



477 MASTER PLAN
EMPLOYMENT AND
TRAINING

SPOKANE TRIBE OF INDIANS

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 the 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
- Head Start

Department Of Education

- Vocational Rehabilitation

Department of Commerce

- Low Income Home Energy Assistance Program (LIHEAP)

Implementation Date and Duration of Plan

Plan's duration will be October 1, 2024 through September 30, 2027

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 2,017, of which 1,855 are enrolled Tribal members (2023 U.S. Census). 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 36.1%. The poverty rate is 32.7%, and per capita income is only \$14,287. In contrast, the unemployment rate in Washington State is 4.7%, and the poverty rate is 10% (U.S. Census, 2023). 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, increased incidence of crime, and an increase in unplanned pregnancies.

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 is 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 if there is a member of another tribe living in the household STOI may serve the family.

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 services in job training and placement services to all eligible Veterans and Spouses according to the Public Law 107-288, Job for Veterans Act.
5. Improving network infrastructure through network server upgrades as well as replacing computers, laptops and other electronic devices.
6. Minor renovations as needed, to 477 program offices and buildings including:
 - a. Roof repair
 - b. Window repair replacement
 - c. Install emergency exit windows for safety.
 - d. Floor coverings, tile, linoleum, carpet replacement for safety
 - e. Renovate employee and client bathrooms.
 - f. Active shooter safety preparedness
7. Install surveillance cameras in all 477 buildings to include childcare and youth center classrooms. Install/update fire alarm/suppression systems.
 - a. Early Learning Childcare Centers and classrooms
 - b. Youth Centers and Classrooms
 - c. 477 occupied offices and buildings.
8. Purchase company clothing with a logo for staff. Outreach work in rural areas and during community events.
9. Mental health packets for employees and clients.
10. Develop and assist the JOM Language program to educate and gain fluent language speakers at youth and adult levels to relieve tribal-wide needs.
11. Develop an internship program for juniors and seniors with a declared major and/or minor, or hands-on vocational training students to gain hands-on experience for post-graduation job attainment and success.
12. Develop healthy and culturally appropriate food produced through ecologically sound and sustainable methods, promoting safe and nutritious foods, and increasing access to the same.

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. The goal is to promote the expansion of current businesses and the establishment of new ones, which will lead to job creation and economic growth within the Tribe's service delivery area. The aim is to generate

employment opportunities for those on public assistance and bring jobs to the Spokane Indian Reservation. Resources will be utilized within the parameters of this plan while complying with relevant federal 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. The goal is to provide assistance to Indian families residing in the Tribe's service area/population who are currently reliant on public and tribal financial support. The Tribe aims to offer programs and services that will assist these families in obtaining higher education, training, internship opportunities, job placement, and support in order to reduce their dependence 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 (WIOA) 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 WIOA program serves adults and youth living in the service area. Eligibility for adult services in the comprehensive plan for 102-477 when WIOA 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 WIOA 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 WIOA, will be used for training activities related to microenterprise development services; WIOA 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 unless the household consists of a member of a different tribe STOI may serve them. The average client caseload for 2024 was 90 assistance units served out of the Wellpinit Office and 189 units served out of the Spokane Office. We are in our fourteenth 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 PL 102-477, TANF funds may be used for economic development activities.

The Tribe currently operates the Childcare and Development Funds, both mandatory and discretionary. See section eleven 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 and 477 clients. The Employment and Training will link AVT, Internships, 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 is the same as the service delivery listed under Service Area. 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).**(c)** Accept local and seasonable employment when it is available (§20.314(a)(3)). Suspension will occur if client does not comply with this section, or refuses or quits a job 25 CFR §20.314, and 25 CFR §20.316-§20.319. A head of household who does not comply with sections a-c will not be eligible for General Assistance

for a period of at least 60 days but not more than 90 days (§20.314(b)).

Suspension will be reduced to 30 days if evidence is presented to show that you have sought local and seasonable employment and will only affect the client, not other eligible members of a household (§20.317(b)(c)).

- 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, two Tribal casinos, and hotel.

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 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 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.
- Serving youth ages 14-21 for education, training, and employment living in the service area would qualify for WIOA 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, WIOA Youth and Adult, General Assistance, Higher Education Policies and Procedures, which include Vocational Services, Internship and JOM, Childcare and Youth services. New programs being added that will have policies and procedures designed to meet all regulatory requirements unless otherwise waived include the following; Vocational Rehabilitation, Head Start, and Low-Income Home Energy Assistance Program.

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

Once clients are confirmed to be eligible for program services, they will undergo an assessment to determine their needs. During the initial appointment with

CW/CDS, clients will be evaluated based on career exploration, learning styles, and occupational interests to determine the level of support required. It is mandatory for clients to obtain a high school diploma or GED before they can receive vocational or academic training. Clients will have the option to pursue both GED and job search activities. The exceptions are:

- Documented learning disabilities; and/or

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, etc.). 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).
7. Internship
8. Vocational Rehabilitation
9. Supportive Housing (energy assistance, rent subsidy)

Youth Services – in general are intended for individuals age 3 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 and language 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.
5. Internship opportunities for juniors and seniors, hands on vocational trade, hands on work experience necessary for post-graduation success.

6. Entrepreneurial support systems for multiple trades.

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 ensure 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 (October 1, 2024 through September 30, 2027). 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 20 adult participants
2. Job Placements or Placement in approved work activities for not less than 20 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 FY 2022

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, 2024 through September 30, 2027. All figures are anticipated revenue.

Anticipated Expenditures

Anticipated expenditures are for the 12-month period from October 1, 2024 through September 30, 2027. 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 23.04% 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, and cash grants. The approved rate for FY 2024 is 13.52%.

Anticipated Revenues

Anticipated Revenues: October 1, 2024 to September 30, 2027		
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
LiHeap	\$354,000	
Vocational Rehabilitation	\$300,000	
Head Start	\$3,000,000	
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, 2024 to September 30, 2027		
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 Programs to include the immersion school and Native Language Project.
- The Boys and Girls Club of America, Spokane Tribe intends to fund its Boys and Girls Club activities through its 477 Plan.

Employment and Training will also work with 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
- 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* (“CCDF”) program, both the mandatory and discretionary funds, under its E&T Master Plan within the 477 Family Child Care Assistance Program (“FCCAP”). The Spokane Tribe is classified as a small allocation Tribe under CCDF, 45 CFR 98.80(a)(2016). 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 Corona virus Response and Relief Supplemental Appropriations Act (CRRSA Act); and public law 117-2 American Rescue Plan Act (ARP Act) have been incorporated throughout the plan—the Tribe has applied for the one time retroactive request to utilize these funds for Major Construction. 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

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—see attachment A. 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:

- Center-based child care;
 - Care for children in a licensed early learning center
- Family home provider child care:
 - Care for children in a providers home licensed to care for children
- In-home/Relative child care (exempt)
 - Care for children provided by a family member, friend or neighbor (“FFN”) in either the child’s home or the home of the FFN

The CCDF Program will enable low-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. Additionally, low-income program eligible families 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.

Eligible clients and providers are made aware of CCDF services and supports through public announcements made through the Tribal email listserv, the Tribal Rawhide Press newspaper, social media, advertisement signs throughout public areas in the community, Tribal case workers, Tribally operated child care centers, Tribally licensed child care providers, CCDF eligible providers, by word of mouth, and through our Tribal licensing outreach program.

The Spokane Tribal triennial public hearing regarding CCDF was held in person meeting on May 31, 2024. Notification of the public hearing was provided to the community 20 days prior to the meeting. Notification sources included

Tribal email listserv, social media, Spokane Tribe Website, and the Tribal Rawhide Press.

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, ECEAP or other Early Learning programs as well as improved attendance rates;
- Increase in 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 to maintain a steady schedule for employment.

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 either a community partnership or a resource and referral process. Those agencies are listed below.

As a result of coordinated activities with the agencies listed below, the Spokane Tribe of Indians Child Care Programs both 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 as well as all care providers;
- 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 in

addition to receiving supports to ensure health and safety measures are maintained;

- 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;
- Spokane Tribal 477 E&T will provide services related to employment and training for both youth and adults, youth services and activities at the two Reservation Community Centers and the one Spokane Center to children age 5 on 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 Licensor will complete all monitoring visits as well as conduct client and provider outreach and delivery of services and/or assistance throughout the Tribe's entire service area.
- The licensor will collaborate with the Department of Children Youth and Families ("DCYF") to develop a strong professional partnership in order to maintain all licensing requirements on the reservation. They will also partner with DCYF licensors to ensure that all off reservation providers are maintaining licensing requirements.
- The FCCAP office will develop an MOA with the DCYF to schedule routine annual on site inspections for all licensed facilities on the reservation at least one time annually—these will be scheduled announced licensing visits.

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 center and family home rates are set at 20% above current DCYF subsidy rates for Spokane County. These approved rates are updated annually in conjunction with the approved rate increases by the Washington State DCYF; new rates will be provided to the agency annually following the release of updated rates from DCYF. See Attachment B for current STOI rates. All

rates are calculated at half-day and full-day rates. For families requiring care for more than 10 hours per day, the provider is eligible for an hourly overtime rate for any care provided + in excess of 10 hours daily. Relative/FFN Providers are eligible for a daily or part-day rate set at 20% above the current DCYF approved Relative Provider rate. Additionally, they are eligible for overtime payment for care provided in excess of 10 hours daily. Provider participation with Washington State's Quality and Rating Improvement System known as Early Achievers is considered when calculating provider rates.

Client rates are calculated according to the child's age and which type of care they will receive. Travel time between the provider and the parents' approved location may be authorized for care upon request.

Summary of facts for rates

A survey of providers in this area determined that other than relative care, Tribally Certified or Licensed Child Care Providers are the only local source of child care providers available. The Tribe utilizes the DCYF rates established for the various types of providers available as a base. The providers eligible for a specific increase in rates due to Early Achievers participation are additionally eligible for this increase through our subsidized voucher program, incorporating the tiered rate matrix. All rates are calculated utilizing the DCYF rate for Spokane County. The 20% increase is to assist providers with increasing the level of quality care provided.

The payment rates are adequate to ensure equal access for child care as the State survey shows that 79% of licensed family home providers and 91% of licensed center-based providers in our service area accept and serve children receiving some form of subsidy assistance, Working Connections Child Care was the most widely accepted by licensed centers at 79% and 60% for licensed family child care homes.

State Median Income

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

See *Attachment D* for the Federal Poverty Guidelines (FPL)

Sliding Fee Scale

See *Attachment E* for the Income Eligibility Worksheet with sliding fee scale calculations. The sliding fee scale indicates the FPL rate of up to 300% will continue to be utilized. Additionally, the program will continue to waive implementation of copayments for families eligible under 300% FPL for the duration of the current plan cycle. This will ensure fairness to families with fewer or additional children needing assistance. For those families with two providers, the family will retain care at both locations—families are required to identify which provider will be their primary provider.

Child Only cases will be calculated utilizing only the child's income. A child only case is defined as a child in a protective class such as placement by an agency or court system.

Application prioritization

Due to any extensive need for services, a CCDF waitlist system will be implemented as needed. *Attachment F* 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 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, or 3) is eligible for membership in the Spokane Indian Tribe, or 4) is the biological child of a member of a Federally recognized 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.

Eligibility Criteria

All families are required to submit documentation to determine income eligibility. Families that are deemed above income that will become income eligible due to out-of-pocket child care expenses are eligible to retain services following a three month wait period to determine actual child care expenses.

Children up to age 18 if incapable of self-care due to a physical or mental condition are eligible for services through the Tribe's CCDF Voucher Program.

Families must submit a complete application in order to be considered for child care assistance. Families that apply for Working Connections Child Care and are approved with a family copayment are eligible for copayment assistance. As clients on our Tribal voucher program are eligible for services with no copayment, the Tribe would then process monthly payments to an approved provider for the difference in copayment rates.

Families are required to submit any change in circumstance to the Tribal CCDF office within 30 days of any change in family composition, parent/guardian employment or schooling schedule, custodial matters, contact information (home address/ mailing address/employment change/telephone/email/etc.), or any other major family changes to prevent interruption of services.

Families must complete an updated application for assistance annually to prevent interruption of services.

Narrative Description of Quality Efforts

The Tribe learns about the quality of care offered on the Spokane Indian Reservation by maintaining contact with the following: licensed family home and center providers, performing initial and monitoring inspections of health and safety standards for family home and center providers, and obtaining self-

certification checklists for exempt (relative and in-home) providers that both providers and parents are in agreement of.

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 and to ensure all health and safety needs are met.

Health and Safety Requirements

Please see *Attachment G* 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 throughout the triennial cycle 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.

The Spokane Tribe 477 Family Child Care Services Assistance Program's emergency or major disaster plan is currently under development. It will align with the Spokane Tribe's Natural Hazard Mitigation Plan.

Relative providers have reduced requirements. They are required to complete a background check through Vertical Identity as well as a Tribal and State Sex Offender Registry. This requirement is for all persons age 18+ within the household where care will be provided. Additionally, all approved relative providers are required to maintain current CPR/First Aid certification, Food Handler's, Blood Borne Pathogens, and Safe Sleep training/certification if licensed to care for infants.

The Tribe's Health and Safety requirements are not currently adopted into code or Tribal Law/Resolution. These are currently under development.

Section Twelve – Vocational Rehabilitation

Vocational rehabilitation provides Alaska Native and American Indian individuals with disabilities, including students in transition and veterans, in the STOI Service Area the assistance to advance vocational opportunities that enrich tribal, cultural, and traditional values and promotes independence and self-determined quality of life. Through culturally appropriate services, vocational rehabilitation works to prepare for, secure, retain or regain suitable employment and wild resource and harvest lifestyle that is consistent with individual strengths, resources, priorities, concerns, abilities, and informed choice. The obligations and responsibilities inherent in the vocational rehabilitation program will continue within the STOI 477 plan. STOI facilities are accessible, and have wheel chair accessibility, parking, door entrance, elevator and restroom facilities for people with disabilities.

A. Eligibility Tribal Members must:

1. Be a member of a federally recognized Tribe.
2. Reside in STOI 477 service area;
3. Have a physical or mental impairment that constitute or result in a substantial impediment to employment; and
4. Seek to return the workforce through training and education programs offered in this plan to build their capacity and remove barriers to gain and maintain self-sustainability through quality employment.

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

C. Delivery of Services Upon receiving a request for service or referral, a vocational rehabilitation counselor will contact the applicant and arrange an on-site visit at the earliest convenience of the tribal member for the application review, disability assessment, and eligibility determination. Services will be delivered based on the tribal member's mutually accepted individualized plan for employment (IPE) that will include goals and services to prepare for meaningful employment or wild resource and harvest lifestyle outcomes. Tribal members receive an individualized and consumer-choice IPE from the vocational rehabilitation counselors traveling to the tribal member's community and experience the resources, barrier, and goals are in the environment. Tribal members have a choice of who will assist them achieve their goals, including counseling and guidance from a natural support that is already in their lives and communities. The vocational rehabilitation counselor will obtain signed releases of information authorization from consumers to ensure that these individuals maintain consumer confidentiality, adhere to vocational rehabilitation service

principles and standards, and project policies and procedures. STOI 477 strives to have staff from the STOI 477 service area to assure the cultural and traditional needs are met of tribal members and meet their success to reach and achieve their vocational goals. The STOI VR project assures that our program representatives are able to communicate with applicants and eligible individuals in their Native language as requested or who have limited English proficiency, unless it clearly not feasible to do so, to empower individuals with disabilities to achieve successful employment outcomes and wildlife harvest lifestyle opportunities. Lastly, tribal members that relocate within the STOI 477 service area will maintain their counselor and natural supports. Examples of services include, but are not limited to:

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

D. Outcomes Each year, Vocational Rehabilitation will remove barriers to employment and/or subsistence to 30 eligible American Indian or Alaska Native tribal members, including veterans and students in transition, and 10 tribal members to become successfully employed this year.

E. Partnerships STOI 477 has an established network of partnerships with local agencies and organizations that can provide effective and reliable linkages for tribal members. Through collaboration with various agencies such as the Washington Division of Vocational Rehabilitation and the Indian Health Service contract health, individuals will have opportunities for assistance in vocational rehabilitation services, physical restoration services, such as personal care assistance, independent living skills, cataract surgeries, prosthesis fitting, and hearing aids. STOI 477 staff will continue to facilitate training, continued education, and other professional development opportunities to assist with increased knowledge, respect, and culturally responsive services. Staff are

required in their annual performance reviews to maintain current knowledge of vocational rehabilitation best practices to improve competency, enhance the provision of consumer services, and the continued growth of the tribal vocational rehabilitation program.

F. Quality of management The 477 Site Manager is accountable for all program funds and authorization of allowable expenditures. Consumer satisfaction surveys of current and past vocational rehabilitation tribal members will be used on-going for the purpose of providing review and feedback on matters of general policy development. The STOI 477 Hearing Committee will be used on a case-by-case basis to review policies, obtain feedback on quality of services, issues that arise with individuals with disabilities, and assist in the evaluation of program progress. Case reviews and semi-annual internal and external evaluations of the project will be ongoing. STOI 477 will monitor to measure success towards projected outcomes through entering information and completion of goals in our database.

G. Rights & Responsibilities Tribal Vocational Rehabilitation program follows the STOI 477 Appeal Process Policy. During intake and closure of services, staff provides the applicant with the Tribal Vocational Rehabilitation Policy & Procedure and a Client Rights Form. Consumers are informed at intake of their rights and the program paperwork, during the development of their IPE, and at case closure. The application and the IPE forms contain the local telephone number and address of CAP. Protection, use, and release of personal information STOI 477 safeguards the confidentiality of all personal information of Tribal Members receiving or seeking Tribal Vocational Rehabilitation services.

- Staff are annually trained on Health Insurance Portability and Accountability Act (HIPAA).
- STOI 477 prohibits the release of information without written consent.
- Applications contain how to contact appropriate staff and to access and release information.
 - Files are secured behind badge access doors. Electronic files are password-protected and only accessible to Vocational Rehabilitation staff.
- TAS and TVR Data OPS. Are the databases we will use and have confidential and privacy protections that meet HIPAA standards and safeguard privacy.

Section Thirteen– Low-Income Home Energy Assistance Program

The Tribe requests the Low Income Home Energy Assistance Program under the Tribe's 477 program. The Low Income Home Energy Assistance Program helps keep families safe and healthy by providing initiatives that assist with energy costs. This assistance helps alleviate the risk of families losing their housing assistance due to power being shut off, thereby helping to maintain stable housing. Stability provides the framework for families to grow towards self-

sufficiency in their work, creating stability in school, and maintaining strong family relationships.

Services

Services are as follows: Direct payment to the energy company, wood, pellets, presto logs, gas propane, and fuel, cooling assistance, and crisis assistance. This program will assist Tribal Homes that have been approved by the program via policy with fans and air conditioners, blankets, and space heaters. Priority will be given to vulnerable populations as defined by ACF followed by applicants applying for services.

For applicants to receive crisis assistance, they must provide a shut-off notice from the energy company explaining that services will be disconnected. In regards to assistance with wood/pellets/gas, etc., the applicant must provide a detailed request explaining the circumstances. If the applicant falls within the definitions of categorically eligible, the LIHEAP Program will assist applicants with needs per program policy. The program will assist applicants within 48 hours, as outlined with ACF.

Pursuant to Tribal Policy, There are identified LIHEAP Eligible Clients who may need a Generator in the event of an energy emergency. There are also identified LIHEAP Eligible Clients who need oxygen 24 hours per day. Some tanks are not battery-operated and use electricity. In this event, the program will purchase a Generator. The program also identifies life-threatening emergencies for Elders over 60, disabled residents, and families with children under 6. All emergencies will be addressed within 18 hours or less.

Winter Crisis: \$1,000 Maximum benefit

Summer Crisis: \$800 Maximum benefit

Year-round Crisis: \$1,800 Maximum benefit

Eligibility

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

Families that are receiving SSI, TANF, Means Tested Veterans Programs or SNAP will be considered categorically eligible for all energy assistance categories.

Counted Income includes: Wages, Self-employment Income, Contract income, unemployment insurance, SSA including Medicare deduction, SSI, retirement pension benefits, General Assistance, veteran benefits and child support.

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

Exempt income includes Senior Assistance, per capita payments from natural resources, job training and educational grants.

Priority for assistance will be given to, elderly, disabled, young children and households with high energy burdens.

- a. Elders of the Spokane Tribe (55) and over.
- b. Tribal Members who are disabled.
- c. Young Children under 6.
- d. Households with high energy benefits.

Outreach Activities

The following are outreach activities that are conducted to ensure that eligible households are made aware of all LIHEAP assistance available:

- Place posters/flyers in local and county social service offices,
- Publish articles in local newspapers or broadcast media announcements.
- Letters mailed to previous year's clients.

Section Fourteen – Head Start

The Spokane Tribe proposes to incorporate Head Start as a 477 Program. Head Start is important to add because children who attend Head Start are more likely to graduate from high school and attend college, have improved social, emotional, and behavioral development, and are better prepared to be parents themselves than similar children who do not attend. This foundation will also lead to financial stability, with these children breaking the cycle of generational poverty.

The Spokane Tribe of Indians has one center-based program located on the Spokane Tribe of Indians Reservation in a rural area. The Children of the Sun Head Start has applied to serve a reduced enrollment of 44 students.

Service Area

The service area for Head Start is the Spokane Indian Reservation and surrounding communities.

Eligibility

For families with children living in the Service area, priority is given to low-income, homeless, and foster children ages 3-5 who are not eligible for kindergarten.

Process:

- Conduct an in-person interview with each family, unless not possible or convenient for the family.

- Be at least three years old or, turn three years old by the date used to determine eligibility for Wellpinit School District.
- The family income is equal to or below the poverty line.
- The family is eligible for or, in the absence of child care, would be potentially eligible for public assistance; including TANF child-only payments.
- The child is homeless.
- The child is in foster care.
- 10 percent of the program's enrollment may compromise a child who would benefit from services, or the program has served all eligible pregnant women or children who wish to be enrolled living in the service area
- 35% of the program's enrollment is comprised of families whose incomes are below 130 percent of the poverty line. Based on outreach and enrollment policies and procedures, Head Start ensures that it is meeting the needs of eligible pregnant women, children, and children with disabilities
- Additional criteria listed in the policy manual.

Center-based Option

The Children of the Sun is a center-based school full range of services. Education and child development services are delivered primarily in classroom settings.

(b) Ratios and group size.

- 4 and 5-year-olds- no more than 20 children enrolled in any class. No more than 17 children enrolled in any double session class.
- 3-year-olds- No more than 17 children enrolled in any class.; No more than 15 children enrolled in any double session class.

A program must maintain appropriate ratios during all hours of program operation, except:

- For brief absences of a teaching staff member for no more than five minutes; and,
- During nap time, one teaching staff member may be replaced by one staff member or volunteer who does not meet the teaching qualifications required for the age.

Additional requirements are listed in the policy manual.

Teaching and the Learning Environment

The Children of the Sun Head Start ensures teachers and other relevant staff provide responsive care, effective teaching, and an organized learning environment that promotes healthy development and children's skill growth aligned with the Head Start Early Learning Outcomes Framework: Ages Birth to Five, including for children with disabilities. The program also supports regular and ongoing supervision and a system of individualized and ongoing professional development.

Teachers will implement well-organized learning environments with developmentally appropriate schedules, lesson plans, and indoor and outdoor learning experiences that provide opportunities for choice, play, exploration, and experimentation among a variety of learning, sensory, and motor experiences.

Tribal Language and Culture will be integrated in an effort to preserve, revitalize and restore the language.

Additional learning environment protocol, processes, and procedures in the Head Start policy manual.

Governing Body

The Spokane Tribe Head Start's Governing Body consists of the following positions within the tribe: Tribal Business Councilperson, Chief Executive Officer, Executive Officer, and Compliance Officer. The Policy Council consists of three parents who all have children attending the program. The parent Committee consists of all Parents with students attending the program.

Section Fifteen — TANF

The goal of the Employment and Training TANF Program is to promote and support tribal children and their families in reaching their full potential and 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;
- Respect 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, language classes, 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, Vocational Rehabilitation services, Supportive Housing needs, 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, Internship. SNAP, LIHEAP, Section 8 Housing Choice Voucher, Childcare, Immersion school, Head Start, 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 Internship program, will place eligible students in internship positions directly related to their field of study or vocational training, leading to employment post-graduation.

The JOM Language program will continue to develop curriculum, lessons and involvement at service area schools and programs that is needed at the youth and adult levels to gain fluent language speakers.

The State of Washington will continue to administer the Medicaid and Food Stamp programs. Our links with the State will continue to ensure 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 **400** 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

The TANF program will match the states payment standard.

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 \$10,000 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 the the assignment of child support to the Tribe. The E&T TANF program will retain 100% of the child support collections to reimburse the program's 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 him/her safety or 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 and 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. Learning the Culture and Language
19. Internships
20. Employment barrier removal activities, such as counseling and chemical dependency treatment.
21. 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.
22. 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 participants 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. Programming will provide ground rules that are developed, agreed upon, and posted by the youth participants, and opportunities created that allow youth to share their interests and work collaboratively with their peers. 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.

Science, Technology, Engineering, and Mathematics (STEM) curriculum will be added to the educational portion of the program as many school districts have made cuts to these programs, creating a gap in services.

Youth services offered by the Youth program are generally intended for individuals aged 6 months to 24 years. This program will operate out of a number of 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, and at the next age group (10-14), the program would continue to build off of the service platform described above and add an additional curriculum that would be age-appropriate. This would continue with the next age group (14-18), again building off of the initial platform but adding an age-appropriate curriculum. The age (19-24) population would receive services designed to keep them physically and mentally healthy, informed with regards to risky sexual activity, the choice of abstinence, birth control, and 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 childcare 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.

Boys and Girls Club

Boys and Girls Club in Wellinit through an MOU with the STOI 477 will provide cultural and language activities for the youth attending the Club. Youth living on the reservation meet the eligibility requirements to receive services through 477.

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 first 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 may 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 **year-round** 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 participants 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	Minimum Participation Rate
FY 21-22	35%
Program Year	Minimum Participation Rate
FY 22/23	35%
FY 23/24	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 compete 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. 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,

- interferers with the family's ability to escape the violence or its escalation, or interfere with any legal proceedings
4. 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.
 5. Students attending college on a full-time basis;
 6. A parent caring for their child under the age of 6 months.
 7. 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 ensures due process and review at levels. It is strongly encouraged those issues be resolved at the staff level to ensure 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.

Duplication of Services and Medicaid and Food Stamp Linkage

In order to prevent a family's participation in more than one TANF program, the E&T TANF will establish a procedure to prevent receipt of duplicative benefits as required per 45 CFR, Section 286.75.

In order to assure that TANF recipients receive Medicaid and Food Stamps, all necessary information will be submitted in a timely manner to the State of Washington for consideration of those services.

Fiscal Accountability

For each fiscal year during which the STOI receives or expends funds pursuant to a block grant under Section 412 of Title 1-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.

Data Collection and Reporting

The STOI will comply with all statutory and regulatory reporting requirements pertaining to the TANF program.

Retrocession

In the event that the Tribe should choose or have to retrocede the program to the State, the Tribe will comply with all pertinent statutory and regulatory requirements.

Public Comment/Hearing

A copy of the plan was uploaded to the Spokane Tribe Of Indian's website on May 15, 2021, an email notifying stakeholders and community members was sent on the same day requesting comments and provided information on how to submit comments. Plan notification was also posted on the tribal newspaper's Facebook page The Rawhide.

Pandemic restrictions prevented an in person meeting, the tribe is also situated in a rural area with limited access to internet. Those who do have it live near the Tribe's administrative building or their connection does not allow streaming live video. The comment period ended on June 28, 2021 there were no comments submitted.

Section Thirteen – Tribal Resolution Approving Plan

See attachment I

The Spokane Tribal Business Council is the recognized governing body of the STOI under the authority of the STOI constitution adopted by the General Council on January 6, 1987. By Resolution No. 2021 -365 dated xxxxx the Spokane Tribe of Indians Business Council adopts this plan.