

Association of Village Council Presidents  
AVCP Workforce Development Division  
P.L. 102-477 Plan  
**January 1, 2021 through December 31, 2023**  
CY 2021-2023

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## **SECTION I. PROGRAMS TO BE INTEGRATED**

The Association of Village Council Presidents (AVCP) proposes the continued integration of the following programs under this PL 102-477 plan, along with the addition of one other, for CY 2021-2023. The breakdown by department and program are as follows:

- A. U.S. Department of the Interior:
  - Higher Education Program
  - Job Placement & Training Program
  - Adult Basic Education Program
  - Johnson O' Malley Program
- B. U.S. Department of Labor:
  - WIOA Section 166 Comprehensive Services for Native Americans Program
  - WIOA Section 166 Supplemental Youth Services Program for Native Americans Program
- C. U.S. Department of Health and Human Services:
  - Child Care Development Fund Program (CCDF)
  - Native Employment Works Program (NEW)
  - Tribal Temporary Assistance for Needy Families Program (TANF)

Programs NOT integrated in this PL 102-477 plan are as follows:

- U.S. DOI Welfare Assistance Program\*

\* Although the Welfare Assistance Program is not incorporated into this P.L 102-477 plan, AVCP shall research the inclusion of this program at a later date. If we should decide to request this or any other eligible programs to be integrated in our 477 plan, we will submit an amended plan for review and approval.

AVCP proposes to implement this continuation of services effective January 1, 2021, and the addition of TANF effective October 1, 2021 through the end of this plan period. This Tribal Service Delivery Plan will be operational and in place for three years from January 1, 2020 through December 31, 2023.

## **SECTION II. GOALS OF THE 477 PROGRAM**

The AVCP Workforce Development Division affirms the following goals for its programs:

- To promote the economic and social development of our Tribal members in order to reduce joblessness in accordance with the goals and values of the communities we serve.

- To support education, employment, training and economic development activities in order to more fully develop the academic, occupational and literacy skills to make such individuals more competitive in the workforce.
- To assist our Tribal members to succeed in the workforce by encouraging self-sufficiency and helping to familiarize themselves with the world of work and facilitating the creation of job opportunities and services related to those activities.

### **CONSISTENCY WITH THE ACT**

The AVCP service delivery plan remains consistent with the Public Law 102-477 Indian Employment, Training and Related Services as amended. The effective dates for this plan are January 1, 2021 through December 31, 2023. The effective dates of the inclusion of TANF in this plan are October 1, 2021 through December 31, 2023.

AVCP 477 Program's mission is to identify, counsel, and assist Tribal members to become employed and economically self-sufficient. Our programs are consolidated into one plan, one budget and follow one reporting system. We will encourage and assist recipients to fulfill their responsibility to prepare for, accept and retain employment. Services offered include job search, job development/placement, vocational counseling, basic work-skill preparation, training, and other related supportive services.

These consolidated services are made available to the eligible tribal members we represent, the majority being from the 56 tribes within the AVCP region. For tribes that are in the AVCP Compact for Higher Education / Scholarship program, enrolled tribal members will be served whether they reside within or outside of this region (for other programs, compact or non-compact, applicants must comply with our residency requirement). Through tribal consultation we will also assess tribal needs with the goal of strengthening local tribal governments and communities. This will result in competent tribal infrastructures. This internal stabilization, through providing a skilled workforce, will in turn support an economic development environment and a knowledgeable tribal government.

AVCP has been contracting P.L. 93-638 programs well before the passage of P.L 102-477. Many of the clients that we served in this region benefited from grant funds received from the various funding agencies throughout the years. With the grant funds we receive on behalf of our tribes, we have provided higher education for eligible clients. Our training programs are another area that is a very common "desire" for people in most of the communities. Employment opportunities that are and will become available with new infrastructure development that is taking place in this region is planned to increase. Many of our clients are in need of child care and supportive services. Economic Development is happening in our region and the AVCP Workforce Development Division is assisting as many tribal members and other Native Americans that are eligible for the funds, as we can.

### **ELIGIBILITY – TRIBAL AUTHORITY**

The Association of Village Council Presidents (AVCP) is one of the 12 regional Alaska Native Claims Settlement Act (ANCSA) Native non-profit organizations in Alaska. Since its establishment by the regional Tribal Councils in 1964, AVCP has grown to become a large and diverse social service agency, tribal rights advocate and community development organization. AVCP, through its membership of the region's 56 federally recognized Tribes, works for the benefit of all the tribal governments and the people of the Yukon-Kuskokwim Delta. AVCP's programs include those that provide human development, social services and other culturally relevant programs that enhance our culture and traditions through working partnerships with member villages of the Yukon-Kuskokwim Delta and the myriad of

federal, state and local agencies and organizations. A resolution authorizing AVCP to consolidate programs into a P.L. 102-477 program is included as **Addendum B**.

As a major provider of training, economic and social services within the region, AVCP has made an earnest effort to increase the delivery of needed services at the village level. Various economic changes have occurred and are being planned within the region, which required AVCP to initiate a coordinated region-wide response, taking a pro-active approach on issues, and assuming more control of the employment and training outcomes of its tribal members in this region.

### **AVCP SERVICE AREA DESCRIPTION – STRUCTURE & GEOGRAPHY**

The Association of Village Council Presidents (AVCP) is a tribal 501(c)(3) non-profit organization based in Bethel, Alaska. Bethel is the largest town in Southwest Alaska and is the regional hub for its surrounding fifty-six (56) federally recognized tribes, all of whom are members of AVCP. AVCP's member tribes reside in small isolated villages scattered throughout the Yukon-Kuskokwim Delta in an area that is approximately 59,000 square miles and roughly the size of the State of Oregon. The villages are not connected by road to one another, nor to the rest of Alaska. English is a second language for many tribal members who continue to practice a centuries old hunting, fishing and gathering way of life, congregating at home village sites in the winter and moving to fish camps in the summer.

The council presidents of each of the 56 federally recognized Tribes are known as the AVCP full board of directors. The full board of directors, comprised of one delegated representative from each of the Tribes, comes together during the annual convention each fall to conduct business. The AVCP region is divided into 12 smaller sub-units. Each unit elects a representative to sit on AVCP's Executive Board. The Executive Board ("the Board") is the legal governing body of AVCP. The Board includes an At-Large Chairperson, a Traditional Chief and a Second Chief. The Unit Board members are elected every three years in staggered terms. These elections take place at the annual convention. The Executive Board hires a Chief Executive Officer who oversees the day-to-day operations of the organization.

The AVCP Region encompasses the majority of communities on the Kuskokwim River and those in roughly the lower third section of the Yukon River. Specifically, the boundary, which follows the same lines as the ANCSA profit corporation of the region, Calista, goes from Kotlik on the northern side of the Yukon Delta, up the Yukon River to Russian Mission and south along the Bering Sea coast to Platinum, and then up the Kuskokwim River to Stony River, and includes Lime Village.

The 56 Federally recognized Tribes located in the in the AVCP service area are:

Akiachak, Akiak, Alakanuk, Aniak, Atmautluak, Bethel, Bill Moore's Slough, Chefornek, Chevak, Chuloonawick, Crooked Creek, Chuathbaluk, Eek, Emmonak, Georgetown, Goodnews Bay, Hamilton, Hooper Bay, Lower Kalskag, Upper Kalskag, Kasigluk, Kipnuk, Kongiganak, Kotlik, Kwethluk, Kwigillingok, Lime Village, Marshall, Mekoryuk, Mountain Village, Napakiak, Napaimiut, Napaskiak, Newtok, Nightmute, Nunapitchuk, Nunam Iqua, Ohogamiut, Oscarville, Paimiut, Pilot Station, Pitka's Point, Platinum, Quinhagak, Red Devil, Russian Mission, Scammon Bay, Sleetmute, St. Mary's (Algaaciq and Andreafski tribes), Stony River, Toksook Bay, Tuluksak, Tuntutuliak, Tununak, Umkumiut. A map of the AVCP/Calista Region is included in **Addendum H**.

### **TRIBAL SERVICE PROVIDER**

An individual that is seeking services under the 477 from AVCP's Workforce Development Division must be an enrolled member of a federal recognized tribe. Higher Education college / university students must be enrolled members of AVCP higher education compact tribes to receive the US DOI BIA Higher Education grant, all others will be referred for services from their tribes. Individuals interested in training related services must reside in the AVCP Region except in Bethel then they will be referred to Orutsararmiut Native Council (ONC). If they reside outside of the AVCP Region they will be referred to the nearest tribal office of their residence. AVCP's cash assistance services are available to all Alaska Native/American Indian Families within the AVCP service area. For the purposes of this plan "Alaska Native/American Indian Family" is one in which at least one member of the assistance unit is an Alaska Native/American Indian

### **SECTION III. COMPREHENSIVE STRATEGY**

AVCP fully integrates all Federal programs providing employment, education, and training related services. Through our Workforce Development Division it provides extensive access to services throughout the region with our 32 village-based Tribal Workforce Offices serving all 48 tribal communities in the AVCP region. This approach improves effectiveness in that it reaches clients in their communities, provides better access to the entire range of services and is more efficient to administer.

#### **SOCIAL AND ECONOMIC CONDITIONS**

The 2010 U.S. Census reported a total population of 24,393 people living in the AVCP Region. The State of Alaska's population estimates for 2016 indicated the number of people living in the AVCP Region was 26,334 (State of Alaska, Department of Labor and Workforce Development website). That is an increase of 7.4%. The total American Indian and/or Alaska Native population in the region in 2010 was 21,148, or 86.7% (no updates were available; this figure is based on the 2010 U.S. Census).

The Alaska statewide unemployment rate, as of May 2019 was 6.1%. The Bethel Census Area rate was 10.9% and the Kusilvak Census Area rate was 15.7%. Both census areas fall within the AVCP Region boundaries.

#### **CHRONIC COMPETITIVE DISADVANTAGE**

Alaska Natives and Native Americans have long had considerable disadvantages in competing with non-Natives for better paying jobs or for any job in many cases. Financial opportunities, knowledge of possibilities for education and training, lack of jobs available, personal/family situations, etc. are some of the many barriers people must face. These are compounded even more if an individual lives in an area where there are not sufficient resources available to help break down those barriers. All too familiar is it to our Native communities that it has become harder to find permanent full-time and/or seasonal employment, even in those industries traditionally filled by our tribal members. Knowledge of available resources and services, along with appropriate assessment and counseling services are crucial components to the success of our clients. Access to employment opportunities, financial resources, the appropriate assessment and counseling services all provide our tribal members, our clients, encouragement, motivation and the skills to continue to pursue and achieve their goals.

The American Indian and Alaska Native (AI/AN) labor force in the AVCP Region continues to make progress in becoming qualified for employment but, many continue to struggle to enter the job market and secure adequate employment. The unemployment statistics for Natives generally show that those rates are double or sometimes even

triple what the general population unemployment rates. That is clear when you look at the Alaska statewide unemployment rate of 6.1% and compare it to the Bethel Census Area's rate of 10.9% and the Kusilvak Area's rate of 15.7%. As stated above, the two census areas have a much higher concentration of AI/AN's in their overall populations (86.7%) both being comprised of rural and primarily Native communities.

### **ECONOMIC OPPORTUNITIES: EMPLOYMENT BY INDUSTRY AND TYPE**

Opportunities for year-round employment are not readily available. The areas of state and local governments, health and education services are the primary employing entities with jobs. There are many tribal and native organizations (tribal councils and village corporations), some federal government jobs and then many of more traditional private sector employment options available.

The majority of occupations in the AVCP region are vocational in nature and up to 90 percent of the job opportunities in rural areas of the region are estimated to require vocational or on-the-job training. Regional employers have stated that half the jobs identified with labor shortages were entry level and primarily attributed their need to the ability and/or skills not being available in the existing labor force. Infrastructure development in this region is creating employment opportunities in the villages and before these projects take place, AVCP, along with other agencies, are assisting the local workforce by training and employment assistance in this process.

As these employment opportunities become available, based on industry and type, the AVCP Workforce Development Division will continue to assist all eligible members in this region with employment and training needs. The information provided reports on the employment and training needs, labor forecasts and economy for AVCP Alaska Natives and their communities.

The AVCP Workforce Development Division will collaborate with the Community Development Division to reestablish Tribal Employment Rights ordinances (TERO) and related functions. When TERO is reestablished AVCP's Workforce Development Division will be available for consultation with the Economic Arm for work-related TERO training and employment opportunities.

#### **Yuut Elitnaurviat**

We have been partnering with Yuut Elitnaurviat (YE), which is the first regional vocational training center of Western Alaska. YE offers culturally relevant and regionally responsive training programs in response to the suffering regional economy and high unemployment rate, and building programs that combine intensive academics and on-the-job training. We have been in collaboration on many education and training programs geared toward the employment opportunities that currently exist.

The new YE Air Frame and Power Mechanics Training School has started training sessions in 2019 and we will provide eligible individual assistance as attending any other training facility.

#### **Commercial Fishing**

Commercial fishing has been a major part of the area's economy in years past but, now it is almost practically non-existent. There are a few fisheries that have been able to continue, both because salmon returns have not had as dramatic of a decline seen in other fisheries and, because there is a desire to purchase those fish, namely by local CDQ

groups. Community Development Quota (CDQ) groups, part of the Western Alaska CDQ Program, are unique entities are part of the federal fishery management system. In 1992, Congress reauthorized the Magnuson - Stevens Fishery Conservation and Management Act. This act ratified the creation of local, regional bodies and provided them substantial harvest shares in many of the federal fisheries regulated by the North Pacific Fishery Management Council (NPFMC).

In the AVCP region there are two CDQ groups – the Yukon Delta Fisheries Development Association and the Coastal Villages Region Fund. Each CDQ has specific member communities and work towards providing them with economic opportunities in a variety of ways. The past several years there have been no fish buyers; therefore, families which depended on commercial fishing for additional income have not received it. The lack of commercial fishing income has provided additional hardships financially. With community's cash outlook bleak, so there are more, and many individuals are seeking financial assistance for the cost of living while others are searching for opportunities that will enable them to become active members in the workforce through higher education or vocational training.

### **ECONOMIC DEVELOPMENT – BUSINESS DEVELOPMENT**

AVCP 477 may use up to 25% of the combined 477 funding a year for economic development. AVCP service is based on working and partnering with local and regional businesses and entities who are willing to work together to create jobs and career paths for the community and our participants to promote economic development for the AVCP Region. AVCP may use a model of collective impact to bring together stakeholders engaged in workforce development and job creation in the region. This process may include gathering our current partners and identifying new partners who are willing to coordinate activities that increase job opportunities and job readiness for our participants and provide a link between training and employment opportunities. Job creation activities may be developed of the course of this plan.

AVCP's Workforce Development Division plan will include the following support collaborations:

AVCP Head Start: AVCP Child Care will partner with Head Start in facility improvements, staff development, as well as, but not limited to, curriculum development.

AVCP Community Development Division: This division works with regional partners to produce the five-year Regional Comprehensive Economic Development plan. Workforce Development Division will work with the Community Development Division in the project planning and implementation phases.

Yukon Kuskokwim Health Corporation (YKHC): In partnership with YKHC, AVCP Childcare will utilize YKHC's campus to provide child care. YKHC's facilities and AVCP Child Care Program will collaborate to develop child care providing opportunities for AVCP Tribal Members, as well as, but not limited to, YKHC Staff.

### **ADDRESSING EMPLOYMENT BARRIERS**

AVCP's Workforce Development Division programs are designed to assist eligible tribal members in easing and/or removing barriers they may have. Examples of many barriers we've identified in the Region fall into the following areas:

- Lack of hands-on training opportunities

- Financial constraints distinctive while pursuing education or training while raising a family
- Lack of adequate and culturally appropriate counseling opportunities
- Loss of security in the absence of village and family support systems
- Lack of understanding of and employee's needs and concerns by prospective employers
- Social stigmas that contribute to or even inflate employment barriers
- Lack of vital essential personal, work and job-specific skills

These obstacles are not insurmountable, and our programs continue to work towards developing services that better prepares individuals, potential employees, for job opportunities. Our programs identify individual barriers for each participant, and we work to break down those barriers. A significant number of tribal members have been assisted and they now have the necessary personal, work and job specific skills necessary to become self-supporting members of their communities. The final barrier for them, and often the most difficult to overcome, is finding actual employment opportunities.

## **OUTREACH**

Outreach is a very important component of the AVCP's Workforce Development Division. Technology in Southwest Alaska has developed significantly over the last several years but, there is still a large gap in services available to the average person in a village. Internet and email access are still spread thin and the system connections are so sluggish that it is almost a deterrent to have to use them. The AVCP Region encompasses such a large geographic area and such a large number of diverse communities that that in itself is a barrier for making sure people have access to information.

The AVCP Workforce Development Division has local Tribal Workforce Development Offices in over 30 villages throughout the region that service all 48 Tribal communities in the entire region. Each office is staffed with a Workforce Development Navigator who, working in conjunction with our Benefits Division, assists clients with one integrated cash assistance application, Individual and Family Development Planning, overcoming barriers to employment such as obtaining their GED or getting a driver's license, locating employment opportunities, and assists clients with applying for scholarships and accessing training opportunities.

## **ELIGIBILITY**

The AVCP Workforce Development Division will assist eligible applicants residing within our service area, in acquiring the education and job skills necessary for employment. Through this process, staff will offer supportive services where appropriate, including assessments such as TABE and vocational counseling/guidance. Staff will assist in the selection of available training options or with employment related services, which will coincide with current labor market projections in this region.

Basic Requirements for Eligibility under the 477:

- An enrolled member from a federally recognized Tribe within the AVCP region who are Alaska Native or their descendants, or have a Certificate of Degree of Indian Blood (CDIB) or tribal enrollment card noting they are Alaska Native / American Indian.
- A resident of the AVCP Service area for the most recent thirty days (Higher Education is excluded from this requirement)



- Complete and sign the application
- Complete an Individual Development Plan (IDP)
- Selective Service Number (for applicable 18 – 25-year-old males)

### **PRIORITY OF SERVICE (POS)**

AVCP gives Priority of Service for Veterans and Eligible Spouses residing within AVCP's service region.

Because of the statistical realities of very few employment opportunities available to clients in the AVCP Region, virtually most if not all applicants who apply for services would be considered eligible; a person's income status would not be a limiting factor for the majority of situations.

## **SECTION IV. SERVICES TO BE PROVIDED**

### **INTAKE, ASSESSMENT AND AN IDP**

The AVCP's 477 program includes one general application for services. As a prospective client goes through the intake process their initial eligibility is determined. An assessment and/or evaluation of skills, interests, abilities and a determination of needs. From there they will be guided through a more in-depth assessment, one-on-one with staff, where additional circumstances of their current situations will be discussed and assessed. An Individual Development Plan (IDP) is included in the general application for services. It will be reviewed with the individual and staff will make sure all questions were understood and that it is complete. This will be the tool that will guide AVCP in our services to that individual until they've reached their individual goals, both long-term and short-term. Once it is determined what services a client is eligible for and is requesting, further information will need to be submitted. The general process an interested individual will follow through our program is as follows:

- The client is assigned to one or more services from a comprehensive list of services. The services provided to any individual client will be based on the needs of that individual or of his/her family.
- After the intake process is complete applications are forwarded to the appropriate case manager.
- Priority will be giving to those applicants who are low income unemployed or underemployed in need of training and/or financial assistance to obtain full time employment.
- Selection of applicants shall be made without regard to sex or marital status, provided they meet the requirements of the program requested. Non-Native spouses are not eligible for tribally managed funds.
- Repeat training and related services will be allowed on an individual case-by-case basis and may not be available if funds become limited. All repeat services will be considered a lower priority than the initial service. No client is entitled to be funded for repeat services. Any repeat service must be fully justified and approved in advance.
- Applicants seeking training must be at least 18 years old or an emancipated youth, at least 16 years old.

The Bethel Census Area has a poverty level of 27% and the Kusilvak Census Area has a poverty level of 39.1%, together these two census areas cover the AVCP Region. With these high poverty levels, much of the population would be considered low income.

### **POSITIVE PROGRESS BY CLIENT**

Individuals in a training or work-related program are required to make satisfactory progress in their respective programs and must give evidence by authorizing the institution or employer to provide grades, attendance records and progress reports/evaluations to AVCP. Failure to meet these requirements due to reasons outside the client's control may result in termination of benefits.

## **PROGRAM SERVICES**

### **A. EMPLOYMENT, EDUCATION, TRAINING AND SUPPORTIVE SERVICES**

#### **Employment Services**

Employment services are offered to adult and youth residing in the AVCP region. Services for adults ages 18 and over prepare participants for employment and self-sufficiency. Employment activities, including job search, job development and placement, community work experience, community service programs, traditional subsistence activities, and subsidized and unsubsidized public and private sector work experience and employment.

AVCP provide short term work experience to assist participants to become more competitive in the labor market. This type of work activity is considered subsidized employment in the public sector or in private non-profit agencies. Work situations are temporary, and it is strongly recommended to participating entities that they put forth good effort in offering the client permanent employment at the conclusion of their program. The main purpose of the program is to allow an individual to develop occupational skills and good work habits and to expose him or her to various occupational opportunities. Adult Work Experience is typically viewed to be more appropriate for the less competitive segments of the target population, including younger and elderly persons.

Intentions of the Work Experience Program:

- To provide short-term work assignments for a client who has not worked in the competitive labor market for any extended period, allowing for adjustment to a job setting; and
- To provide short-term work experiences for a client that can help define a definite occupational goal; and
- To provide short-term work experience for a client while a training or job opportunity is being developed.
- WE contracts will contain a detailed training/learning plan with a specified time frame.

AVCP will arrange for work sites in the public non-profit sectors. Each participant involved in the Adult Work Experience program will be paid wages for work done. The wage rate will be the minimum wage or the prevailing wage rate for similar work sites. Work site supervisors will provide supervision and instruction in work habits, occupational skill development, and work sampling (all outlined in the Worksite Agreement), and monthly evaluations of the client's performance. AVCP Workforce Development Division staff will conduct reviews throughout a client's tenure with an organization and make sure they are achieving what has been preset for them. Follow-ups with the client will be conducted once they finish the program as well, and they will be referred to any other programs they may be interested in and eligible for.

#### On-the-Job Training

The On-the-Job Training (OJT) program is an employer-based training program designed to provide a client more opportunities, who may already have some work experience, to enhance and gain additional skills. The intention is that a client will be hired by that employer permanently after their training period has concluded.

Job development activities are designed to facilitate and open employment possibilities for those who have been adequately prepared for long-term employment. Assessments can be used to assist in determining a client's suitability for a job or occupation. The process will include analyzing results and discussing any recommendations to the client. From there, staff will provide information to the client, for them to become familiar with the current labor market and to identify realistic expectations regarding their employment possibilities.

### **Youth Employment Services**

Youth services are offered year-round. Youth Employment services are contracted directly with all AVCP Region Tribes. A predetermined amount of funding is provided to each eligible Tribe or community to carry-out the program. When funds available are limited, the program is offered on a "first come, first serve" basis; those tribes who complete the application packet/process on time will receive funding.

#### 1. Youth Employment:

- Is available to Alaska Native and American Indian, income-eligible youth who reside in participating villages in the AVCP region who are between ages of 14-24
- Provides experience that activates youth towards local job employment interests and works to increase and expand their basic understanding of integrating employment into their daily lives.
- Provides employment to participants who are eligible and economically disadvantaged.
- Youth is prioritized if they meet one or more of the following categories:
  1. School dropout
  2. Basic skills deficient
  3. Have educational attainment that is one or more grade levels below the grade level appropriate to their age group
  4. Pregnant or parenting
  5. including learning disabilities
  6. Is a homeless or runaway youth;
  7. Other: eligible youth who face serious barriers to employment
- Youth between the ages of 14 to 17 will be required to complete work permits as required by the State of Alaska, Department of Labor. They will not be allowed to work until this process is complete.
- Participating tribes or communities are responsible for providing all required documents and expenditure reports to AVCP Workforce Development Division staff as directed prior to funds being provided.

### **Education Services**

AVCP works directly with Yuut Elitnaruvik (YE) to provide ABE/GED services to youth and adults in all 56 tribes. These services are provided through their facility in Bethel. AVCP Workforce Development Division contracts with YE to hire twenty (20) GED Facilitators in villages with high numbers of individuals who do not have either a high school diploma or GED. There will be course intensives in reading, writing and math for those who are in need of

additional learning in order to pass their GED. Those individuals will be brought into Bethel for the intensive courses and, if deemed ready, will take the GED exam. There are four intensives a year with a maximum of six students per session. We track the number of clients who have received their GED and solicit information in the form of evaluating surveys that clients complete after they have attended training to improve the effectiveness of this service.

### **Education/Scholarships**

AVCP service provides higher education scholarship to eligible tribal members of AVCP *Compact* villages. The goal of the program is to provide students with the ability, via financial assistance and career counseling, to pursue higher education. Students must be degree seeking (associates, bachelors, graduate or professional degree). Students must be admitted to an institution of higher education that is accredited by national, or regional accrediting agency, is a candidate for accreditation, or is an eligible institution.

Accredited institutions include universities, colleges, community colleges, and tribal colleges. Scholarships will be open to all fields of study and degree programs.

Payments are made directly to the college or university financial aid office. Funding amounts will be based on availability of funds. Funding is based on an overall unmet need of each individual student and, is subject to funding secured from any other funding agencies. Students are required to apply with the Federal Student Aid (FAFSA) and, have some sort of additional funding secured (other scholarships, PELL Grant, loans, etc.).

### **Training Services**

Short- and long-term occupational training are offered in all 56 villages. Training services depends on the needs of the individual, the type of jobs in demand and where the client is willing to live. Eligible participants must be unemployed, underemployed or of low income. Training services include job and/or skills development. These services assist tribal members in becoming self-sufficient, with the obvious benefits being increased economic opportunities, enhanced self-worth and development of positive role models for others.

Following the regulations and parameters set forth by the various funding agencies, AVCP administers a training program as part of our overall service. The AVCP will provide assistance to both Compact tribal members and Non-Compact tribal members. Tribal members of Non-Compact tribes must contact their tribe to request for funds. If they are denied services (no funds provided) or the amount of funds they are provided is less than what we would provide, we will consider their application for funding. It will be understood that we will not pay for the same items their tribe provides funds for.

AVCP provides the following types of training:

1. Technical Training – considered longer-term, traditional vocational (skills-based) training.
2. Occupational Training – geared towards individuals needing training as a requirement of their employment or that will provide the opportunity for advancement.
3. Apprenticeship Training – considered a supportive service program for an individual participating in a formal, documented apprenticeship program.

Training facilities and services required for vocational training programs may be arranged through other AVCP Divisions and contracts or agreements with outside agencies, establishments, or organizations. This scenario will be

considered at times when it would be more financially feasible to conduct a training locally or in one of the regional villages.

### **Support Services**

Support services are offered to participants to address participant barriers in preparing for, obtaining, or retaining employment. Support services are individualized on a case-by-case basis and listed on the participants Individual Service Plan, Family Self Sufficiency Plan, or other case management plans. Supportive services are such services that provide support for job seekers to obtain or retain employment. Services will be provided when it is determined that they are essential in achieving the objective of employment entry, successful completion of training or educational programs and when the employability development requires them for goal achievement.

Supportive services may include but not limited to, transportation, training, child care, work clothing, tools and special equipment, licensing or professional fees, limited health and other assessments and cash assistance as necessary to identify/remove barriers, GED remedial, vocational, post-secondary, and alternative education, job skills, job readiness, on-the-job training, business management, rent, work-required clothing or equipment, and living stipend. The applicant must meet income requirements and demonstrate a financial need. An employment verification form will need to be completed and signed by the client's new supervisor and if rent is requested, a landlord verification form will be required.

### **B. JOHNSON O' MALLEY SERVICES**

AVCP include Johnson O' Malley (JOM) funding into our 102-477 Service Delivery Plan. The AVCP Workforce Development Division works with those Compact tribes who request their allocated funds. AVCP provides JOM services to meet the specialized and unique educational needs of eligible Indian students, including programs supplemental to the regular school program and school operational support, where such support is necessary to maintain established State educational standards. The desired outcomes of the program are to increase Indian student achievement and encourage the use of cultural enrichment initiatives within JOM programs in place in public schools.

Eligible students are those that are age 3 through grade 12. They must be a member of a federally recognized tribe or descendent of a member of a federally recognized tribe. Funded activities may include culturally appropriate and should be used as incentives for attendance, grade improvement, citizenship or any other measurable academic outcome, where feasible. In the AVCP Region, requested activities typically include the purchase of basic school supplies or cultural supplies for "culture day" or "culture week" within the school system, and travel expenses for students to attend tribal gatherings or culturally-related school or organizational events (Native Youth Olympics, native/tribal gatherings, etc.).

JOM Contracts are maintained with the Tribe.

- a. Expenditure reports – a tribe will be required to report on actual expenditures, including submitting support documents showing how the funds were spent.
- b. Statistical report – a tribe will be required to report on the details of how many students benefitted from the JOM program, including their age, sex and grade demographics.

### C. CHILD CARE SERVICES

The AVCP Workforce Development Division provides child care assistance as part of our P.L. 102-477 consolidation of programs through the Child Care program. The AVCP Child Care program is funded through the Department of Health and Human Services, Administration for Children and Families, Office of Child Care, for those tribes participating in AVCP's Compact program. Each tribe is required to submit a resolution requesting to participate in AVCP's Child Care program along with their current year's child count included. Resolution copies from all the AVCP Region tribes, authorizing AVCP to receive and administer the CCDF on behalf of their tribes and authorizing the CCDF program be integrated in AVCP's 477 Plan, will be submitted to the Office of Child Care directly. A sample of the resolution provided to the tribes to use will be included as, total Regional child count determines annual funding amounts. A copy of AVCP's FY2018 Child Count Declaration is attached as **Addendum I**.

The majority of the client's we assist with child care services are in the outlying villages, outside from Bethel. All are families with parents who are working or going to school or training while their children are being cared for by providers enrolled in the program. A sliding fee scale, incorporating family size, is used for determining eligible financial assistance amounts. In communities where child care centers are available, parents have the option to send their children there for child care. AVCP shall pay all child care providers directly within 21 days of receipt of invoice.

The AVCP Child Care program is one of the more important programs provided to clients in this region – it allows for people to work or go to school without worrying about who is watching their children or how they are going to pay for child care. This program also directly provides “jobs” and income – for the child care providers. Child Care Specialists are also employed and based in several of the service units in the AVCP region. The specialists travel to their assigned villages, recruiting participants and conducting site visits to provider's homes for health and safety home inspections. The Bethel Child Care staff also travel to the villages to recruit and provide health and safety inspections, as well as receive and process the countless applications, monthly timesheets, check requests and other necessary paperwork to keep the program functioning, and our clients eligible.

AVCP Child Care Staff will work in coordination with partner agencies on the below services:

**Health:** The AVCP Child Care program may coordinate where necessary with health clinics in the communities, school districts, the State of Alaska Public Health Service, the Women, Infant and Children (WIC) program, the Indian Health Service, and Head Start to ensure children participating in CCDF have access to adequate health care services. AVCP, as the lead agency, will verify that their children are up to date on immunizations. Keeping with the one-stop shop, AVCP provides priority to participants engaged in education, employment, training and child care programs.

One issue that has come to light is some community health aides do not have regular access to TB tests and so, potential providers in those communities have a much harder time meeting that requirement. We plan to continue working more closely with the State of Alaska Public Health Service to coordinate travel schedules with their itinerant nursing staff so that we can begin to help those who need to obtain TB tests.

By encouraging all children in the program to be immunized, we ensure they are protected against life threatening diseases and sicknesses.

**Education:** AVCP works with higher education students, school districts, AVCP Head Start and Early Childhood Programs to share information regarding the services offered through our program. Our relationship with the Infant

Learning Program helps identify children with special needs early, to help families receive early education and child care assistance for children.

- a. Attend college or training full or part-time
- b. Online or distance education programs
- c. Participate in a program that is accredited which leads to a certificate, degree or license and has reasonable employment opportunity.
- d. During substance abuse treatment

**Employment:** AVCP works closely with the State of Alaska, Regional employers to offer child care services to those who are employed. This allows more people to retain, obtain or advance in employment.

- a. Job readiness activities
- b. Community work experience
- c. Approved subsistence activities
- d. Job search for three months after termination of employment will be allowed if family has become unemployed while on this program.
- e. TANF parents working means participation in work activities as assigned, including subsidized and unsubsidized work.

**Training:** AVCP Child Care works closely with Tribal Temporary Assistance for Needy Families (TANF) program which may use the Child Care Assistance program for TANF families in need child care needs, this will result increased employment of needy families.

- a. Temporary Assistance for Needy Families job training
- b. Tribal Workforce Innovation and Opportunity Act training
- c. Workforce development training
- d. Apprenticeships
- e. Job shadowing
- f. Continuing education or online training courses leading to an occupation or employment (at least 80% attendance).

Attending job training or education job training the number of hours will be determined by the education or training schedule up to 50 hrs a week. This includes lunch, 2 hours of travel time round trip per day and 2 hours of homework time per one hour of class time.

### **Child Care Definitions:**

AVCP provider types:

- Family home care: in providers home
- In-home Care: in child's home.
- State License Child Care Provider: <https://dhss.alaska.gov/dpa/Pages/ccare/providers.aspx>

Relative Providers are: Great grandparent, grandparent, aunt, uncle and sibling living in the same household due to multi-generational lifestyle in the AVCP villages over the age of 18.

Non-Relative Providers are: Not related to the family or children. They may provide care in the providers home or child's home.

**Indian Child:** Any individual child who is tribally enrolled in a federally recognized Tribe, a Native American or Alaska Native (verified by Tribal Enrollment or Certificate of Indian Blood) or eligible for enrollment from a federally recognized tribe children under the age of 13. We may serve children up to 18 if documented physical or mental capacity is verified. Non-native parent of native children can receive assistance if documentation is provided that the child meets the requirement of being a member of a native family, as “Family”.

**Special Needs Child** is defined as: A child with a physical or developmental or cognitive disability (as documented by a physician or medical professional licensed by the State of Alaska).

**Protective services** - Children who receive or need to receive child protective services as verified by the Office of Children Services (OCS) and/or Indian Children Welfare Assistance (ICWA), children of essential workers during a state of emergency, children who are homeless, in need of respite care, or who are in care of a relative who are not the custodial parent may be eligible for child care services. Respite care is temporary relief care designed for children in protective services may be provided up to 25 hours of respite care a month.

Priority is given to children of families with very low income, taking family size into account and including children “with special needs.” A special needs child is defined here as:

- In child protective custody care;
- Involved in an Indian Child Welfare case;
- Being physically or mentally challenged; or
- Homeless

## **CHILD CARE SERVICES ARE PROVIDED**

AVCP provides Child Care services to eligible families residing within our service area using a Certificate system. This delivery system works well for the people within the AVCP Region and best meets the intent of the Act and Regulations.

AVCP also provides Child Care services to eligible families from AVCP Compact Tribes, who move out of the service area, for no more than one year. The family must remain a permanent resident of the AVCP service area and verify that they are living temporarily outside the service area to attend school. If the client chooses to live in said service area they must seek services from the nearest CCDF provider. If the local service provider cannot assist the parents they can request documentation of the denial of service through a formal letter from that service provider and then present that to AVCP. If the parent completes all application requirements, they can receive Child Care Services from AVCP while residing outside the service area. Also, if a family is from a Non-Compact tribe moves away from their home tribe and is denied child care by that tribe, AVCP can assist them also, for up to one year.

## **ELIGIBILITY**

AVCP determines 12-month eligibility for child care services. Re-determination is made every 12 months. Families are encouraged to report significant changes due to income, employment, training or residency. Eligibility may be



discontinued if the participant(s) and/or the provider(s) are not compliant with the child care program requirements and/or fail to report changes in household size, income, contact information, and/or change of providers.

Child care certificate will be issued to the eligible parents and listing the children eligible for the 12 month period. It will indicate the days and hours of care authorized, the parents and child’s names, the time frame of the authorization, an approval for payment of registration fees, and the parental co-payment.

*AVCP will temporarily waive co-pays for all families receiving assistance through AVCP’s Child Care Assistance services, as per approved integrated into AVCP’s 477 Plan and Program, in response to the COVID-19 pandemic as approved on September 28, 2020.*

In the rural villages in-home care is usually the preferred option for child care.

**QUALITY IMPROVEMENT**

AVCP Child care Assistance will offer training and technical assistance to support provide, and improve Quality for children in underserved populations. Underserved populations may include infants and toddlers, children with disabilities, children in underserved geographic areas, and children who receive care during non-traditional hours.

AVCP shall continue to support the development or adoption of high-quality program standards related to health, mental health, nutrition, physical activity, and physical development; provide quality and professional development activities on health and safety requirements; developing child care material, as required; address needs during disaster declarations; and promote culturally relevant activities. AVCP will phase in the requirements to increase spending towards quality measures setting aside 3% towards infant and toddlers.

AVCP current CCDF funding levels qualifies AVCP as a “Large” size CCDF grantee. To meet the new CCDF final rule AVCP will phase in the requirements to increase spending towards quality measures setting aside 3% towards infant and toddlers. AVCP will spend no less than 8% in fiscal year 2021 and no less than 9% in fiscal year 2022 and no less than 9% in 2023 to improve the quality of child care services and to increase parental options for, and access to, high quality child care.

<b>Table: Quality Spending</b>	<b>FY 2021</b>	<b>FY 2022</b>	<b>FY 2023</b>
Quality Set-Aside (All Tribes)	8%	9%	9%
Infant – Toddler (Medium and Large)	3%	3%	3%
Total Quality (All Tribes)	8%	9%	9%
Total Quality (Medium and Large)	11%	12%	12%

AVCP can provide direct support for quality improvement activities under this plan which may include but, are not limited to:

1. Repair for safety issues present that include but, are not limited to:

- a. Repairing stairs/walkways where children have access;
  - b. Supplies (toys, learning materials)
  - c. Providing child safe play areas; and
  - d. Repairing windows, carpeting or other safety issues within the child or children's access.
2. Staff development training for providers for professional development activities that include but are not limited to:
- a. The providers' required training hours needed for licensing purposes, which will count towards a certificate or degree in Early Childhood Development or related degree.
  - b. Infant/toddler caregiver training.
3. Any other training that is determined to promote knowledge in early childhood development, health and safety requirements, or quality improvement activities:
- a. Activities to support culture and language within childcare and afterschool programs
  - b. Providers may also receive reimbursement for the purchase of developmental and/or educational materials that will enhance learning opportunities for children and to promote kindergarten readiness.

Services are to be leveraged from multiple sources whenever possible to meet the individualized client or program needs.

Procedures have been designed to ensure that providers of Child Care services afford parents unlimited access to their children during the normal hours of operation and whenever such children are in the care of such providers. A record of substantiated parental complaints is maintained and available to the public on request for tribally certified providers, for State licensed providers AVCP will direct family's to the state website:

<https://dpaworks.dhss.alaska.gov/FindProviderVS8/zSearch.aspx>

Other Child Care consumer education provisions are under development.

AVCP Child Care has a set standard of conduct and coordinates the following activities designed to improve the quality and delivery of services, when feasible:

- Initial and annual home visits to monitor legally exempt providers: These visits review and document compliance with all applicable health and safety requirements (658E (2)(G));
- The two-day, sixteen-hour Child Care Provider's Conference orientation for all new child care providers. This includes instruction on the applications and payment procedures, health and safety requirements, and parental access rights. AVCP Child Care offers to provide emergency first aid kits, fire extinguishers, fire alarms, carbon monoxide detectors, and flashlights for providers, when feasible.
- Provider Training Conferences: Allows for offering pediatric first aid and CPR classes for providers. A schedule of available classes for new providers as well as for those who need to renew their certificates will be maintained and available. Other training topics include recognition of communicable diseases, child abuse detection and care of children with special needs;
- Regular disbursement of child care information to parents and providers: Consumer education materials are collected and made available to potential applicants, existing clients and all child care providers. In addition, information will be posted on bulletin boards when applicable.

- Monitoring in home child care providers within the state of Alaska outside the AVCP region is either done with a AVCP staff from our office performing a face to face interview and home inspection. State Licensed Day Care Centers are required to provide their state license and monitoring report.
- Family members are required to meet all health and safety requirements.

As funding allows, Child Care Provider conferences or workshops will be held, where child care providers will convene in one location for various presentations. The expectation is that access to first aid and CPR classes will be proved for any new providers or those wishing to “refresh” their knowledge. As many local agencies and organizations will be invited to share their program information, as it relates to infant learning and direct child care supervision.

Specifically related to identifying quality needs of our providers, we plan to survey all active child care providers in order to determine what they identify as quality needs. This survey should be conducted on an annual basis, beginning with any provider conferences or workshops we are able to arrange and, will be followed by mail-out surveys for those not in attendance. The results of these surveys will instruct our department to what we need to focus on in the coming year. The responses will prioritize how we develop and fund quality activities. For example, we may say the first year’s priority will be health and safety.

#### **INTERAGENCY COOPERATION**

Child Care and Development Fund programs and activities will be carried out for the benefits of Indian children in our service area. AVCP will coordinate to the maximum extent feasible with the Lead Agency in the State of Alaska and any others who have direct connections to the work we do and the region we provide services to. With respect to any State, local or Tribal regulatory requirements, health and safety requirements, payment rates, and registration requirements, procedures or other requirements promulgated for the purpose of the Child Care and Development Fund, AVCP will not restrict parental choice from among the categories of care and types of providers mentioned above, pursuant to 1198.30(g).

In addition, AVCP staff must consult and coordinate with other providers to:

- Identify existing resources;
- Prevent duplication of services; and
- Ensure that the maximum levels of services are available for participants to successfully achieve self-sufficiency.

AVCP administers the Tribal TANF program in the region. Coordination occurs at the time of TANF eligibility and case workers refer clients to the child care program. The results of that are the parents are available to go to work or school.

AVCP Child Care will work closely with the Head Start Program in providing services to our clients. The child care department will coordinate with the AVCP Head Start and Rural Cap Head Start schools to offer our child care services if those parents would like to participate. By enrolling the children in our program we could provide services which would benefit the enrolled children. All activities in coordination with Head Start would take place in a child care setting.

Some of the many ways we could assist but, not limited are:

- Providing a teacher/mentor who would support the teaching staff by assisting with curricula implementation and individualization who would;
- Develop comprehensive teacher mentoring plan;
- Support teaching staff in readiness goals and objectives;
- Identify training needs for teaching staff;
- Provide guidance on classroom and time management;
- Monitor staff progress;
- Participate in site visits, classrooms, observations and work with staff to assess program needs and planning;
- Supports the teaching staff who are taking college classes;
- Assist teachers in analyzing and arranging the physical environment of Head Start classroom; and
- Offers teachers support by listening and sharing.
- After school activities

AVCP choose to take advantage of the categorical eligibility option to align CCDF program eligibility requirements with other early childhood programs, including tribal home visiting, Early Head Start and Head Start. AVCP would consider all Head Start students to be categorically eligible and use CCDF funds to operate a fully day, streamlined Head Start and CCDF classroom.

The students would benefit in the classroom from the above services by having teachers who are more knowledgeable in what is needed to provide a well-managed classroom which provides the best teaching environment for children to learn.

By working with the Head Starts in the region who serve tribally enrolled children, we could also provide but, are not limited to, educational materials for the classrooms that are conducive to learning. By working with the Head Start teachers we will learn more as time passes and will be able to determine how the AVCP Child Care Program can be of greatest assistance for the children's benefit.

Most children with special needs attend Head Start if it's available in that community. School District personnel are required to provide services upon a child's third birthday, but those services can be provided while the student is in a Head Start classroom, child care center, or home-based child care. These collaborations are handled on a case-by-case basis depending on the needs of the child and the availability of services in each community. In most cases there are no Tribal, Federal or State child care services besides the Head Start program and local home child care providers. We will be working towards coordinating efforts to support Early Childhood Education programs in all communities with age eligible children.

AVCP has coordinated services with the Family Infant Toddler, (FIT) Program with the Yukon Kuskokwim Health Corporation (YKHC) and Thread. The FIT Program is for families with very young children with special developmental and health needs, which may include: prematurity (born before 37<sup>th</sup> week of pregnancy), lack of oxygen or trauma at birth, frequent illness (ear infections, pneumonia), serious illness (meningitis, RSV, pneumonia), prenatal exposure to substances (FAS, FAE), syndromes present at birth (down syndrome, cerebral palsy, vision impairment, limb differences, cleft palate), exposure to violence/trauma. We are working with the FIT and Thread program to see how we can support and provide assistance in the best interest of the children.

In the next 3 years AVCP will address the supply of child care through a survey village by village in coordination with Head Start, Rural Cap and the participating tribes.

Public Hearings

AVCP, as the lead agency, is required to conduct public hearings, notifying the public about our Child Care plan for the coming years. A minimum of 20 days is required for notice.

The public hearing was scheduled for August 26, 2020; notice of the public hearing was sent out on August 3, 2020, to all villages with compacted child care agreements. The public hearing took place on August 26, 2020 at the AVCP Tugkar Conference Room from 1:00pm to 3:00pm. The villages were afforded the opportunity to participate telephonically. The posting will list the time and location of the hearing along with instructions for submitting public comments in person, via phone, fax or mail. There were no comments during the public hearing. **Addendum K**

**Alaska State Health and Safety  
From Alaska State’s CCDF Plan – April 2020**

**Under development**

**Health and Safety Standards**

Standard	Licensed Family Child Care, Group Home Care, and Center Care	Standards for Licensed Exempt Family Child Care, In-Home Care and Relative Care Providers.
a. Prevention (including immunizations) and control of infectious diseases	<ul style="list-style-type: none"> <li>•Immunization;</li> <li>•Hand hygiene;</li> <li>•Cleaning, sanitizing, and disinfecting;</li> <li>•Policy for inclusion/exclusion of children and staff due to communicable diseases and outbreak control;</li> <li>•Prevention of exposure to blood or bodily fluids.</li> </ul>	<ul style="list-style-type: none"> <li>• Immunization</li> <li>• Hand washing</li> <li>• Cleaning, Sanitizing, and disinfecting;</li> </ul>
b. Prevention of sudden infant death syndrome and the use of safe sleep practices	<ul style="list-style-type: none"> <li>•Safe sleep environment and equipment;</li> <li>•Safe sleep practices;</li> <li>•Supervision; and</li> <li>•SIDS risk reduction.</li> </ul>	<ul style="list-style-type: none"> <li>• SIDS risk reduction</li> </ul>
c. Administration of medication, consistent with standards for parental control	<ul style="list-style-type: none"> <li>•Procedure for permission of administration of medication to include prescription and nonprescription medication;</li> <li>•Storage of medication;</li> <li>•Administration of medication;</li> <li>•Documentation of administration</li> </ul>	<ul style="list-style-type: none"> <li>• Medication in locked cabinet</li> <li>• Medication out of reach of children</li> </ul>

	<p>of medication; and</p> <ul style="list-style-type: none"> <li>•Unused medication.</li> </ul>	
<p>d. Prevention of and response to emergencies due to food and allergic reactions</p>	<ul style="list-style-type: none"> <li>•Identifying between food allergy and food sensitivity;</li> <li>•Plan of care for children with food allergies to include minimization of exposure, feeding plans, and dietary modification;</li> <li>•Response to allergic reaction due to food;</li> <li>•Emergency intervention; and</li> <li>•Documentation of allergic reaction occurrences.</li> </ul>	<ul style="list-style-type: none"> <li>• Response to allergic reaction due to food;</li> <li>• Plan of care for children with food allergies to include minimization of exposure, feeding plans, and dietary modification</li> </ul> <p>Emergency Intervention</p>
<p>e. Safety of Building and physical premises, including the identification of and protection from hazards that can cause bodily injury, such as electrical hazards, bodies of water, and vehicular traffic</p>	<ul style="list-style-type: none"> <li>• Identification of and protection from hazards, bodies of water, and vehicular traffic;</li> <li>•Active supervision;</li> <li>•Safe indoor and outdoor environments; and</li> <li>•Safety of equipment, materials, and furnishing.</li> </ul>	<ul style="list-style-type: none"> <li>• Active supervision</li> <li>• Safe indoor and outdoor environments</li> <li>• Identification of and protection from hazards, bodies of water and vehicular traffic</li> </ul>
<p>f. Prevention of shaken baby syndrome, abusive head trauma, and child maltreatment</p>	<ul style="list-style-type: none"> <li>•Infant and toddler appropriate developmental practices, to include how to cope with a crying/fussy infant;</li> <li>•Knowledge of shaken baby syndrome and abusive head trauma prevention and identification; and</li> <li>•Recognition of signs of abusive head trauma.</li> <li>•Behavior guidance policies at the provider level that address appropriate discipline to prevent child maltreatment.</li> </ul>	<ul style="list-style-type: none"> <li>• Knowledge of shaken baby syndrome and abusive head trauma prevention and identification; and</li> <li>• Recognition of signs of abusive head trauma.</li> </ul>

<p>g. Emergency preparedness and response planning resulting from a natural disaster or a human-caused event (such as violence at a child care facility), within the meaning of those terms under section 602(a)(1-2) of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5195a(a)(1-2)).</p>	<ul style="list-style-type: none"> <li>•Written plan and training for handling urgent medical care, threatening incidents, shelter in place, lock down, and natural disasters;</li> <li>•Evacuation and emergency drills, to include policy and documentation;</li> <li>•First aid, food, and water supplies; and</li> <li>•Continuity of Operations Plan (COOP).</li> </ul>	<ul style="list-style-type: none"> <li>•Evacuation and emergency drills, to include policy and documentation;</li> <li>•First aid, food, and water supplies; and</li> </ul>
<p>h. Handling and storage of hazardous materials and the appropriate disposal of bio contaminants</p>	<ul style="list-style-type: none"> <li>•Use and safe storage of hazardous materials; and</li> <li>•Universal precautions, to include prevention and exposure to blood and bodily fluids.</li> </ul>	<ul style="list-style-type: none"> <li>• Universal precautions, to include prevention and exposure to blood and bodily fluids.</li> </ul>
<p>i. Precautions in transporting children (if applicable)</p>	<ul style="list-style-type: none"> <li>•Qualifications of drivers;</li> <li>•Child passenger safety;</li> <li>•Procedures for supervision and accountability of children;</li> <li>•First aid and emergency roadside supplies, to include emergency contact information; and</li> <li>•Knowledge of environmental hazards, to include indoor and outdoor temperatures of vehicle.</li> </ul>	<ul style="list-style-type: none"> <li>• AVCP does not allow childcare providers to transport children.</li> </ul>
<p>j. Pediatric first aid and cardiopulmonary (CPR) certification</p>	<p>The standard is defined as valid current Pediatric first aid and cardiopulmonary resuscitation (CPR) and the following minimum standards are checked during on-site monitoring and inspections: pediatric first aid and CPR certification</p>	<p>The standard is defined as valid current Pediatric first aid and cardiopulmonary resuscitation (CPR)</p>
<p>k. Recognition and reporting of child abuse and neglect</p>	<ul style="list-style-type: none"> <li>•Recognition of signs of child abuse, neglect, and maltreatment;</li> <li>•Importance of reporting; and</li> <li>•Mandated reporting.</li> </ul>	<ul style="list-style-type: none"> <li>•Importance of reporting; and</li> <li>•Mandated reporting.</li> <li>•Recognition of signs of child abuse, neglect, and maltreatment</li> </ul>

*Relative care providers* will not be exempt from the standards.

### **Health and Safety Training**

#### **Pre-service Training:**

**State Licensed Providers:** Preservice training (which takes between 6-20 hours to complete) in prevention and control of infectious diseases; prevention of SIDS and use of safe sleep practices; administration of medication; prevention of and response to emergencies due to food and allergic reactions; building and physical premises safety; prevention of shaken baby syndrome, abusive head trauma and child maltreatment; emergency preparedness and response; handling and storage of hazardous materials and disposal of bio contaminants; precautions in transporting children; pediatric first aid and CPR; and recognition and reporting of child abuse and neglect.

**Licensed Exempt FCC Providers and In-Home Care Providers:** All providers are required to complete Pediatric first aid and cardiopulmonary resuscitation (CPR) certification within the first 3 months (90 days) of being a provider through AVCP.

Under development

**Relative Providers:** Providers must be at least 18 years of age or older and may be exempt from immunization requirement. Relative providers are required to complete Pediatric first aid and cardiopulmonary resuscitation (CPR) certification within the first 3 months (90 days) of being a provider through AVCP.

#### **Ongoing Training:**

**State Licensed Providers:** Annually 24 hours of training is required, of which at least one hour must be in a health and safety specific training on Alaska's approved health and safety training list.

**Licensed Exempt FCC Providers and In-Home Care Providers:** Annually two-day or 8 hours of training on some of the above health and safety standards such as Annual CPR, first aid training and shake baby syndrome.

**Relative Providers:** Annually 5 hours of training on some of the above health and safety standards such as CPR and first aid training.

### **Monitoring and Enforcement**

Monitoring for licensed providers is performed by the State of Alaska, AVCP will obtain a copy of the facility State License to verify compliance. Also, AVCP Child Care may review the state license report annually. Relative child care providers may be exempt from the home monitoring.

**Monitoring and enforcement is under development for license exempt providers.**

**AVCP Monitoring:** Monitoring in home childcare providers within the state of Alaska outside the AVCP region is either done with an AVCP staff from our office performing a face to face interview and home inspection. State Licensed Day Care Centers are required to provide their state license and monitoring report.

The AVCP Child Care Program must conduct a home visit/inspection for all new licensed exempt child care providers. The Child Care Program will conduct a minimum of one (1) announced visit/inspection during the following calendar year. While on site the staff member will inspect the home/facility to ensure compliance, will document any areas of non-compliance, and discuss these areas with the provider prior to leaving. The provider is required to address any



areas of non-compliance within three (3) months. Staff will also ensure that the provider is compliant with the child/provider ratios.

### **Inspector Qualifications**

**State:** Licensing Specialists under the CCDF Lead Agency, the Child Care Program Office (CCPO) and Municipality of Anchorage (MOA), meet the job qualifications and classification for their position as Community Care Licensing Specialists: A bachelor's degree from an accredited college and two years of technical or professional experience in social services, education, health care, mental health, juvenile justice, or a closely related field. All Licensing Specialists are required to be trained for their first year of employment by their Supervisors in all aspects of their licensing positions including the statutory and regulatory requirements for licensing in AS 47.32, AS 47.05, 7 AAC 10, and 7 AAC 57; and continue to receive additional training throughout their time employed as a Licensing Specialist. Most of the Licensing Specialists also have certifications in Council on Licensure, Enforcement and Regulation (CLEAR) National Certified Investigator/Inspector (NCIT) Training, and some have completed the National Association for Regulatory Administration licensing training modules. All current licensing staff will receive health and safety training appropriate to the age of children in care and type of provider setting before the end of FY19, and all new licensing staff will be required to obtain the health and safety training appropriate to the age of children in care and type of provider setting within their first year of employment. Licensing staff are not required to be certified in Pediatric First Aid and CPR.

**AVCP:** Childcare Specialists are flown into Bethel for a biannual conference and training on how to process clients. Individuals who monitor or inspect CCDF providers are required to have knowledge of the health and safety standards, and monitoring enforcement practices used by the AVCP Child Care Assistance program. Child Care Specialist must keep current in all health and safety training.

### **Ratio of Inspectors to Facilities**

**State:**

**AVCP:** AVCP will have a ratio of licensed inspectors 1-75 child care programs.

Must be 18 years of age or older, have the ability to pass a background check and be able to perform all job duties. Child care staff are flown into Bethel for a biannual conference and training on how to process clients and providers in their villages. Individuals who monitor or inspect CCDF providers are required to have working knowledge of the health and safety standards used by the AVCP Child Care Assistance program.

### **Staff: Child Ratios and Qualifications**

#### **Licensed Centers**

##### **Ratios and Group Sizes**

- Infant: birth through 18 months of age, 1:15, 10
- Toddler: 19 months through 36 months, 1:6, 12
- Preschool: 3 and 4 years of age, 1:10, 10
- School age: 1:14, 28 (kindergarten) and 1:18, 36

**AVCP Ratio:** A child care provider may provide care for no more than six (6) children under the age of 13, of which no more than two (2) may be under the age of 30 months of age, and no more than four (4) may be under the age of 48 months of age. A variance may be granted to relative providers on a case-by-case basis based on children ages, home size, location, number of hours.

Teacher qualifications: Teacher/caregiver qualifications include being at least 18 years of age to count in the child-to-caregiver ratios, except in a child care center a caregiver who is at least 16 years old may be counted if they have completed a child care training course or have demonstrated competency in child care to the administrator's satisfaction, works under the supervision of an adult caregiver, works within sight and sound of an adult caregiver, and makes up no more than one-fourth of the total caregivers on duty. Teacher/caregiver qualifications also include an orientation of the facility's policies and procedures; where appropriate, satisfying the individual needs of children; emergency procedures and health and safety measures;

Director qualifications: The director (administrator) of a child care center must be at least 21 years of age, and must: have an understanding of the development of children; have the ability to care for children; have the skills to work with children, family members department staff, community agencies; and, if applicable, staff of the child care facility; and have management and supervisory skills necessary to handle finances, plan and evaluate programs, and select and supervise personnel, including delegation of responsibility and motivation of staff. The administrator of a child care facility must have at least 12 semester hours of college credits in early childhood development, child development, child psychology, or the equivalent, or must hold either a current child development associate (CDA) credential from the Council for Early Childhood Professional Recognition or a Montessori certificate issued by a program accredited by the Montessori Accreditation Commission for Teacher Education. College credits in management may substitute for three of the 12 required credits. The administrator of a child care center for school age children may substitute relevant college courses, except that at least three semester hours of college credits in child development are required

### **Licensed Family Child Care**

- Child Care Facilities Licensing regulation 7 AAC 57.505 (a) requires: a childcare home must have at least one caregiver and may provide care for no more than a total of 8 children under age 13 years. Of the total children in care, no more than 3 may be under the age of 30 months, and no more than 2 may be no ambulatory.
- Child Care Facilities Licensing regulation 7 AAC 57.505 (b) requires: a child care group home must have at least two caregivers and may provide care for no more than a total of 12 children under age 13 years. Of the total children in care, no more than five may be under the age of 30 months, and no more than four may be no ambulatory.
- Teacher/caregiver qualifications include being at least 18 years of age, and an orientation of the facility's policies and procedures; where appropriate, satisfying the individual needs of children; emergency procedures and health and safety measures.

### **AVCP:**

#### **Staff/Teacher Ratios:**

- License Exempt Family Child Care Providers: 1 to 4, Group size 4
- In-home Care Providers: 1 to 6, Group size 6
- Relative Providers: A child care provider may provide care for no more than six (6) children under the age of 13, of which no more than two (2) may be under the age of 30 months of age, and no more than four (4) may be under the age of 48 months of age.
  - A variance may be granted to relative providers and in-home providers on a case-by-case basis based on children ages, home size, location, number of hours.

#### **Provider qualifications:**

- Be at least 18 years of age, complete required training and pass the background check

## Background Checks

Background Checks completed by Alaska State for state licensed providers (indicated by AK)

<b>Criminal Background Check Requirements</b>			
<b>Required Components (Unless the Tribe Has an Approved Alternative Approach)</b>	<b>National</b>	<b>Current State of residence: Alaska</b>	<b>State(s) of residence last 5 years</b>
FBI with fingerprint check	AK	n/a	n/a
National Crime Information Center (NCIC) National Sex Offender Registry (NSOR)		n/a	n/a
State criminal registry or repository	n/a	AK	
State sex offender registry or repository	n/a	AK	AK
State child abuse and neglect registry and database	n/a	AK	

Background Checks completed by AVCP

<b>Criminal Background Check Requirements (Licensed Exempt FCC and In-Home Care Providers=</b>			
<b>Required Components (Unless the Tribe Has an Approved Alternative Approach)</b>	<b>National</b>	<b>Current State of residence: Alaska</b>	<b>State(s) of residence last 5 years</b>
FBI with fingerprint check		n/a	n/a
National Crime Information Center (NCIC) National Sex Offender Registry (NSOR)		n/a	n/a
State criminal registry or repository with fingerprints	n/a		
State criminal registry or repository without fingerprints		AVCP	
State sex offender registry or repository	n/a	AVCP	
Court view	n/a	AVCP	n/a

<b>Criminal Background Check Requirements (Licensed Exempt FCC and In-Home Care Providers=</b>			
State child abuse and neglect registry and database	n/a		

Relative providers are required to complete a background check, as an alternative we will perform a Court View and the Child Abuse and neglect registry.

Background check requirements apply to all child care providers who receives payment through this program for the care or supervision of children. For family child care homes, this includes the caregiver requesting a check of him/herself, as well as any other individuals in the household over the age of 16 that may have unsupervised access to children.

Child care providers cannot be approved and/or receive payments under this program if they refuse a background check; make materially false statements in connection with the background check; are registered or required to be registered on the State or National Sex Offender Registry; have been convicted of a felony consisting of: murder, child abuse or neglect, crimes against children, spousal abuse, crime involving rape or sexual assault, kidnapping, arson, physical assault or battery, or subject to an individual review, at the State's option, a drug-related offense committed during the preceding 5 years; or have been convicted of a violent misdemeanor committed as an adult against a child.

Fees for background checks - Fees incurred for the costs of processing applications and administering a criminal background check will be paid by the program.

**DISASTER RELIEF/STATE OF EMERGENCY**

**CCDF emergencies under development**

A disaster is defined as federal, state, tribal, and/or regional. AVCP will follow the tribe’s disaster or state or emergency policies. AVCP Child Care program will have the flexibility to continue providing child care services despite disruptions to families and providers. An amendment and /or a waiver may need to be submitted for certain changes in the current plan.

**CHILD CARE PROVIDER CONSUMER STATEMENT: Addendum: J**

Education, Employment Services, Benefits Division (TANF):

Through community hearings and our many travels to the villages in our Service Area, we provide outreach and education about the Child Care program. We visit with families directly, along with the tribal council offices, the local schools and the public, sharing information. Our village specialists travel almost monthly to their assigned villages, recruiting new families and providers and, sharing and educating about our program.

As part of a departmental approach, the 477 staff, when conducting their travels and outreach, also shares information about the Child Care program. When any of our clients identify child care as a barrier for them, they are forwarded to the Child Care staff in order to explore their options. We make sure that all parents know about our services, whether they need child care while attending school or training, or when they enter the workforce.

We work with the AVCP Benefits Division (formerly TANF), whenever we have a client who has identified themselves as a cash assistance recipient, including those that need child care services.

Definition of Income: or Categorical Eligibility- that certain households will be determined **eligible** to participate in AVCP's Child Care without consideration of income or resources, if the households meet all other **eligibility criteria**.

Under categorical eligibility, children must still meet the grantee's definition of "Indian and must still live within the grantee's service area, and families must be in work, education, training and protective services status in order to receive child care services.

Categorical eligibility gives grantees the flexibility to consider any Indian child in the service area eligible to receive CCDF funds, , work or training status, as long as services are provided to children with the highest need. AVCP can choose to establish additional eligibility criteria based on other factors such as income for family's work, education or training status, provided that these criteria are defined in the plan.

Low-income families can experience multiple rapid changes within a short period of time, and unemployment and job loss are very disruptive to families. Maintaining a family's eligibility during such changes—for example, a temporary period of unemployment or extended leave due to illness—can reduce some of the stress and facilitate a smoother transition back into the workforce.

- The sliding fee scale outlines financial assistance available to eligible families with children up to age 13 and/or children with special needs through age 18, by family size, household income, and children in protective custody care;
- Co-pay will be per child
- AVCP will waive all co-pays for children in protective services
- AVCP will waive co-pays for families under 100% of poverty
- AVCP will not terminate child care services due to temporary changes in parents' work or activities up to 3 months.
- During 12 month eligibility period if a child turns 13 they will be served until the 12 month eligibility period end.
- If a family changes permanent residence or moves out of Alaska child care services will end.
- Child does not attend care for a period of time, 30 days
- AVCP will pay upon enrollment to license centers and group homes.
- AVCP will pay based upon attendance for licensed and license exempt homes with up to 3 absence days per month.
- If a family voluntarily stops using the child care services they are authorized for, AVCP Child Care does not have to continue payment to the provider.

## **D. TRIBAL TEMPORARY ASSISTANCE FOR NEEDY FAMILIES**

### **Four Goals of the Program**

AVCP administers the TANF program through two interconnected Divisions, the Workforce Development Division and the Benefits Division. The Benefits Division is responsible for determining eligibility and providing cash assistance to needy families, and the Workforce Development Division works with needy families providing comprehensive case management to help them attain self sufficiency through education, training and employment services.

The four overriding goals of the AVCP cash assistance plan are:

1. Assist needy families so that the children can be cared for in their own home;
2. Reduce the dependency of needy families by promoting job preparations, work and marriage;
3. Prevent out of wedlock pregnancies; and
4. Encourage the formation and maintenance of the two-parent family.

Only needy families, as defined in this plan, may receive cash assistance (see Financial Eligibility below) or any benefits or services pursuant to goals 1 or 2 above. “Needy” means financially deprived, according to income and resource criteria established in this Plan.

AVCP may use segregated Federal TANF funds to provide services (and related activities) that do not constitute cash assistance to individuals and family members who would be eligible for services that meet goals 1 or 2 above. Objective criteria will be established for participation in these programs.

AVCP will use program funds to provide workforce development activities (trainings, scholarships, professional development services, business development services, and subsidized employment) that do not constitute “assistance” to individuals under the age of 25 who are not receiving cash assistance benefits, but still fall under the category of “needy”, and fit the criteria for the kind of services that meet goals 3 or 4 listed above. Objective criteria will be established for participation in these programs.

### **Eligibility for Cash Assistance**

#### **1. Tribal Enrollment:**

- Either the head of household or the other adult applicant in the household unit must be a federally enrolled Alaska Native or American Indian tribal member in a two-parent household; or
- The person making applications must have biological children that are of Alaska Native or American Indian descent that are enrolled in a federally recognized tribe in a one-parent household; or
- In child only household units, the child(ren) must be eligible to enroll or are enrolled in an Alaska Native or American Indian federally recognized tribe.
- A pregnant woman in her third trimester must be bearing a child that is of Alaska Native or American Indian descent and will be eligible to be able to enroll in a federally recognized tribe once born.

### Acceptable Documentation of Tribal Eligibility:

AVCP will rely upon self-identification to make the initial determination of whether a person is an Alaska Native. Should verification become necessary acceptable documentation may include but is not limited to:

- Tribal Enrollment Card from a federally recognized tribe or village
- Written acknowledgement by Tribe that at least one member of the assistance unit is Alaska Native/American Indian or a member of or are eligible for membership by a tribe in the AVCP service area.
- ANCSA Enrollment
- Birth Certificate showing Alaska Native
- Enrollment under the Alaska Native Claims Settlement Act.
- BIA or I.H.S. eligibility for receipt of benefits or services from the Indian Health Service or Bureau of Indian Affairs.

### 2. Non-Financial Eligibility Requirements.

#### Family Includes Dependent Child.

To be eligible for assistance under this Tribal 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.

#### Dependent Child.

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 in vocational or technical training, whether the training can be completed by age 19 or not. A dependent child also includes persons who may be a caretaker and are not themselves an applicant for assistance such as a minor parent applying for assistance for their own dependent children.

#### Caretaker Relative.

A “caretaker relative” is a person who provides the care and control of the dependent child and/or who is:

- a. a biological or adoptive parent or step-parent to the dependent child;
- b. a biological or adoptive relative to the child within the fifth degree of consanguinity;
- c. 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 has maintained a caretaking role with the dependent child for a significant period of time; or
- d. a caretaker to the child based on tribal custom or law; or
- e. a step-sister, step-brother, or step-grandparent.

#### Special Requirements for Minor Parents.

- a. A minor parent must live with an adult caretaker relative or another approved relative.

- b. 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.

#### Residency.

All recipients of the Tribal TANF benefits must be a resident of the 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.

#### Non-Duplication of Benefits.

AVCP’s cash assistance recipients may not receive duplicative assistance from other State or Tribal programs.

### 3. Financial Eligibility Requirements: Needy Families.

#### 185% Eligibility Test.

All applicants and recipients have eligibility benefits determined prospectively. Incomes of each member of the economic unit are identified, exempt incomes are disregarded, gross monthly incomes are computed, and the monthly income of each person is totaled and compared to the 185% eligibility standard. If the economic unit has income less than or equal to the 185% eligibility standard, the unit will receive assistance.

#### Maximum Benefits.

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

- a. for a dependent child living with a non-needy relative caretaker, \$452 per month, plus \$102 for each additional child;
- b. 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
- c. for a family consisting solely of an eligible pregnant woman, \$514 per month.

#### Resources.

A family or child will not be eligible for cash assistance benefits if they have non-exempt resources in excess of \$2,000. 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:

- a. cash on hand or deposit;
- b. the equity value of countable motor vehicles, boats and snow machines;
- c. countable non-cash personal property such as cash or loan value of insurance, value of stocks and bonds, etc.;
- d. countable real property other than the home the family lives and the land the home sits on; and/or



- e. “luxury” items, personal or household.

#### Availability of Resources.

To be counted under the exemption the resource must be actually available to meet the needs of the child. The resource must be cash or convertible to cash. The AVCP cash assistance program has adopted the State of Alaska’s rules regarding availability of resources with the exception that limited entry fishing permits shall not be considered as a liquid asset to be counted in determining eligibility.

If a child for whom application is made lives with their 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.

For program purposes, all the resources of a husband or wife are automatically considered available to the other spouse they live with.

The “one day - one month” principle applies to resources. If, on any single day of a calendar month, a family unit meets the resource requirements, the family is resource eligible for the entire month.

#### Benefits and Shelter Standards. **Addendum Q**

##### State of Alaska Standard.

AVCP has determined that it is in the best interests of the program to minimize differences between the income limits applicable to the recipients of the State of Alaska’s Alaska Temporary Assistance Program and recipients of the AVCP’s cash assistance program. Therefore, the AVCP has adopted the two-tiered income limit test used by the State of Alaska. Thus, gross countable earned income of self-employed and employed individuals may not exceed the State’s 185 percent eligibility standard and the countable gross income, adjusted by applicable deductions, may not exceed the State’s need standards.

#### **Cooperation with Child Support Enforcement.**

Cash assistance participants must cooperate with the AVCP Benefits Division and the State of Alaska Child Support Enforcement Division (CSED) or their tribe (when a tribe operates a child support enforcement program) in their efforts to establish paternity and to establish, modify, or enforce a child support order for a dependent child with an AVCP cash assistance family. An AVCP cash assistance applicant may not begin to receive benefits until he or she has assigned all rights to child support to AVCP for the period for which benefits are paid. AVCP will authorize the distribution of child support pass through payments to recipients. AVCP will condition eligibility for cash assistance on the assignment of child support. This plan confirms compliance with 45 CFR 286.75 (a)(8) and 45 CFR 286.155.

#### Distribution of Child Support Collections.

AVCP may retain some child support collections to reimburse for cash assistance expenditures, and will distribute the excess back to families.

Use of Retained Child Support Collections. AVCP will reinvest all collection surplus back into the program.

**Diversion Payments.**

AVCP Benefits Division offers a diversion payment program as an alternative to recurring reliance on cash assistance 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. Diversion payments do not count toward the sixty-month time limit for receipt of cash assistance. The payment amount is based upon actual, immediate needs and may not exceed two months' worth of cash assistance benefits. A diversion payment will count as income if the family reapplies for cash assistance benefits within three (3) months. 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.

**Reunification.**

AVCP supports the reunification of all tribal families, and will assist and support those efforts in every way possible.

**Sixty-Month Limit**

AVCP has determined that it will implement the State of Alaska's time limits to minimize the differences between AVCP's cash assistance program and the State's ATAP. Thus, families are not eligible for a cash assistance payments when the family includes an adult who has received benefits by a TANF program in this or another state or Tribe or a TANF-funded program in another state or operated by another tribe, for a total of 60 months. AVCP will count prior months of assistance funded with TANF block grant funds, except for any month exempt or disregarded by statute or regulation. The AVCP cash assistance program operates consist with the four goals listed above, and the purpose of cash assistance is to encourage self-sufficiency. AVCP uses the 60 month time limit to allow cash assistance program participants enough time to receive and complete the training or education required to obtain a sufficient income to support a family (provided the participants live in a location where sufficient job/income-generating opportunities are available, see *Exemptions* below).

**Exempt Alaska Native Villages. Addendum R**

In determining the number of months for which an adult has received assistance under a state or tribal program, the AVCP Benefits Division 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 a 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 such term in section 1151 of Title 18, United States Code. AVCP follows the State of Alaska ATAP Addendum 1: Exempt Alaska Native Villages.

**Hardship Exemptions.**

During or after 60 months of non-exempted participation, a family may continue to receive benefits if the AVCP Benefits Division determines that the family qualifies for a hardship or domestic violence exception. Time limit exemptions may not exceed 20% of the AVCP Benefit Division's caseload. Hardship exemptions include:

- a. adults with a physical or mental inability to perform gainful activity (verified by a doctor or appropriate medical authority);

- b. caretaker relatives who are caring for a child who is experiencing a disability;
- c. victims of ongoing 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;
- d. for families who have suffered a fire or devastating damage to a home. Families may be provided support to replace beds and essential furniture; and
- e. Families who have exceeded their 60-month time limit, but reside in communities that changed from Non-Exempt communities to Exempt due to village population fluctuation. AVCP follows the State of Alaska Exemption schedule. **See Addendum R.**

### **Work Participation Requirements and Activities.**

#### Self Sufficiency Plan and Assessment.

Every family receiving cash assistance benefits that includes an able-bodied adult must complete a Family Self-Sufficiency Plan. The plan outlines the steps the family will take to increase their independence, identifies specific milestones to indicate progress, and indicates the services the Workforce Development Division will provide to assist the family toward their goals. The steps to independence include contributions to the community a family can make to offset benefits the family receives when paid employment is unavailable. The Workforce Development Division 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.

#### All Parent and Two Parent Families Participation Rates.

Cash assistance recipients will participate in AVCP’s work readiness and self-sufficiency programs. These programs, offered through the Workforce Development Division, promote regional job creation and provide recipients with job preparation and support services designed to help them gain and retain paid employment, or community services when paid employment is unavailable. AVCP believes that the following participation rates represent realistic and appropriate standards, in light of such factors as a high rate of educational training deficiencies, prevalence of mental health, substance abuse issues, and a substantial long-term unemployment rate among its cash assistance client population. These issues are only further complicated by the current and projected job market and economic situation in the State of Alaska. Many Federal, State, and local employers are reluctant to hire new staff in light of the State’s negative economic forecast.

Federal Fiscal Year	All Families
October 1, 2021 – September 30, 2022	32%
October 1, 2022 – September 30, 2023	32%
October 1, 2023 – September 30, 2024	32%

#### Individual Participant Requirements.

AVCP believes that the following average participation hours/per week standards reflect what can reasonably be expected from our cash assistant recipients. There is a requirement of twenty-five (25) hours per week of work participation. These twenty-five (25) hours per week of work participation hours may be shared between a two- parent family. A significant number of cash assistance participants will have been out of school for a long time and it would be unrealistic to expect they have the discipline needed to participate in a full week of activities especially in extremely high unemployment communities. This would interfere with the maximum number of program participants being able to participate.

Federal Fiscal Year	Participation Rates
October 1, 2021 – September 30, 2022	25 hours
October 1, 2022 – September 30, 2023	25 hours
October 1, 2023 – September 30, 2024	25 hours

#### Acceptable Work Activities.

The AVCP Benefits Division requires parents or caretaker relatives to participate in acceptable work activities for twenty-five (25) hours each week. Acceptable work activities include:

- Basic education
- Job search (with such limitations as provided in 45 CFR 286.105)
- Assessment
- Job readiness activities (with such limitations as provided in 45 CFR 286.105)
- On-the-job training
- Subsistence and cultural activities
- Vocational education training
- 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
- Unsubsidized employment
- Providing child-care services for individuals participating in community work service
- Eldercare
- Community service activities
- Other activities developed by AVCP to meet needs of an individual cash assistance participant as related to one of the four goals listed above..

#### Exemptions.

A cash assistance participant who is subject to work participation requirements may be exempt from work activities because of certain family situations or because participation would cause unreasonable hardship. A parent may be exempt because they are:

- a. Needed in the home to care for a disabled person;
- b. A caretaker of a child under 6, when the following is not available:
  1. “Affordable child care,” which is considered child care not above the State of Alaska child care rates;
  2. “Appropriate child care,” which is child care facilities and homes licensed by the State of Alaska or approved by Alaska CCDF Child Care Program;
  3. “Reasonable distance child care,” which is child care within one-hour commuting time of activity; and/or
  4. “Suitable informal child care,” which is an in-home provider approved by the Alaska CCDF Child Care Program.
- c. Determined to be physically or mentally unable to perform gainful activity as verified by a doctor or appropriate medical authority;
- d. A caretaker of a child under age 13 months; and/or
- e. A parent or caretaker has been or is a victim of domestic violence.

The exemption from participation in work activities for domestic violence will be for a length of time individualized to meet the parent’s or caretaker’s needs. Individualized responses and service strategies will be determined with the parent or caretaker and other social service organizations, including the state, consistent with the needs of the parent or caretaker. If it has been determined that it is necessary for further protection and response for the victim, an additional length of time can be provided.

Clients exempt from the work activities requirement are still required to engage in other activities documented on the FSSP that prepare the individual to participate in work activities when the exemption is no longer in place. If clients do not participate satisfactorily in these activities, they can be penalized for not complying with their FSSP.

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.

Good Causes for Non-Cooperation.

Cash assistance recipients who fail to perform work participation activities, or who fail to accept and/or maintain employment, will be subject to sanctions, except when they are able to demonstrate good cause for such a failure. A cash assistance recipient who is subject to work participation requirements may be exempt from work activities because of certain family situations or because participation would cause unreasonable hardship.

### **Supportive Services.**

Support services will be made available to cash assistance participants, directly or through their service providers or employers, to enable them to engage in assigned work participation activities and/or to accept and maintain employment. These services are to be provided to maximize the cash assistance recipient’s integration into the job market. Other support services such as substance abuse and other related job retention services will be made available through close collaboration and coordination with agencies such as the Yukon Kuskokwim Health Corporation. If the State of Alaska is authorized to enter into a contract with AVCP for those eligible residents currently not served by this plan, AVCP will apply to the State of Alaska for a grant to provide supportive services to those eligible residents added to this plan. Office managers will set local procedures for authorization of supportive services. Supportive service payments are not automatic or an entitlement. Each request will be examined to determine the need. Applicant’s

personal resources, such as Permanent Fund Dividends, also must be considered prior to authorization of a supportive service. Once the need is determined, supportive services may pay for:

- a. Job referral and placement services
- b. Work subsidies
- c. Job search assistance
- d. Job counseling
- e. Personal and family counseling, including:
  1. domestic violence prevention - child, elder, and spousal
  2. abuse prevention;
  3. financial;
  4. health and hygiene; and etc. (e.g. cleaning supplies, bed bug sprays, and lice treatments)
  5. Substance abuse counseling.
- f. Substance abuse treatment
- g. Transportation
- h. Child Care
- i. Elder Care
- j. Initial screening for qualification for other related programs and services, e.g. JTPA (WIA), WtW, NEW, Food Stamps, GA, TWEP, AVT, etc.
- k. Referrals to other tribal, state, and local support services and related employment and training programs
- l. Health service systems referrals
- m. Eye glasses and/or dental care as related to obtaining or keeping a job (these may be provided only after IHS, tribal or state medical services, insurance, and other related health services/resources have been exhausted or determined as not covering these costs)
- n. Housing referrals and assistance
- o. Clothing, tools, and equipment needed for training or to get or retain a job
- p. Books and supplies for job-related educational activities
- q. Educational counseling and services
- r. Educational programs, including, Adult Basic Education, GED, and stay in school initiatives
- s. Youth services and activities related to TANF goals
- t. Traditional cultural support activities
- u. Nonrecurring, short-term benefits (emergency assistance)

#### Transitional Services.

If an adult member of the family is employed at the time their cash assistance case closes, and within one year of the cash assistance case closing the client needs supportive services to retain their job, and they do not have another means to pay for the supportive service request, the benefits specialist or workforce development navigator will authorize the supportive service request as long as it falls within the supportive service request items listed above.

#### **Sanctions/Penalties**

##### General Principles.

Sanctions are intended to induce cooperation with the AVCP cash assistance requirements on the part of the participants who, without sanctions or the threat of sanctions, would fail to do so. The sanction process is progressive

in that it will have graduated levels of response to program violations: the more serious the program violation, the more severe the sanction. Penalties/Sanctions for non-cooperation may result in vendor payments or reduction in benefit. In addition, a participant sanctioned at a certain level will be at-risk of higher level of sanction for future violations. Built into this progressive sanction process however, is the opportunity to mitigate the impact upon direct support and benefits to the needy children of affected families.

### **Agreements, Compacts and Subawards**

Cash assistance services will be provided directly by AVCP on behalf of tribes in the region until requested by the tribe to deliver services directly at the tribal level through a memorandum of agreement. These memorandums of agreement will be executed with those tribes in the region who request to deliver direct welfare related services by the tribe; and who also have the demonstrated financial and administrative capacity and capability to deliver services directly at the tribal level.

AVCP may enter into subaward agreements with outside organizations to directly carry out supported activities outlined in this plan at the tribal level. Per AVCP's policy, the subaward must have a formal written subaward contract/agreement that meets the specific administrative, financial and reporting requirements of this plan. AVCP provides ongoing monitoring of subaward agreements to ensure compliance with this plan. AVCP is responsible for subrecipient spending and reporting actions, which must conform with all the terms and conditions outlined in this plan. Subawardees cannot use funds received from AVCP to form their own subaward with other third party organization or third tier subaward and must only use the subaward to provide direct services at the tribal level.

### **Fiscal Accountability Assurance.**

For each fiscal year during which AVCP 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)(1) of the Indian Self-Determination and Education Assistance Act (25 U.S.C. §§ 450c(f)(1), relating to the submission of a single agency audit report required by chapter 75 of Title 31, United States Code, applies.

### **Retrocession.**

If AVCP elects to retrocede its Cash Assistance program back to the State and Feds, it will give ninety (90) days notification to the Department of Interior, and comply with all the statutory and regulatory requirements pertaining to retrocession.

### **Public Notice and Comment Period.**

AVCP assures compliance with the 45-day comment period. AVCP submitted notice for a 45-day comment period to each Tribal Office via mail, email, and/or fax on May 17, 2021 to be posted in a public area, and will accept comments from region's tribal members until July 1, 2021. AVCP will make copies available to all regional tribal members through the tribal council offices throughout the region, at our Tribal Workforce Development offices throughout the region, and on our website. The notice will include the date/time for a public hearing on June 16, 2021, with a toll free teleconference call line. Any public comments submitted before or during the hearing will be considered in finalizing the proposed plan amendment.

## **E. EXPECTED RESULTS**

The AVCP Workforce Development Division works to provide client services in the region, following P.L. 102-477 grant requirements and guidelines that are outlined within this service delivery plan. P.L. 102-477 allows us to integrate our programs with the requirement of one annual narrative, statistical and financial report. This has reduced the administrative burden in the implementation process of program funds we receive at AVCP. We strive to improve every aspect of delivering services to the clients in the region and our goals and objectives remain, first and foremost, to provide services to all eligible tribal members.

The coordination with other agencies in providing financial assistance to the clients we serve is essential. With the continuation of our partnerships for more extensive services, we will have increased our awareness of available funding. The single record keeping and reporting requirements for P.L. 102-477 allow more time and flexibility in planning and evaluating various scenarios.

The biggest and most apparent result expected is that we will increase numbers in our population who are educated and employed and able to be self-sufficient!

### **Performance Standards:**

The AVCP 477 program goals are to reach youth and adult by providing services throughout the AVCP communities. They are:

1. A client who is eligible for training and/or education funding assistance will successfully complete the academic program they set out to complete.
2. A client who needs help securing employment will successfully obtain or enter unsubsidized employment.
3. Department staff will be located in communities around the region to assist any and all interested in our program services.

AVCP will adhere to any additional regulatory requirements regarding performance standards and measures for program services. Specifically, our Child Care program will keep eligibility requirements in the fore front and make sure all parents of children and providers are eligible in all aspects.

### **Data Collection and Reporting:**

AVCP will comply with all the statutory and regulatory data collection and reporting requirements pertaining to the P.L. 102-477 and TANF program.

AVCP will submit the annual P.L. 102-477 program narrative report describing the year's activities, the annual statistical report outlining actual numbers of clients and their respective outcomes, and the annual financial report indicating funds spent. The performance standards outlined above will be evaluated and it will be determined whether those marks were met or not.



Throughout various meetings and functions in and outside the AVCP region, the Workforce Development Division may be tasked with providing not only program service information but, also results and information pertaining to clients assisted. Information will be shared on an as-needed basis.

**F. APPEALS POLICY**

The AVCP Workforce Development Division has established an appeal process for individuals who wish to appeal a decision made regarding any eligibility decisions made on their behalf. It contains provisions that apply to all programs. The process allows for due process and establishes a roadmap for someone wishing to file a grievance. All appeals and grievances must be in writing and submitted within ten (10) business days of the action being appealed. Participants will be advised of determination(s) within five (5) business days of receipt of written complaint(s). An appeal/ grievance may be sought by any participant within our programs who believe that a violation of the Regulations has occurred or to further research eligibility or payment determination. A copy of the appeals process is provided to every applicant within our application itself. The appeals process is also available to anyone who requests a copy.

**Addendum L.**

AVCP as an organization also has an established grievance policy procedure that is applicable to all staff. It will apply to staff employed in these 477 programs.

**SECTION V. ANTICIPATED REVENUE AND EXPENDITURES**

**AVCP 477 Workforce Development - Anticipated Revenue**

Higher Education Scholarships (DOI-BIA)	\$ 507,213
Job Placement & Training (DOI-BIA)	\$ 191,414
Adult Education (DOI-BIA)	\$ 7,939
Education Line Officers (DOI-BIA)	\$ 16,129
Johnson O' Malley (DOI-BIA)	\$ 166,378
WIOA Adult Comprehensive Services (DOL-WIOA)	\$ 403,514
WIOA Supplemental Youth Services (DOL-WIOA)	\$ 163,404
Native Employment Works (DHHS-NEW)	\$ 326,075
Child Care Development Fund (DHHS-CCDF)	<u>\$ 4,137,233</u>
Tribal Temporary Assistance for Needy Families	<u>\$ 5,420,841</u>
<b>Total</b>	<b>\$ 11,340,140</b>

**AVCP 477 Workforce Development Division - Estimated Expenditures**

Direct Program Expenses	\$ 8,965,332.00
Total quality and infant/toddler-year 1 @ 11%	\$ 323,756.00
Program Administration/Indirect:	<u>\$ 2,051,052.00</u>
<b>Total 477 Program Budget:</b>	<b>\$11,340,140.00</b>

## SECTION VII. REQUESTS FOR REGULATORY WAIVER

*Waive 668.430 (b) Youth participants must be low-income individuals, except that not more than five percent (5%) who do not meet the minimum income criteria, may be considered eligible youth if they meet one or more of the following categories: (1-8).*

**Replace with:** We want a consistent 477 plan and utilize the State of Alaska's Poverty guidelines in determining eligibility. We also do not want to limit our ability to help youth that are at risk of being non-productive individuals if funding allows. Operating in small rural communities, in many cases, we are the only program that provides services to youth. We would like the opportunity to assist all students when we are able if they meet one or more of the 8 categories listed.

Waive 45 CFR Part 98.2

A child care provider who is 18 years of age or older who provides child care services only to eligible children who are, by marriage, blood relationship, or court decree, the grandchild, great grandchild, siblings (if such provider lives in separate residence), niece, or nephew of such provider, and complies with any applicable requirements that govern child care provided by the relative involved;

Replace 45 CFR Part 98.2:

A child care provider who is 18 years of age or older who provides child care services only to eligible children who are, by marriage, blood relationship, or court decree, the grandchild, great grandchild, siblings (over the age of 18 living in the same residence), niece, or nephew of such provider, and complies with any applicable requirements that govern child care provided by the relative involved;

## SECTION VIII. ASSURANCES AND CERTIFICATIONS

AVCP's Assurances and certifications are included as **Addendum: F**

## SECTION IX. TRIBAL RESOLUTION APPROVING PLAN

At the time of initial approval of our P.L. 102-477 Plan in the mid-nineteen nineties, BIA was sent the original P.L. 102-477 Tribal Resolutions. These resolutions remain in effect, unless a tribe elects to contract for any one of the programs directly. To date, the only communities operating Child Care Development Fund (Discretionary only) grants directly include Akiachak, Akiak, Kwethluk, Mountain Village and Bethel (ONC). Some of the Tribes operate their own BIA Higher Education, Job Placement & Training, Adult Education and Johnson O' Malley (JOM) programs. WIOA and NEW are regional programs. An updated AVCP resolution authorizing the continued consolidation of programs, the consolidation of workforce development programs, and adding the Tribal Temporary Assistance to Needy Families program is included as **Addendum B**.