpayment is due to fraud or false reported information the client will be terminated immediately for six months minimum or until repayment is recouped by the client following the six months of termination. The payment recouped will be due in lump sum amounts through notification in writing to the client. All findings of over or underpayments will be provided in a written notification to the client within 10 days of determination.

The General Assistance application will list notice to the applicants that if they knowingly and willfully provide false or fraudulent information they are subject to prosecution under 18 U.S.C. section 1001(25 CFR 20.607)

Applications for services will be processed at the TANF/Employment and Training Division offices in Wellpinit or Spokane (depending on mailing address and where the children attend school or what is most convenient for the client to receive services). The one-stop type of program will ensure clients are served in a convenient, efficient method.

The Assessment Process

All clients who are determined eligible for program services will be assessed to determine needs. Career exploration, learning styles, and occupational interest will be used to determine level of need during the initial appointment with CW/CDS. Clients will be required to obtain a high school diploma or GED before vocational or academic training is offered. Clients will be able to both pursue GED and job search activities. The exceptions are:

- Documented learning disabilities; and/or
- Clients who are over the age of 55.

Testing may be administered on-site by a qualified staff member or services may be contracted to obtain professional and quality testing either through private organization or an educational facility.

Prior to referral to appropriate services, all clients will be interviewed by the Caseworker/Career Development Specialist. It is in this initial meeting that staff will develop, with the client, the Individual Success Plan (ISP) along with description of services available as well as client responsibilities and programmatic responsibilities regarding service delivery (timely notices, appeal process, complaints, ect.). The CW/CDS will coordinate and maintain contact with client for all program services available in the region.

The ISP will include goals such as obtaining a valid driver's license/identification, GED certificate, high school diploma, and/or any appropriate education and training goals leading to employment and self-sufficiency. Included in the ISP will be obtainable benchmarks by which progress will be measured.

The client will be assigned to the Caseworker/Career Development Specialist to coordinate program services, develop the ISP, and guidance to the client through the various stages of obtaining their goals of employment, training and education. These services may include job preparation skill development, job obtainment/placement, and job retention services in addition to GED, higher education and vocational type training.

The CW/CDS will inquire and assist the client in identifying life challenges that may be preventing the client from obtaining employment and reducing dependency from Tribal/Government subsidies. The CW/CDS will offer services that will assist the client in overcoming life challenging situations by offering program services. The approach will be based on guidance through rather than intervening directly.

General Description of Services Offered

Sequential or concurrent enrollment in a variety of program services will be used in accordance with the client's ISP.

Adult Services – are designed to provide individuals who meet eligibility requirements with a variety of program services necessary to prepare for education and/or employment.

Included are:

1. Remedial education
2. Occupational/vocational training
3. Tribal higher education services
4. Supported work services
5. Prevention and diversion
6. Employment services (job skills training, professional license, special tools or equipment, transportation, driver's license/non-DUI or criminal fines, vehicle repair, auto insurance, remedial medical/dental, clothing, grooming hygiene).

Youth Services – in general are intended for individuals age 7 to 24. These services may include and will operate out of a number youth centers to ensure access to services on and off the Spokane Indian Reservation.

1. Remedial education and tutoring services
2. Supported work services and career exploration
3. Youth leadership services

4. Prevention and diversion through education or learning activities.
5. Culture teachings and activities
6. Fitness and Nutrition

Services in Support of Tribal Economic Development – is designed to address the Tribe's lack of jobs on or near the Spokane Indian Reservation. Services may include:

1. Training of clients in industry specific skills including but not limited to flooring, carpentry, electrical, equipment operation, and plumbing apprentice programs.
2. Management support training for potential managerial positions as well as training needed for small business development and management.
3. Purchase of special training equipment, trade related tools, clothing, safety items, etc needed for training and employment placement.
4. Economic and business development services – Including but not limited to initial and ongoing general and specific management skills training.

Expected Outcomes and Accountability for Program Results

The annual report, including the narrative on program accomplishments, will be presented to the Tribal Council and reviewed by Tribal Compliance to insure accountability of program staff for results under this program.

The Tribe adopts the following performance standards for each of the three full years of this Plan (January 1, 2015 through December 31, 2017). The annual standards for years subsequent to year one may be modified by the Tribe with notice provided to the 477 Office in the Bureau of Indian Affairs.

1. Job Placements of not less than 50 adult participants
2. Job Placements or Placement in approved work activities for not less than 50 assistance recipients
3. Higher Education completion of 75% of approved participants, approved for one full academic year, will complete one year of their program.
4. Youth participants assisted through the employment or remedial education program, 75% will remain in school, or return to school.
5. Successful support for at least one on-reservation and one off-reservation major economic development project through job creation. This is in addition to microenterprise and small business development programs.

In addition to the proposed performance standards, the Tribe expects services to clients to improve considerably. Support services for employment, job retention and post-employment will enhance the client's ability to maintain self-sufficiency and remain off assistance programs. Support services will include but not be limited to clothing and tools, gas, vehicle maintenance or repairs, tires, insurance and other needs associated with securing or retaining employment or training.

The Spokane Tribe expects better coordination of services throughout the Tribal system, and maximizing resources.

Eligibility for Services

Eligibility for TANF assistance for services is established in the Tribe's approved TANF plan and TANF Federal and State funds will be spent in accordance with the approved TANF plan.

Only needy families, as defined in the TANF plan, may receive: (a) any form of Federally or State MOE funded "assistance" (as defined in 45 CFR 286.10); or (b) any benefits or services pursuant to TANF purposes 1 or 2, regardless of the purpose served. "Needy" means financially deprived, according to income and resource (if applicable) criteria established in the TANF 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 CFR 286.10) to individuals and family members who are not financially deprived but who need the kind of services that meet TANF purposes 3 or 4. Federal TANF services include services for non-custodial parents which will enhance the non-custodial parent's employability and therefore assist the non-custodial parent's ability to contribute to their family needs; and may also include services to first line decedents of any federally recognized Tribe as it pertains to youth employment services. Objective criteria will be established for participation in these programs.

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

Section Eight – Projected Revenues and Expenditures for 2012

This is a brief overview of the budget portion of the ETMP, including a description of the assumptions involved in revenue projection, a description of the cost categories used, the definitions of administrative costs, and a brief discussion of administrative and indirect cost issues.

Anticipated Revenues

Anticipated revenues are shown on the following page for the 12-month period from October 1, 2021 through September 30, 2022. All figures are anticipated revenue.

Anticipated Expenditures

Anticipated expenditures are for the 12-month period from October 1, 2021 through September 30, 2022. All figures are projected expenditures.

Expenditures are grouped into seven service categories including administrative costs.

The program categories of services are: Education, Employment and Training, Child Care Services, Youth Services, Culture Case Management, and Administration. The Administration Service category includes indirect cost. Additional services available to TANF clients at each Site include services for food stamps, medical, and childcare administered by Washington State.

The plan proposes a set of services for Economic Development. They are described in previous pages.

As described, these services will not violate any regulations in programs included in the Plan.

Administrative Expenses

Administrative expenses are defined as including all costs not directly associated with program services. The projected total administrative expense for the ETMP is expected to be approximately 13% of all expenditures. The Tribe's indirect cost plan calculates indirect costs on all program expenditures excluding line items such as service agreements > \$5k, honorariums, cash grants and support services. The approved rate for FY 2021 is 10.43%.

Anticipated Revenues

Anticipated Revenues: October 1, 2021 to September 30, 2022		
Program	Anticipated Revenue	Basis for Estimate
Non-638 Programs		
WIOA - Comprehensive Services	\$39,610.00	FY 2019 Budget
WIOA – Supplemental Youth Services	\$23,557.00	FY 2019 Budget
Child Care Development (Disc)	\$418,719	FY 2019 Budget
Child Care Development (Mand)	\$79,209.00	FY 2019 Budget
Federal TANF	\$8,403,229.00	CY 2019 Budget
Subtotal Non-638 Programs	\$8,964,324.00	
638 Programs		
Adult Education Training	\$636.00	FY 2019 Budget

Higher Education	\$136,195.00	FY 2019 Budget
JOM	\$22,162.00	FY 2019 Budget
General Assistance	\$30,190.00	FY 2019 Budget
Contract Support	\$51,908.00	FY 2019 Budget
Subtotal 638 Programs	\$244,026.00	
Total Anticipated Revenue	\$9,208,350.00	

Anticipated Expenditures

Anticipated Expenditures: October 1, 2021 to September 30, 2020		
Category	Anticipated Expense	Percentage of Total
Employment	\$1,234,677.00	13%
Case Management	\$4,382,277.00	48%
Child Care Services	\$6,061,842.00	66%
Youth Services	\$3,716,154.00	40%
Education	\$2,432,833.00	26%
Employment and Training	\$378,900.00	4%
Culture	\$420,781.00	5%
Total	\$18,827,474.00	202%
NOTE: The Tribe's anticipated expenses exceed anticipated revenues by \$9,419,124.00. The Tribe has an unmet need in the category of Employment.		

Section Nine – Program Management

Employment and Training is an integrated set of employment and training related services provided by The Spokane Tribe of Indians. As a tribal program, the Council has the final authority to establish goals and policies of the program, and to oversee its implementation.

The Education Program has established a JOM committee consisting of parents of children attending local schools and community members. The JOM Committee revised the Education Plan to ensure approved programs are being implemented. The EP also includes those areas as required by Section 273.18. The JOM Committee is authorized through the Spokane Tribe of Indian's Business Council Resolution.

The Tribe consists of a five (5) member Council. Terms for the Council are three (3) years and are staggered on an annual cycle. The Chairman is elected at large, and the Tribal Business Council typically designates and assigns a council member to guide programs such as this. The designee along with the Executive Director will review progress.

Responsibility for the program ultimately rests with the governing body of the Spokane Tribe. However, the technical expertise rests with the program with oversight by the Deputy Director who reports to Tribal Business Council. To ensure coordination, the Division Director will establish and maintain a working relationship with the council designee(s) and the Deputy Director.

The responsibilities for implementing this ETMP are assigned as follows:

477 will be the department to administer the programs within the ETMP. It will be responsible for all education, employment and training, youth services as described in this plan. Staff working with eligible clients will be housed within the 477 Division. 477 will have two offices, one on the Spokane Indian Reservation, Stevens County - Wellpinit, Washington, and an office in Spokane Washington. .

In addition, 477 will work closely with the following departments:

- Tribal Finance and Accounting – to coordinate check requests, voucher system, purchasing, property management and inventory
- Tribal Economic Development Team – to coordinate entrepreneurial services and business development
- The Airway Heights Master Plan Task Force – to coordinate training and development of potential staff for the project
- Tribal Credit and Economic Development – to coordinate business and economic development services
- Tribal Health & Human Services – to coordinate counseling for clients and family members
- Tribal Head Start – to coordinate child care services, and
- TERO and other Tribal Programs – to coordinate employment opportunities, that may include OJT, WEX
- Tribal Enterprises and Casinos – to coordinate employment opportunities and training potential staff for jobs

- Sovereign Foods Program
- Culture and Language Program

Employment and Training will also work the following agencies that are outside the Tribal structure, most times without a charge to the program:

- Indian Health Service – to receive medical and dental services when appropriate
- Local public school district(s) – to coordinate youth activities and tutoring services
- Upper Columbia United Tribes – to share employment announcements and other information to Tribes in this region
- American Indian Community Center – to coordinate services, refer clients, receive referrals for services to the urban Indian community
- Native Project – to coordinate services, refer clients, receive referrals to the urban Indian community
- Community Colleges of Spokane – to continue our collaboration to provide higher education and vocational training services
- Spokane Tribal College – to develop and implement a Native Skills Center along with pre-entry coursework and any client surveyed interests.
- Local Native American vendors for speaker services, workshops, catering, ceremonial, and activities
- State, Regional and local transportation departments – to develop and further transportation services for clients and other community members
- Spokane Workforce Council - a network of community partners, committed to providing effective, accessible and high-quality career, talent pipeline development, and skills acquisition services for all individuals and businesses in the Spokane County region.

Section Ten – Assurances and Certifications

The standard Assurances and Certifications are attached.

Section Eleven-Child Care and Development Fund (CCDF) Requirements

Statement to Administer

The Tribe will continue to operate the *Child Care and Development Fund* program, both the mandatory and discretionary funds, under its E&T Master Plan within the Family Child Care Assistance Program (FCCAP). The additional funds allocated to the Tribe under public law 116-136 Coronavirus Aid, Relief and Economic Security Act (CARES Act); public law 116-260 Coronavirus Response and Relief Supplemental Appropriations Act (CRRSA Act); and public law 117-2 American Rescue Plan Act (ARP Act) will be incorporated throughout the plan. The Spokane Tribe of Indians agrees to follow the provisions of the Child Care and Development Block Grant Act of 1990, as amended and applicable regulations at 45 CFR Parts 913 and 99. Additionally,

the Tribe will continue to meet the assurances and certifications provided by the CCDF and the E&T Master Plan for the entire plan period. The Tribe previously submitted the required triennial Child Count Declaration (see Attachment A). The Spokane Tribe certified that the number of Indian children under the age of 13 as defined in the CCDF section of the E&T Master Plan who reside on or near the Reservation or within the service area is 4,223. The Tribe will take extra precautions to ensure children are not dually counted with neighboring Tribes also operating as a CCDF Grantee. Those Tribes are contacted via email and/or telephone to develop plans to ensure children are not dually counted. The CCDF Program will continue operations as the Spokane Tribal Family Child Care Assistance Program.

Description of Services

The CCDF Program will offer parents/guardians the choice of all of the following types of child care categories under the FCCAP utilizing a voucher system:

- Center-based child care;
- Family home provider child care; and
- In-home/Relative child care (exempt)

The CCDF Program will enable low-to-moderate income parents, parents receiving Temporary Assistance for Needy Families (TANF), families whose children are receiving protective services, and those families transitioning from public assistance in obtaining quality child care in order to participate in legal employment activities, approved and accredited educational or training programs, approved job search activities, and approved TANF activities. Additional families outside these categories considered to be low-income households MAY BE served as funding permits, but not at the expense of those families described above. In addition, a percentage of the funds must and will be used to enhance child care quality and availability. Priority will be given to those families either ineligible to receive child care subsidy through Working Connections Child Care or whom are assigned an obsessive copayment amount.

Results

As a result of providing quality child care services to those families listed above, we expect to observe an increase in the following areas related to education, training, and employment:

- Increase in parents/guardians enrolling in and completing 1) GED or High School certificate program, 2) college or trade school courses, 3) all levels of college degree programs;
- Increase in parents/guardians sustaining employment and becoming self-sufficient;
- Increase the percentage of young children attending Head Start as well as improved attendance rates;

- Increase the percentage of young children ready for Kindergarten by offering training to all providers;
 - Increase in children and families receiving referral or resource services;
- and
- Decrease in the number of families for which child care is a barrier to attend college, training courses or attend work.

Agency/Agencies Involved in the delivery of CCDF Services

The Spokane Tribe FCCAP office will be responsible for the delivery of CCDF services under the E&T Master Plan. There will not be any other agencies responsible for the actual delivery of CCDF services, although there will be coordinated activities in which Tribal agencies will provide services to children and families through a resource and referral processes. Those agencies are listed below.

As a result of coordinated activities with the agencies listed below, the Spokane Tribe of Indians FCCAP is able to receive and assist with providing services to benefit the children and families throughout our service area. Following are the results of those coordinated efforts:

- Department of Health and Human Services will provide services related to Behavioral Health, Children and Family Services, Community Services, Prevention, Parent-Child Assistance and Advocacy, Domestic Violence, Adult and Youth Chemical Dependency, Birth-to-Three, LIHEAP, Health Education, Women Infant and Children (WIC) for both children/families;
- The Head start Program will receive services from the Spokane Tribal Child Care Center-Based Program to provide child care to any enrolled child from the Children of the Sun Head Start Program before and after Head Start school hours for qualified CCDF clientele as space allows;
- The Wellpinit School District, LEA, will provide services related to education needs of the children in which CCDF serves;
- Spokane Tribal 477 E&T will provide families a choice of child care providers for Employment and Training Program clients to complete Work First assignments, training or job searches when space allows;
- Spokane Tribal 477 E&T will provide services related to employment and training for both youth and adults. Including, youth services and activities at the Reservation Community Youth Centers and the Spokane Youth Center to children age 5 and up, career development services, support services, GED or tutoring for pre- and post-secondary education students, and higher education assistance;

- Wellpinit Indian Health Service (David C. Wynecoop Memorial Clinic) will provide immunization records for eligible children, training on health issues for providers and clients;
- The Spokane Tribal Employment and Training Licensing Specialists will offer support to approved providers with health and safety needs and training.

The above programs will work together to develop 1) a comprehensive plan for CCDF services, 2) eligibility policies and procedures, 3) communication to include any common families, and 4) understand any trends within the community to improve services to the children and families served through the CCDF program.

Payment Rates

Approved rates are set at 5% above current DCYF subsidy rates. These approved rates are updated annually in conjunction with the approved rate increases by the Washington State Department of Children Youth and Families (DCYF). See *Attachment B* for current approved DCYF rates for child care services. All authorizations will be calculated at 5% above the DCYF rates according to provider, region, type, child age, and provider participation with Early Achievers (Washington State's quality, rating and improvement system).

Summary of Facts for Rates

Other than relative care, Tribally Certified or Licensed Child Care Providers are the only local source of child care available. The Tribe utilizes DCYF rates established for the various types of providers available as a base. The providers eligible for a rate increase due to Early Achievers participation will receive this increase through our subsidized voucher program. The additional 5% increase implemented within our plan is designed to assist providers with increasing the level of quality care provided.

State Median Income

See *Attachment C* for the State Median Income Matrix Monthly (SMI)

See *Attachment D* for the State Median Income Chart (SMI)

See *Attachment E* for the Federal Poverty Guidelines

Sliding Fee Scale

See *Attachment F* for the Income Eligibility Worksheet with sliding fee scale calculations. The sliding fee scale and family co-pay attachment indicates the FPL rate of up to 300% will continue to be utilized. Additionally, the program will continue to apply a per child co-payment instead of a family co-payment. This will ensure fairness to families with fewer or additional children needing assistance. For those families with two providers, the family copayment must be paid to the primary provider.

Application Prioritization

Due to any extensive need for services, a CCDF waitlist system will be implemented as needed. *Attachment G* shows the prioritization system utilized. This system will remain in effect for prioritization of new applicants.

Definitions

Indian Child means any unmarried person under the age of 13, or up to age 18 if incapable of self-care due to a physical or mental condition who is also **1)** a member of any federally recognized Tribe, or **2)** is the direct descendant of an enrolled Tribal member of any federally recognized Tribe (biological child), or **3)** is eligible for membership in the Spokane Indian Tribe. Enrollment with the Kalispel Tribe is not considered per the request of the Kalispel Tribe of Indians.

Indian Reservation or Tribal Service Area client eligibility is dependent upon residency: the Tribe's service area is defined as living on the Spokane Indian Reservation or within the counties of Stevens, Lincoln, Adams, Whitman, Spokane and Pend Oreille; excluding the Kalispel Reservation and Kalispel Tribal members within their service area at the request of the Kalispel Tribe.

Narrative Description of Quality Efforts

The Tribe monitors the quality of care offered on the Spokane Indian Reservation by maintaining contact with licensed family home and center providers; performing initial and monitoring inspections of health and safety standards (family home and center providers); and obtaining self-certification checklists for exempt (relative and in-home) providers. Self-certification checklists must be agreed upon by both the provider and client.

The training and technical assistance needs of the providers served by the Child Care Services office under the STOI CCDF program are following:

Health and safety compliance, infant/toddler development, behavior management, working with children with special needs or disabilities, working with children in protective services, working with children in foster care, emergency preparedness and response, and supervision of children.

These needs are based off of the provider request as well as licensing monitoring visits. The Tribe will focus on training needs for providers, including youth center staff working primarily with school age children. Additionally, the Tribe will focus on improving the quality of care by offering supplies/materials to providers in areas of non-compliance.

Health and Safety Requirements

Please see *Attachment H* (Spokane Tribe of Indians Health and Safety Requirements worksheet) regarding all mandatory health and safety requirements. The Tribe will budget to ensure a minimum of 9% of funding

expended in 2022 and 10% in 2023 is allocated to improve quality of care. Monitoring of all programs both off and on reservation is completed utilizing the Washington State Minimum Licensing Requirements. Upon approval of the final draft of the newly updated CCDF Health and Safety Standards, these will also be maintained at all sites located on the Spokane Indian Reservation. The Spokane Tribal Licensing Specialist is responsible to ensure these are maintained at all times.

Pandemic Modifications

In recognition of the current Coronavirus (COVID-19) Pandemic, the Tribe is adding supplemental allowances should the pandemic continue into the term of the new Triennial plan. The Tribe will implement any pandemic allowances not requiring a waiver or plan amendment. Any plan allowances requiring amendment or waiver will be reviewed at that time.

Section Twelve— TANF

The goal of Employment and Training TANF Program is to promote and support tribal children and their families in reaching their full potential; becoming healthy, productive and self-sufficient. As much as possible, the E&T TANF Program will be offered in a way that:

- Protects and benefits Tribal children;
- Respects and preserves the culture, values and traditions of the Spokane Tribe of Indians;
- Gives families access as well as input into the full range of programs and services they need; and
- Promotes self-esteem, independence and self-sufficiency.

Progress for the TANF goals will be measured by the percentage of families eligible for Food Stamps that receive them. Increase in the number of health and wellness activities offered in the youth programs. The employment retention rate will measure the length of time TANF recipients who found jobs stayed.

Program Description

The E&T TANF Program will be administered using a family assistance model. Each eligible adult in the family unit will be assessed by the case manager for employment skills and barriers to gain self-sufficiency. The family assistant unit (AU) will develop an Individual Success Plan (ISP) with their case manager that outlines the AU's rights and responsibilities of the E&T TANF Program. The Program will assist families in obtaining services including, but not limited to, the following: family preservation, education, vocational training, job readiness training, work experience, on the job training, employment barrier removal

services, child support collection assistance, chemical dependency treatment, child care, mental health counseling, food insecurity removal, emergency pandemic assistance through short term non-recurring assistance, elimination of food insecurity and other identified resources to meet the needs of the family.

Families will be determined eligible if they meet income asset guidelines and are a part of E&T TANF services area and eligible service population. Cash assistance will be provided.

Basic cash assistance will be paid once a month. Basic assistance support services will be provided as needed.

Basic assistance support services may include, but are not limited to, the following:

- Job referral and placement services
- Job search assistance
- Job counseling
- Personal and family counseling, including: domestic violence prevention; child, elder, and spouse abuse prevention; financial; health and hygiene; etc
- Substance abuse counseling
- Substance abuse treatment
- Mental Health Assessment
- Transportation
- Driver's Education
- Know your rights
- Child Care
- Elder Care
- Initial screening for qualification for other related programs and services i.e. JTPA WIOA, WtW, NEW, Food Stamps GA, Higher Education
- Referrals to other tribal, state, and local support services and related employment and training programs.
- Health service systems referrals
- Housing referrals and assistance
- Clothing, tools and equipment needed for training or to get or retain a job
- Books and supplies for job-related educational activities
- Educational counseling, services, and programs, including, Adult Basic Education and GED
- Traditional cultural support activities
- Supplies and materials for participation in on-site workshops
- Incentives for participation in workshops relating to prevention, education, culture, Health and Fitness, surveys, and/or any other activity required by the Individual Success Plan (ISP) that will lead to self-sufficiency. The incentives are available to the approved TANF service population. The qualification for incentives is included in the Spokane Tribal 477 Policies and Procedures which include verifiable documentation. The limits of incentives will be reasonable and clearly associated with the completed workshop/activity. The incentives are requested by the case worker/youth

- coordinator/career development specialist and processed by another individual who is solely responsible for issuance of gift card incentives which are documented in the TAS software system.
- Medical services related to removal of barriers to employment, training, or job-related education not covered by Medicaid, Indian health Services or Tribal health services or insurance.
 - Other items and/or services considered essential for participation in work activities, employment, training or job-related education.
 - Subject to the availability of funds, the E&T TANF Program may provide support services to non-custodial parents for the purposes of assisting this individual to start or enhance child support payments to the family and can only be provided to a family receiving Tribal TANF benefits. Support services under this category may include: transportation assistance, training, job search and readiness activities, employment, required personal tools, equipment, and uniforms, union fees and dues, job/business licensing requirement.
 - Subject to the availability of funds the Spokane TANF Program may use TANF funds to fund Individual Development Accounts for individuals eligible TANF assistance as per 45 CFR 286.10 (b) (5) and 45 CFR 286.40

College and vocational training will continue to place eligible students in local college and vocational programs leading to employment.

The State of Washington will continue to administer the Medicaid and Food Stamp programs. Our links with the State will continue to insure that all eligible families are receiving these services until the STOI assumes these services.

Transitional Support Services will also be provided, for a period of twelve months, the twelve months of transitional services is a lifetime limit and is a total from all previously opened cases if any, and as funding permits for families who are no longer receiving cash assistance services due to sufficient income level, both earned and unearned. These services will include case management services to assist with childcare, job training, education and child support collection assistance. The E&T TANF Program will provide these services in order to assist families to remain self-sufficient, but is not the exclusive provider of these or related services. The E&T TANF Program will provide non-recurring benefits according to 45 CFR, Section 286.10. The right of tribal families to equitable access to non-TANF Federal and State services, including childcare is not waived.

Subject to the availability of funds, the Spokane Tribal TANF Program may provide Diversion Services. Diversion Services or diversion benefits are a cash payment and/or support services normally associated with providing benefits and services to families who meet the following eligibility requirements; 1) are not currently TANF recipients, 2) are at risk of becoming dependent on the TANF program, 3) are in need of one-time or limited benefit(s) to help them avoid dependency on TANF, and 4) who do not need, by their or the program's determination, or want to become a "regular" TANF client, i.e. an assistance unit

receiving monthly cash assistance, requiring ongoing support services, and necessitating the adult members of the family to engage in work participation activities 5) the amount of assistance provided is equal to 4 months of cash assistance the family would qualify for if they were a regular TANF client. Diversion services are usually; 1) a one-time, lump-sum, cash grant provided in lieu of monthly payments, 2) are not intended for families who have readily available resources, or accessible means of meeting their current needs, and 3) are not intended to be provided on a repetitive or scheduled basis. Eligible Diversion assistance for a particular service cannot span successive years of service to camouflage "assistance" under another label.

For diversion and NRST benefits participants the threshold is 250 percent poverty. This allows families who may be making a living wage and who do not normally need ongoing assistance to manage an economic crisis.

Administrative Costs

The STOI will limit the administration costs to the maximum amounts allowed per 45 CFR, Section 286.50 as approved by ACF.

Service Area and Population

Service Area and population is defined as the ETMP service area and population.

Eligibility

To be eligible to receive services under this ETMP:

1. The family must reside in the defined service area and include a member of a federally recognized tribe and provide proof of enrollment and residence; and
2. The family must include one of the following in the home:
 - a. A dependent child who has not attained 18 years of age;
 - b. A dependent child who has not attained 19 years of age and is a full-time student in a secondary school (or in the equivalent level of vocational or technical training) or
 - c. A pregnant woman.
3. All school aged children up to age 18 must be engaged in an approved educational program.

Dependent children for purposes of this plan means:

1. Biological children;
2. Adopted children
3. Step-children;
4. Relative children/children for which the adult in the home is the legal guardian/caretaker.

Eligibility as Related to the Purposes of TANF

Eligibility for TANF assistance and services is as established in the Tribe's approved ETMP.

Only needy families, as defined in the TANF plan, may receive; (a) any form of Federal or State MOE funded "assistance" (as defined in 45 CFR 286.10); or (b) any benefits or services pursuant to TANF purposes 1 or 2. "Needy" means financially deprived, according to income and resource (if applicable) criteria established in the ETMP 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 CFR 286.10) to individuals and family members who are not financially deprived but who need the kind of services that meet TANF purposes 3 or 4. Objective criteria will be established for participation in these programs.

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

Time Limits

The intent of the E&T TANF Program is to assist families to self-sufficiency. There shall be a lifetime limit on assistance under this plan of 60 months. The Tribe will count prior months of assistance, from any State or Tribe funded with TANF block grant funds, except for any month that was exempt or disregarded by statute, regulation, or under any experimental, pilot, or demonstration project approved under section 1115 of the Social Security Act.

As provided in 42 U.S.C. 608(a)(7), the Tribe will disregard any month during which the participant lives in Indian Country in which at least 50% of the adults are not employed.

As required by 286.115 the Tribe will not count towards the time limit 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.

Hardship Exemption

The E&T TANF Program will exempt families that suffer extreme hardship, as defined by the Tribe, and families in which members have been battered or subject to extreme cruelty per Section 286.120. The hardship exemption will be limited to 20%. Family Units or recipients may be exempt from applicable

time limits due to hardship as that term is defined by the STO including, but not limited to families which include members who have been subject to:

1. Physical abuse or physical acts that resulted in physical injury.
2. Sexual abuse or being forced to engage in non-consensual sexual acts or activities.
3. Threats of, or attempted, physical or sexual abuse.
4. Mental abuse
5. Neglect or deprivation of medical care.
6. Other extreme hardship cases, as defined by the Tribe.

Pursuant to 45 CFR Section 286.140 the STOI hereby elects the Family Violence Option as a part of its ETMP. The STOI TANF Program has established and is enforcing standards and procedures pursuant to 45 CFR 286.140 (a)(1),(2), and (3).

Financial Requirements

The STOI believes that financial incentives will help families from becoming dependent on the TANF income assistance.

All income in the AU will be counted toward the family assistance limit except in the case of a relative or other child placement. All income both earned and unearned in the AU will be counted towards the calculation of the family AU grant amount. Non needy relative or other child placements will be considered as "child only" cases with assistance provided only to the child and thus the relative or guardian income will not be counted.

Income Assistance Limit and Eligibility Matrix

Youth Number in Household	Income Assistance/Limit
1	\$363
2	\$459
3	\$569
4	\$670
5	\$772
6	\$877
7	\$1013
8	\$1121
9	\$1231
10	\$1338

All income both earned and unearned with the exception of those listed below is counted as monthly income. Earned income is defined as any legal income that is taxable under the United States Tax.

In order to encourage adult family members to work and earn income and improve the lives of their children, the STOI will disregard the first \$300 of earned

income and 50% of each dollar earned up to twice the grant amount each month in order to calculate the TANF grant amount. A needy family is defined as a family with a dependent child(ren) and whose income is such that after all the income disregards have been calculated the family would be eligible to receive a monthly cash grant.

Financially eligible families will be limited to a resource limit of \$5,000 for the entire family unit. Resources exempted from this limit will include: the house the family resides in, vehicles, and equipment needed to maintain, or obtain, employment.

Cooperation with Child Support

The Spokane Tribe will condition eligibility for E&T TANF assistance on assignment of child support to the Tribe. E&T TANF program will retain 100% of the child support collections to reimburse the program expenditures, with any amount exceeding the cash grant distributed directly to the client. Any amounts generated under an assignment and retained by the Tribe will be used by the Tribe's TANF program to serve the four purposes of TANF.

If cooperation poses a threat to a client, such as identification of the whereabouts of a family member who has reason to be concerned for hi/her safety of that of his/.her children, then a good cause exception will be granted.

Program Income

The goal of the E&T TANF Program is to promote and support tribal children and their families in reaching their full potential; becoming healthy, productive and self-sufficient.

Any program income generated by the TANF program will be used in accordance with the four purposes of TANF, for allowable TANF services, activities and assistance.

Economic Opportunities

Currently the principal employer for the Tribal families is the Tribe and its enterprises, casinos, logging, Public Works, and small businesses.

Major employers in the defined STOI service area include service industries, school districts and tribal and other government agencies/programs.

Participation Requirements:

The expectation is that all adult family members will be engaged in an appropriate activity while in the E&T TANF Program with the exception of non-needy relative or "child only" cases. Single parent family TANF households will be required to participate a minimum of 20 hours a week. In two-parent households, the total family participation will be 30 hours per week. Parents in a

two-parent family may share the number of hours required to be engaged in work. The number of shared hours must be agreed upon by each parent and the case manager and stated in each person's ISP. Eligible teen parents who do not have a GED or high school diploma will be required to attend school as their work participation.

Because of the limited employment opportunities on the Spokane Indian Reservation, and in the surrounding area, improving the education and employment skills will be the primary focus. All families applying for cash assistance who are required to participate will be assessed for education and employability. Individuals who do not have a GED or high school diploma will be first assisted in completing the GED or high school diploma prior to engaging in other employment related participation.

Activities counted as work toward the work requirement may include:

1. Subsidized Tribal employment
2. Employment]
3. Subsidized work in private sector
4. Non paid tribally approved work experience activities
5. On-the-job training
6. Job search activities per 45 CFR, Section 286.105 of the regulations
7. Participation in a job readiness program per 45CFRR, Section 286.105 of the regulations
8. Traditional self-employment such as fishing, hunting and gathering
9. Traditional subsistence gathering
10. Vocational training
11. Driver's education
12. Job skills training
13. Education related to employment with successful milestones
14. GED completion training
15. High school course work
16. Provide child care
17. Teach cultural activities
18. Internships
19. Employment barrier removal activities, such as counseling and chemical dependency treatment.
20. Transportation time: Reasonable transportation time will be included in an adult's weekly hours in accordance with CFR 286.80. Reasonable is defined as the realistic length of time that it would take an individual to travel from their home to their work site as defined in the Spokane Tribe's 477 policy and procedure, including any necessary stops along the way (i.e. childcare, schools). 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 owns a car.

The Spokane Indian Reservation is one hour from Spokane, Washington where higher education and employment opportunities are more readily available and one hour from Colville, Washington where food, childcare,

and medical services can be made available for clients residing in Stevens County. Individuals living in Ford and West End of the Spokane Indian Reservation, Washington may be required to commute as much as 35/45 miles round trip in order to get to and from the Wellpinit TANF office. To ride the transit bus from any point in Spokane to get to and from the urban TANF office can be up to a two hour, one-way transit commute. In considering the length of time and cost of gasoline, it is only reasonable to credit clients who have motivation to overcome the hurdle of travel time. Experiencing and enduring a commute is a large step towards understanding what it will take to commute to and from a jobsite in order to become self-sufficient.

21. Community service volunteer in an established community or non-profit service organization.

Job Creation Activities

Establishing educational and job training programs for eligible clients that address the needs of local businesses, provide support for client in gaining and maintaining employment through supportive services such as transportation, work expense and child care, providing subsidized employment for youth and consulting with other tribal departments promoting economic development as well as incentivizing existing businesses to hire and train clients.

Work Experience (WEX) Clients:

WEX placements will be made as appropriate and available for clients who have completed our basic requirements of the E&T Program. STOI E&T TANF clients who have completed their GED or high school diploma may apply for WEX placement. TANF clients must have completed workshops appropriate for professional placement such as Dependable Strengths and Job Readiness, exceptions may apply for clients who have some experience working in the field or have taken the workshops within the past 12 months. The Spokane Tribal E&T TANF program will sign a "work Site Agreement" that will include a job description, training plan and client goal sheet.

The WEX placement can last up to four months for a regular WEX position and up to twelve months for an apprentice WEX position. Placements will be with employers who are willing and able to train individuals in a certain trade or skill. WEX participants will be provided an hourly stipend rate from the TANF program which is dependent on the type of WEX placement. More specifically apprentice WEX positions will receive an hourly stipend rate that differs from all other WEX placements. Actual hourly rates are defined in the 477 Policy and Procedure Manual. Income earned from the WEX will be treated as a stipend and will not be deducted from the cash grant. Clients will only be placed in a WEX position that aligns with a job skill or trade that they are interested in. All WEX placement are monitored and supervised to ensure maximum benefit of the client. TANF clients on WEX agreements must follow all Tribal Policies and Procedures. In accordance with 45 CFR 286.110, client will not fill a position that would or has displaced other workers.

Apprentice Program:

The STOI E&T TANF program will work in conjunction with TERO Sovereign Foods and other local Workforce Councils to provide apprenticeship opportunities for our TANF clients. Client hours will count towards becoming a journeyman in the selected field of apprentice where applicable.

Subsidized Wage Employment:

Subsidized wage positions within a private or public sector will be made as appropriate and available for adult clients who have completed our basic requirements of the E&T Master Plan. The goal of Subsidized Wage employment is to find sustainable employment for TANF clients. Spokane Tribal E&T TANF clients must have minimal to NO barriers, have a GED or high school diploma, driver's license or be able to obtain this within a two month time frame, and have completed all required workshops including, but not limited to, Dependable Strengths, Job Readiness, and resume writing/interview skills refresher. Two phases of subsidized wage employment are available, Phase 1 for clients with entry level skills and experiences in a desired field and Phase 2 for clients who have completed Phase 1 or are transitioning to be hired through unsubsidized wages by the employer. Both Phases are for a maximum of six months placement each. The subsidy rate will be 100% of gross wages and fringe benefits for Phase 1 and 50% of gross wages and fringe benefits for Phase 2. These wages will be paid 100% upfront by the partnering employer and reimbursed by 477 according to the signed agreement. Clients who obtain positions will no longer receive a cash assistance benefit and will be eligible for transitional support services and employment bonuses.

All adult family TANF members receiving E&T TANF income assistance will be required to participate in work requirements and/or employment barrier removal activities unless appropriate activities are unavailable or such persons are exempted by the criteria in the exemption section.

School Participation and Immunization:

Education is identified as one of the highest priorities. The tribe believes that educated people can better withstand the challenges they will face and better protect the future of the Tribe. To that end, all dependent children meeting the applicable minimum school age who are in a family AU receiving TANF basic assistance will be required to participate in an approved educational program during the public school year and meet all immunization requirements for attending school. The failure of parents to comply with this section may result in sanctions or other appropriate referrals as determined by the program.

Youth Services

Youth served through the Tribe's Employment and Training program must meet the following general requirements:

Be an enrolled member of this Tribe a member of another federally recognized Tribe or an Alaskan native. In the case of youth or children Youth Activities, the youth or child need only be the child of a person who is enrolled in this or another federally recognized Tribe or Alaska Native and/or part of a Tribal TANF Assistance Unit, and a descendant of any federally recognized tribe or living on the Spokane Indian Reservation. For youth participant's engaged in the Youth Activities Program, there will not be financial eligibility criteria. Youth Activity Services are offered under TANF 3 – prevent and reduce the incidence of out-of-wedlock pregnancies.

The Youth program is structured to provide school year support, as well as after school and summer programming and thus provide supervision when school is not in session. Supervised youth are less likely to have the opportunity to engage in activities that would result in out-of-wedlock pregnancies. Youth will have access to an array of services including health and wellness to include sports and nutrition, homework assistance, motivational and self-esteem workshops, no your rights, career awareness and higher education seminars, driver's education and cultural/language activities which are all designed to keep the youth in school and motivated to pursue jobs and higher education or post-secondary school. The Youth Program will also offer abstinence programming that includes services from agencies such as Health and Human Services, Gathering of Native Americans, Empire Health Foundations, Native Project and American Indian Community Center. The Youth Program will offer nurse services, counseling sessions and teen pregnancy prevention campaigns.

Youth services offered by the Youth program are generally intended for individuals' age 6 months to 24 years. This program will operate out of a number youth and child care centers to ensure access to services both on and off the Spokane Indian Reservation.

It is the program's intention to group out-of-wedlock pregnancy prevention information and activities according to age appropriate guidelines. The youth Activities Program would be based on a holistic incentive basked approach so that the younger youth would receive services geared toward building a foundation for them that would help the avoid risky behaviors associated with teen sexual activity Therefore, at the younger age group, activities that encourage good school performance (i.e. tutoring and homework assistance at the youths centers), avoiding the use of alcohol by instilling a strong sense of cultural identity though language songs dancing and drumming activities and daily physical activities such as basketball, baseball, soccer, karate, yoga, gymnastics etc. Healthy mental outlooks will be modeled by supervisors and guest speakers. The younger age group would have information presented that addresses appropriate touching, empowering younger children to say no to adult touching associated with sexual abuse which could be linked to promiscuity, poor self-esteem and other risk factors associated with teen sexual risky behaviors that could lead to out of wedlock births. The program would continue to build on this holistic approach an at the next age group (10-14) the program would continue to build off of the service platform described above and add additional curriculum that would be age appropriate. This would continue with the nest age

group (14-18); again, building off of the initial platform but adding age appropriate curriculum. The age (19-24) population would receive services designed to keep the physically and mentally healthy, informed with regards to risky sexual activity, the choice of abstinence, birth control, STD prevention, plus education and job and career guidance that are design to keep them on a path to self-sufficiency, The services described forth 19-24 age group would also be the types of additional services provided for the 14-18 age group with certain modification to ensure that information is age appropriate. The child care programs will focus on appropriate sexual behaviors for children ages 6 months to 12 years, the centers will provide training and resource materials for parents focusing on age appropriate body awareness and building self-confidence. So our children feel confident to learn and explore. Confidence makes it easier for babies and toddlers to move into group situations. Parents will learn what normal behavior is and what behaviors could be a cause for concern. They will receive resources and training on the benefits of nurturing to create a sense of safety and security for their infants and toddlers.

Youth Employment Program

Youth will be eligible to participate in the Summer Youth Employment Program and the Year Round Youth Employment Program. The Youth Employment Program is intended for youth between the ages of 14 and 19 (if the 19 year old is still attending school) and is structured as a subsidized employment program. The Summer Youth Employment Program will be an up to a 10 week program that begins when schools in the service area break for summer which is usually between June and ends in August. The Year Round Youth Employment Program will offer employment opportunities during the school year. The program will provide employment for youth who are enrolled in a Federally Recognized Tribe, or are fist line descendants or are part of a Tribal TANF Assistance Unit. This employment opportunity will provide skills and experience for youth. The subsidy rate will be 100% of wages and fringe benefits. These wages will be paid by a 3rd party that my include Off-Reservation Employers, Enterprise Employers, the Tribe and other Tribal Programs and Faith Based Employers. Youth ages 19-24 and who are attending college may participate in the summer internship program. Youth who are enrolled in a Federally Recognized Tribe, or are first line descendants or are part of Tribal TANF assistance Unit. For youth participant's engaged in the Youth Employment Program, there will not be financial eligibility criteria. Youth Employment Services are offered under TANF 3 – prevent and reduce the incidence of out-of-wedlock pregnancies.

Family Participation Rates

The STOI has had a long history of high unemployment and under employment. The following participation rates represent realistic and appropriate standards.

All Family Participation Rates

Program Year FY 21-22	Minimum Participation Rate 35%
--------------------------	-----------------------------------

Program Year
FY 22/23
FY 23/24

Minimum Participation Rate
35%
35%

The remote location of the Reservation and inadequacy of public transportation limits access to the job market. This lack of available job opportunities results in a high unemployment rate on the reservation. The key to employment opportunities is to provide education, training and work experience to help tribal members complete for available economic opportunities.

Exemption from Employment Responsibilities

The STOI ETMP will require all adults, excluding child only in the TANF family to participate in work activities. In case of hardships the STOI ETMP shall exempt from employment related work participation:

1. Pregnant women in their last trimester;
2. Temporary health disability, physical, mental (as determined by a competent medical authority) and spiritual (as determined by a traditional Tribal healer);
3. Persons over the age of 55;
4. Special circumstances (e.g. (a) care for a disabled child or elder, (b) death in the family, (c) domestic violence or court action, (a) care for a disabled relative who has been determined to require 24 hour care per a medically certified provider or spiritual healer, while alternative suitable care is being sought. (c) caretaker or parent experiencing domestic violence where engagement in work activities could endanger a family member, interferes with the family's ability to escape the violence or its escalation, or interfere with any legal proceedings
5. Lack of adequate child; as classified by child care not above the state of Washington's child care rates; appropriate, as classified by child care facilities and homes licensed by the State of Washing or approve by CCDF child care program suitable informal care, as classified as in-home providers approved by the CCDF child care program; within a reasonable distance, as child are within 30 minutes commuting time of the activity.
6. Students attending college on a full time basis;
7. A parent caring for their child under the age of 6 months.
8. They are experiencing circumstances beyond the family's control that prevents the caretaker from participating in work activities or becoming self-sufficient and the loss to temporary cash assistance would threaten the health or safety of the family.

(Although exempt from employment related work participation other participation, such as attending classes and meeting the needs of the children, may count towards necessary participation.)

Penalties for Failure to Participate

The E&T TANF Program is designed to assist families and not cause undue harm. However, there may be an occasion where an adult refuses to participate in the work responsibilities. Sanctions are intended to encourage cooperation with the program requirements for the individuals who would not cooperate without such sanctions. All STOI TANF customers who receive assistance are required to meet the requirements of this program.

Failure to comply with the requirements will result in an initial written notification sent to the family, unless the failure to comply was due to an appropriate exception. This notification will document the non-compliance issues and corrective actions the adult family members must take. The adult family member will have 30 days to complete the corrective actions.

Failure to complete a 30-day corrective action will result in the adult's share of the cash assistance being withheld for 30 days. All corrective actions must be completed before cash assistance will be restored to the original amount.

Failure to complete the correction action plan after the 30-day reduction in the adult benefit will result in continued reduction of the adult from the program. All corrective actions must be completed before the TANF assistance can be restored.

Failure of the adult to adequately meet the needs of the children shall be reported as required under the Spokane Tribe of Indians Law and Order Code or other child protection laws.

Termination Due to Fraud

The E&T TANF Program can terminate a family due to fraud, such as collecting TANF benefits from multiple sources, providing false income information or failure to report all income. The adult participants can be declared ineligible for a period up to one year. The sanctions under this section can be imposed in addition to any criminal penalties under applicable laws.

Uniform Grievance and Appeals Policy

For clients placed in positions designed to gain work experience, the program will use the Spokane Tribe's Personnel and Policy manual for guidance. Clients placed in O-J-T will use the company's grievance procedures. As it pertains to other matters as far as program administration, the grievance and appeals process is as follows:

An individual who chooses to file a complaint or grievance for STOI 477 Program discrimination, denial of services or misconduct has the right to appeal to the 477/TANF E&T Division Director within 5 working days of the claimant's receipt of the initial notification or contact with the Program... OR,

An individual accused of an intentional program violation has the right to appeal to the 477/TANF E&T Division Director within 5 working days of the claimant's receipt of the initial notification.

Request to Appeal Hearings:

Advance and adequate written notice of all adverse actions will be sent to all customers and applicants within 7 working days. A claimant disagreeing with the proposed Written Response or actions set forth can file a written appeal to the 477/TANF E&T Division Director. This written appeal must be received by the Department Director within five working days of the claimant's receipt of the initial notification. The Director shall provide a written decision to the claimant within five working days after the appeal is received, or, if applicable, within seven working days by mail of the written response.

If the Grievant is not satisfied with the Department Director's written response, the Grievant shall file a separate grievance of the Department Director's written response to the Spokane Tribe's Executive Director for a final determination within five working days of the Department Director's written response, or if applicable, within seven days of the mailing of the Department Director's written response. The Executive Director will issue final decision within five working days of the Claimant's written response, or if applicable, within seven days of the mailing of the Claimant's written response. The Executive Director's decision is considered final.

Additional grievance procedures may exist pursuant to individual funding agencies such as Department of Health and Human Services, Department of Labor, and Bureau of Indian Affairs.

Any questions about or complaints alleging a violation of the nondiscrimination provisions of WIA section 188 may be directed or mailed to the Director, Civil Rights Center, U.S. Department of Labor, Room N-4123, 200 Constitution Avenue, NW, Washington, D.C. 20210.

It contains provisions that will apply to all program participants engaged in any type of activities under this plan. The procedure insures due process and review at levels. It is strongly encouraged that issues be resolved at the staff level to insure operations continue to run efficiently and effectively. However, when not appropriate, the claimant may use the appeal process.

The Tribe has a grievance and appeals procedure applicable to all tribal staff, and it will apply to staff employed by the 477/TANF Employment and Training.

Both grievance and appeal procedures are on file and contained in the Spokane Tribe's Policy and Procedure Manual.

Confidentiality

E&T TANF family information is confidential. The E&T TANF program will restrict the use and disclosure of information about individual families receiving services. The E&T TANF Program will not disclose individual family information except as specifically authorized by the TANF customer, Tribal law, administrative rule, other applicable laws, or as ordered by a court for competent jurisdiction.

Section Thirteen – Tribal Resolution Approving Plan

DRAFT