

KARUK TRIBE
KARUK TRIBAL TANF PROGRAM (KTTP)
TRIBAL FAMILY ASSISTANCE PLAN

ADMINISTRATION & THE FOUR TANF PURPOSES

Public Law 104-193, the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA) authorizes federally-recognized Indian Tribes to administer and operate their own Temporary Assistance for Needy Families (TANF) programs. The Karuk Tribe has elected to operate its own TANF Program to align with the tribe's principles/values: To promote the general welfare of all Karuk people, to establish equality and justice for our tribe, to restore and preserve Tribal traditions, customs, language and ancestral right, and to secure to ourselves and our descendants the power to exercise the inherent rights of self-governance. The Karuk Tribal TANF Program (KTTP) mission statement is: To preserve and strengthen the children and families of the Karuk Tribe and other Native American tribes through an effective social welfare system that empowers individuals and families to work toward and achieve self-sufficiency, sobriety and to become loving responsible parents in a culturally relevant way. Services and activities will be provided to fulfill the purposes of TANF, in the context of the Tribe's guiding values:

1. To aid needy families so that children may be cared for in their own homes or in the home of relatives
2. To end the dependence of needy parents on government assistance by promoting job preparation, work and marriage
3. To prevent and reduce out-of-wedlock pregnancy
4. To encourage the formation and maintenance of two parent families

PROGRAM GOALS & MEASUREMENTS

KTTP will provide eligible parent(s) and/or caretaker participant(s) with job preparation, work experience, education/training, and supportive services to enable them to leave the program and become self-sufficient. KTTP may provide non-cash support services under purposes 3 & 4 to "other eligible" families who would benefit from specific types of services. It is the intent of KTTP that assistance shall be provided promptly with due regard for the preservation of Indian family life. The four purposes of TANF are the guidelines under which KTTPS goals are conducted and accomplished.

KTTP Goals are:

- Expanding job opportunities, related to stewardship of the indigenous homelands, by working with other tribal, federal, state and local public sector agencies to provide education, vocational trainings, work subsidy & experience and job placement through the use of Memorandum of Understanding/Agreement(s)

- To promote self-sufficiency, through skill development, and participant engagement in traditional cultural and community activities and customs as a way to support family strengthening (two-parent families) and as a prevention method (to prevent out-of-wedlock pregnancy and high-risk behaviors) of indigenous people(s)

KTTP will measure successful achievement of the goals by:

- Track participant case data on a quarterly basis to measure and increase the percentage of participants who are successfully engaged in skill development, training, education, subsidized employment, and job experience by 10% on an annual basis
- Tracking participant case data on a quarterly basis to show that participants are completing items in the FSSP (Family Self-Sufficiency Plan), related to education, vocational trainings, work subsidy and experience and job placement.
- Tracking participant data on a quarterly basis that demonstrates successful participation and completion of traditional activities meant to support and foster pregnancy prevention and the formation and maintenance of two-parent families

DESIGNATED AGENCY

The Karuk Tribe shall be responsible for the administration of the Tribal TANF Program and will provide Tribal TANF assistance and services to the approved service population in the approved service area(s) as outlined within this plan. The TANF department is responsible for the daily operations and supervision of the program, with oversight by the Karuk Tribal Council. The main TANF office is located in Happy Camp, CA with satellite offices in Orleans and Yreka, CA.

REVIEW AND COMMENT ON KTTP TRIBAL TANF PLAN

Pursuant to 45 CFR 286.75 (6), the KTTP Tribal Family Assistance Plan (TFAP) was available for a 45-day public comment period prior to submission between August 15, 2023 and September 30, 2023. Notification of the public comment period was posted on the Karuk Tribe website. The TFAP was posted on the tribal website and hard copies were available at all KTTP office locations for public review and comment.

PERIOD COVERED BY THIS PLAN

This plan covers the continued operation of the Karuk Tribal TANF Program (KTTP) for an additional three-year period beginning December 1, 2023 through November 30, 2026.

SERVICE AREA and SERVICE POPULATION

Siskiyou County

KTTP will provide TANF assistance and/or support services to eligible needy Indian families who reside in the approved service area of the off-reservation areas of Siskiyou County and on the Karuk and Quartz Valley reservations. The service population in the off-reservation areas of Siskiyou County and on the Karuk and Quartz Valley reservations includes:

- Karuk Tribe members and their lineal descendants
- Indians listed on the federally recognized California Judgement Roll and their descendants
- Indians enrolled in any Federally Recognized Tribal Entity
- Quartz Valley tribal members who reside either on or off the Quartz Valley Indian Reservation

Humboldt County

KTTP will provide TANF assistance and/or support services to eligible needy Karuk Tribal members and their families and lineal descendants who reside in the Karuk Tribe's defined BIA service area of the Northeastern corner of Humboldt County. The service population in the defined BIA service area of the Northeastern corner of Humboldt County includes:

- Karuk Tribe members and their lineal descendants

DUAL ELIGIBILITY: PROVIDING BENEFITS AND ASSISTANCE TO KARUK ENROLLED TRIBAL MEMBERS WHO LIVE OUTSIDE OF THE TRIBAL TANF

In accordance with the authority granted under TANF-ACF-PI-2018-02, the Karuk Tribe elects to provide, as financial resources permit, the full range of Tribal TANF assistance and services as described in this plan to all eligible enrolled Karuk Tribal members and their families, who reside outside of the approved Tribal TANF of the Karuk tribe service area. This area would consist of the neighboring counties adjacent to the Karuk tribes service area. This would include Del Norte, Modoc, Trinity, Shasta, Jackson, Klamath and Josephine counties.

The Karuk Tribe understands that no additional funding will be provided now or in the future for this additional service population, and that all federal rules and regulations governing Tribal TANF apply. The Karuk Tribe understands that it is not authorized to establish a Tribal TANF office outside of the Tribal TANF of the Karuk Tribe approved service area without expressed permission of the entity that has designation of that service area and without the approval of an expanded service area in the plan. The Karuk Tribe understands that the time limit exception associated with "50% or more not-employed" applies to the actual location a recipient is living in, not the location of his or her Tribe.

ELIGIBILITY FOR KTTP ASSISTANCE AND SERVICES

Eligibility for TANF assistance and services is as established in the Karuk TFAP. Only needy families,

as defined in the TANF plan, may receive: (a) any form of Federally or State Maintenance-of-Effort (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 criteria (if applicable) established in the Karuk Tribal TANF Family Assistance Plan to receive the particular "assistance", benefit or service.

KTTP may use segregated Federal TANF funds (and/or state MOE funds, as allowed under the MOU with the state) 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 services.

CHILD SUPPORT ENFORCEMENT

KTTP does not require participants to cooperate with child support enforcement agencies as a condition of eligibility for TANF assistance. Participants will be provided with the option to cooperate with child support enforcement in order to obtain additional financial assistance for eligible children.

ELIGIBLE INDIAN FAMILY

KTTP defines an eligible needy Indian family as all biological children, stepchildren, adopted or relative child(ren) (including non-Indians) and siblings under the age of 18, and up to age 19 (if attending high school), living with an eligible Indian adult as defined in the service population section of this plan.

In addition, eligible Indian families must also meet one of the following criteria:

- Needy single Indian/non-Indian parent families with eligible Indian child(ren) OR
- Needy, pregnant Indian woman with no children (individuals will become eligible for KTTP services in the third trimester of pregnancy); OR
- Needy Indian/non-Indian two parent families with eligible Indian child(ren); OR
- Eligible needy Indian child(ren) residing with an Indian/Non-Indian timed-out parent-must be related by blood; OR
- Needy care-takers with eligible children-must be related by blood, tribal culture or tradition, or by legally conferred guardianship from a tribal, federal or state court
- Indian/non-Indian non-needy caretaker with eligible child(ren); must demonstrate their own income, must be related by blood, tribal culture or tradition, or by legally conferred guardianship from a tribal, federal or state court

ELIGIBLE NEEDY FAMILY

KTTP defines needy families as those families with total family income equal to or less than 250% of the Federal Poverty Guideline (FPG) and meets the resource and assets limit requirements, for receipt of cash assistance or TANF funded support services and activities under TANF purposes 1 and 2.

INCOME AND EARNINGS

KTTP evaluates all income when determining eligibility for monthly cash assistance. When determining the monthly benefit amount, all earned and unearned income reported will be evaluated. Specific disregards will be applied as outlined below.

Needy Families Income and Earnings

- Eligibility for KTTP cash assistance will be calculated monthly by taking the total family gross earned income, less disregard (\$500) then excluding 50% of each additional dollar of earnings up to 250% of the FPG.
- KTTP will disregard a child support pass through of up to \$600.00 per child, per month, received by TANF families. The pass-through amount is disregarded for eligibility and income purposes
- KTTP does not use childcare disregards in determining eligibility
- Social Security based income (excluding SSI) will be calculated as follows; the total of all disability income will be added together, less disregard (\$500).
- Unearned income will be counted dollar for dollar as income
- Income earned from temporary employment with the U S Census Bureau will be disregarded in determining eligibility and in calculating the monthly assistance grant.
- Income earned from subsidized employment and Workforce Innovation and Opportunity Act Funds will be disregarded in determining eligibility and in calculating the monthly assistance grant.
- KTTP will exclude all Indian judgment funds or other disbursements that are excluded under federal law from being counted as income in determining eligibility and in calculating the monthly assistance amount.

Non-Needy Caretaker Families (child only)

- Only the child's income will be used to determine monthly eligibility
- Social Security based income (excluding SSI) will be calculated as follows, total of all disability income will be added together, less disregard (\$500), then counted dollar for dollar.

RESOURCES AND ASSETS

- KTCP will exclude from the resource limit one fixed, mobile, or motor vehicle home that the family resides in, and one vehicle for each eligible adult in the household receiving assistance
- KTCP will exclude \$10,000 in all other available resources; any additional available assets (such as real property equity, mineral rights, stocks, bank accounts, cash, vehicle equity etc.) beyond the \$10,000 limit will be counted in determining eligibility.
- KTCP will exclude any equipment needed to maintain (or obtain) employment
- KTCP will exclude land located on an Indian reservation or held in trust by an individual
- Other exceptions granted in special circumstances may include burial accounts, and/or other assets held in trust. Accessible resources beyond this limit shall be considered available income to the needy family, including equity in additional vehicles
- KTCP will allow participants to accumulate assets through an individual or family group development account

CASH ASSISTANCE

- KTCP will provide eligible needy families monthly assistance as defined in 45 CFR 286.10 in the form of cash, checks, vouchers or other forms of benefits designed to meet a family's ongoing basic needs, such as food, clothing, shelter, household good, utilities, personal care items, and general incidental expenses. This includes childcare and transportation assistance for those TANF recipients who are participating in work activities but are not employed
- Yearly cost of living adjustments may be applied to cash assistance as funds are available
- When an applicant has received diversion assistance, the applicant will not be eligible for TANF cash assistance services for 5 years

SUPPORT SERVICES

KTCP may provide eligible, needy TANF participants, who are participating in an approved activity, with the following support services:

- Vocational training, skills assessment, job readiness, placement support, and training
- Educational activities and services designed to increase self-sufficiency, job training and work experience (excluding tuition for public education)
- Domestic Violence Referrals outside of the Family Violence Option, that are culturally relevant support services and activities, and are directly related to the purposes of TANF
- Childcare/transportation costs for participants engaged in work activities
- Teen pregnancy prevention activities and education

- Culturally relevant youth services and activities, youth intervention, counseling and educational activities and services that are directly related to the 4 purposes of TANF
- Medical and non-medical substance abuse services and mental health services as related to removal of barriers to employment, training and job-related education. However, TANF funds will not be used to subsidize, contribute to, or supplant other available medical services or funding
- One-time payment towards education loans, with a maximum payment of \$1000.00, that are in default (recipient must be within 12 months of graduation to be eligible)
- One-time payment towards traffic fines to obtain driver's license for the purpose of removing a barrier to employment and training
- Education, training, and/or support services to a non-custodial parent of an eligible family (for the purposes of improving the individual's ability to provide or enhance child support payment to the custodial parent), up to a maximum of \$1000 in costs.
- Provide training and resource referral assistance to clients for small business development

OTHER ELIGIBLE

KTTP may provide TANF Purpose 3 and 4 prevention services and activities to both assistance eligible families (whose income does not exceed 250% of the FPG) and to non-needy individuals and/or families whose income is under 500% of the Federal Poverty Guideline. Non-needy families that are under 500% of the FPG will also need to meet the eligibility criteria, as outlined in this plan, for receipt of Purpose 3 and 4 activities. These activities will advance the prevention of out-of-wedlock pregnancy, encourage and foster the formation of two-parent families, and support maintenance of existing two-parent families.

Families whose income exceeds 500% of the FPG will not be eligible for TANF Purpose 3 and 4 activities or services.

KTTP will work with internal tribal departments, as well as outside agencies to provide maximum services to the tribal community. KTTP will ensure that in determining the types of service to be considered, that no duplication or supplanting of services occurs between participating departments. An "other" eligible risk assessment and a project activity request must be completed to determine the special needs or barriers. 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. "Other" eligible applicants/participants must be members of the approved service area and the approved service population. The following "at-risk" criteria will be utilized to determine "other" eligibility for Indian children and families who may benefit from participation in select activities under TANF Purposes 3 & 4. At least two (2) of the "at-risk" factors must be present for children and their

families to be eligible for participation in TANF Purpose 3 & 4 activities.

- Living in the Karuk Service Area
- Attendance at a low performing school districts
- Residing in a high rate of crime area
- Family with an absent parent or child living with a caretaker relative
- Victims of domestic violence
- Families/individuals impacted by substance addiction
- Family member has been convicted of a crime
- Youth with low academic skills
- Have negative self-perception and/or low self-esteem
- Youth with truancy issues
- Homelessness or housing stability issues

ACTIVITIES UNDER TANF PURPOSES 3 AND 4

KTTP may provide TANF Purpose 3 and 4 activities and support services to both eligible needy families and to “other” eligible families who meet the criteria outlined in the TFAP. Purpose 3 and 4 activities and support services may include participant incentives. KTTP Purpose 3 and 4 support services and activities include:

- Tribal cultural and traditionally relevant support services and activities such as educational classes, workshops, traditional food gathering activities and nutrition, and talking circles that contribute to family stabilization, social capital development, community connection, and overall well-being
- Educational classes, workshops and training activities and programs focused on teen pregnancy prevention; self-esteem and healthy relationship development; and the development of decision-making skills for youth and teens
- Healthy marriage workshops, positive/responsible parenting classes, domestic violence and anger management classes and awareness activities, health education classes, prevention classes, counseling and responsible/healthy lifestyle choice classes to support and foster family formation, family stability and maintenance
- Youth services and activities including vocational, career and education development, mentoring, tutoring, stress-relief strategies, life skills, self-esteem building and other services designed to reduce the need for government-based income/supports.

ELIGIBLE FAMILIES MOVING INTO THE SERVICE AREA

Eligible Families moving into the service area will receive the same amount of cash assistance and supportive services as all eligible program participants within the KTTP service area.

TRIBAL OPTIONS

The following Tribal Options apply to eligible needy participants meeting the criteria outlined in this plan.

- No family caps
- No deprivation requirements
- All applicants (including non-needy caregivers) shall be required to complete a drug screen at intake. The purpose is to identify and address any barriers to the health and safety of the children in the home, under purpose 1 of the 4 purposes of TANF. Positive screens will result in participants being required to participate in a substance abuse assessment and when applicable participate in recommended substance use disorder treatment
- KTTP will continue to provide cash assistance while an eligible parent/needy caretaker is in an in-patient substance use disorder treatment program
- Should a client fail to comply, KTTP may continue assistance to the family through a voucher system, as well as, deny, reduce or terminate benefits until the client regains compliance
- All school age children shall be required to attend school full-time with regular attendance and KTTP may provide school age participants (grades TK-12) with educational incentives such as good grade incentive. Educational incentive limits and/or allowances are subject to availability of funds; specific guidelines and incentive parameters are outlined in KTTP policies and procedures. Good grade incentives may take the form of check, voucher or gift card and will not exceed two (2) semesters per school year nor exceed \$1200.00 per student annually. Additional incentives may be provided for participation or academic achievements (e.g. perfect attendance), as funds permit
- Eligible participants who complete high school or earn GED while on the program will receive an incentive in an amount not to exceed \$1000.00. TANF participants may also be eligible to receive incentive awards for higher education degrees and/or certifications (as defined in KTTP policies and procedures)
- KTTP may provide school age participants (grades TK-12) with clothing allowances. Clothing allowances are to be used for books, school supplies, clothing, and personal care items. Specific guidelines and incentive parameters are outlined in KTTP policies and procedures. Allowances may be given up to twice per school year and will not exceed \$1000.00 per child, per school year
- KTTP will require youth to participate in academic and prevention activities to encourage

academic achievement and to increase the rate of high school graduation and college attendance. Youth participants who successfully complete this requirement may qualify to participate in educational field trips, conferences, workshops, youth leadership activities and receive incentives applicable to the activity

- Adult recipients attending GED or post-secondary education may receive the educational awards/ incentives as defined in KTTP policies and procedures.
- Shall require verification of current immunizations of all children in the household, who are not in school (K-12)
- Shall exempt parent/needly caretakers 55 years of age or older from work participation requirements. The Karuk Tribe considers persons reaching age 55 to be an elder in the Indian community and deserving of deferential treatment
- Benefits will be denied for 2 years to individuals convicted of violent crimes, violent drug/alcohol felonies or child abuse related crimes. Violent crimes include; robbery, assault, assault and battery, sexual assault, rape and homicide. After 2 years, and before individuals are considered for KTTP benefits, the individual must show proof of completion of all court-mandated requirements
- KTTP will provide a one-time \$2000.00 incentive to the Head of Household for getting married. The one-time payment of \$2000.00 is to assist couples with premarital counseling and other marriage costs. This will be considered an incentive and the amount shall be exempted as an available resource in the calculation of the monthly cash assistance grant and is subject to availability of funds
- KTTP may provide summer youth work experience to eligible children
- KTTP may provide TANF services that support family reunification for families involved in the Child Welfare system.
- KTTP may provide family reunification services, that are not supplantation of CW funded services, in preparation for a child to return to their primary caregivers, in accordance with Indian Child Welfare (ICW) and/or Child Protective Services (CPS) requirements in the interest of promoting healthy families so that children may be cared for in their own homes. KTTP may provide TANF assistance to the parent(s) even when the child(ren) has been removed from the home, for a period not to exceed six (6) months, provided they are currently compliant with Karuk Tribal Court and/or Karuk Social Services approved reunification plan and KTTP work participation requirements

NON-RECURRING SHORT-TERM BENEFITS (NRSTB)

As funds permit, the Karuk Tribal TANF Program may provide needy-eligible Tribal families with non-recurrent, short-term benefits (NRSTB) to meet an extraordinary need that arises from a crisis situation and is beyond those needs that are intended to be covered by regular TANF assistance and support services. As per the regulation at 45 CFR Part 286.10 (b)(1), NRSTB must meet the following criteria:

- Are designed to deal with a specific crisis situation or episode of need;

- Are not intended to meet recurrent or ongoing needs;
- Will not extend beyond 4 months;

KTTP has established an annual cap in its operating procedures for NRSTB benefits for assistance eligible TANF participant families outside of the context of a natural disaster or pandemic.

NON-RECURRENT SHORT-TERM BENEFITS IN THE CONTEXT OF NATURAL DISASTER OR PANDEMIC

As funds permit, the Karuk Tribal TANF Program may provide eligible Indian families and assistance eligible Indian families whose total family income is equal to or less than 300% of Federal Poverty Guidelines, with non-recurrent, short-term benefits to meet an extraordinary episode of need that arises from a government-declared (federal, state, county, or tribal government) natural disaster, emergency, or pandemic. NRSTB provided in the context of a natural disaster, or emergency pandemic will be capped at \$10,000 per event, per family, for a period not to exceed 12 months from the date of the disaster and will not extend beyond four months. The Karuk Tribal Council may authorize NRSTB beyond the cap, for situations where extraordinary circumstances require additional funds.

As per the regulation at 45 CFR Part 286.10 (b)(1), NRSTB must meet the following criteria:

- Are designed to deal with a specific crisis situation or episode of need;
- Are not intended to meet recurrent or ongoing needs;
- Will not extend beyond 4 months;

NRSTB provided in the context of a governmentally-declared natural disaster, emergency, or pandemic will be limited per household, for each event, as per the cap limits outlined above. Families who meet the income eligibility criteria must also demonstrate an episode of need in order to be eligible for receipt of NRSTB in this context.

DIVERSION SERVICES

Diversion services are non-recurring short-term benefits (NRSTB) excluded as assistance per CFR 260.31(b) (1), to support families who do not need to participate in the regular cash assistance program and who have the potential capability to move directly into or remain in the work force without going into the cash assistance program, but who need support to address a crisis or emergency that could jeopardize their employment and/or stability.

The KTTP will provide payment to eligible individuals (with income up to 300 % of Federal Poverty Guidelines) with families as an alternative to ongoing cash assistance. Individuals with families must be employed, have an explicit job offer, or have a recent work history. A recent work history is defined as having worked within the 90-day period immediately preceding the date of the application. Individuals with families must also have a written plan for self-support from earned or unearned income.

- Diversion services are for working (earned income) individuals who are not currently

TANF cash assistance clients AND who are at risk of becoming TANF clients.

- Diversion is non-assistance that is designed to deal with a specific crisis or episode of need AND is not intended to meet recurring or ongoing need.
- Diversion assistance will not extend beyond four (4) months as per 45 CFR 286.10 (b) (1); AND will not exceed \$7,500 AND will have a lifetime limit of \$15,000.
- Upon receiving diversion services, the recipient will not be eligible for Diversion again for a period of 5 years from the close date of the previous diversion case AND the recipient will not be eligible for TANF cash assistance for a period of 5 years from the close date of the previous diversion case

TRANSITIONAL SERVICES

KTTP may provide Transitional services to Tribal TANF participants in the form of support service payment for up to twenty-four (24) months after they become employed and lose eligibility for TANF cash grants due to excess income (i.e. income that exceeds the Tribal TANF eligibility requirements).

- Transitional services may be in the form of ancillary training, or support (e.g., equipment or uniforms not provided by employer) required to maintain unsubsidized employment.
- Transitional services will be used to support the family in achieving self-sufficiency (e.g., transportation support, childcare, work clothes and tools, directly related to maintaining unsubsidized employment).
- Transitional services will be provided until the family income exceeds 300% of the federal poverty guidelines OR the participants reach the 24-month time limit OR the participants reach the \$7,500 service limit, whichever comes first.
- Families whose children are receiving extended assistance funded through MOE because the adult reached their 60-month time limit, will not be eligible to receive transitional services.

EMPLOYMENT OPPORTUNITIES

The Karuk Tribe is located within the isolated rural areas of Siskiyou and Humboldt counties. Karuk headquarters are in the rural area of Happy Camp, bordered on the West by the frontier area of Orleans and includes, to the east, the semi-urban town of Yreka. Travel between the communities is accomplished by traversing a two-lane winding, mountainous highway that is subject to closures and detours. This is often due to rain, snow, ice, slides, and accidents. In addition, there is limited, inconsistent public transportation. The geographic isolation, wide disbursement of the population, severe weather conditions, limited public transportation and overall rural nature of the service area inhibit access to employment and education resources and TANF offices. In these areas, chronic poverty,

geographic isolation, high unemployment, lower levels of education and lack of basic life skills increase barriers to employment and self-sufficiency.

The largest employers within the service include, the Karuk Tribe, Siskiyou County, and the US Forest Service. Employment ranges from entry level positions at the Tribal Casino (i.e. food service) to highly specialized positions, like Medical Doctor, at the Karuk Health Clinic. Positions within the county also vary greatly from receptionist to Clinical Psychologist. Unskilled positions (laborer) are available, however these are mostly seasonal and subject to weather, road conditions, and lay-offs. In addition, the lack of available housing, especially in the rural and frontier portions of the service area, and inconsistency of public transportation, make commuting for work, almost impossible.

KTTP works to first stabilize families, with housing, food and clothing. Barriers are identified through an assessment and gradually removed by providing training, health and wellness training, support and job search services to move the participating families from welfare dependency to independence. KTTP will work in collaboration with local employers to develop employment opportunities for eligible participants. KTTP will continue to establish, develop and maintain relationships with nearby industries and businesses to provide work experience, training and subsidized/unsubsidized employment opportunities. KTTP will work with participants to prepare them for positions available within the industries specific to the area. KTTP will address and resolve the deficiency in employable skills through trainings, education, employment assessments, referrals and job placement in ways that promote self-sufficiency and support Indian culture.

TRIBAL WORK ACTIVITIES

Due to our unique geographical area as described above, KTTP will allow up to 1 hour per day of travel to and from an approved activity to be counted as work participation hours. In accordance with 45 CFR 286.80(b)(2)(i) the reason for providing travel time is due to the lack of or limited transportation within the Karuk service area. Travel time may be adjusted to fit the need of the client due to the remoteness of some of the TANF sites.

KTTP work activities include:

- Private, public or Tribal subsidized/unsubsidized employment.
- Participation in a Native Employment Works (N.E.W.) or Workforce Investment & Opportunity Act (WIOA) and Karuk Tribe/Northern California Indian Development Council activities.
- Work experience.
- On the job training/job shadowing.
- Apprenticeship.
- Job search/job readiness assistance & basic skill development within the limitations specified at 45 CFR 286.105 (b & c).
- Community service

- Community economic and job development, as approved by ACF
- Post-secondary education/vocational educational training.
- Job skills training directly related to employment.
- Education/training directly related to employment.
- Participation in barrier removal activities such as mental health counseling, domestic violence counseling and/or substance abuse/chemical dependency treatment.
- Small business/entrepreneurial training.
- Life skills training/education such as financial management, parenting education, health, hygiene. Nutrition that leads to family wellness and individual readiness for the job market.
- Culturally relevant work activities to increase self-sufficiency such as activities which result in food or other basic needs fulfillment, products or services that may be sold to provide income or those activities that increase skills applicable to employment.
- Satisfactory attendance and completion of secondary school or a course of study leading to a GED in cases where a participant has not completed secondary school or received diploma or GED certificate.
- The provision of childcare services for children of another KTTP client who is participating in a KTTP approved work activity or community services program.
- Regular participation in family preservation/maintenance activities, as an ancillary part of weekly approved work participation activities. Family preservation/maintenance service activities are further described below:
 - Short-term, family-focused and community- based services designed to help families cope with significant stresses or problems that interfere with their ability to nurture their children. The goal of family preservation services is to maintain children with their families, or to reunify them, whenever it can be done safely.
 - Family Maintenance services are provided to families whose children are a risk of neglect or abuse and who are participating in services from KTTP, Karuk Child & Family Services or Siskiyou/Humboldt County Child Welfare Services.

DISPLACEMENT

KTTP has established and is maintaining procedures to resolve displacement complaints pursuant to 286.110. In order for the Karuk Tribal TANF Program to prevent displacement of an employee from an employer interested in utilizing a subsidized employment participant, the following prohibitions are in place:

A participant in a KTTP subsidized employment program or authorized activity must not displace (including a partial displacement, such as a reduction in the hours of non-overtime work, wages, or employment benefits) any currently employed employee.

A KTCP subsidized employment program or activity must not impair existing contracts for services or collective bargaining agreements. When a KTCP subsidized employment program or activity would be inconsistent with a collective bargaining agreement, the appropriate labor organization and employer must provide written concurrence before the program or activity begins.

A participant in a KTCP subsidized employment program or activity may not be employed in or assigned to a job if:

- Any other individual is on layoff from the same or any substantially equivalent job;
- The employer has terminated the employment of any regular, unsubsidized employee of otherwise cause an involuntary reduction in its workforce with the intention of filling the vacancy so created with the subsidized employment participant; or
- The job is created in a promotional line that infringes in any way on the promotional opportunities of currently employed workers
- The employer would decline to hire a regular employee or decline to fill an open job posting in order to bring on a subsidized employee
- The worksite is involved in an abnormal labor condition such as a strike or lockout.

KTCP will notify the public, including employers, employees and anyone who may consider themselves displaced by a KTCP subsidized employment program or activity participant by:

- Posting signage in the workplace in an area that is conspicuous to employees indicating the prohibition or displacement of an employee by the KTCP Subsidized Employment Program including procedures for filing a complaint by any employee alleging that displacement has taken place
- Providing each worksite with complaint procedures and forms
- Notifying employers during orientation to the KTCP Subsidized Employment Program that an agreement must be signed by the employer prior to placing a participant in subsidized employment.

Any person alleging displacement due to the placement of an individual from a KTCP subsidized employment program or activity may file a complaint by completing a complaint form or submitting a written statement within 45 days of the alleged occurrence to: Karuk Tribal TANF Program, TANF Director, 64236 Second Avenue, Happy Camp, Ca 96039

MANDATORY WORK REQUIREMENTS

KTCP agrees to satisfy the following minimum participation rates as it is consistent with economic conditions and resources;

<u>Fiscal Year</u>	<u>Minimum Rate</u>
FY 2024	40%
FY 2025	40%
FY 2026	40%

TRIBAL FAMILY WORK PARTICIPATION REQUIREMENTS

KTTP minimum work participation requirements will apply to families that receive tribal assistance that include an adult or minor head of household receiving such assistance.

At least one spouse in a two-parent family household will be required to participate in a work activity for the minimum number of hours as listed, however, for two parent families, the work hours of both parents can be combined to meet the minimum number of work activity requirements listed below

Weekly Work Hour Requirements

Single Parent/Needy family (who is the only parent or relative in the family) with children over 12 months and under 6 years old

<u>Fiscal Year</u>	<u>Minimum Hrs./Wk.</u>
FY 2024-2026	20

Single Parent/Needy family with children over 6 years old

<u>Fiscal Year</u>	<u>Minimum Hrs./Wk.</u>
FY 2024-2026	20

Two Parent Families

<u>Fiscal Year</u>	<u>Minimum Hrs./Wk.</u>
FY 2024-2026	30

LIMITATIONS AND SPECIAL RULES

An individual shall be considered to be engaged in work by virtue of participating in any work activity specified in this plan or approved by the caseworker in advance (within the limitations specified at 45 CFR 286.105).

KTTP shall consider participation of an individual in a job search and/or job readiness activity for a minimum of 3 days per week to be considered a full week of

participation by that individual. However, a participant's job search and/or job readiness activity may only count towards 6 weeks in any fiscal year, unless the Tribal unemployment rate in the approved TANF service areas is at least 50 percent greater than the United States total unemployment rate for that fiscal year, then an individual's participation in job search or a job readiness activity count for up to 12 weeks in that fiscal year. If job search or job readiness activities are an ancillary part of another activity then there is no limitation on counting the time spent in job search and/or job readiness.

A single parent with a child under one year of age shall be exempted from work participation requirements until the child reaches one year of age.

A teen head of household who maintains satisfactory school (High School, GED, or College) attendance will be considered to be meeting the required work participation requirements.

Upon certification by the Family Service Specialist, cash assistance will not be terminated or reduced if a single parent who cares for a child under the age of 6 years old refuses or stops work activities for the following reasons (statement must include time limitation for exemption):

- Appropriate child care within a reasonable distance from the home or worksite is unavailable with no appropriate licensed childcare facilities within a reasonable distance from the individual's home or work site (within a 30-minute driving distance).
- Informal child care by a relative or under other arrangements is unavailable or unsuitable due to home having unsafe conditions or for health and safety reasons.
- Appropriate and affordable formal child care arrangements are unavailable and is defined as facilities in the area are serving at 100% capacity, and do not have any slots available to serve additional children
- Appropriate and Affordable childcare:
Appropriate childcare definition - to ensure the maintenance of minimum standards for the care and protection of children away from their homes and to encourage and assist the relative childcare home to meet maximum standards.
Affordable childcare definition - to ensure that the cost of childcare does not cause a financial hardship on a family to where the family cannot maintain or move towards self-sufficiency.

TIME LIMITS

When an eligible family member reaches the 60-month time limit, Federal TANF cash assistance to the family will end. Once a family is ineligible to receive federally funded TANF assistance due to the federal time limit, the Karuk Tribal TANF program may continue to provide assistance to the children in the family, using State MOE funds provided to Karuk by the State of California (if the funds are available). Families receiving State MOE funded assistance (child-only) must meet the same income eligibility and resource standards of financial need applicable to all other Tribal TANF eligible families and consistent with State policy concerning the extension of assistance to timed-out families.

KTTP will count all prior months of assistance received from another Tribal/state TANF program toward the 60-month limit. The KTTP will count all prior months of TANF assistance funded with TANF block grant funds, except for any month(s) that was exempt or disregarded by statute, regulations, or under any experimental, pilot, or demonstration project approved under Section 115 of the Act.

KTTP will not count months of assistance received from another Tribal/State TANF Program toward the 60-month time limit, if the applicant lived on an Indian Reservation that had a not-employed rate of at least 50%.

HARDSHIP CASES

Hardship exemptions are conditions that hamper or inhibit an individuals' ability to maintain work or enter into work activities. KTTP may exempt up to 20% of their caseload based upon hardship. Hardship exemptions must be evaluated and approved, in writing, by the Family Services Specialist who will monitor the case based upon Monthly Eligibility Report (MER) submitted by the client. KTTP will consider the following categories of cases for exemption from the 60-month time limit, on a case-by-case basis:

- Individuals with cognitive, physical, and/or mental disabilities (including medical conditions) resulting in limited education, job skills attainment, and/or ability to secure and retain employment (documented by a physician or other medical professional).
- Cases in which one (1) parent in a two-parent family is temporarily incapacitated by illness or disability (as documented by a physician or other medical professional) and

must be cared for by the other parent full time; not to exceed 12 months.

- Single parents with 4 or more children under 12 years of age.
- Eligible applicant adults responsible for the full-time care of an elderly or disabled relative.
- Victims of domestic violence.
- Individuals with a medical release from a physician or as approved on a case-by-case basis, depending upon severity.
- Cases where an individual has reached the 59th month of the Federal Time Limit and will receive a certificate or diploma within six months or has enrolled in a training or apprenticeship program resulting in job placement within six months. This exemption will be in place until the individual completes the certificate/diploma/training.
- Cases where time limit termination of benefits would likely result in a child(ren) being placed into emergency shelter or foster care; not to exceed three (3) months.

PENALTIES AGAINST INDIVIDUALS

If an individual in a family receiving assistance refuses to engage in a work activity as agreed upon within the individual's service plan, and in the absence of good cause, KTCP may sanction by reducing or terminating the amount of assistance or place the family on a voucher system to cover basic needs only until such time that the needy parent/caretaker resumes work requirements. A voucher system will pay for food, utilities, and shelter only, and any remaining balance will be used to meet basic needs of the family.

Any individual that refuses to participate in Substance Abuse/Mental Health counseling when referred by KTCP shall be placed on the voucher system

GOOD CAUSE

KTCP may temporarily exempt certain individuals from work participation requirements and/or penalties for “good cause”. Good cause is a temporary condition or circumstance that significantly hinders an individual’s ability to fulfill the weekly work participation requirement, on a temporary basis. It is the responsibility of the participant to provide written verification supporting the claim of “good cause”. Participants whose individual circumstances are considered extraordinary and beyond their personal control, such as temporary family crisis or tragedy, for a period of time determined and approved by the TANF Family Service Specialist, KTCP Manager, or other TANF Authorized Official, and on a case-by-case basis. These exemptions will be reviewed on a monthly basis except when “good cause” includes fleeing from Domestic Violence, in which case, the exemption will be reviewed, at minimum, once every 3 months. Acceptable examples of “good cause” include:

- Temporary lack of appropriate child care (as defined in this plan)
- Jury duty verified by appropriate documentation
- Temporary lack of transportation
- Mental or physical illness of the participant or their dependent child (established and documented by a by a qualified professional), until resolved
- Required court appearances that conflict with scheduled work activities and/or education, until resolved
- Extreme weather conditions such as flood, heavy snow, wildfire or other extreme acts of nature, until resolved
- Cases in which an eligible participant adult must provide full time care to a partner/spouse or immediate family member with a serious health problem (established and documented by qualified professional), limited to 12 weeks in a 12-month period
- Victims fleeing from Domestic Violence, in which hardship will not extend beyond 12 months

ASSURANCES

FRAUD

In cases where there has been a termination for deliberate fraud, i.e., collecting TANF benefits from multiple sources, knowingly providing fraudulent information when participant was receiving SSI or was employed independently or deliberate withholding or misstating resource information, the TANF program, at the discretion of the TANF Director, may declare the participants ineligible for a period up to three years.

NON-DUPLICATION OF SERVICES

All applicants will be required to sign the KTTP application and documentation certifying that they and other family members are not receiving assistance from another Tribal/ state TANF program. Information will be shared with other Tribal and state TANF programs to verify non-duplication of TANF assistance and/or services. Social security numbers of all KTTP applicants will be cross referenced with Tribal and county welfare staff to avoid duplication of services. Applicant will continue to verify information on a monthly basis to ensure continued eligibility.

APPEAL RIGHTS AND PROCESS

As per 45 CFR 286.75 (a) (7), KTTP will apply the following dispute resolution process for all individuals or families who wish to appeal KTTP's decision to deny, reduce, suspend, sanction or terminate assistance.

- KTTP will issue a notice of adverse action within 10 business days, to participants at risk of losing assistance, before said action takes place.

- All appeals must be submitted in writing to the Family Service Specialist within 10 business days of receiving the notice of adverse action
- The Family Service Specialist will notify the participant in writing within 10 business days of receiving the first level appeal of their decision
- The participant may further appeal the decision to the KTTP Manager within 10 business days of receiving the Family Service Specialists' decision
- The KTTP Manager will review and notify the individual, within 10 business days of receiving 2nd level appeal
- The participant can further appeal the KTTP Manager's decision to the Karuk Tribal Council within 10 business days of receiving the KTTP Manager's decision. The participant may submit the appeal to the Karuk Tribal Council, and be notified of Council's decision within 10 business days of receipt
- The Tribal Council's decision is the third and final level of appeal

MOU's and County/State Cooperation

The Karuk Tribe has negotiated Memorandum of Understanding (MOU) with each of the California counties located within KTTP service delivery area that will detail the process for the transfer of cases to ensure a smooth transition of eligible customers choosing to transfer from the State TANF services to KTTP services. The MOU's will ensure the following:

- Qualified Native American Indian families can choose to receive Native TANF or State TANF but cannot receive assistance from both programs simultaneously.
- KTTP and State/County TANF Program will exchange information as needed to determine eligibility for Tribal TANF, State/County TANF Program, Medicaid, Medi-Cal or Cal Fresh (food stamps).
- State/County TANF Programs and KTTP agree to exchange, at a minimum, the name, date-of-birth, social security numbers, as needed, to prevent duplicate aid.

SAME OR COMPARABLE SERVICES

KTTP will provide welfare related services and assistance to all eligible Indian families in an equitable and fair method.

KTTP will provide the same or comparable activities and services in all parts of the KTTP service area

COORDINATION WITH OTHER PROGRAMS

KTTP will coordinate with other Tribal service providers and welfare related agencies to maximize services.

Local city, county and state departments may include; City or State Human Services, Department of Transportation (DOT, non-tribal childcare, health care services (medical), Siskiyou County, and the City of Yreka.

KTTP will coordinate with state and county agencies, local business, local high school and community colleges for employment and educational needs to enhance job training and employment opportunities.

KTTP will coordinate with other Karuk Tribal Departments to maximize services. These may include; Karuk Low Income Assistance Program (UAP), Karuk TERO/Childcare Program, Karuk Indian Child Welfare (ICWA), Karuk Human Services, Yav Pa Anav, Tribal Wellness Center, Tribal Computer Center, Tribal Victim Services, Karuk Tribe Housing Department, and Karuk Education to enhance job training and employment opportunities.

CONFIDENTIALITY STATEMENT

KTTP will require all Tribal TANF staff to sign a confidentiality agreement, annually, acknowledging they understand and will follow all policies and procedures to ensure applicants and participants rights to complete confidentiality and that any violation of confidentiality may result in the staff members' immediate termination.

FISCAL ACCOUNTABILITY

For each year in which the Karuk Tribe receives or expends TANF funds, the Tribe will comply with fiscal accountability provision of 25 U.S.C.450(c)(f)(1), relating to the submission of a single-agency audit report required by chapter 75 of title 31, United States Code.

ADMINISTRATIVE CAP

The Karuk Tribal TANF program will not expend more than 25% of the Tribal Family Assistance Grant on administrative costs for the period covered by the Tribal Family Assistance Plan.

DATA COLLECTION AND REPORTING

KTTP will comply with all federal statutory and regulatory TANF reporting requirements. KTTP will measure progress and outcomes by collecting data that describes the assistance

and/or services provided to eligible families and/or individuals each month.

RETROCESSION

In the event that the Karuk Tribe should choose to retrocede KTTP, the Karuk Tribe will follow all requirements as defined by applicable TANF statutes and regulations pertaining to retrocession as presented in 45 CFR 286 and the Social Security Act.

Date Approved:

Submitted as Authorized:

Russell Attebery Chairman

Date