



## **Benefit Determination**

Comparability:

Welfare-related services and assistance to all eligible Indian families will be provided in an equitable and fair manner. Services and activities are offered consistently across all areas within the service area.

## **Diversion Payment:**

Diversion services are non-recurring short-term benefits (NRSTB) designed for families who do not require ongoing cash assistance but face a crisis or emergency that could impact their ability to work or maintain stability. These services help families avoid entering the regular TANF cash assistance program.

## **Eligibility and Criteria:**

- Families with income up to 300% of the Federal Poverty Guidelines are eligible.
- Applicants must be employed, have a job offer, or have a recent work history (within the last 90 days).
- A written self-support plan (for earned or unearned income) is required.

## **Key Features:**

- Diversion services are for working individuals who are at risk of needing TANF assistance.
- These services are not for ongoing needs but are intended to address specific crises.
- Limitations:
- Diversion assistance lasts up to 4 months.

## **Support Services**

Eligible, needy TANF participants, who are engaged in approved activities will be provided with a variety of support services to help improve self-sufficiency and remove barriers to employment. These services may include:

- Vocational Training & Job Support
- Educational Services
- Domestic Violence Referrals
- Youth Services
- Substance Abuse & Mental Health Services
- Transportation Services
- Non-Custodial Parent Support
- Small Business Development



## **Transitional Support Services**

Transitional Services will be provided to TANF participants who have become employed and lost eligibility for TANF cash grants due to excess income. These services are designed to help families maintain self-sufficiency after transitioning off TANF. Transitional services continue until one of the following occurs: the family's income exceeds 300% of the federal poverty guidelines.

## **Work Participation Rate and Hours**

Work participation rates and minimum weekly work hour requirements have been established to ensure active engagement and progress toward self-sufficiency.

- **Minimum Participation Rates:**
  - 40%, consistent with economic conditions and available resources.
- **Work Hour Requirements:**
  - **Single Parent/Needy Family:**
    - 20 hours/week
  - **Two-Parent Families:**
    - Minimum of 30 hours/week
    - Both parents' work hours can be combined to meet the total required hours.

## **Individual Participant Requirements**

Enrolled clients are required to fulfill specific responsibilities to maintain eligibility for assistance. These include:

1. **Random Drug Testing:**
  - Clients must agree to random drug screening while enrolled. All adult clients receiving TANF benefits will be referred to appropriate services to address barriers.

## **Work Participation Activities**

A variety of work participation activities will be provided to help participants achieve self-sufficiency. Given the geographic challenges and limited transportation in the Karuk service area, travel time (up to 1 hour per day) to and from approved activities is counted toward work participation hours.

Work Activities Include:

1. **Employment:**
  - Private, public, or Tribal subsidized/unsubsidized employment.
2. **Training and Education:**
  - Work experience, On-the-job training, Apprenticeships.
  - GED attainment, post-secondary education or vocational education directly related to employment.



- Job skills training and other employment-related education.
- 3. Job Search and Readiness:
  - Job search and job readiness assistance.
  - Basic skill development.
- 4. Community Service and Economic Development:
  - Community service work.
- 5. Barrier Removal Activities:
  - Participation in programs addressing barriers to employment, such as mental health counseling, domestic violence counseling, and substance abuse treatment.
- 6. Entrepreneurship and Life Skills:
  - Small business and entrepreneurial training.
  - Life skills training such as financial management, parenting education, health, nutrition, and hygiene to promote family wellness and job readiness.
- 7. Culturally Relevant Work Activities:
  - Culturally relevant activities that support self-sufficiency, such as those that provide income through the sale of goods or services, or activities that increase job-relevant skills.
- 8. Childcare:
  - Providing childcare services for clients participating in approved work activities or community services programs.
- 9. Family Preservation and Maintenance Services:
  - Participation in family preservation/maintenance activities, aimed at helping families cope with significant stressors or issues that may interfere with their ability to care for their children. These services focus on maintaining children with their families or reunifying families when possible and safe.
  - Family Maintenance services are also available for families at risk of child neglect or abuse, in cooperation with TANF, Karuk Child & Family Services, or county Child Welfare Services.

### **Work Participation Exemptions & Justifications**

Exemptions and justifications for work participation requirements may be provided in specific circumstances, ensuring that individuals are supported in their efforts toward self-sufficiency.

1. General Work Participation:
  - Individuals are considered engaged in work if they participate in any approved work activity.
2. Job Search & Job Readiness:
  - Job search or job readiness activities.
3. Exemptions for Parents:
  - Single Parent with Child Under 1 Year: Exempt from work participation until the child turns 1 year old.
4. Teen Head of Household:



- A teen head of household who maintains satisfactory school attendance (High School, GED, or College) will meet work participation requirements.
- 5. Childcare-Related Exemptions:
  - Single Parent with Child Under 6 Years: Cash assistance will not be terminated or reduced if the parent refuses or stops work activities due to childcare issues, provided the exemption is certified by the Family Service Specialist.
  - Reasons for exemption include:
    - Unavailable child care: No appropriate child care within a reasonable distance (30 minutes).
    - Unsuitable informal childcare: Unavailable or unsafe arrangements, such as with a relative.
    - Inadequate formal childcare: No available slots at licensed child care facilities, which are at full capacity.
- 6. Definition of Appropriate and Affordable Childcare:
  - Appropriate Childcare: Meets minimum standards for care and protection of children, ensuring safety and proper development.
  - Affordable Childcare: Does not cause financial hardship, allowing the family to continue working towards self-sufficiency.

#### Penalties (Sanctions) Summary

##### 1. General Penalties for Non-Compliance:

- If a client fails to comply with requirements, their assistance may be reduced or terminated for a defined period.
- Sanctions apply to the individual client, not the entire Assistance Unit (AU).
- Non-compliance with work activities may result in reduced or terminated assistance, with basic needs provided through a voucher system for food, utilities, and shelter for children only, until work requirements are resumed.

##### 2. Substance Abuse/Mental Health Refusal:

- Individuals refusing substance abuse/mental health counseling (when referred) will be placed on the voucher system.

##### 3. Fraud Sanctions:

- Deliberate fraud (e.g., collecting benefits from multiple sources or providing fraudulent information) may result in the individual being declared ineligible.

#### **5.4.3 Cash Assistance for Individuals (General Assistance)**

General Assistance provides specific, short-term financial assistance to meet basic essential needs (e.g. food, utilities, transportation and/or shelter), as basic needs must be met in order for individuals to pursue educational or vocational training, maintain a job, and achieve self-sufficiency.

#### Employment Requirements

If an applicant or recipient is determined to be “employable”, he/she must be actively seeking employment, provide evidence of monthly efforts to obtain employment, make satisfactory progress in meeting to goals of his/her an ISP, and accept local and seasonable employment when available.



Case Review

The social services worker must approve or deny an application within 30 days of the application date. The local social services worker must issue written notice of the approval or denial of each application within 45 days of the application date. Program staff will meet the clients to review ongoing eligibility for General Assistance every 3 months for individuals who are employable and not exempt from seeking employment, or every 6 months for all recipients. Program staff will review eligibility whenever there is a change in status.

The employment policy in § 20.314 does not apply to . .	if . . .	and . . .
(a) Anyone younger than 16		
(b) A full-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	He/she is making satisfactory progress.
(c) A person enrolled at least half-time in a program of study under Section 5404 of Pub. L. 100-297	He/she is making satisfactory progress	He/she was an active General Assistance recipient for a minimum of 3 months before determination/redetermination of eligibility.
(d) 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	He/she must be referred to SSI if the disability status exceeds 3 months.
(e) An incapacitated person who has not yet received Supplemental Security Income (SSI) assistance	A physician, psychologist, or social services worker certifies that a physical or mental impairment (either by itself, or in conjunction with age) prevents the individual from being employed	The assessment is documented in the case plan.
(f) 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 there is no other appropriate household member available to provide this care.
(g) 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	
(h) A person for whom employment is not accessible	There is a minimum commuting time of one hour each way	

**5.4.4 Burial Assistance:**

In the absence of other resources, the Karuk Tribe can provide Burial Assistance for eligible Indians meeting requirements.

**5.4.5 Emergency Assistance**



Emergency Assistance payments can be provided to individuals or families who suffer from a burnout, flood, or other destruction of their home and loss or damage to personal possessions. The Bureau will make payments only for essential needs and other non-medical necessities.

**5.4.6 Low Income Home Energy Assistance Program (LIHEAP)**

Funds can help households stay safe and warm in the winter by providing assistance with home heating bills, preventing energy shutoffs, reconnecting services, making homes more energy efficient, and repairing or replacing heating equipment.

- Eligible households shall be assisted on a first come, first serve basis.
- Priority One will be given to household members who are sixty (60) years and older and receiving disability income, or has a disability that is verified by a physician or federal agency;
- Priority Two will be given to household members who are sixty (60) years and older;
- Priority Three will be given to household members who are receiving disability income or has a disability that is verified by a physician or federal agency.
- Priority Four will be given to household members with young children who are five (5) years old or younger.

A life-threatening crisis is limited to individuals, who are exposed to extreme indoor/outdoor temperatures that adversely affect their health and/or well-being within days of running out of fuel/utilities being shutoff. A household member's health and/or well-being will likely be endangered if energy assistance is not provided. Utility services are disconnected if the households heating/cooling system requires electricity. Deliberate failure to maintain account up to date does not qualify as a crisis or life-threatening crisis.

Crisis benefit amounts is determined where the safety and well-being of a vulnerable household member is at risk as a result of disconnection of energy services, depletion of energy supplies, inoperable furnace, unsafe stove, natural disaster or declaration of state of emergency etc. The benefit amount is determined by household size, income, fuel type and shall not exceed FAU payment benefit matrix amount. A household that experienced power outage and/or impassable road conditions caused by severe rain, snow, wind storms, or mud creating health and safety hazards due to extreme cold during the winter months and extreme heat during the summer months, for which they will be eligible for crisis assistance. If an applicant is determined eligible for crisis assistance due to inoperable heating/cooling services they will be provided with blankets, space heaters, fans to meet their heating/cooling needs.

Renters: Eligible households, who rent, will be provided weatherization only if the landlord provides written authorization for the minor repairs/improvements.



Renters living in subsidized housing: Eligible households who are applying for weatherization assistance and are living in subsidized housing must obtain prior authorization and approval from the housing agency.

Weatherization assistance includes cost-effective energy related Minor Home Repair, AC unit, and Wood/Pellet Stove. Dwellings which do not meet the criteria for weatherization assistance will be given the option to receive other types of energy assistance e.g. cooling or heating assistance. Thereafter, priority shall be provided, in accordance with the following, to households which include at least one (1) vulnerable member.

#### **5.4.7 Incentives**

All participants will be eligible for incentives. Incentives or recognition may be offered to participants for their successful participation in and completion of education or training services and tied to the goals of the respective program. Incentives may include but are not limited to fee reimbursement, gift cards, gas, school supplies, event door prizes, or traditional crafts sold by local artists and are dependent upon program funding.

#### **5.4.8 Recoupment**

When an improper payment is found, monies must be recouped by having the client repay or sign a payment agreement. Those unwilling to repay or sign a payment agreement will be added to the Tribe's delinquent list and cannot use services until the debt is resolved, with the exception of Medical, Dental, and Mental Health services.

## **6. ECONOMIC DEVELOPMENT**

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The Karuk Tribe may use up to 25% of the combined 477 funding a year for economic development. Karuk services are based on working and partnering with local and regional businesses and entities who are willing to work together to create jobs and career paths for the community and our participants to promote economic development for the region. The Karuk Tribe's 477 plan may involve the expenditure of funds for the creation of employment opportunities, for the development of economic resources of individual tribal members.

Such expenditures must be consistent with an overall regional economic activity that has a reasonable likelihood of success and is consistent with the purposes specifically applicable to tribal programs in the statute under which the funds are authorized. Eligible tribal members who are pursuing self-employment may be assisted with funding which would allow the participant to obtain training, new business fees, start-up materials, and/or equipment. We may also provide assistance to obtain appropriate training in business courses including accounting, inventory, preparing a business plan, which involves budgeting, and/ or assistance with the application or loan process.

## **7. EMERGENCY DISASTER, CRISIS AND MITIGATION RESPONSE**

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The primary role of government is to provide for the welfare of its citizens. The welfare and safety of citizens is never more threatened than during disasters. The goal of



emergency management is to ensure that mitigation, preparedness, response, and recovery actions exist so that public welfare and safety is preserved, and community resilience is improved. In addition, such disasters imperil the Karuk Tribe and 477 Program participants' efforts toward self-sufficiency, job training and skill development, and economic development. Effective and efficient responses will help the Karuk Tribe's participants get these efforts back on track in the event of an emergency or disaster.

The Karuk Tribe's All Hazards Mitigation Plan provides a comprehensive framework for tribal emergency management. It addresses the roles and responsibilities of tribal organizations and provides a link to local, State, Federal, and private organizations and resources that may be activated to address disasters and emergencies in the Nation.

The Karuk Tribe Hazards Mitigation Plan ensures consistency with current policy guidance and describes the interrelationship with other levels of government. The plan will continue to evolve, responding to lessons learned from actual disaster and emergency experiences, ongoing planning efforts, training and exercise activities, and Federal guidance.

It is the responsibility of officials under this plan to save lives, protect property, relieve human suffering, sustain survivors, repair essential facilities, restore services, and protect the environment. All components of the Tribe's 477 Plan serve in critical areas in support of the Tribe's All Hazards Mitigation Plan. Karuk Tribes Childcare maintains a robust emergency response plan that operates in concert with the larger operations of the tribe. The plan is part of the Karuk Tribe's Childcare Health and Safety standards and is fully incorporated here by reference.

The effort starts with pre-mitigation on an individual basis. Through the Safe & Stable Families initiative, each household is guided to prepare and practice emergency response plans. Families will be encouraged to become involved in educational training or events that help them plan for safety. Household education may include how to mitigate conditions or risks; how to prepare Emergency 'Go' Kits; practicing Evacuation Routes; and other Household Mitigation tips.

In the event a disaster occurs, Karuk Tribe's efforts includes, but are not limited to:

- Identifying, locating, and coordinating services to adversely affected participant households.
- Responding to new cases created by the emergency.
- Assisting in communication or filling the void with caseworkers and other essential child welfare personnel who are displaced because of the disaster.
- Preserving essential records.
- Coordinating services and sharing information with other service agencies as appropriate.
- Assisting with manpower response.
- Improving preparedness and resilience to protect against future disasters





## 8. PUBLIC HEARING NOTICE

The Karuk Tribe advertised an open comment period for our new 477 plan. Flyers were posted in all communities, emailed to all users, website announcement notification and social media postings were shared from December 17, 2024 to January 31, 2025 for the 45-day comment period for the 477 Plan which will be effective April 1, 2025 through September 30, 2035. See Appendix O.

## 9. BUDGET

ANTICIPATED REVENUE		
Program	Administration	Revenue
<b>BIA</b>		
Adult Education	BIA	\$300.00
Burial Assistance	BIA	\$35,000.00
General Assistance	BIA	\$75,000.00
Higher Education	BIA	\$96,200.00
Job Placement and Training	BIA	\$28,400.00
Johnson O'Malley (JOM)	BIA	\$45,400.00
<b>HHS</b>		
Child Care Development Fund (CCDF) Discretionary	HHS	\$310,246.00
Child Care Development Fund (CCDF) Mandatory	HHS	\$58,681.00
Head Start	HHS	\$802,030.00
Low Income Home Energy Assistance Program (LIHEAP)	HHS	\$43,735.00
Native Employment Works (NEW) FY 23	HHS	\$39,154.00
Native Employment Works (NEW) FY 24	HHS	\$39,154.00
Temporary Assistance for Needy Families (TANF) FY 20	HHS	\$871,653.00
Temporary Assistance for Needy Families (TANF) FY 21	HHS	\$813,735.00
Temporary Assistance for Needy Families (TANF) FY 22	HHS	\$1,211,817.00
Temporary Assistance for Needy Families (TANF) FY 23	HHS	\$1,211,817.00
Temporary Assistance for Needy Families (TANF) FY 24	HHS	\$1,211,817.00
Temporary Assistance for Needy Families (TANF) FY 25	HHS	\$1,211,817.00
<b>Department of Justice</b>		
DOJ/BIA Adult Wellness Re-Entry Program	DOJ	\$218,430.00
DOJ/OJJDP Tribal Youth Program	DOJ	\$439,842.00
<b>Total Anticipated Revenue</b>		<b>\$8,355,365.00</b>
<b>Anticipated Annual Expenditures</b>		
<b>Program Accounts</b>		<b>Amounts</b>
Administrative		\$1,503,966.00
Non-Administrative		\$6,851,399.00
<b>Total Anticipated Annual Expenditures</b>		<b>\$8,355,365.00</b>



### **Administrative Expenses and Indirect Cost**

For the purposes of the Karuk's 477 Plan, administrative expenses are defined by the Karuk Tribe's negotiated Indirect Cost Agreement (see Appendix C). The administrative expense category includes direct administrative costs and all indirect costs attributable to the programs, which are costs incurred for a common or joint purpose and benefit more than one cost objective. As noted in the expenditure budget, the Karuk Tribes FY2024 approved Indirect Cost Rate Agreement with the Department of Interior's Interior Business Center used a fixed with carryforward calculation to determine the rate. The rate applies to all programs administered by the Tribe. To determine the amount of indirect costs to be billed under this agreement, direct salaries and wages should be summed and multiplied by the rate. All other program costs, including fringe benefits associated with direct salaries and wages, should be eliminated from the calculation. Fringe benefits applicable to direct salaries and wages are treated as direct costs; fringe benefits applicable to indirect salaries and wages are treated as indirect costs. Section 3413(d)(1) of the 477 law "All administrative costs may be commingled and participating Indian tribes shall be entitled to the full amount of such (costs under each program or departments regulations).

### **Reporting**

Karuk Tribe will comply with all statutory and regulatory data collection and reporting requirements under P.L. 102-477. Karuk acknowledges an annual report (statistical, financial, and narrative) will be filed annually per OMB 1076-0135.

## **10. WAIVERS**

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The Karuk Tribe Head Start Program is requesting a waiver of \$164, 406.00 for the non-federal share for the 2025 Program Year (PY). See Attachment M.

## **11. APPENDIX**

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- Appendix A - - Tribal Resolution
- Appendix B - - Letter of Intent
- Appendix C - - Indirect Cost Agreement
- Appendix D - - SF424
- Appendix E - - Assurances and Certification (including SF-424 B)
- Appendix F - - Annual Audit
- Appendix G - - 477 Tribal Officials
- Appendix H - - Organizational Chart
- Appendix I - - TANF Payment Rates
- Appendix J - - Child Count Declaration
- Appendix K - - Child Care Program Rate Schedule
- Appendix L - - Child Care Provider Consumer Statement
- Appendix M - - Head Start Waiver Request Letter
- Appendix N - - Uniform Appeal and Grievance Process
- Appendix O - - 477 Plan Public Notice Comment Period