

The Washoe Tribe of Nevada and California



Washoe Native TANF Program *Temporary Assistance for Needy Families*

TRIBAL FAMILY ASSISTANCE PLAN RENEWAL

DRAFT Plan Renewal for January 1, 2024 – December 31, 2026

Approved by Resolution No. (TBD)



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Statutory Authority

Public Law 104-193, the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA) authorizes Indian Tribes to administer and operate their own Temporary Assistance for Needy Families (TANF) program. The Washoe Tribe of Nevada and California will administer the Washoe Native TANF Program (WNTP).

Administration

The Washoe Tribe of Nevada and California is responsible for all aspects of the administration of the Washoe Native TANF Program, and will serve the approved service population residing in the approved service areas with TANF assistance and support services, and provide eligible enrolled Washoe Tribal members who reside outside of the approved area with TANF benefits as described in this plan.

The Washoe Tribal Council has delegated the management of the TANF day-to-day operations to the Tribe's TANF department, and fiscal matters to the Tribe's Chief Financial Officer (CFO). The WNTP Director and CFO report to the Tribal Administrator.

Program Intent and Purpose

The Washoe Tribe of Nevada and California's Native TANF Program (WNTP) will comply with all federal statutes and regulations governing Tribal TANF while meeting the four purposes of TANF:

1. Provide assistance to needy families so that children can be cared for in their own homes or in the homes of relatives;
2. End the dependence of needy parents by promoting job preparation, work, and marriage;
3. Prevent and reduce the incidence of out-of-wedlock pregnancies;
4. Encourage the formation and maintenance of two-parent families.

The Washoe Native TANF Program will further the four purposes of TANF by helping, supporting, and preparing families to meet the challenges of achieving self-sufficiency by providing essential assistance, support services, and resources that will empower participants to succeed in reaching their full potential.

It is WNTP's vision to fulfill the four purposes of TANF by inspiring independence through culture, knowledge, and resiliency. It is our mission to provide opportunities to improve lives through culture, inspiration, and respect.



Program Goals and Outcomes

WNTP specific goals and means for measuring progress on these goals are:

WNTP will increase the employability of participant families and the number of families who are able to secure employment by providing comprehensive employment-related services and support to increase the employability of needy families through education, training, skills development, job placement, and on-the-job training/work experience. Progress on this goal will be measured by work participation rates, completed job training and education goals, and employment retention through the 24-month transitional period.

WNTP will reduce the risk factors in adults and youth, in particular those in non-needy caretaker households, associated with unplanned pregnancies and other maladaptive behaviors through pregnancy prevention education and activities, mental health wellness, and family support services. Progress on this goal will be measured by participant self-reports, successful completion of family support plan milestones, case management and mental wellness expert reports, and successful participation in prevention activities.

WNTP will increase the number of families who demonstrate and/or report improved two-parent stable home environments for children by providing education and family supports to all AI/AN families who are in need of help. Progress on this goal will be measured by participant self-reports, successful completion of family support plan milestones, case management and mental wellness expert reports, and successful participation in family strengthening activities.

Progress on the program goals will be measured by using specific reports to track and analyze data, participant surveys, and case management related information.

Period Covered by the Plan

The Washoe Native Tribal TANF Plan covers the operation of the WNTP for a three-year period beginning January 1, 2024 and ending December 31, 2026.

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Service Population and Service Area

The Washoe Native TANF Program's approved service area includes Washoe reservation lands in Alpine County, California, Carson City, Nevada, and Douglas County, Nevada; the off-reservation areas of Carson City, Nevada, and Douglas County, Nevada; and the off reservation areas of Alpine, Nevada, Alameda, San Francisco, Santa Clara, San Mateo, Santa Cruz, and San Joaquin* Counties in California.

The Washoe Native TANF Program's approved service population includes:

- a. Eligible Washoe Tribal members and their descendants who reside in the off-reservation areas of Carson City and Douglas County in Nevada, and on Washoe reservation lands in Nevada and California; and
- b. Eligible Washoe Tribal members, members of Federally recognized Tribes, members of the California Judgment Roll, and their descendants who reside in the off-reservation areas of Alpine, Nevada, Alameda, San Francisco, Santa Clara, San Mateo, Santa Cruz, and San Joaquin counties in California.

**San Joaquin County Tribal TANF services are shared with California Tribal TANF Partnership (CTTP).*

Provide benefits to enrolled Washoe Tribal members who reside outside of the Approved Service Area

In accordance with the authority granted under TANF-ACF-PI-2018-02, the Washoe Tribe hereby elects to provide the full range of Tribal TANF assistance and services as described in this plan to all eligible enrolled Washoe Tribal members and their families, who reside in the off-reservation areas of Washoe County and Lyon County, Nevada. Eligibility and services will be managed by the existing WNTP offices located in Carson County, Nevada and Douglas County, Nevada.

In order to be eligible, at least one family member (parent, non-needy caretaker, or child) must be an enrolled Washoe Tribal member. The parent or non-needy caretaker (Indian or non-Indian) must have custody of at least one AI/AN child and meet the WNTP definition of "Needy" in accordance to income and resources limitations.

It is understood 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 Tribe also understands that it is not authorized to establish a Tribal TANF office outside of the WNTP's approved service area, and that the time limit exception associated with 50% or more not-employed does not apply to those enrolled Washoe Tribal members who reside outside the Washoe Reservation lands.

As per the requirements outlined in TANF-ACF-PI-2018-02, and as noted in this plan, the Washoe Tribe of Nevada and California has established memorandums of understanding with the State agency serving Washoe County and Lyon County as to ensure non-duplication of benefits and services.



The Washoe Tribe of Nevada and California assures that the Washoe Native TANF Program has the administrative capacity to provide TANF benefits and services with no negative impact to overall Tribal TANF operations and/or current provision of benefits and services.

Eligibility for WNTP Assistance and Services Related to the Purposes of TANF

Only needy families, as defined in this TFAP, may receive:

- a. any form of Federal 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 one or two.

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 three and/or four. Objective criteria will be implemented to determine eligibility for participation in TANF Purpose 3 and/or 4 activities.

Unless the State of California 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.

Eligible American Indian/Alaskan Native Family

WNTP shall define an eligible American Indian/Alaskan Native (AI/AN) family as a unit comprised of biological children, step children, adopted children, or relative children (including non-Indians) under the age of 18 (or 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) living with an eligible adult/adults, where at least one member of the family unit is an enrolled member or descendant of a federally recognized Tribe. Eligible AI/AN families must also meet one of the following criteria:

- a. AI/AN or non-native single parent family with an eligible child or children (at least one child must be AI/AN).
- b. Single, pregnant AI/AN adult (with no other children) with verification of pregnancy.
- c. AI/AN or non-native teen head-of-household with eligible child/ren (at least one child must be AI/AN).
- d. AI/AN or non-native two-parent family with eligible child/ren (at least one child must be AI/AN).
- e. Eligible AI/AN children residing full-time with a needy or non-needy caretaker relative who is related by blood, marriage, tribal culture, or tradition, with legally conferred guardianship giving caretaker authority to provide care and control of a child.

***Needy Family***

For receipt of cash assistance, “Needy” means financially deprived, according to income and resources. WNTP defines needy families as those families with total countable family income equal to or less than 200% of the most recently published federal poverty guidelines. Income exclusions are defined under *Income Eligibility and Assistance Determination*.

Other Eligible

WNTP may provide services and activities under TANF Purposes 3 and 4 to individuals and families who are not financially deprived, but who have been determined to be eligible under objective criteria defined in this plan under *Support Services for “Income-Eligible” and “Other Eligible” under Purposes 3 and 4* and are part of the approved service population residing in the approved service area.

Assistance

WNTP will provide eligible, needy families monthly assistance (as defined in 45 CFR § 286.10) in the form of cash, direct payments, vouchers, and other forms of benefits designed to meet a family’s ongoing basic needs, (e.g. food, clothing, shelter, utilities, household goods, personal care items, and other basic needs). This includes child care and transportation assistance for those eligible needy TANF program participants who are engaged in approved work activities but are not employed, and eligible program participants who are transitioning off of assistance due to earned income.

Monthly cash assistance amounts will be determined based on a rate that is specific to the family size and income. To ensure that the families are receiving the full amount of assistance entitled to, WNTP will reimburse verified Electronic Benefit Transfer (EBT) funds charged for withdrawing funds or monthly fees imposed by the EBT card company.

Income Eligibility and Assistance Determination

Upon evaluation of all earned and unearned income reported, WNTP will disregard any excluded income and use all remaining income as total countable income to determine whether the family is income eligible. The following sources of income received by WNTP families will be excluded when determining income eligibility and/or when calculating the monthly cash aid payment.

- a. All Indian judgement funds or other disbursements excluded under federal law
- b. Tribal General Welfare Exclusion Act distributions
- c. Disaster relief or emergency/crisis benefits
- d. Educational assistance received from government financial aid programs
- e. Payments received under Universal Basic Income programs
- f. Any other State, County, or City guaranteed income programs
- g. Disregarded portion of child support income received as pass-through payments
- h. Earned income of a minor child or teen parent while enrolled and attending high school



When calculating the monthly cash assistance payment amount, income eligible needy families will receive an earned income deduction. Eligible adults participating in the WNTP On-the-Job-Training (OJT) program will receive a deduction of \$1,000 from the total countable gross earned income, then, from the remainder, 50% will be counted as the net countable earned income. For all other eligible working adults, WNTP will deduct the first \$750 from the total countable gross earned income, then, from the remainder, 50% will be counted as the net countable earned income.

Assets and Resources

WNTP will exclude from the asset/resource limit: a family's primary residence, whether it is fixed, mobile, or a motor vehicle; one operable vehicle for each eligible and licensed adult/high school student in the household; equipment or tools needed to maintain or obtain employment; Indian judgement funds or other disbursements that are excluded under federal law; land located on an Indian reservation or held in Trust; burial accounts; retirement accounts with restricted access; and other assets held in trust. In addition, up to \$10,000 may be excluded from the resource limit for a special savings account/plan being set aside for the purchase of a home or vehicle.

All other available assets such as real property equity, stocks/bonds, bank accounts, cash, cryptocurrencies, boats, recreational vehicles, and vehicle equity (beyond those exempted above), will be counted as resources and considered in determining eligibility based upon income. Exceptions may be granted for inoperable vehicles that have no verifiable value. Total combined value of countable assets cannot exceed \$10,000 in order to be considered for eligibility.

Support Services and Activities for Income Eligible Participants (Purposes 1 & 2)

As funds permit, WNTP may provide needy eligible participant families with the following supportive services:

- a. Vocational training, skills assessment, job readiness, job placement support, and training;
- b. Educational activities designed to increase job skills, and work experience;
- c. Subsidized employment (i.e. payments to employers or third parties to help cover the costs of employee wages, benefits, supervision, and training);
- d. Job related or educational costs when cooperating with WNTP work participation requirements, including but not limited to the following: educational books and school supplies/kits, tuition, child care, clothing allowance, transportation expenses, gas allowance, and vehicle repairs;

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- e. Transitional support services may be provided for up to twenty-four months to employed participants who are no longer eligible to receive assistance due to earned income exceeding 200%, but whose earned income does not exceed 300% of the federal poverty guidelines. Transitional services are intended to help families transition successfully from TANF.

Transitional services are not available if the family's cash assistance has been terminated due to fraud, sanction, or if the family is receiving child-only cash assistance.

Transitional support services include childcare, transportation, and expenses to maintain employment such as tools, clothing, certification fees, licensure, and limited trainings required to maintain employment. Specifics about the benefits available during transition are outlined in program policies and procedures.

Transitional cases may be eligible for employment retention incentives of a progressive nature for maintaining employment while remaining eligible to TANF transitional services. Employment retention incentives will not exceed a maximum total amount of \$4,500 per lifetime.

- f. Individual Development Accounts for needy eligible TANF program participants, if implemented.
- g. Economic and job development as approved by the Administration for Children and Families (ACF).
- h. Domestic violence (DV) services and referrals for any family members impacted by DV (victims, aggressors, child witnesses, elder caretakers, etc.) with the goal of addressing trauma and preventing future incidents; services include but not limited to counseling, prevention outreach, education, anger management, parenting classes, and assistance with temporary or emergency shelter services.
- i. Non-medical substance abuse services, anger management, and mental health services to remove barriers to employment and self-sufficiency.
- j. Assistance with limited health services (such as eye glasses) in order to remove barriers to employment when all other resources have been exhausted.
- k. To promote marriage and the formation of two-parent families, WNTP may provide needy eligible participants with a one-time marriage incentive of up to \$1,500. This incentive is provided to assist with marriage costs including but not limited to the cost of a marriage license, officiant, and appropriate attire. Adults are required to complete premarital marriage counseling that may be covered by WNTP and is not included in the \$1,500.



- l. Assistance with student loan debt in the context of removing barriers to employment, income-eligible participants may be eligible to a one-time payment of up to \$1,500 toward any education loans that are in default.
- m. One-time or limited payment (not to exceed four months) to assist an income-eligible participant in addressing bad debt that is causing a barrier to securing employment or shelter. Lifetime limit not to exceed \$5,000.
- n. To promote work and self-sufficiency efforts, WNTP will provide a one-time incentive payment (equal to the participant's maximum monthly cash assistance grant) for obtaining and retaining full-time unsubsidized permanent employment following 90 days of continuous successful employment.
- o. Home Safety Funds (HSF) may be provided for needs discovered upon the completion of a home visit or brought to the attention of and recommended by a Site Manager. HSF items are intended for the safety of the children in the home, but cannot be used for construction costs or basic home furniture (with the exception of beds). HSF items may include but are not limited to: smoke/carbon monoxide detectors, child safety plugs, child safety gates (stairs), choking rescue devices, first aid kits, fire extinguishers, and age appropriate beds/bedding, etc.
- p. WNTP may provide support with the cost of basic Baby Needs to income-eligible parents with a newborn. Baby Needs may be available within the first 12 months of infancy for items such as diapers, bottles, toiletries, sanitizers, clothing, highchairs, cribs, strollers, and car seats. In the context of AI/AN tradition, WNTP may provide an additional payment, not to exceed \$500, to apply towards a traditional cradleboard/baby basket or the materials to make one in place of purchasing a basinet as bed/bedding for an infant.
- q. WNTP may provide TANF participant families with an allowance to purchase new school clothing and school supplies for the school-age children enrolled in school (K-12).
- r. For children between the ages of two to four who are not yet in school, WNTP may provide TANF participant families with an annual clothing allowance to ensure they have basic clothing needed for their health and safety.
- s. One-time payment per eligible adult towards non-felony related traffic fines, court-imposed classes, record expungement, expired car registration, expired auto insurance, ignition interlock devices and/or payment of parking fines in the context of removing barriers to employment and training.
- t. WNTP will pay up to \$500 per occurrence to assist with costs for paternity testing to form or maintain a two-parent family.



- u. WNTF will provide child care assistance to WNTF participant families who:
 - 1. Are cooperating with the work participation requirements, but not yet employed;
 - 2. Have a temporary medical condition that limits the parent's ability to lift and care for the child/children as verified through a licensed medical provider;
 - 3. Are employed Non-Needy Caretakers (NNCR);
 - 4. Are non-working NNCRs in need of respite care that will benefit the child(ren), of up to 16 hours per month.

Achievement Incentives for Income Eligible Participants

Subject to the availability of funds, incentives will be offered to income-eligible TANF participants who are meeting their educational goals as outlined in their Family Self-Sufficiency Plan. Achievement Incentives will be tied to the purposes of TANF, will be reasonable, and have established, objective criteria. Verification of the certificate or degree is required prior to receiving an academic achievement incentive. A prorated calculation of the achievement incentive may be applied on a per semester basis (full-time equivalent) for the amount of education or vocational training completed while an active WNTF participant.

- a. Income-eligible TANF parents may receive a \$500 achievement incentive for completing and obtaining a High School diploma or their GED certificate, \$1,000 for a vocational certificate program, or a career certificate program such as, but not limited to, licensed vocational nurse (LVN), dental assistance, cosmetology, massage therapy, welder, or mechanic as directly related to employment; \$1,500 for an Associate's Degree from an accredited college, and \$2,500 for a Bachelor's Degree from an accredited college/university.
- b. WNTF youth in a family receiving cash assistance may be eligible for the following achievement incentives.
 - 1. Two times per school year, based on student's report card, the student may receive \$100 for an "A" average; \$75 for a "B" average; and \$50 for a "C" average.
 - 2. At the end of the school year, an eligible youth may receive an additional \$75 achievement incentive when obtaining a full grade point average improvement or if maintained an "A" average from the last reporting period of the school year.
 - 3. For perfect attendance throughout the school year, the student may receive an additional \$100 at the end of the school year.
- c. WNTF youth in a family receiving cash assistance and a senior graduating from high school may be eligible for a graduation achievement incentive of \$500.



Support Services for “Income-Eligible” and “Other Eligible” under Purposes 3 and 4

Subject to the availability of funds, WNTP may provide services and activities to individuals and families, regardless of financial need, who have been determined to be eligible to participate in Purpose 3 and 4 activities. At-risk individuals and families meeting “other eligible” criteria will be identified through a survey to determine “at risk” status. Eligibility criteria is determined by meeting three of the following indicators:

Living on or near reservation	Domestic Violence issues	Recent relocation from reservation
One-parent household	Substance abuse issues (current or previous)	Relative caretaker household
Lack of affordable housing	Co-dependency substance abuse	Lack of family resources
Lack of affordable childcare	Alcohol abuse issues (current or previous)	Lack of family relationships
Homelessness	Child(ren) truancy issues	Teen pregnancy or teen parent
Lack of transportation	Child(ren) struggling with grades	4+ children under the age of six
Lack of job opportunities	No high school diploma or GED	Physical health concerns
No valid driver's license	Lack of education	Mental health concerns
Lack of job skills	Lack of educational opportunities	Financial hardship
Low or No work experience	Lack of vocational training	Caring for an elder

WNTP will provide services and activities that are rooted in historical tradition and cultural practices, including non-medical wellness and healing intended to bring together a spectrum of AI/AN individuals, parents/guardians, children in a variety of settings that are designed to prevent out-of-wedlock pregnancies (Purpose 3) and promote successful two-parent families (Purpose 4).

Services and activities under Purposes 3 & 4 may include referrals, classes, workshops, individual/group talking circles, and education such as:

- a. Referrals to counseling and education for teen pregnancy related issues.
- b. Domestic violence education and referrals for any family member impacted by DV.
- c. Addressing issues of mental health, historical trauma and/or current community trauma through education and/or individual/group counseling which will promote individual and family wellness and healing.



- d. Culturally relevant support services and activities for the children/youth designed to reduce risk factors that can lead to unwanted pregnancies, suicide, substance abuse, truancy, and other maladaptive behaviors by engaging the children with counseling, tutoring, youth employment readiness workshops, and elder mentoring that may incorporate traditional skills and language.
- e. Culturally relevant activities that involve utilizing community resources to support and strengthen the family connection and bonding as a whole while incorporating traditional beliefs and elements that have been passed down from generation to generation such as basket weaving; pine nut and acorn gathering/preparation for eating; and the making of traditional clothing/regalia, bows and arrows, and drums.

Non-Recurrent, Short-Term Benefits for Emergency/Crisis Situations (Non-Natural Disaster or Pandemic)

As funds permit, WNTP may provide Non-Recurrent Short-Term Benefits (NRSTB) to eligible AI/AN families. In order to receive the benefit, a family must demonstrate a specific episode of need, and as per the regulation at 45 CFR Part 286.10 (b)(1), NRSTB must meet the following criteria:

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

NRSTB for Needy Participant Families

Income eligible Tribal TANF participant families may be eligible to NRSTB to meet an extraordinary need that arises from a specific crisis situation (not natural disaster/pandemic related) beyond the needs intended to be covered by regular TANF assistance and support services. The total family income must be equal to or less than 200% of the Federal Poverty Guidelines and the family must meet WNTP eligibility requirements. The lifetime monetary limit for emergency NRSTB is \$10,000.

NRSTB for Non-Needy Caretaker Participant Families

Non-needy caretaker relatives (NNCR) with temporary or permanent guardianship and caring for at least one eligible AI/AN child in their home may be eligible to NRSTB to meet an extraordinary need that arises from a specific crisis situation (not natural disaster/pandemic related) that affects the safety and well-being of children beyond what regular TANF assistance and support services can cover. The total family income must be equal to or less than 200% of the Federal Poverty Guidelines and the family must meet WNTP eligibility requirements. The lifetime monetary limit for emergency NRSTB provided to a caretaker relative family is \$5,000.



Non-Recurrent Short-Term Benefits in the Context of Natural Disaster or Pandemic

As funds permit, WNTP may provide NRSTB to eligible TANF participant families, caretaker relatives, and eligible AI/AN families whose total family income is equal to or less than 200% 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. In order to receive the benefit, a family must demonstrate a specific episode of need, and as per the regulation at 45 CFR Part 286.10 (b)(1), NRSTB must meet the following criteria:

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

NRSTB provided in the context of a governmentally-declared natural disaster, emergency, or pandemic will be limited to \$3,000 per event for TANF participant families and eligible AI/AN families; and to \$1,500 per event for relative caretakers.

Diversion Services

WNTP may provide Diversion services for non-TANF AI/AN families at risk of welfare dependency. The intent of Diversion services is to provide a one-time or limited short-term (not to exceed 4 months) benefit to an eligible family to assist them through a specific crisis situation or episode of need. Diversion service payments are made directly to the vendors and or services provided to the families. This is a one-time benefit with a \$10,000 lifetime limit per family.

To be eligible, the family must be residing within a WNTP service area; must not be a current TANF recipient or have federal time on aid available; and meet all other WNTP eligibility requirements including asset/resource limits. The total family income must be equal to or less than 300% of the Federal Poverty Guidelines. In addition, the family must be: 1) at risk of becoming dependent upon WNTP and 2) in need of a one-time or limited benefit(s) to assist the family to stay off of welfare.

Coordination with Other Programs

- a. WNTP coordinates with the state, county, local schools, community colleges, universities, and local Native American programs for educational needs and to enhance job opportunities.
- b. WNTP coordinates with outside tribal, local, county, and state organizations as well as local schools, high schools, and community colleges to provide educational resources and employment services for Native Youth.



- c. WNTP support services are provided through a variety of methods, including direct provision of services by WNTP and through agreements with other organizations, local community organizations, Tribal service providers, county governments, welfare related agencies, school districts, and other private contractors, where feasible or reasonable for each county.
- d. WNTP sites will provide career development services to coordinate with the local private/government/business training agencies to generate training and employment opportunities. WNTP will also collaborate with community partners to provide small business opportunities for WNTP participants. In addition, WNTP will provide services to address transportation issues as appropriate.

Employment Opportunities and Economic Outlook in Service Area

WNTP operates in both rural and urban areas; each service area presents its own unique set of assets and challenges in terms of employment opportunities, geographic and infrastructure barriers, and economic outlook.

Rural Areas and Reservations

Challenges and Barriers

The WNTP service area includes reservation lands that are located primarily in rural areas. The majority of the reservation communities covered under the program are geographically isolated, located a significant distance from areas with job opportunities and with limited access to public transportation. The logistical challenges presented by this isolation contribute to significant social and economic challenges including chronic poverty, high rates of unemployment, low levels of education, and deficiencies in basic life skills; these challenges serve as barriers to successful employment and the attainment of self-sufficiency for the populations that live in these communities.

Employment Opportunities and Industry

While there are limited commercial employment opportunities in the rural reservation service areas, there are currently tribal, federal, state and local public sector employment opportunities related to stewardship of the indigenous home lands near the reservation area communities. In accordance to the Nevada Department of Employment, Training, and Rehabilitation (DETR) and the California Employment Development Department Labor Market Division, the occupational growth trends in WNTP's rural service areas are anticipated from 2018 to 2028 to be in such sectors as construction, office/administrative support, nursing and residential care facilities, government services, food service and drinking places, computer network services, and transportation. Being near the Washoe Tribe of Nevada and California's Tribal Headquarters also offers individuals with options and opportunities. Other opportunities for rural area participants have included potential self-employment or small business operations including work-at-home opportunities.

**WNTP Strategies to Assist Participants in Rural Areas in Becoming Employed**

WNTP provides vocational training and an apprenticeship model for workforce development. WNTP staff build on the participant's skill-set through several avenues including:

- Direct work with WNTP Employment Coordinators
- Work Experience (WEX) Program with the various departments of the Washoe Tribe
- On-the-Job-Training (OJT) opportunities with community-based employers
- Vocational training and certification including licensing preparation
- On-Line based (Distant Learning) degree programs and certifications
- Tribal operated enterprises

WNTP has also established and maintains relationships with nearby industries and businesses to provide trainings, work subsidy, work experience, and employment opportunities to WNTP participants. WNTP addresses the deficit of employable skills through vocational trainings, employment assessments, education, job placement, and will promote self-sufficiency in a way that supports traditional activities, customs and ways of life of indigenous people.

Urban Service Areas**Challenges and Barriers**

In the urban areas within the WNTP service delivery area, there are many job opportunities in both the public and private sector, but the cost of living is extremely high. Families with low wage jobs are not able to be economically self-sufficient nor are they able to afford the education and training necessary to obtain higher paying jobs.

Employment Opportunities and Industry

In California, the Workforce Innovation and Opportunity Act (WIOA), American Job Centers present opportunities to enhance career and job options through the job-driven public workforce system. In accordance to California Employment Development Department Labor Market Division, WNTP's urban service areas such as the California Bay Area are experiencing an anticipated occupation growth from 2018 to 2028 in such sectors as health care technicians, nursing assistants, information security analysts, communication equipment operators, software developers/application.

WNTP Strategies to Assist Participants in Urban Areas in Becoming Employed

WNTP locations serving the urban areas work closely with the major employers of this area including hospitals/healthcare and laboratories, schools/universities, county government, grocers, technology companies and electronic equipment/supplies. Within the WNTP service area, there are also Native American specific agencies such as the Native American Health Centers, Intertribal Friendship House, and the American Indian Child Resource Center.



In the urban areas of California public and private employers, WNTTP matches available opportunities with Tribal TANF participants including such industries as computer and information technology, health, transportation, retail, food services, and seasonal work. Whenever possible, we partner with AI/AN specific entities that are within the service area as well as various Workforce Development Boards.

Assessment Tools for Job Seeking and Skill Preparation for all Service Areas

In an effort to reduce or eliminate barriers to employment, WNTTP utilizes a wide variety of assessment tools which assist participants in determining skills required and their potential career path. From basic math, reading and English skills testing to assessments providing insights into their interest to help in deciding an appropriate career choice for themselves.

On-line, self-paced workshops are used to promote job readiness skills. In addition, workshops to prepare participants for the workforce are provided by WNTTP staff. These tools and information are provided to assist in the growth and development of skills required for successful job placements.

Employability Workshops for all Service Areas

Employability Workshops are provided by WNTTP's Career Development staff. These various workshops are intended to assist WNTTP participants with the tools to assist in obtaining employment. These workshops and classes are designed to provide skills, motivation, and increase confidence in the individual's ability to successfully attain their career goals. Employability topics include:

- Resume Building
- Strategies for Job Search Success
- Dress for Success
- Soft Skills
- Interview Skills
- "Indeed" at a Glance
- Budgeting for Hire

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Tribal Work Participation Activities

WNTP ensures work participation requirements meet the unique challenges of serving both on-reservation and off-reservation rural communities as well as urban communities.

The approved work activities reflect the employment opportunities in the area, the resources of the Tribe, and the skills and needs of WNTP participants to enter the workforce and secure employment as part of their path towards economic mobility.

The WNTP service area includes the densely populated San Francisco Bay area as well as remote rural counties. In the Bay area, public transit commutes of more than one hour each way are not unusual. In remote and isolated counties such as Alpine and Nevada Counties, WNTP participants have to travel twenty or more miles to work, to reach a grocery store, or seek medical care. For those who do not own their own vehicle, they must rely on limited public transportation or extended family.

Whether it is by public transportation or personal vehicle, reasonable transportation time is a necessary part of obtaining and/or maintaining employment. Up to two hours total for each day of travel to and from work/training sites and travel time to and from child care providers will be counted as time towards meeting participant's work participation requirements. By allowing the participants to count the travel time to and from work/training sites and travel time to and from child care provides participants with the opportunity to learn how to navigate public transportation with confidence and plan around transportation commute challenges they may be faced within both urban and rural service areas which aligns with the purposes of TANF by promoting job preparation and work.

WNTP approved work activities include:

- a. Private, public or tribally subsidized/unsubsidized employment;
- b. Participation in a Native Employment Works (NEW) activity;
- c. Work experience;
- d. On the job training/job shadowing;
- e. Apprenticeship;
- f. Job Search/Job readiness assistance and basic skill development within the limitations specified at 45 CFR § 286.105 (b& c);
- g. Community service;
- h. Post-secondary education/vocational educational training;
- i. Job skills training directly related to employment;
- j. Education/training directly related to employment;
- k. Participation in mental health counseling, domestic violence counseling and/or substance abuse/chemical dependency treatment as a barrier removal activity;
- l. Small business/entrepreneurial training that will lead to self-employment;



- m. Life skills training/education such as financial management, first aid, parenting, health, hygiene, nutrition, and other activities that contribute to family stability and individual readiness needed to be able to enter the job market (total hours for life skills activities cannot make up the total work participation requirement with the exception of court ordered classes);
- n. 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 a diploma or GED certificate; and
- o. Culturally relevant activities to increase self-sufficiency such as activities which will result in food or other basic needs fulfillment, products or services that may be sold to provide income, and/or activities that will increase skills applicable to employment.

Work Participation

Work Participation Rates

WNTP agrees to satisfy the following minimum work participation rates as established which is consistent with economic conditions and available resources:

Minimum Work Participation Rates, All Families

Plan Year	Minimum Rate
FY 2024 – FY 2026	43%

Hourly Work Participation Requirements

The WNTP minimum work participation requirements will apply to families that receive Tribal Assistance that include an adult or minor head of household receiving such assistance.

Family Type	Minimum Hours/Week
Single Parent with child/children under 6 years old	16
Single Parent with child/children over 6 years old	24
Two Parent Families	30

Single and two-parent families are required to participate in a work activity for the minimum number of hours per week listed above. For two-parent families, WNTP will allow either one or both parents to fulfill the weekly work requirement.

It is recommended in a two-parent family that both parents participate in opportunities presented which will enhance the self-sufficiency goals as well as count towards the WPR of the family.



Limitations and Special Rules

- a. An individual shall be considered to be engaged in work by virtue of participation in any approved work activity specified in this plan or approved by WNTP in advance.
- b. Exemptions provided for work participation requirements do not extend the time limit for receiving Federal assistance.
- c. Individuals who are participating in approved vocational education activities will not be subject to a 12-month limitation.
- d. WNTP may consider participation of an individual in a job search and/or job readiness activity for a minimum of three days per week to be counted as a full week of participation by that individual as long as the minimum weekly work participation requirement is met. An individual's job search and job readiness may only count toward work requirements for a total of six weeks in any fiscal year, unless such activities are an ancillary part of other work activities such as employment/training, education classes, or other job readiness classes.
- e. If the participant resides in a WNTP service area with an unemployment rate that is at least 50% greater than the United States total unemployment rate for that fiscal year, then an individual's participation in job search or job readiness assistance may count for up to twelve weeks in that fiscal year. If job search and/or job readiness activities are an ancillary part of other work activities, there is no time limit.
- f. A single parent with a child under one year of age may choose to be exempt from any work requirements until the child reaches one year of age. Maximum exemption of 12 months per lifetime.
- g. Two parent families may choose to be exempt from any work requirements for the first three months after the birth of a child to encourage family bonding.
- h. A teen head of household who maintains satisfactory school, high school, GED, or college, attendance is considered to be meeting the work participation requirements.
- i. WNTP may exempt parents who are 55 years of age or older from work participation requirements.
- j. WNTP Site Managers (SM) may provide, with documentary verification, approval for the temporarily exemption for victims of domestic violence (DV) from work participation requirements for an initial period of three months. DV victims will be exempted from sanctions related to work participation requirements while living at a shelter with their children for up to three months or for so long as necessary in cases where compliance would make it more difficult for such individuals to escape DV, unfairly penalize those who are or have been victimized by such violence, or who are at risk of further DV. Upon recommendation of the case manager and approval by SM, the exemption for DV may be extended.



- k. WNTTP may temporarily exempt participants of an in-patient substance abuse, alcohol abuse, and/or mental health rehabilitation program (placement includes children) from work participation requirements, up to a maximum period of three months.
- l. A single parent who is in need of out-patient treatment, as identified by a medical professional, in order to remove barriers that are prohibiting the WNTTP participant to successfully participate in job preparation activities may be considered as meeting the work participation requirement by providing verification of actively attending all out-patient substance abuse, mental health, and/or behavioral counseling appointments/meetings, for a period of three months at a time but not to exceed six months total per lifetime.

Penalties Against Individuals

If an individual in a family receiving assistance refuses to engage in approved work activities as required by the WNTTP in the absence of good cause, WNTTP will reduce or terminate the amount of assistance otherwise payable to the family and may provide limited assistance for basic needs through a voucher system for those individuals that fail to participate in work participation requirements, until such time that the individual resumes work requirements. The voucher system may pay for food, clothing, shelter, utilities, household goods, personal care items and general incidental expenses.

WNTTP may impose progressive sanctions up to and including case closure. In addition, sanctioned households will not be eligible for support services and/or incentives until such sanction period has been served or a good cause determination has been issued.

Any individual who refuses to participate in substance/alcohol abuse screening and/or substance abuse, alcohol abuse and/or mental health counseling when referred by WNTTP will be progressively sanctioned up to and including case closure.

Refusal to work when an acceptable form of child care is available is not protected from sanctioning.

With a written statement verified by a participant's Site Manager, WNTTP will not terminate or reduce cash assistance to a single parent caring for a child under the age of six if the parent refuses or stops work activities for the following reasons:

1. Unavailability of appropriate child care within a reasonable distance from the individual's home or work site; and/or
2. Unsuitability of informal child care by a relative or under other arrangements; and/or
3. Unavailability of appropriate and affordable formal childcare arrangements.

These are further defined as follows:

- a. Appropriate child care: The provider meets applicable state standards of care, or an informal arrangement in which the environment is representative of the quality of care provided to others in the community.



- b. Reasonable distance: A parent should not have to travel more than 30 minutes dropping his/her child off at the care provider's location and 30 minutes picking up their child.
- c. Unsuitability of informal care: Informal child care is unsuitable if it is not being provided legally, or does not meet basic health and safety standards as outlined in county ordinances and/or State statutes. Informal child care is unsuitable if the arrangements do not support the working schedule of a parent, are not affordable, not easily accessible, or do not meet quality standards as defined by the parent.
- d. Affordable child care arrangements: Affordable child care is child care that does not exceed the regional market ceiling rates for subsidized child care established by the State of California or 200% of the rates established through the regional market ceiling rates for subsidized child care for Nevada.

Good Cause

WNTP may exempt certain individuals from work requirement penalties due to a good cause for a limited period of time. Good cause may be determined on a case-by-case basis when unforeseen events or situations arise that prevents the individual's ability to complete the work participation requirements within a specific month. Acceptable "good cause" events/reasons may be the death of an immediate family member; temporary lack of transportation; temporary illness verified by a doctor or medical professional; temporary lack of accessible child care; extreme weather or natural disasters which may temporarily prevent safe travel to or from work, training, or approved activity; or other extenuating crisis situations that is beyond the participant's control.

Time Limit

WNTP shall limit the time a family may receive cash assistance to a maximum of sixty months due to the challenges and barriers that many of our participants face. These challenges and barriers include but are not limited to poverty, lack of education, transportation, joblessness, and employment opportunities. During this assistance time, WNTP shall provide participants with assistance and support meeting all four purposes of TANF to help families achieve their goal of self-sufficiency. This is consistent with the purposes of TANF and the economic conditions and resources of the Tribe.

As defined in Title 18 US Code 1151 and 45 CFR §286.115, WNTP will not count toward the limit:

- 1. Any month of receipt of assistance (from any Tribal, State or County TANF Program) to a family that does not include an adult head-of-household
- 2. Any month of receipt of assistance (from and Tribal, State or County TANF Program) by an adult during which the adult lived in Indian country or in an Alaskan Native Village in which at least 50 percent of adults were not employed.



WNTP counts all prior months of TANF benefits received under a State, County, or other Tribal TANF program's TANF assistance funded with TANF block grant funds, except for any month(s) that exempted or disregarded by statute, regulation, or under any experimental, pilot, demonstration project approved under Section 1151 of the Act. In addition, WNTP will count all prior months of Welfare-to-Work (WtW) cash assistance provided for basic needs is defined as "assistance" under the regulations against the time limit on Tribal TANF assistance. (§ 286.130). WNTP will count any pro-rated or partial assistance as a month of assistance received.

For families residing in California, once a family is ineligible to receive federally funded TANF assistance due to the federal time limit, the Tribe may continue to provide assistance for the benefit of the eligible children of the timed-out parent(s) using State Maintenance of Effort (MOE) funds if funds are available and provided to the WNTP by the State of California. Any family whose assistance is extended through State MOE funds will not be eligible for federally funded supportive services. Families receiving MOE funded assistance must meet the same WNTP income eligibility and resource standards of financial need applicable to all other WNTP eligible families and consistent with the state MOE provision concerning the extension of assistance to timed-out families.

Hardship Exemption

An exemption to the time limit may be granted due to hardship conditions that hamper or inhibit an individual's ability to maintain work or enter into work activities. WNTP may approve an extension to the 60-month time limit, not to exceed 20% of the total case load, on a case-by-case basis, due to any of the following hardship situations:

- a. Adult participants with significant learning disabilities as confirmed in writing by a licensed medical or psychological professional;
- b. Single parents with four or more children under twelve years of age;
- c. Single parents responsible for the full-time care of an elderly or disabled parent/relative (as confirmed by a physician);
- d. Victims of domestic violence as described in Limitations and Special Rules (j.).
- e. Participants with significant medical restrictions as diagnosed by a physician and approved on a case-by-case basis, depending upon severity. WNTP will refer those with severe medical restrictions to the appropriate agencies for disability benefits and services.
- f. Single parents who were unable to complete their educational goals prior to reaching the time limit and are actively enrolled and are on track to receive an Associate's or Bachelor's degree or completing vocational education within 12 months.
- g. Participants experiencing an emergency situation beyond their control where the termination of benefits would pose an immediate and extreme impact to the family/children (not to exceed six months).



Tribal Options

- a. Subject to the availability of funds, there will be no limit to the number of individuals included in a family.
- b. WNTTP requires all applicants, including non-needy caretakers, to complete a substance abuse testing or screening for illegal substances as defined by federal regulations or for undocumented prescription medications. A positive result requires recipients to participate in a substance abuse assessment and to provide proof of compliance with a plan recommended by a qualified provider, which may include counseling sessions or participation in a rehabilitation program. Random testing may be conducted at any time. Refusal to participate in a substance abuse initial screening, substance abuse evaluation and/or subsequent treatment recommendation will result in progressive levels of sanction up to and including case closure.
- c. All school age children shall be required to regularly attend school full time. Verification of enrollment, attendance, and current status is required. Cash benefits may be reduced, suspended, or terminated until the child or children return to school and attend regularly. WNTTP may report lack of school attendance to proper local authorities.
- d. WNTTP shall require written verification of current immunizations of all children in the household who are not enrolled in a school with immunization requirements. WNTTP shall comply with all applicable local, state and federal laws governing immunization requirement to protect and to assure children are not compromised, or excluded from education opportunities due to non-compliance to immunization requirements.
- e. WNTTP may continue to provide cash assistance to an eligible parent who is participating in an inpatient substance abuse treatment program with their children for a maximum of one year. WNTTP may provide assistance through a voucher system or provide benefits through the method of "disperse on behalf of" while a participant is completing their treatment recommendations.
- f. Where welfare fraud is established, WNTTP reserves the right to impose the maximum allowable penalties available within the service area jurisdiction pertaining to the denial of benefits.
- g. May provide assistance to income-eligible TANF participant youth with fees, uniforms and/or equipment required to participate in positive youth development activities such as in-school activities, or sport-related activities that support the goals of the youth plan. Limited to one activity per child, per year. In order to be eligible for this benefit, youth must maintain a "C" GPA or recommendation from a school or counseling professional.

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Administrative Cost Rate

WNTP will not spend more than 25% of its annual federal TANF grant on administrative costs as per the regulation 45 CFR 286.50 (c).

Assurances

Review and Comment on Tribal TANF Plan

The Washoe Tribe of Nevada and California posted a draft of this TFAP renewal 45 days prior to its submission to the Administration for Children and Families (ACF). The draft was presented at Tribal Council and posted at the Washoe Tribe's Headquarters, the WNTP Headquarters, on the Tribe's intranet web site, and at each of the eight WNTP sites.

Fiscal Accountability

For each year in which the Washoe Tribe of Nevada and California receives or expends TANF funds, the tribe will comply with the fiscal accounting provision of Section 5(f) (1) of the Indian Self-Determination and Education Assistance Act 25 U.S.C. 5305 (f) (1), relating to the submission of a single-agency audit report as required by Chapter 75 of Title 31, U.S. Code.

Data Collection and Reporting

WNTP complies with all statutory and regulatory TANF reporting requirements. WNTP will measure progress and outcomes by collecting data that describes the assistance and/or services provided to eligible families and/or individuals each month.

Non-Duplication of Services

All applicants will be required to sign the WNTP TANF application and documentation certifying that they and other family members are not receiving assistance from another Tribal, State, or County TANF Program.

Information will be shared with other Tribal, State, and County TANF programs to verify non-duplication of TANF assistance and/or services. Social Security numbers of all WNTP applicants will be cross referenced with Tribal, State, and County welfare staff to avoid duplication of services. Applicants will verify information on a monthly basis to ensure continued eligibility.

Appeals Rights and Process

In accordance with 45 CFR § 286.75 (a) (7), WNTP implements a dispute resolution process for all individuals or families who wish to appeal WNTP's decision to deny, reduce, suspend, sanction, or terminate assistance.



All adverse actions or sanctions must be appealed in writing. Any participant at risk of losing assistance or receiving sanctions will be issued a notice of action for any adverse action, 10 business days prior to the onset of such action.

Adverse actions including denial of eligibility or sanctions affecting cash assistance grant amounts may be appealed. All appeals must be submitted in writing to the WNTTP headquarters office within 10 business days of the postmark date of the Notice of Action (NOA). The WNTTP appeals process includes up to three levels as follows.

Level 1 Appeals: Level 1 appeals will be reviewed and determined by the Senior Manager of Program Compliance (or their designee) who will notify the complainant in writing of their decision. Notification will occur within 10 business days of the receipt of the appeal.

Level 2 Appeals: An individual may appeal the level 1 decision within 10 business days of the postmark date of the level 1 decision. The level 2 appeal will be reviewed and determined by the WNTTP Director of TANF (or their designee) who will notify the individual of their decision in writing. Notification will occur within 20 business days of receipt of the level 2 appeal.

Level 3 Appeals: Only notices of action resulting in the termination of benefits or removal of an individual from the Assistance Unit can be appealed to the 3rd level. An individual may appeal the level 2 decision and submit a level 3 appeal within 10 business days of the postmark date of the level 2 decision. The level 3 Appeal will be reviewed and determined by the WNTTP Hearing Officer who will notify the individual of their decision in writing within 45 business days of receipt of the level 3 appeal. The WNTTP Hearing Officer's decision is final.

Non-Displacement Complaints Resolution

In accordance with 45 CFR §286.110, WNTTP provides assurance and maintains safeguards that participants in Tribal TANF work activities do not displace other workers if:

1. Any other individual is on layoff from the same or substantially equivalent job.
2. The employer terminated the employment of a regular employee or otherwise caused an involuntary reduction in force in order to fill a vacancy with a TANF participant.

WNTTP maintains under Employer Assurances, contractual language in the On-the-Job Training (OJT) and/or Subsidized Employment Contract which ensures the TANF OJT employee will not displace a regular employee in a vacant employment position.

In addition, the Employer assures that the OJT Employee has neither been hired into nor will remain working in any position when any other person is on layoff from the same or a substantially equivalent job within the same unit of the organization or has been bumped and has recall rights to that position.

Each employer under contract with an eligible TANF participant is responsible for posting and making available the displacement grievance procedures.



WNTP is responsible for receiving all grievances, responding to, and resolving any complaints of alleged violations of this displacement rule.

Our displaced worker grievance procedure is listed on our website as a means to providing the public information on these procedures and how an individual can submit a grievance/complaint.

Non-Construction Assurance

The Non-Construction Assurance certification has been submitted with this plan.

Provision of Services

The Washoe Tribe maintains a Memoranda of Understanding (MOU's) with each of the California counties located within WNTP service delivery area and with the State of Nevada which details the process for the transfer of cases to ensure a smooth transition of eligible applicants/participants choosing to transfer from the State/County TANF services to WNTP services. The MOU's will ensure the following:

- a. Qualified Native American Indian families can choose to receive Native TANF or State/County TANF but cannot receive assistance from both programs simultaneously.
- b. WNTP and State/County TANF Program will exchange information as needed to determine eligibility for Native TANF, State/County TANF Program, Medicaid/Medical or Food Stamps.
- c. State/County TANF Programs and WNTP agree to exchange Social Security Numbers, as needed, to prevent duplicate aid.

Same or Comparable Services

WNTP will provide welfare related services and assistance to all eligible AI/AN families in an equitable and fair method.

WNTP will review and compare current Maximum Aid Payments (MAP) as established by the California Department of Social Services and Nevada Division of Welfare and Supportive Services to accommodate for the higher cost of living in specific counties. WNTP MAPs are reviewed annually and may remain as established, increase, or decrease based on economic conditions and poverty levels within the service area as approved by Tribal Council.

Eligible Families Moving into the Service Area

Eligible families moving into the service area will receive the same amount of cash assistance and/or supportive services as all eligible program participants within the WNTP service areas as described in Same or Comparable Services.

***Confidentiality Statement***

WNTP requires all WNTF staff to sign a confidentiality agreement acknowledging they understand and will follow all policies and procedures to ensure applicant's and participant's rights to complete confidentiality and that any violation of confidentiality will result in staff disciplinary action up to and including termination.

Retrocession

In the event that the Washoe Tribe chooses to retrocede, the Tribe will follow and comply with all requirements defined by applicable TANF statutes and regulations pertaining to retrocession as described in the 45 CFR, part § 286.30 and the Social Security Act.

Respectfully Submitted,

Serrell Smokey, Chairman
Washoe Tribe of Nevada and California

Date Renewal Plan Signed