

COOK INLET TRIBAL COUNCIL, INC

TEMPORARY ASSISTANCE FOR NEEDY FAMILIES PLAN



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1. INTRODUCTION

1.1. Authority

1.1.1. Statutory

The Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA) authorizes Indian tribes, including 13 Alaska Regional Native non-profit organizations, to administer a Temporary Assistance for Needy Families (TANF) program and to receive direct federal funding for such program. 42 U.S.C. § 612.

1.1.2. Eligibility for CITCI TANF

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

Only needy families, as defined in the TANF plan, may receive: (a) any form of Federally or State MOE funded "assistance" (as defined in 45 CFR 286.10); or (b) any benefits or services pursuant to TANF purposes 1 or 2, regardless of the purpose served. "Needy" means financially deprived, according to income and resource (if applicable) criteria established in the TANF plan by the Tribe to receive the particular "assistance," benefit or service.

The Tribe may use segregated Federal TANF funds to provide services (and related activities) that do not constitute "assistance" (as defined in 45 CFR 286.10) to individuals and family members who are not financially deprived but who need the kind of services that meet TANF purposes 3 or 4. Objective criteria will be established for participation in these programs.

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

1.1.3 . Approval by governing body

Cook Inlet Tribal Council, Inc. (CITCI) Board of Directors authorized the President to submit this Tribal Family Assistance Plan (TFAP) and to carry out its TANF program under the terms of this plan. CITCI Resolution 03-04 (June 18, 2003) and 12-03 (April 6, 2012). See Appendix 1.

1.2. Comparability with state program

CITCI assures that this TFAP is comparable to the requirements applicable to the State of Alaska's Temporary Assistance Program (ATAP), as required by 42 U.S.C. § 612(h)(1), and is consistent with the goals and principles-contained in the Alaska Temporary Assistance Program (ATAP) of the State of Alaska.

1.3. Plan preparation

CITCI has visited other TANF programs within the state and has conducted a feasibility study of the program using various assumptions relative to changes (both higher and lower than the 1994 amounts used in calculating TANF funding) in the number of individuals to be served. A formal presentation of the plan scenarios was made to the full Board of Directors. The directive to the President to further pursue Tribal TANF from the Board was unanimous.

1.4. Agreements, contracts or compacts

Welfare related services will be provided directly by CITCI on behalf of Alaska Natives and American Indians living in the Municipality of Anchorage and the Matanuska-Susitna Valley. The Matanuska-Susitna Valley is being added to CITCI service area effective July 1, 2014. CITCI will offer service to the remaining villages within the CIRI region and amend the plan as needed with each village tribe's resolution to provide Tribal TANF services.

2. GOALS, PRINCIPLES AND STRATEGIES

2.1. Goal

The overriding goal of this tribal TANF plan is to assist primary individuals in families to become self-sufficient. This will be demonstrated by meeting the work participation rates in section 13.2.

2.2. Principles and strategies

The following principles and strategies will guide CITCI toward achieving this goal.

2.2.1. Emphasize work

Custodial and non-custodial parents of children needing assistance under this Plan must work to the extent of their ability. CITCI is committed to making efforts to create opportunities for paid and unpaid employment.

2.2.2 . Promote self-sufficiency

CITCI will encourage all participants to move toward personal, family and community self-sufficiency.

2.2.3. Promote education

CITCI encourages all participants to complete at least a high school education (or its equivalent), so that participants can enjoy greater opportunities to obtain work that will produce sufficient income to support their families and contribute to their community.

2.2.4 . Discourage unwed pregnancies

CITCI will work with all sectors of the community to discourage out-of-wedlock pregnancies, especially among teens.

2.2.5 . Promote family stability

CITCI will encourage family stability by requiring teen parents to remain in their parents' or another responsible adult's home. In addition, CITCI will encourage the formation and maintenance of two-parent families.

2.2.6 . Promote responsibility

CITCI will encourage responsibility by requiring cooperation with efforts to ensure both parents provide support for their children.

2.2.7. Discourage dependency

CITCI will assist each family to develop a plan to reduce dependency on Tribal TANF assistance and to assure that each family contributes to the community for any assistance it does receive.

2.2.8. Minimize bureaucracy

CITCI will work closely with the State of Alaska and other social service agencies to minimize the bureaucracy that families needing assistance often encounter and must overcome to obtain help and support.

2.2.9. Maintain a safety net

CITCI will work to maintain a safety net in which families in need of assistance may continue to receive benefits whether employment opportunities are available or not. Through exercising the existing exemption for up to 20% of the monthly CITCI Tribal TANF caseload, making certain eligible families have continued access to Food Stamp and Medicaid programs, and by utilizing funding available through Tribal 477 support programs (when eligible), CITCI will maintain a safety net in which a parent may continue to provide care for their own children in their own home.

3. TERM

3.1. Term

The term of this Plan shall be July 1, 2014, through September 30, 2015.

3.2. Retrocession

CITCI may not terminate its responsibility for the operation of the TANF program under this Plan during the term, except:

3.2.1. Notice

Upon no less than 120 day notice to the Department of Health and Human Services and the State of Alaska; or

3.2.2. Agreement

On a date agreed upon between CITCI and the State of Alaska.

3.3. Compliance

CITCI will comply with all applicable TANF regulations and related laws as specified in 45 CFR 286.30 related to retrocession.

4. SERVICE POPULATION AND AREA

4.1. Population

CITCI will serve all Alaska Native and American Indian families within the Municipality of Anchorage and Matanuska-Susitna Valley service area who meet the TANF eligibility criteria.

4.1.1. Verification of enrollment status

CITCI will make the initial determination of whether the head of the assistance unit is a qualified and eligible applicant as defined in Section 4.1 at the time of application for benefits. Verification of enrollment will be met by the following criteria:

4.1.1.1. Documentation

Applicants must provide adequate documentation that the head of the assistance unit is a qualified and eligible applicant as defined in Section 4.1 at the time of application for benefits.

TRIBAL Documentation to include but not limited to:

1. Letter or card from the Bureau of Indian Affairs showing enrollment number, or
2. Tribal Enrollment Card (from Federally Recognized Tribe or Village), or
3. Birth Certificate showing Alaska Native or American Indian heritage, or
4. Letter on Tribal stationary showing Alaska Native or American Indian, giving the enrollment number or indicating that the applicant is an enrolled member or a descendant of an enrolled member of the tribe or village, or
5. Notarized statement from tribal officials stating their tribal affiliation and attesting to the fact that they know the applicant's family. (used primarily in cases where non-Native children are adopted by a Native family), or
6. Baptismal Certificate indicating applicant is Alaska Native or American Indian, or
7. Health Services Statement indicating eligibility as Alaska Native or American Indian to receive IHS services.

4.2. Service Area

CITCI will serve eligible Alaska Natives and American Indians living in the Municipality of Anchorage and Matanuska-Susitna Valley service area.

4.3. Head of the Assistance Unit Defined

4.3.1. Two Parent Households

The head of a two-parent household is defined as that person who makes application for benefits for the assistance unit. To be eligible for benefits the person making application for benefits must fit the criteria established in section 4.1. – 4.1.1.1.

4.3.2. One Parent household

The head of a one-parent household is defined as that person who makes application for benefits for the assistance unit. To be eligible for benefits the person making application for benefits must fit the criteria established in 4.1. – 4.1.1.1.

4.3.3. Child Only Household

A child only household is defined as one in which neither parent, or caretaker relative, is eligible to make application for benefits. To be eligible for benefits, one of the child(ren) on behalf of whom application for benefits is being made must fit the criteria established in 4.1. – 4.1.1.1.

5. EMPLOYMENT OPPORTUNITY IN SERVICE AREA

5.1. Native Population Increase

Cook Inlet Tribal Council, Inc. service area, which includes the Municipality of Anchorage and Matanuska-Susitna Valley, has experienced an increase of Alaska Native population over the last decade. Anchorage experienced an increase of 6,360¹ Native People from 2000 to 2010, which is by far the largest increase across the state, and the Matanuska-Susitna Valley experienced an increase of 2,542 Native People from 2000 to 2010.

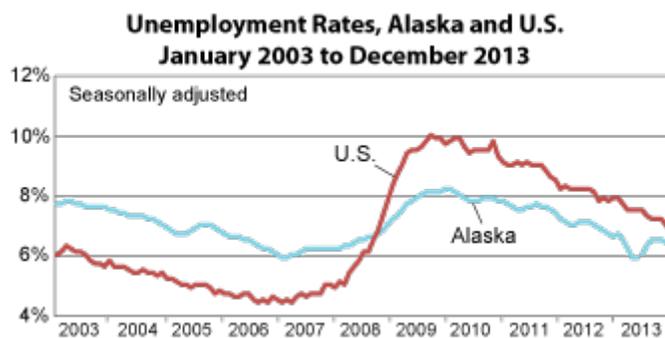
5.2. Geographic Description

The Cook Inlet Region, Inc. (CIRI) is one of the thirteen regional profit corporations established by the Alaska Native Claims Settlement Act of 1971 (43 USC 1601 et seq.) (ANCSA). According to a hierarchy established under the Indian Self Determination and Education Assistance Act (PL 93 638), a regional corporation is vested with Tribal Authority in the absence of a recognized IRA or traditional Council of ANCSA Village Corporation. Cook Inlet Region, Inc. is recognized as the appropriate Tribal Authority, governing body, for the CITCI (non-profit) service area which includes the Municipality of Anchorage.

The Cook Inlet Region is 38,000 square mile and includes Alaska's largest city, Anchorage and the Matanuska-Susitna Borough. The mileage from Anchorage to the northern-most point is 140 miles; to the southern-most point is 255 miles. The only way to the village of Tyonek on the western boundary is by bush plane from Anchorage and to get to the village of Seldovia in the south, a drive for 4.5 hours followed by a 20 minute flight over Kachemak Bay.

5.3. Economic Description of CIRI region

Alaska's Cook Inlet region is home to eight small villages and the Municipality of Anchorage, which is 9 times larger than Alaska's next-largest city. Anchorage's size and location make it the economic, medical, judicial, transportation, and social service hub of the entire state.



Overall, the CIRI region has fared well, economically, during the recent Great Recession. Alaska's unemployment rate has remained relatively stable in comparison to that of the United States and in the winter of 2013 Anchorage (whose economy dominates the Cook Inlet region) has an unemployment rate (4.6%) that compares

¹ Alaska Department of Labor and Workforce Development, <http://labor.state.ak.us/trends/apr13.pdf>

favorably to that of the state, overall (6.5%), and that of the nation (6.7%), the Mat-Su Borough (7.3%) is slightly higher than the nation.

The overall comparative health of the region's economy, as measured by unemployment rate, masks the significant degree of economic distress among the region's Native population. The economic disparity between the Native and non-Native population in Alaska is the greatest to be found *anywhere in the United States*, with Alaska leading the nation in American Indian unemployment (21.3%) despite the relatively low overall unemployment rate. The disparity between Alaska Native unemployment rates and Alaska's White unemployment rates (14.4%) is the greatest disparity of any region in the nation.

Unemployment Rate, December 2013³	
Anchorage	4.6%
Mat-Su	7.3%
Alaska	6.5%
U.S	6.7%

American Indian and White Unemployment by Region, 2010⁴

	West	Southwest	Southeast	Southern Plains	Northeast	Northern Plains	Midwest	Alaska
American Indian	16.8%	14.4%	13.1%	12.0%	14.4%	16.4%	19.3%	21.3%
White	11.6%	9.9%	8.8%	7.1%	8.1%	6.3%	9.4%	6.9%
Disparity	5.2%	4.5%	4.3%	4.9%	6.3%	10.1%	9.9%	14.4%

5.4. Reason for Population Growth

The Alaska Department of Labor and Workforce Development's 2009 25-year population projection⁵ forecasts steady growth among the Alaska Native population, from its current total of approximately 125,000 to an expected 171,660 in 2034. This projection is based on a projected decrease in Alaska Native mortality rates (which are currently among the highest in the United States), on the population's high fertility rate (currently 3.2 children per woman), and current migration rates into/out of the state.

Within the Cook Inlet region, however, the number of Alaska Natives is expected to grow considerably. Alaska Natives are in-migrating from the villages to the Anchorage and Matanuska-Susitna regions in record numbers. Natives are moving from village Alaska to urban Alaska to find jobs and improve the quality of their lives, as well as gain access to the Alaska Native Medical Center health services not available in rural areas.

³ Alaska Department of Labor and Workforce Development, <http://labor.state.ak.us/news/2014/news14-04.pdf>

⁴ Austin, A. (2010). Different race, different recession: American Indian unemployment in 2010. Economic Policy Institute, Issue Brief, #289, November 18, 2010.

⁵ Alaska Department of Labor and Workforce Development, <http://laborstats.alaska.gov/pop/projected/pub/projch2.pdf> <http://laborstats.alaska.gov/pop/projected/pub/projch2.pdf>

5.5. High Competition For Jobs

Alaska Native/Native Americans have a serious competitive disadvantage in competing with non-Natives for the better paying jobs or any jobs at all. It has become harder to find permanent full-time and/or seasonal employment even in industries traditionally filled by Alaska Native and American Indians. As stated previously, a recent report from the 2010 Census shows the unemployment rate for American Indians and Alaska Natives in Alaska at 21.3%, whereas the unemployment rate for someone of Anglo descent is 6.9%.

5.6. Becoming Competitive

Knowledge of available resources and services, along with appropriate assessment and counseling services, are critical components to the success of our clients. Access to life skills training, substance abuse treatment, employment opportunities, industry training, higher education and counseling services will provide clients encouragement, motivation, and skills to continue to pursue and achieve their goals.

5.7. Employment Possibilities

Alaska Department of Labor predicts Alaska's employment will grow in 2014, adding about 1,500 jobs statewide⁶. With the increase in 2014, this will make it the fifth straight year of increases in employment since 2009. Government jobs are expected to decrease due to years of federal cuts, but employment in health care, natural resource extraction and leisure and hospitality will help in losses in other industries.

Anchorage, which dominates the region economically, will continue to experience an increase in employment for 2014. Similar to the statewide forecast, Anchorage will have a decrease in governmental jobs, but increases in the health care field and tourism.

5.8. Full-Time Permanent Employment

Year-round employment opportunities in the Municipality of Anchorage and Matanuska-Susitna Valley service area are available for those with the job skills relative to the job market. People migrating into the area from the lower 48 states and other parts of Alaska take up the majority of the permanent full-time employment positions. Work opportunities that exist in the region are largely government related or tied to service or health industries. These include:

5.8.1. Alaska State, Matanuska-Susitna Borough and Municipality of Anchorage Government Offices

5.8.2. Federal Government Offices Serving the Region

5.8.3. Tribal For Profit and Non-Profit Offices

5.8.4. Non-Profit Social and Community Services

5.8.5. Private Employers:

- Automotive sales and services
- Banking services
- Construction
- Health services
- Housekeeping and janitorial services

⁶ Alaska Department of Labor and Workforce Development, <http://labor.state.ak.us/trends/jan14.pdf>
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Information/ telecommunications services
Leisure and hospitality services
Plumbing, heating, and home maintenance services
Restaurants and food services
Retail and wholesale trade services
Seafood industry
Social Services
Transportation services
Utilities

5.9. Commitment to Develop Resources

CITCI will work with employers in the above sectors to determine employment opportunities for TANF recipients and assist in economic development and job creation activities. This effort will be coordinated with the State of Alaska as well as the major regional and sub-regional social services organizations.

6. NON-FINANCIAL ELIGIBILITY REQUIREMENTS

6.1. Family Must Include Dependent Child

To be eligible for assistance under the CITCI TANF Plan, a family must include a caretaker relative and one or more dependent children or a woman in the last trimester of her pregnancy.

6.1.1. Dependent Child Defined

A "dependent child" is a child under 18 years of age; or a person under 19 years of age if the person is a full-time student in a secondary school or equivalent vocational/technical training, whether the training can be completed by age 19 or not. A dependent child is not a Temporary Assistance applicant themselves.

6.1.2. Caretaker Relative

A "caretaker relative" is a person who provides the care and control of the dependent child and who is:

6.1.2.1. Parent

A biological or adoptive parent or stepparent to the dependent child; thus it is possible to have a parent who may also be a dependent child.

6.1.2.2. Relative

A biological or adoptive relative to the child within the fifth degree of consanguinity;

6.1.2.3. Married Relative

A person who is or was married to a biological or adoptive relative to the child within the fifth degree of consanguinity if the person is maintaining a caretaking role with the dependent child.

6.1.2.4. Tribal Law

A relative to the child based on tribal custom or law; or

6.1.2.5. Step-Relatives

A stepsister, stepbrother, step-parent, or step-grandparent including those after the marriage was terminated by divorce or death.

6.2. Special requirements for minor parents

6.2.1. Living arrangements

A minor parent (defined as under the age of 18, unmarried, and not emancipated) must live with a parent, legal guardian, an adult relative, or approved adult caretaker. In addition, a minor parent may also live in an approved adult supervised living arrangement if living with the minor parent's own parent, legal guardian or another adult relative is not appropriate (i.e. Job Corps, boarding school dormitories or agency supervised independent living facilities).

6.2.2. Education

A minor parent must be a full-time student until he or she completes high school or its equivalent, unless the minor parent has a condition that causes him or her to lack the requisite capacity.

6.3. Cooperation with Child Support Services

CITCI TANF participants must cooperate with CITCI and the State of Alaska Child Support Services Division (CSSD) to establish paternity and to establish, modify, or enforce a child support order for a dependent child per 45 CFR 286.155 and 286.75 (a)(8). CITCI TANF will interface with CSSD to capture and allocate child support payments. Up to \$50.00 of the monthly child support collections will pass through to the participant and not count against the monthly benefit amount they receive. An applicant may not begin to receive benefits until he or she has assigned all child support collection rights to CSSD while on CITC Tribal TANF.

6.4. Residency

All CITCI TANF benefit recipients must be residents of the CITCI Tribal TANF service area. A "resident of the service area" means an individual physically present in the service area and living in the service area voluntarily with the intention of making a home in the service area. A child present in the service area will be considered a resident of the service area if the child is living in the service area with a caretaker relative who is also a resident under this section. An applicant or recipient who is absent from the service area for a period longer than two months but does not intend to change residency and plans on a return, may be approved in advance by CITCI if the absence is for the following purposes:

- 1) Obtaining essential medical care; or
- 2) Participation in an activity, treatment, training, or educational activity approved by CITCI.

CITCI will not serve those participants that temporarily enter the Anchorage or Matanuska-Susitna Valley service area for training, education, or temporary plan completion while maintaining their original residency with no plan to remain in the Anchorage or Matanuska-Susitna Valley service area upon completion of the activity.

6.5. Non-Duplication of Benefits

CITCI Tribal TANF benefits recipients may not receive duplicative assistance from other State or Tribal programs funded under Part A of Title I of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996, P.L. 104-193, 42 U.S. § 601 et. seq.

7. FINANCIAL ELIGIBILITY REQUIREMENTS

7.1. Resources

7.1.1. Limits

A family or child will not be eligible for CITCI Tribal TANF if they have non-exempt resources in excess of \$2,000, or \$3,000 if the assistance unit has someone 60 years of age or older. Certain types of real and personal property are exempt. Exempt resources are not counted against the resource limit. Non-exempt, or countable, resources are those which must have their value totaled and matched against the \$2,000 limit to determine if eligibility exists on the factor of resources. The \$2,000 resource limit can be reached by any combination of the following types of resources:

7.1.1.1. Cash

Cash on hand or deposit;

7.1.1.2. Motor Vehicles

The equity value of countable motor vehicles, boats, and snow machines;

7.1.1.3. Insurance, Stocks, Bonds

Countable non-cash personal property such as the cash or loan value of insurance policies, value of stocks and bonds, etc.;

7.1.1.4. Real Property

Countable real property other than the home the family lives in and the land the home sits on; and

7.1.1.5. Luxury Items

"Luxury" items, personal or household not essential to day to day life.

7.1.2. Availability of a Resource

7.1.2.1. Defined

For purposes of determining CITCI Tribal TANF eligibility, a resource must be actually available to meet the needs of the child. Under this requirement the resource must be in cash or readily convertible to cash.

7.1.2.2. Parent vs. Caretaker

If a child for whom application is made lives with his natural or adoptive parent, all the resources and income available to the parent are considered to be equally available to the child. However, if the child is living with any other caretaker relative, resources belonging to that caretaker relative are not considered available to the child.

7.1.2.3. Spousal Availability

For CITCI Tribal TANF purposes, all the resources of a husband or wife are automatically considered available to the other spouse.

7.1.2.4. Counting Resources

For an applicant, resources are measured as of the date of the interview. For a recipient resources are counted in the first day of the month for which eligibility is being determined.

7.1.3 . Countable Resources and Standard Exemptions

7.1.3.1. Real Property

All real property which is not the home (for sale or un-saleable, jointly owned with an absent or non-agreeing co-owner, or otherwise exempt), will be counted against the resource limitation. The amount to be considered will be the owner's equity, which is defined as fair market value less legal encumbrances.

7.1.3.2. Luxury Items

The equity value of "luxury items", household goods, and personal affects not essential to day-to-day life, are countable resources.

7.1.3.2.1. Religious Articles

Religious articles such as religious jewelry, prompt books or Bibles, crucifixes, or Russian Orthodox iconography are exempt.

7.1.3.2.2. Decorative Objects of Art

Decorative objects of art such as paintings, statuary, blankets, masks, carvings, etc. are only exempt if they were made by a person whose relationship to the CITCI Tribal TANF recipient would qualify as a caretaker relative, or the item(s) has an important cultural significance to a recipient's clan, village, ethnic, or racial community such that the recipient is in effect standing as caretaker or agent of the community and is not free to dispose of the item without suffering personal or social consequences for violating established written or unwritten laws or rules.

7.1.3.3. Stocks, Bonds, and Securities

All bonds (United States Government savings bonds or treasury notes, municipal or government bonds, or corporate bonds), all stocks (common or preferred shares of business organizations) and securities which are not otherwise exempt will be counted against the resource limit.

7.1.3.4. Joint Bank Accounts

If the holders of a joint bank account (checking, savings, or "share" accounts) are legally married and living together, the balance on the account becomes equally and totally available to each person. This is true if the joint account requires any one signature to withdraw (an "or" account) or both signatures (an "and" account).

If the holders of a joint account are legally married but not living together:

1. An "and" account balance will not be considered an available resource if the absent spouse can't be located, or can be located but refuses to sign joint withdrawals;
2. An "or" account balance is considered totally available regardless of the absent spouse's location or intention.

If the holders of a joint account are not legally married and:

1. The other signer on an “and” account can’t be located, or refuses to sign joint withdrawals, the balance will be considered an unavailable resource; or
2. The account is an “or” account, the balance will be considered an available Temporary Assistance resource without regard to the location or intent of the other signer, except in situations listed below.

Bank accounts on which an applicant has signature authority but that the applicant does not own, in whole or in part, are totally unavailable and exempt. Prudent judgment should be used in determining ownership, considering the source of the funds, the stated intent of the parties named on the account, and the actual use, if any, to which the funds have been put.

When the case worker discovers that a recipient has a joint account containing resources considered available under this chapter which are sufficient to place the unit over the Temporary Assistance resource limit, the recipient must be given a written notice allowing 30 days after discovery to remove their name from the account and prove to the agency they have done so. If he or she complies within the 30 days, the unit remains eligible and no overpayment has occurred.

Deposits made into a joint account may also be considered as available income in the month the deposit is made.

7.1.3.5. Trust Funds.

7.1.3.5.1. When Available

If the person who established the trust is also the sole beneficiary of the trust and is not legally incapacitated, s/he can terminate the trust at any time even if the purpose for which it is established is not fulfilled. Trusts set up in this fashion will be considered available resources. They will also be considered countable resources, if the applicant is not legally incapacitated and is the legally responsible natural or adoptive parent of the children for whom CITCI Tribal TANF assistance is being sought.

All other trust situations not noted above must be individually examined to determine if they are available and if they are exempt or countable. Examination is done by viewing the trust documents and contacting the persons who establish the trust or who serve as trustees.

7.1.3.5.2. Funds Held in Trust

Funds held in trust by the state or a tribe for children in the legal custody of a tribe or the state are not available to meet the needs of the child for whom they are held, or to any family with whom the child lives. The interest, which accrues on the balance held in trust, is similarly unavailable. Such funds become available, and are subject to treatment as countable resources, only when they are actually released to the child or to the child's parent or legal guardian.

7.1.3.6. Permanent Fund Dividends

Permanent Fund Dividends and Food Stamp PFD Hold Harmless Payments: monies retained from receipt of Permanent Fund Dividends (PFDs), or Food Stamp PFD Hold Harmless (FS HH) payments issued to replace Food Stamp benefits, are disregarded as a resource.

7.1.3.7. Motor Vehicles.

The equity value of a motor vehicle counts in the CITCI Tribal TANF resource determination, unless it can be **exempt** for one of the reasons below.

7.1.3.7.1. Necessary and In-Use

A motor vehicle is exempt and excluded as a resource if it is necessary, and used:

7.1.3.7.1.1. Meeting Basic Needs

For family transportation to meet the family's basic needs, such as getting food and medical care or other essentials, or going to and from work, school, or training;

7.1.3.7.1.2. Home

As the family's home;

7.1.3.7.1.3. Self-Employment

To produce self-employment income and it is doing so;

7.1.3.7.1.4. Disability

To transport a disabled family member, whether or not they are part of the assistance unit; or

7.1.3.7.1.5. Work

To participate in an approved work activity.

7.1.4. Exempt Resources

7.1.4.1. The Home in Which the Family Resides

The home in which the applicant or recipient resides and the land upon which it is situated are both exempt regardless of their value.

7.1.4.2. Burial Plots

One burial plot for each assistance unit member is an exempt resource, regardless of location, salability, or equity value.

7.1.4.3. Funeral Agreements

The equity value of funeral agreements is excluded up to \$1,500 per assistance unit member.

7.1.4.4. Personal Effects and Household Goods

Basic items (personal effects and household goods) essential for day-to-day living are exempt.

7.1.4.5. Items Used in Employment

7.1.4.5.1. Tools

Tools and light or farm machinery are exempt as personal property. Tools required by a school as a condition of enrollment and tools required by an employer as a condition of employment are exempt as personal property.

7.1.4.5.2. Stock and Inventory

Stock and inventory essential to the production of self-employment income are exempt. Stock and inventory includes all items necessary to produce gross self-employment income; including fishnets, traps, motor vehicles (including fishing boats), and Limited Entry Fishing Permits.

7.1.4.5.3. Stock and Inventory For Sale

If the stock and inventory is actually for sale as part of a legitimate business it can be considered as an exempt resource in any month in which, for reasons beyond the control of the recipient, there is no gross self-employment income.

7.1.4.6. TANF Corrective Payments

Any CITCI Tribal TANF corrective payment is considered an exempt resource in the month received.

7.1.4.7. Other Exemptions

Monies retained from the following sources are also exempt as resources:

- Receipt of bona fide loans;
- Restitution payments;
- Disaster relief funds; and
- Earnings from participation in the Summer Youth Employment and Training Program (SYETP) operated under the Workforce Investment Act.

7.1.5. Special Resource Provisions

7.1.5.1. Lump Sum Payments

Non-recurring lump sum payments are exempt as income. Generally, lump-sum payments are monies owed to the family from the past. Lump sum payments include such things as income tax refunds, retroactive payments from Social Security or other agencies, and insurance settlements. Lump-sum payments are counted as a resource in the month of receipt.

7.1.5.2. Employment Related Funds

IRA and KEOGH accounts are not exempt.

7.1.5.3. APA-SSI-AFDC Households

Resources of APA/SSI recipients are disregarded. All resources of any person who is actually receiving Adult Public Assistance (APA), and/or Supplemental Security Income (SSI) benefits will be disregarded in determining the CITCI Tribal TANF eligibility of the other family members.

7.1.5.4. Land, Stock, and Payments Made to Native Americans

7.1.5.4.1. ANCSA Distribution

Land or stock distributions made by ANCSA corporations are disregarded as resources. \$2,000 per individual retained in a calendar year of cash payments made by ANCSA corporations (village or regional) is also excluded from consideration as a resource providing it remains identifiable. Interest or other earnings from the investment or deposit of excluded ANCSA funds are not exempt.

7.1.5.4.2. Native Restricted Land

“Native Restricted Deeds” will be considered as exempt.

7.1.5.4.3. Per-Capita Payments

Funds held in trust by the Secretary of the Interior for an Indian tribe and distributed on a per capita basis to members of that tribe are excluded as resources.

7.1.6. Resources to Promote Long Term Self-Sufficiency and Reduce Dependency

Money paid into Individual Development Accounts and all related interest shall be exempt from the resource limit if kept in a safeguarded account, which is available only for those items clearly spelled out in the IDA contract, such as post-secondary education, first home purchase, business capitalization.

7.2. Types Of Income

7.2.1. Earned Income

7.2.1.1. Defined

Earned Income for participants and applicants means: income earned in cash or in kind in the form of wages, salary or commissions in exchange for the performance of services by the employee. Earned income includes payments made at one time for services performed over a long period. The term earned income means the total or gross amount of payment, excluding the amounts of work incentive deductions for the personal or non-personal expenses of earning the income.

7.2.1.2. Earned Income For Self-Employed People

The amount earned by the obtaining, producing, or purchasing of goods or services after all the allowable, non-personal costs (business expenses) of earnings are subtracted.

7.2.2. Unearned Income and Standard Exemptions

7.2.2.1. In-Kind Income and Vendor Payments

Any cash contribution made directly to, or on behalf of, any member of a CITCI Tribal economic unit is considered as income.

7.2.2.2. Certain Child Support Income

Once an application is authorized for payment, any child support received in that month is considered unearned income. Child support is considered unearned income from the 1st day of the month the application is received. The amount received is considered income, unless it is from CITC and up to \$50.00 which will be passed through to the recipient by CITCI Tribal TANF payment system. Child support payments received by the recipient while their case is open are considered unearned income unless turned back to CSSD. Retaining child support payments in excess of \$50.00 after Tribal TANF is approved is considered non-cooperation. A financial penalty is imposed and a protective payee must be selected to receive the Tribal TANF grant.

7.2.2.3. Educational Assistance

7.2.2.3.1. Department of Education and Bureau of Indian Affairs Grants and Awards

The total amount of any grant, scholarship, or award made to an undergraduate student for educational purposes under any program administered, funded, or insured under Title IV of the Higher Education Act of 1965 or under a Bureau of Indian Affairs student assistance program is not counted as income in determining eligibility or grant amount for CITCI Tribal TANF applicants or recipients.

7.2.2.3.2. Other Educational Grants and Awards

Any grant, scholarship, or other award that is not made, funded, or insured from a program administered under Title IV of the Higher Education Act of 1965 or under a Bureau of Indian Affairs student assistance program will not be counted as income to any applicant or recipient if it is made or used under conditions which preclude its use for current living costs.

7.2.2.4. Charitable Contributions

Cash donations based on need, up to \$300 per quarter, from private non-profit (as determined by the IRS) charitable organizations are exempt. For this provision, quarters are January - March, April - June, July - September, and October - December. Cash donations over \$300 per quarter are not excluded. For example, an individual receives \$200 in May and \$200 in June. The \$200 May payment and \$100 of the June payment are exempt; \$100 is countable income in June.

The \$300 exemption is available to each member of the assistance unit and to any person who is not included in the assistance unit but whose income is defined as available to the assistance unit.

The case worker must document the family's receipt of income that is exempted under this section.

7.2.2.5. Payments to Native Americans

7.2.2.5.1. Per-Capita Payments

All funds held in trust by the Secretary of the Interior for an Indian tribe and distributed on a per capita basis to members of that tribe are excluded as income.

7.2.2.5.2. ANCSA distribution

The first \$2,000 per year of cash distributions made by Native corporations to Alaska Native shareholders under the Alaska Native Claims Settlement Act (ANCSA) is excluded as income. This \$2,000 exclusion applied to each individual and to each single calendar year. Cash distributions paid in excess of \$2,000 per calendar year to an individual shareholder by a regional or village Native corporation count as income to the individual shareholder in the month of receipt.

7.2.3. Exempt Income

7.2.3.1. Property Payments

Payments received under the Uniform and Real Property Acquisition Act of 1970 will not be counted in determining initial and continuing eligibility and payment amounts.

7.2.3.2. Loans

All bona fide loans, including educational, personal, and commercial loans, are disregarded as income.

7.2.3.3. Work-Study Earned Income

Any income an applicant or recipient earns from employment in a work-study program will not be counted as income for CITCI Tribal TANF purposes.

7.2.3.4. Vocational Rehabilitation Payments

Payments made by the:

- U.S. Department of Veterans Affairs (VA), or
- Alaska Department of Labor (DOL) and Workforce Development, (WIA) ;or
- Division of Vocational Rehabilitation (DVR) for vocational rehabilitation, are considered complimentary program benefits and disregarded as income.

7.2.3.5. Foster Care and Boarding Home Payments

Any foster care or adult foster care payment made by a tribe or any division of the Department of Health and Social Services to a CITCI Tribal TANF caretaker relative in order to care for a foster child or foster adult who is not receiving CITCI Tribal TANF benefits will not be counted as income in determining eligibility or payment amounts. A child cannot be included in a CITCI Tribal TANF assistance unit and be receiving Title IV-E Foster Care or state-funded foster care benefits for the same period.

7.2.3.6. Earned Income Tax Credit

Any Earned Income Tax Credit payment made to an applicant or recipient of CITCI Tribal TANF is disregarded as income.

7.2.3.7. Energy Assistance Payments

All payments made to or on behalf of a CITCI Tribal TANF applicant or recipient by state or Tribal Energy Assistance Programs are totally disregarded as income, including annual direct cash payments to CITCI Tribal TANF recipients. Energy assistance monthly payments made by the Alaska Housing Finance Corporation to its tenants are disregarded as income.

7.2.3.8. TANF Payments

Any TANF retroactive corrective payment is disregarded as income in the month it is received. Regular on-going payments are not counted as CITCI Tribal TANF income.

7.2.3.9. TANF Supportive Service Payments

Payments made for supportive services under the CITCI Tribal TANF program are exempt regardless of whether they are paid to a vendor or directly to the participant. This includes payments made for childcare, transportation, work-related expenses, and any other CITCI Tribal TANF-related supportive services.

7.2.3.10. Major Disaster and Emergency Assistance

Any Federal major disaster and emergency assistance or any comparable disaster assistance provided by states, local governments or disaster assistance organizations are disregarded as income.

7.2.3.11. Summer Youth Employment and Training Program

Any income earned from participation in the Summer Youth Employment and Training Program and/or TANF Youth Career Ready Program operated with funding from the U.S. Department of Labor and Tribal TANF Program.

7.2.3.12. Permanent Fund Dividends

Permanent Fund Dividends and Food Stamp PFD Hold Harmless Payments are disregarded as income.

7.3. Benefit Determination

7.3.1. Comparability

CITCI will minimize differences between the income limits applicable to the recipients of the State of Alaska's Alaska Temporary Assistance Program (ATAP) and recipients of the CITCI Tribal TANF program for the purpose of comparability. Therefore, the CITCI program has adopted the two-tier income limit test used by the State of Alaska, which is reflected in the remainder of this section. The gross countable earned and/or unearned income of self-employed and employed individuals may not exceed the state's 185% eligibility standard indicated in this plan and the countable gross income adjusted by applicable deductions, may not exceed the state's need standards.

NOTE: The state's income eligibility and need standards are adjusted annually by the same percentage as the annual January COLA increase in federal, SSI payments.) The income eligibility and need standards as they apply to the CITCI Tribal TANF program through December 31, 2014 are indicated in the Needs Standard (Appendix 2) and will be adjusted according to the local needs and standards. Any substantive changes in the state's standard itself will be incorporated into the CITCI Tribal TANF program plan for the purpose of comparability.

The amount available to a household is the difference between the income standard and need standard with work incentive deductions (earned income, child and incapacitated parent care), the shelter allowance, and the ratable reduction applied according to the conditions of the household up to the maximum benefits indicated in Section 9.1.

7.3.2. 185% Eligibility Test

All applicants and recipients have their eligibility determined "prospectively". Once the incomes of each member of the economic unit are identified, exempt incomes are disregarded, and the gross monthly earned incomes of self-employed and employed individuals are computed; the monthly income of each person in the unit is totaled and compared to the 185% eligibility standard listed in Appendix 2. If the assistance unit has countable income equal to or less than the 185% eligibility standard for the unit, they "pass". The 185% eligibility standards are developed by the State of Alaska and are related to the comparability requirement described in Section 7.3.1.

7.3.3. Income Eligibility Determination

Once the assistance unit's countable gross income from the 185% test determination has been adjusted by allowing an applicable work incentive (earned income & unearned income child care deductions, and child support payments), the total amount is compared to the appropriate need standard listed in the Needs Standards Appendix 2, for the assistance unit. If the assistance unit has countable income equal to or less than the need standard for the assistance unit, they "pass".

7.3.4. Work Incentive Deductions

Work incentive deductions (i.e., earned income and childcare deductions) may be allowed against earned income in computing the benefit payment amount. The only circumstance in which they are not allowed is when an individual, without good cause, refuses or terminates employment, reduces earnings, or fails to report earnings timely. The following terms apply:

7.3.4.1. Earned Income Deductions

First 12 Months of gross earnings	\$150 and 33% of the earned income
Second 12 months:	\$150 and 25% of the earned income
Third 12 months:	\$150 and 20% of the earned income
Fourth 12 months:	\$150 and 15% of the earned income
Fifth 12 months:	\$150 and 10% of the earned income
After 60 months:	\$150

The income deduction applies only to earnings received by recipients while they are participating in the CITCI Tribal TANF program.

7.3.4.2. Child and Incapacitated Parent Care Deductions

Child or incapacitated parent care costs, which are actually paid by the assistance unit, are allowed as a deduction within certain limits. An "incapacitated" parent is one who has been determined to be physically or mentally unable to perform gainful activity.

7.3.4.2.1. Monthly Maximums

The actual cost of care, up to the following maximums, may be deducted for each child or dependent at a rate of \$200 per month for each child under age 2 and \$175 per month for each child age 2 or older or incapacitated parent. The lower standard (\$175) is applied beginning with the benefit month following a child's second birthday.

7.3.5. Shelter Allowance

30% of the Need Standard is designated for the assistance unit to pay for shelter expenses. Shelter costs are the monthly mortgage, rent, home heating and utility expenses incurred by the CITCI Tribal TANF family for the family's home. Other allowable shelter costs include property taxes, renters or homeowners' insurance and security deposits. The assistance unit is allowed all or part of the shelter allowance to the extent that they actually incur such costs.

The shelter allowance calculation does not apply to:

- Child only cases, or,
- the 185% or Income Eligibility Tests.

7.3.6. Ratable Reduction

A ratable reduction is a percentage reduction in a benefit amount to less than 100% of need. The State of Alaska, 2014 TANF payments are 59.24% of need; this is a ratable reduction of 40.76%. Once a CITCI Tribal TANF family's amount of need is determined, the payment amount will be calculated by multiplying the amount of need by the percentage of need payable. The CITCI Tribal TANF program will use the same ratable reduction utilized by the State of Alaska, Division of Public Assistance.

8. DETERMINATION OF ELIGIBILITY

8.1. Initial Determination of Eligibility

8.1.1. Application

An applicant for assistance under CITCI Tribal TANF must apply for benefits by providing the information required in the application form developed by CITCI or the State of Alaska ATAP Application and attest to the correctness of the information. A signature or witnessed mark by the applicant must appear on the completed application.

8.1.2. Eligible Signatures

An application for Tribal TANF benefits must be signed by the caretaker relative(s) (as defined under Section 6.1.2.) of the dependent child who is the basis of the application for benefits. Persons authorized by State or Tribal law to act for the caretaker relative if the dependent child resides with both parents may also sign the application. If one caretaker is absent due to subsistence or other planned absence, that caretaker may provide a notarized signature via fax or mail.

8.1.3. Date of Application

Applications are date-stamped upon receipt. This date will be deemed the date of initial request for benefits. The CITCI TANF program will follow the Tribal Council's policy of a completed application before client service delivery is determined.

8.1.4. Household

To the extent possible, CITCI will include in one TANF payment all related individuals who are eligible for TANF benefits and who reside together. The parent or parents of a dependent child who is temporarily living away from the household shall not be included in the household, unless approved by the TANF Program outlined in section 6.4.

8.1.5. Social Security Number

A Social Security Number must be provided for the following individuals:

- The applicant;
- Other persons included in the CITCI Tribal TANF unit;
- Caretaker relatives in the household;
- Dependent children.

8.1.6. Interview

CITCI will rely on a case management approach to the administration of its program. This will begin during the application period with the initial interview. If a face to face interview is not feasible, it may be conducted telephonically with the applicant(s) and any other household members as appropriate. The interview will be used to give the applicant an opportunity to:

- Provide any missing information required in the application;
- To assist the applicant to consider options to the receipt of CITCI TANF benefits;
- To initiate the self-sufficiency planning process; and
- To determine temporary monthly cash benefit and/or support services.

8.1.7. Disposition of Application

8.1.7.1. Finding

CITCI will make a determination of eligibility within 30 days for every complete application for assistance that it receives unless the applicant withdraws the application, dies, or cannot be located.

8.1.7.2. Notice

CITCI shall give written notice to each applicant about the disposition of the application, including;

8.1.7.2.1. If Approved

The amount of benefits to be paid, when payment begins, and any conditions on receipt; or

8.1.7.2.2. If Denied

The specific reason for the denial and an explanation of the applicant's right to request a hearing to reconsider the denial.

8.2. Reporting By Participants

CITCI TANF participants must report to CITCI any change in household circumstances that might affect their program eligibility or benefits. This report must be made within a ten-day period after the participant knows of the change. Reports that a child is expected to be absent from the home or entering the home must be made within five days.

8.3. Change Reports

8.3.1. Acting on Changes

Re-determinations of eligibility may occur upon any report of change under Section 7.2 (Types of income), and any change in household composition. Recipients must cooperate in the re-determination process by providing the information requested, and cooperating in interviews per request of the eligibility worker.

8.4. Review Period Length

Reviews are usually scheduled every 6 or 12 months, although special circumstances may warrant a different review period.

Most families will be reviewed every 6 months. This review period may be set longer or shorter to coincide with anticipated changes in the family's situation, such as the beginning or end of seasonal employment or changes in a parent's incapacity status. Cases with few anticipated changes may be assigned longer review periods. For example, Child-Only cases in which the child has no resources or income would normally be assigned the maximum review period of 12 months. A longer review period might also be assigned to cases in which the adult is actively engaged in a longer-term Family Self-Sufficiency Plan, such as vocational training or working with Tribal Vocational Rehabilitation.

9. BENEFITS

9.1. Maximum Benefits

The amounts of assistance for basic living expenses may not exceed the following:

9.1.1. One Child and a Non-Needy Caretaker

For a dependent child living with a non-needy relative caretaker, \$452 per month, plus \$102 for each additional child;

9.1.2. One Child and a Needy Caretaker

For a dependent child living with at least one needy parent or relative caretaker, \$821 per month, plus \$102 for each additional child and \$102 for a second needy parent if the second parent is physically or mentally unable to perform gainful activity as defined by department regulation; or

9.1.3. Pregnant Woman

For a family consisting solely of an eligible pregnant woman, \$514 per month.

10. DIVERSION PAYMENT

10.1. Defined

CITCI offers a diversion payment program to TANF applicants that meet the definition of "needy" as an alternative to recurring reliance on Tribal TANF benefits for families with a job-ready member. Families that qualify for the diversion program may choose a lump sum payment in lieu of ongoing assistance. Diversion payments will provide short-term financial assistance to meet critical needs in order to secure or retain employment. Applicants must meet the criteria of section 4.1.1.1, have employment secured during the diversion months or have current employment they are in danger of losing, and reside in the Municipality of Anchorage or Matanuska-Susitna Valley.

10.2. Based on Need

The payment amount is based upon actual, immediate needs and may not exceed three months worth of TANF assistance benefits.

10.3. Reapplying For Benefits

A diversion payment will count as income if the family reapplies for Tribal TANF benefits within 3 months of application received date.

10.4. Limitation

A family may receive a diversion grant only once in a twelve-month period. However the grant may be paid in more than one installment. TANF recipients are not eligible for the TANF Diversion Program, recipients are considered to have received TANF benefits within the last two months. Diversion payments are limited to four in the lifetime of the assistance unit.

11. SUPPORT SERVICES

11.1. Use of Existing Services

Support services may be made available to CITCI TANF participants, directly or through their service providers or employers, to enable them to engage in assigned TANF work activities, assist in the care of Tribal TANF children, and/or to accept and maintain employment. Support services include those available for eligible tribal members through CITCI's current approved P.L. 102-477 consolidation plan for education, employment and training related services, which also includes transitional services, child care and welfare to work. These services are to be provided to maximize the TANF recipient's integration into the job market.

11.1.1. Work-Related Support Services

- On-the job training
- Short-term job-training
- Counseling and skill building
- Job search assistance as per 45 CFR 286.105 (b) and (c)
- Job referral
- Job placement
- Referrals to community work service
- Transitional services including childcare assistance and post-employment services
- GED instruction
- Vocational Training
- Higher Education
- Transportation by gas allowance and/or bus pass;
- Work and training related clothing;
- Work related tools, dues, or initiation fees;
- Training related materials and supplies;
- Help with childcare expenses;
- Housing/Utility referrals and assistance
- Medical services not covered by Medicaid;
- Other items and/or services considered essential for participation.

11.1.2. Transitional Support Services

CITCI program participants may be eligible for support services payments for up to twelve months after they become employed and close the CITCI TANF case (i.e., income that exceeds the CITCI TRIBAL TANF eligibility standards, or close their case with employment).

11.1.3. Enrichment Services

11.1.3.1 Youth

Education Goals: CITCI Tribal TANF Program Case Managers will provide supportive services and cash/gift card incentives to Tribal TANF children for reaching their educational goals with the measurement of attendance record and/or grades. Achievement of this goal will be determined by the TANF Manager.

Activity Goals: CITCI Tribal TANF Program Case Managers will provide cash/gift card incentives to youth completing approved TANF program activities. Successful completion will be determined by the approved program's director. Programs will be approved by the CITCI TANF Program Director and will be included in the CITCI Program Policies and Procedures. All activities will be related to the four purposes of TANF.

Employment Goals: CITCI Tribal TANF Program will provide subsidized employment opportunities to Tribal TANF youth.

11.1.3.2. Adults

Education Goals: CITCI Tribal TANF Program Case Managers will provide supportive services and cash/gift card incentives to Tribal TANF adults for reaching their educational goals with the measurement of attendance record and/or grades. Achievement of this goal will be determined by the TANF Manager.

Activity Goals: CITCI Tribal TANF Program Case Managers will provide cash/gift card incentives to adults completing approved TANF program activities. Successful completion will be determined by the approved program's director. Programs will be approved by the CITCI TANF Program Director and will be included in the CITCI Program Policies and Procedures. All activities will be related to the four purposes of TANF.

11.2. Cooperation With Other Programs

Other support services such as substance abuse and other related job retention services will be made available through close collaboration and coordination with agencies available in the service area.

11.3. Separate Contract For Non-Native Families

If the State of Alaska is authorized to enter into a contract with CITCI for those eligible residents currently not served by this plan; CITCI will apply to the State of Alaska for a grant to provide supportive services and other education, employment and training related services, including state child care services, to those eligible residents added to this plan.

12. SIXTY MONTH TIME LIMIT

12.1. Limit

CITCI will follow the Personal Responsibility Work Opportunity Reconciliation Act of 1996 when implementing the 60 month time limit. CITCI will count all previous

months of TANF block grant funds provided by any State or Tribe, except as exempted in the following section (12.2).

12.2. Mandatory Exemptions

In determining the number of months for which an adult has received assistance under a state or tribal program, CITCI shall disregard any month during which the adult lived in Indian Country or an Alaska Native village if the most reliable data available with respect to the month (or period including the month) indicate that at least 50 percent of the adults living in Indian Country or in the village were not employed. ("Indian Country" shall have the meaning given in Section 1151 of Title 18, United States Code.)

12.3. Hardship Exemptions

12.3.1. Generally

After 60 months of participation, a family, not exempt under Section 12.2, may continue to receive benefits if CITCI determines the family qualifies for a hardship or domestic violence exception. Hardship exemptions will be limited to 20% of the current caseload. Hardship exemption will include:

12.3.1.1. Disability

Adults with a physical or mental inability to perform gainful activity, as verified by a medical authority;

12.3.1.2. Disabled Child

Caretaker relatives who are caring for a child who is experiencing a disability, as verified by a medical authority;

12.3.1.3. Victims of Domestic Violence

Victims of on-going or recent domestic violence, if the physical, mental or emotional well-being of the victim would be endangered by a strict application of the limit.

12.3.1.4. Other Hardships

It is determined by staff and, if possible, with the input of other agencies who work with the family, the loss of Temporary Assistance would result in a threat to the health or safety of the family due to circumstances beyond their control that are preventing the adult caretakers from reaching self sufficiency.

13. WORK REQUIREMENTS

13.1. Self Sufficiency Plan and Assessment

Every family with a needy adult caretaker receiving a Tribal TANF benefit will complete a Tribal TANF Self Sufficiency Plan in cooperation with their case manager, tailored to the family's situation. The plan outlines the steps the family will take to increase their independence, identifies specific milestones to indicate progress, and indicates the services CITCI will provide to assist the family toward meeting their goals of independence from TANF. CITCI will work with the family to assess skills, work experience, educational needs, and barriers to achieving independence and employability of each adult caretaker and parent who is age 18

or who is not attending secondary school and is without a high school diploma or GED.

13.2. All Families Participation Rates

CITCI TANF will implement work and self-sufficiency programs that promote job creation, provide recipients with job preparation, and provide job support services designed to help recipients gain and retain paid employment or perform community services when paid employment is unavailable. CITCI believes that the following participation rates represent realistic and appropriate standards; in light of such factors as high rate of education training deficiencies, prevalence of mental health, substance abuse issues, and a substantial long term unemployment rate among its TANF participant population. CITCI is requesting the participation rates for the following plan years remain the same. There is a disparity of unemployed Alaska Native and American Indians compared to other populations within the service area, as outlined in Section 5.3. Child-only cases (those with non-needy adult caretakers) are exempt from the participation rate calculation and from the work requirements.

Year	All Families
7/1/2014-6/30/15	35%
7/1/2015-9/30/15	35%

13.3. Individual Participant Requirements

CITCI believes that the following average participation hours per week reflect what can reasonably be expected from TANF participation population. It is assumed that a significant number of Tribal TANF participants may be unable to exercise the discipline needed to participate in a full week of activities.

All Families	Hours per week
7/1/2014-6/30/15	30
7/1/2015-9/30/15	30

13.4. Acceptable Work Activities

The Tribal TANF program requires parents or caretaker relatives to participate in acceptable work activities. Non-needy adult caretakers are exempt from participation (child-only cases). Acceptable work activities include:

- Unsubsidized employment
- Basic education
- Job search assessment as per 45 CFR 286.105 (b) and (c)
- Job readiness activities as per 45 CFR 286.105 (b) and (c)
- Job skills training
- On-the-job training
- Internships
- Vocational education training (36 month maximum)
- Job sampling or work experience
- Approved community work service job skills directly related to employment
- Education in subjects in which there is a reasonable chance of obtaining employment

- Sheltered/supported work
- Work experience
- Subsidized public or private sector employment
- Providing child care service for individuals participating in community service work
- Community service activities
- Traditional subsistence activities (i.e. hunting, fishing, gathering, etc.)
- Traditional work activities (i.e. weaving, beading, carving, etc.)
- Cultural activities
- Self-employment
- Providing childcare to TANF participants
- Substance abuse treatment
- Life skills training
- Other activities developed by the Tribal TANF to meet general participant needs or the needs of an individual Tribal TANF participant (to include time spent applying for SSI).

13.5. Exemptions

13.5.1. Justification

A CITCI TANF participant who is subject to work participation requirements may be exempt from work activities because of certain work situations or because participation would cause unreasonable hardship. Even though exempt, they are still required to complete a Family Self Sufficiency Plan. The following situations may exempt a participant from work activities:

- They are needed in the home to care for a disabled relative who has been determined to require 24 hour care, per a medically certified provider, while alternative suitable care is being sought;
- They are determined by medical provider to be physically or mentally unable to perform gainful activity for a period of more than 30 days.
- A caretaker of a child no more than 1 year of age;
- A parent or caretaker, who is experiencing domestic violence where engagement in work activities could endanger a family member, interferes with the family's ability to escape the violence or its escalation, or interfere with any legal proceedings.
- They are experiencing circumstances beyond the family's control that prevents the caretaker from participating in work activities or becoming self sufficient and the loss of temporary cash assistance would threaten the health or safety of the family;
- A caretaker of a child under 6 and affordable, appropriate, child care (or suitable informal care) is not available within reasonable distance
 - "affordable" is considered child care not above the State of Alaska child care rates.
 - "appropriate" is child care facilities and homes licensed by the State of Alaska or approved by CITC CCDF Child Care Program.
 - "reasonable distance" is child care within one hour commuting time of activity.
 - "suitable informal care" is in home providers approved by the CITC CCDF Child Care Program.

13.5.1.1. Duration of Exemption Due to Domestic Violence

The exemption from participation in work activities for domestic violence will be for a length of time up to six months, individualized to meet the parent's or caretaker's safety and legal needs. Each case will be reviewed at the end of six months and may be extended if continuing circumstances warrant an extension. Individualized responses and service strategies will be developed with the parent or caretaker and other social service organizations, including the state, consistent with the needs of the parent or caretaker.

13.5.1.2. Personal Safety

Adult participants who are experiencing domestic violence will be given resources for support and safety. A victim of domestic violence will be encouraged to receive individual or group support counseling and develop a safety plan. Perpetrators of domestic violence who are included in the household receiving cash assistance will be encouraged to temporarily find alternative housing and to abide by any and all conditions of a restraining order issued by the court. They will be given resources and referrals to appropriate services which may aid them in learning appropriate and safe behavioral options.

13.5.2. Conditions

Individuals who are exempt from work activities may be referred to other programs or agencies for services such as vocational rehabilitation, counseling, substance abuse treatment, or other services. These activities will be monitored as a part of the Family Self Sufficiency Plan which is required to be developed even if the caretaker is currently exempt from work activities.

13.5.3. "Good cause" For Non-Cooperation

Participants who fail to participate in all the assigned CITCI Tribal TANF activities (including work activities) of their self-sufficiency plan or who fail to accept and/or maintain employment will be subject to sanctions indicated in Section 15, except when they are able to demonstrate "good cause" for such a failure.

13.5.3.1. What Constitutes "Good Cause"

For the purposes of determining "good cause" relating to:

1. The refusal of or voluntary separation from suitable employment;
2. Failure to comply with a condition of the self-sufficiency plan; and
3. Failure to participate in work activities under Section 13.4.

The following circumstances may constitute "good cause":

- The recipient is a single parent of a child under age six years and childcare is either inappropriate or unavailable;
- Participation would interfere with the recipient's attempt, or the attempt by a member of the recipient's immediate family, to escape domestic violence or its escalation;
- The recipient is over the age of 59 and has limited strength and stamina;
- A sudden and temporary situation beyond the control of the family, affecting physical or mental health of a member or ability to comply, including family illness or death or tragedies of nature;
- The recipient is involved in a mandatory plan implementation for complying with OCS (when it is time sensitive);

- The recipient must appear in court or serve on a jury;
- The recipient is in detention, incarcerated or under house arrest;
- Necessary transportation breaks down or otherwise becomes unavailable, and the recipient lacks a reasonable alternative;
- Weather conditions prohibit travel;
- The recipient accepts a job with gross wages and employee benefits equal to or greater than those at the job left;
- The recipient is separated from paid employment for a reason outside the recipient's control and not due to the recipients action or inaction;
- The job is unavailable because of a labor dispute or is otherwise involved in a labor dispute;
- The work is more hazardous to the recipient than to the average worker employed in a similar job;
- There is a coordinated plan between the recipient and case manager to enter approved training, or change place of employment that will lead to a higher wage and/or long term self-sufficiency;
- The wages do not meet the Alaska minimum wage requirement;
- The recipient cares for the recipient's child less than 17 weeks of age;
- The recipient has been subjected to discrimination, contrary to state law.

14. PENALTIES

14.1. General Principles

Penalties are intended to induce cooperation with Tribal TANF program requirements on the part of the participants who without the penalty or the threat of penalty, would fail to do so. The penalty process is progressive and unless the individual complies, the amount of reduction in a family's cash assistance may increase over time. However, the opportunity to mitigate the impact upon direct support and benefits to the needy children of affected families is built into this progressive sanction process.

14.2. Applying Penalties

CITCI applies sanctions and penalties regarding TANF benefits for the following requirements:

14.2.1. Family Self Sufficiency Plan

When the participant chooses not to develop, sign and comply with the Family Self-Sufficiency Plan.

14.2.2. Work Activities

When a participant is able but chooses not to take part in work activities or other self sufficiency activities on the plan.

14.2.3. Child Support Services Non-Coop

When the participant does not cooperate with Child Support Services Division and has no Good Cause.

14.2.4. Dependent Not Attending School

When the assistance unit contains a school age dependent child not attending school or other equivalent training program, a penalty is applied to the family until the minor is back into compliance with school/training attendance, unless good cause has been determined by CITCI.

14.2.5. Minor Parent Not Attending School

When a minor parent without high school diploma or GED is not attending school or equivalent training and has no Good Cause.

14.2.6. Intentional Fraud

CITCI will conduct investigative home visits to verify household composition, earned income, and resources when circumstances are questionable due to conflicting information or questionable verification. Home visits results will be written and corrective action will take place when needed to correct eligibility amount determinations.

When an individual incurs an intentional fraud penalty, it will result in the following: the first offense will remove the offender from the case for six months; the second offense will mean a permanent disqualification. Prior to a penalty being imposed, an administrative hearing will take place to review the evidence and determine if an offense took place, unless the participant signs a waiver for an administrative hearing.

14.3. FSSP, Work, and Child Support Penalties

The amount of the penalty for non-cooperation with CSSD, failure to develop and comply with an FSSP, dependent child not attending school, or failure to participate in work or self-sufficiency activities, is 40% of the maximum payment for the family size. If the non-cooperation continues for more than four months, the family's cash assistance may be reduced by 75 % of the maximum payment for the family size. If the parent or caretaker does not cooperate for eight months, the family may be penalized the full amount of their cash assistance. The case is closed and the family must reapply to receive further benefits. However, the progression from the 40% to the 75% reduction or from the 75% to the full family sanction is not automatic. The following actions must be taken before a family's assistance can be reduced by 75% or their case closed:

- Complete a home visit. If a home visit cannot be completed, document the attempts to make the visit.
- Consider any information obtained from a home visit, other information about the family, and the availability of services in the community that might fit the family's needs.
- Document that the health, safety and well-being of the children in the family will not be significantly jeopardized by imposition of the 75% or 100% reduction in assistance. If a home visit is not or cannot be attempted, the family's assistance cannot be reduced further, without program manager approval.

14.3.1. Purpose of the Home Visit

The purpose of a home visit before imposing a 75% or full reduction in assistance is to ensure that everything possible has been done to re-engage the family in efforts toward self-sufficiency and to determine the effect of the reduction on the children. Home visits are intended to achieve the following objectives:

- To observe firsthand the family's situation;
- To encourage the recipient to comply with the activity for which they were penalized;

- To determine if the recipient is refusing to comply, unable to comply, or needs additional supports or services; and,
- To gather information to assess the impact of further reductions in benefits if the recipient is able but chooses not to comply. To accomplish these objectives, it is essential that every effort is made to establish a mutually respectful relationship between the worker and the family.

14.3.2. Health, Safety, and Well-Being

The determination that the health, safety and well-being of the children will not be significantly jeopardized by reductions in assistance beyond 40% means that further loss of assistance will not result in conditions that threaten the children's health or safety. If there is any indication that the children's health or safety could be threatened, the family's cash assistance will not be reduced beyond 40%.

Conditions that threaten health or safety include those when the family:

- Does not have sufficient income or resources to provide for housing, food, transportation, or other essential needs; or,
- Does not have access to an alternative means of support, such as from a relative, live-in partner, or community resource, to meet those essential needs; or,
- The children will be unable to stay in the home if benefits are further reduced or ended; or
- Is working with a division within the Department of Health and Social Services, or with another social service agency, for the safe return of a child temporarily removed from the home, or to prevent removal of a child from the home, and that effort would be disrupted if benefits ended, resulting in the child being at risk of placement into emergency shelter or foster care.

14.4. Determination to Further Reduce Assistance

The final step before reducing a family's assistance by 75% or imposing a full family sanction (100%) and closing the case, is to decide if the reduction will result in conditions that threaten the health or safety of the children in the family. This may be done in a staffing meeting that includes other staff or agencies that have worked with the family. The decision will consider all available information about the family obtained from the home visit, other contacts with the family, collateral contacts, the eligibility worker, the case management and eligibility records, and contacts with other staff or agencies. The decision must be documented in the case record, and record the elements used in making the decision:

- The family's understanding of the reasons for the penalty;
- Whether they will take action to comply with the activity for which the penalty was imposed and if not, any reasons they gave;
- Problems or challenges that need to be addressed so that the recipient can comply if they are willing, or if the recipient is now exempt from completing the required activity;
- Revisions to the family self-sufficiency plan and what additional supports and services are to be provided;
- A description of the family's basic living expenses for housing, utilities, food, clothing or transportation, and any child support obligations that must be met for a child not in the home;
- A description of the extent to which the family's available income, resources and supports will cover these expenses;

- A description of community services that are available to meet the family's basic needs; and
- An assessment of whether further reduction in the assistance amount will result in conditions that threaten the children's health or safety by depriving them of essential basic needs.

14.5. Conduct Justifying Termination of Benefits

Families are ineligible for Tribal TANF benefits when:

14.5.1. Convictions/Misrepresentation

An individual is convicted in state or federal court of fraudulent actions that misrepresented their place of residency in order to receive TANF, Food Stamps, Medicaid, or SSI benefits simultaneously in two states.

14.5.2. Fraud

The family includes an adult who fraudulently misrepresented their residence in order to receive TANF-funded benefits in more than one state. The family is ineligible for 10 years beginning the date the CITC Administrative Waiver is signed, or is found guilty in an Administrative Hearing.

14.5.3. Fugitives

The family includes individuals fleeing prosecution or imposition of sentence for a felony offense. Fugitives under an Alaska Class A misdemeanor are ineligible.

14.5.4. Refusing or Leaving Employment

A caretaker refuses or voluntarily separates from suitable employment without good cause. The family is ineligible for TANF benefits for one month for the first offense, six months for the second offense, and 12 months for any subsequent offenses.

14.5.5. Minor Parent

The family caretaker is an unmarried minor parent not living with a parent or in another CITCI approved adult supervised setting.

14.5.6. Transferring Resources

The family includes an adult who intentionally transfers a resource to become eligible. The family may lose eligibility for up to 12 months, depending on the value of the transferred resource.

14.6. Additional Sanctions Under the CITCI Tribal TANF Program.

14.6.1. Fiscal Responsibility

Temporary cash assistance is to be used for providing the basic needs to the family.

All CITCI Tribal TANF participants will be assisted by program staff in developing a household budget to cover their family's anticipated food, clothing, and shelter-related costs for the month. Upon the assessment of the program staff, CITCI has the option to retain portions of the monthly assistance benefit and encumber it in vouchers up to 100%. This action would be taken as a result of demonstrated

gross negligence by the participant in the use of their benefit or because of a recipient's non-compliance with specific conditions of the CITCI Tribal TANF program as described in this plan.

14.6.2. Parental Responsibility.

Minor parent recipients will be required to participate in locally available parenting skills groups, family planning and other available counseling appropriate to their individual situations. Adult parent recipients will be required to participate in similar groups and counseling. Failure to comply with any of these requirements without good cause, as indicated in Section 13.5.3.1., will result in a penalty.

14.6.3. Parent-Teacher Conferences

As special conditions, all parents will be required to attend all parent teacher conferences regarding their school-age children. In addition, parents will be required to schedule and see that their children attend yearly health check-ups and screening at their local health clinic. Failure to comply with these special conditions without good cause as indicated in Section 13.5.3.1 will result in a penalty on the monthly assistance amount for the month following the infraction as established in consultation between the applicant and the CITCI Tribal TANF caseworker.

14.6.4. Personal Responsibility

All adult and minor parent participants screened for alcohol and substance abuse and determined by program staff to be at high risk will be required to complete a drug and alcohol evaluation within 30 days from the date they file an application for assistance or from the date of request by the case manager of record. CITCI Tribal TANF participants will be required to follow the recommendation(s) resulting from their evaluation within 3 months. Failure to meet these requirements will result in an appropriate reduction of their monthly benefits, established in consultation between the applicant and the CITCI Tribal TANF caseworker. CITCI reserves the option of holding these funds in a program account to be returned to the household as a reward incentive if they comply with the recommendation(s) of their evaluation within six months. Failure of a participant to comply with the recommendations of their evaluation after six months will result in the forfeiture of funds withheld and 100% of the restored monthly benefit being encumbered in vouchers for the household's food, clothing, and shelter costs.

15. Penalty (Sanction) Policy

15.1. Initial Non-Compliance Penalty

The initial penalty for non-compliance will reduce the family's maximum cash assistance amount 40% for months one through four.

15.2. Continued Non-Compliance

If the family continues in non-compliance with the FSSP, the family's maximum cash assistance may be reduced by 75%, for months five through eight. This reduction in cash assistance can only take place after a home visit and/or full assessment of the family situation to make certain there will be no threat to the health or safety of the children if the cash assistance is reduced by more than 40%.

15.3. Full Family Sanction

If, after month eight, non-compliance continues, the sanction could move to a full family sanction of 100%, after consulting with supervisors and attempting to resolve the situation with the family. Again, this decision cannot be made until a home visit has been conducted and the assessment is fully documented. If the family does not comply with the home visit requirement, the program manager must approve the full sanction.

16. FINANCIAL ASSISTANCE FOR NON-TANF

Applicants for each category must reside in the CITC Services Area described in section 4.2 and be considered “needy” according to sections 1.1.2. and 7.3.2. in the CITC Tribal TANF Plan. Each category will have additional eligibility criteria outlined in each section below.

16.1. Financial Assistance to Custodial Parents When Removal of Children

If a custodial parent on Tribal TANF has one/all of their child(ren) removed from their care by Indian Child Welfare (ICW) or Office of Children’s Services (OCS), they may be eligible for continued financial assistance for up to six months, in order to work on their reunification plan. Participants must “needy” and must not have reached their 60 month lifetime limit.

16.1.1. Parental Responsibility

Only custodial parent that were on Tribal TANF at the time of removal may request this on-going financial assistance, and the parent must demonstrate they have an OCS reunification plan and making progress. This will be determined on a case by case basis by the case manager.

16.1.2. Financial Assistance Payment

Parents that have been determined eligible for the financial assistance under this section will still have to be income and resource eligible per TANF Plan section seven and remain residents of the Municipality of Anchorage or Matanuska-Susitna Valley. Payment will be equivalent to the pregnant woman standard set by the State of Alaska need standards. Monthly payments will not be automatic; parents must demonstrate their cooperation and activity compliance each month.

16.2. Subsidized Employment for Non-TANF

16.2.1. Non-Custodial Parent of TANF Children

Non-custodial parents of Tribal TANF children may qualify for subsidized employment. They must agree to notify Child Support Services of new employment.

16.2.2. Families That Have Reach Lifetime Limit

Families that have reached 60 months lifetime limit for Tribal TANF, and are no longer eligible and still have a dependant child(ren) may qualify for subsidized employment.

16.2.3. Parents working with Office of Children Services (OCS)

Parents of Tribal TANF children that were removed by OCS or Tribal Court can qualify for subsidized employment if they are actively working on a reunification plan for their children and are making progress. Parents are not eligible to receive both subsidized employment and financial assistance (see section 16.1) at the same time.

16.3. Nonrecurring Short-term Benefits

Subject to the availability of funds, the CITC Tribal TANF Program may provide Nonrecurring Short-term Benefits, i.e. emergency or crisis assistance, to needy families as provided at 45 CFR 286.10 (b) (1).

Nonrecurring Short-term Benefits are benefits that:

- (i) Are designed to deal with a specific crisis situation or episode of need;
- (ii) Are not intended to meet recurrent or ongoing needs; and
- (iii) Will not extend beyond four months.”

16.3.1. Applicants Eligible for Nonrecurring Short-term Benefits

Applicants must meet the definition of “needy” as defined in section 16.1, reside in the Municipality of Anchorage or Matanuska-Susitna Valley, be Alaska Native and/or American Indian with verification outlined in section 4.1.1.1., and have a specific crisis or need.

16.3.2. Limitation of Nonrecurring Short term Benefits

CITC Tribal TANF program will develop internal policies to identify specific crisis and needs that will be approved, examples include utility shut off and furnace/water heater repair. Requests will have be limited to four times per family per lifetime. Recipients of on-going Tribal TANF will not be able request nonrecurring short term benefits.

17. RIGHTS AND DUE PROCESS

CITCI Tribal TANF will provide written notice of each action taken on any application or ongoing case. These notices must be timely if they will adversely affect the family’s eligibility or grant amount. If a participant disagrees with the action which affects their eligibility determination or change in benefit payment they may file an Appeal. (See *Appendix 3*). A participant follows the Client Grievance Policy (Policy # 3.100) to resolve the grievance for actions outside of eligibility determination realm. (* See Appendix 4.)

18. CONFIDENTIALITY

18.1. Recipient participation information

The Tribal TANF program will comply with and enforce policies and procedures of CITCI regarding CITCI recipients that are designed to restrict the use and disclosure of information about individuals and families receiving assistance under the program.

18.2. Information exchange

In accordance with agreements that may be entered into with the State of Alaska, or other states or tribes administering TANF programs, the Tribal TANF may exchange otherwise confidential information under such agreements to prevent receipt of duplicative benefits, to obtain verification of information provided by the applicant or recipient, or to assist them to obtain additional benefits.

18.3. Providing information to law enforcement

CITCI will follow their Policy #1.030 based on 42 CFR Part II and HIPAA regulations for requests from law enforcement officers involved in carrying out any investigation or information gathering connected with Tribal TANF participants. (*Appendix 5*)

19. FISCAL ACCOUNTABILITY ASSISTANCE

For each fiscal year during which the CITCI receives or expends funds pursuant to a block grant under Section 412 of Title I – Block Grants for Temporary Assistance for Needy Families, the fiscal accountability provisions of Section 5(f)(I) of the Indian Self-determination and Education Assistance Act (25 U.S.C. §§ 450c(f)(1), relating to the submission of a single agency audit report required by chapter 75 of Title 31, United States Code, applies.

20. DATA COLLECTION AND REPORTING

The CITCI will comply with Section 411 (Data Collection and Reporting of Title I - Block Grants for Temporary Assistance for Needy Families) of Public law 104-193.

21. ASSURANCE OF COMMENT PERIOD

The CITCI TANF Program assures compliance with the 45 day comment period requirement in 45 CFR 286.75 (a)(6) prior to the submission of the CITC Tribal TANF Plan. CITC posted in public areas solicitation of comments in the CITC building December 2, 2013 to January 17, 2014. No comments were received.