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OSAGE NATION 477 Policies & Procedures

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Public Law 102-477 Overview

This three year 477 Plan will be effective October 1, 2018 through September 30, 2021 and will cover Fiscal Years 19-21. Osage Nation has operated under the Indian Employment, Training, and Related Services Demonstration Act of 1992, Public Law 102-477, 106 Stat. 2302, commonly known as “477” since October 1, 1997. Pursuant to 25 USC 3405, Section 6 (1) the Nation will refer to these integrated programs that contain three funding streams as the P.L. 102-477 Programs:

- DHHS-TANF
- DOI-Welfare Assistance (General Assistance)
- DOI-Job Placement and Training Program
- DOL-WIOA-Adult Program
- DOL-WIOA-Supplemental Youth Services Program
- DOI-Higher Education

Service Area Overview

The Osage Nation headquarters are located in Pawhuska, Oklahoma. The service area includes approximately 1.5 million acres known as Osage County, the largest county in Oklahoma. The City of Pawhuska is the County Seat and Osage County is included in the Tulsa, Oklahoma, Metropolitan Statistical Area. It's projected that most members of the Nation and non-Osage members reside within an expanded community that encompasses the towns of Pawhuska, Hominy, Fairfax and Skiatook. The expanded community boundaries total 113 miles in radius.

477 Program Goals

The Financial Assistance Department will coordinate in a manner that integrates the employment, training and related services programs into a single, coordinated, comprehensive program that will reduce administrative costs by consolidating administrative functions. This includes a single plan, a single budget and a single reporting system. These programs will utilize the Nation's Customer Relations Management System (CRM) to house required data for reporting requirements. This will ensure that services are not being duplicated but instead complement one another. This system will track client data such as the following:

- Identified barriers
- Program referrals
- Assessments
- Career Development
- Soft Skills Training
- Job Training
- Employment

These programs will comprehensively address the needs of clients through different levels of success. Each level will require compliance, monitoring and completion to ensure client goals are being reached. This concept will have at least five to eight levels that include, but not limited to, the following:

- Application Process
- Eligibility Determination
- Initial Interview which includes the development of the Individual Self-Sufficiency Plan (ISP)
- Assessments to determine barriers
- Case Management
- Career Development
- Job Training
- Subsidized and Unsubsidized Employment

General Eligibility Requirements

All persons entering the Program will be required to establish eligibility for the various services provided.

Basic eligibility to receive services:

- Reside within the service area of the Osage Reservation (Osage County);
- Be Native American as evidenced by a membership card from a federally recognized tribe, a certificate of degree of Indian blood (CDIB) or other official acknowledgment of membership by a federally recognized tribe;
- Income must be below 200% of the Federal Poverty Guidelines
- If applicable, male applicants must also register or be registered for the Selective Service
- Must comply with Drug Screening; not for eligibility requirements but rather to further identify and address employment barriers
- Must complete an Individual Self-Sufficiency Plan

Adult Applicants will also be required to meet one or more of the following criteria to be eligible for services:

- Unemployed
- Underemployed
- Recipient of a lay-off notice effective within six (6) months prior to the application
- Requires Skill Enhancement to obtain, retain, or advance in employment. The Director or Coordinator will determine if the documentation to support "requires skill enhancement" is sufficient
- Meet one of the Social Services eligibility criteria (ex: Homeless, endangered, etc.)

Every applicant must complete a 477 Employment and Training application. The following applies to all services except Temporary Assistance for Needy Families and General Assistance. Specific eligibility

requirement for those additional cash assistance programs will be detailed under their respective sections. This section complies with 20 CFR 684.300 *"Who is eligible to receive services under the Indian and Native American program"*.

Each application must be accompanied by documentation to support information listed. Any of the following are acceptable documentations for each eligibility requirement:

1. Reside within the service area – We will accept the following documentation as proof of residency:
 - Utility Bill in applicant's name
 - Utility Bill in someone else's name with a completed Certification of Address form
 - Tax records to show ownership of residence in applicant's name
 - Tax records in someone else's name with a completed Certification of Address form
2. Native American – We will accept any of the following documentation:
 - CDIB card
 - Membership Card from a federally recognized tribe
 - Other official acknowledgment of membership by a federally recognized tribe
3. Income below 200% of the Federal Poverty Guideline – Each year the guidelines will be updated in accordance with the Federal Government updates. The following sources of income will be used to determine general eligibility, as applicable:
 - Wages for all family members in the family unit – a family unit is a group of people that reside together as one family and all contribute to the needs of the family unit. Once an individual turns 18 they can be considered a family unit of 1.
 - Unemployment income of all family members
 - Social Security and Supplemental Social Security Income
 - Retirement/pension income
 - Rental Income
 - Alimony
 - Child Support

The following documentation will be accepted as proof of income:

- Pay stubs for applicant and family members in the household
- Social Security award letters
- Retirement or pension award letters, bank statements, statement from retirement account
- Rental income – bank statements to show deposit, receipts, lease agreements, notarized statement from tenant
- Child support statement from Child Support office, print out from State Child Support, cancelled checks or bank statements, notarized statement from payer
- Divorce decree showing alimony or cancelled checks for alimony payments

4. Selective Service – All male applicants must also register or be registered for the Selective Service. The only documentation accepted is the official receipt of registration from the United States Government. If applicant is now too old to register and was never registered they must submit a statement as to why they were never registered.
5. Drug Screenings – All applicants are required to complete a drug screen with the Osage Nation TASC department. At time of ISP, the case worker will complete an Alcohol/Drug Screen Referral form which will include the Date and Time of appointment. Applicant must complete within 1 hour to meet eligibility in accordance with the approved Osage Nation Financial Assistance Drug Policy. Only exception is if the TASC office was unable to complete the test in the time frame due to office closings, no available staff, out of supplies, etc. If this occurs documentation from the TASC department will be used as verification and a new appointment will be set.
6. Individual Self-Sufficiency Plan (ISP) – this plan is developed between the applicant and the case manager in person. This occurs at the initial meeting. This cannot be completed until application is complete with all supporting documentation. This document will be filled out by the case manager with the applicant and then reviewed by the applicant. Case manager and applicant will sign the ISP. A copy will be placed in the applicant file, scanned into CRM, and the applicant will receive a copy.

Adult Applicants must also meet an additional criteria for eligibility. Below is a list of eligible criteria and acceptable documentation:

1. Unemployed – notarized unemployment statement, letter or statement from unemployment benefits (can be denial, exhaustion of funds or current payments).
2. Underemployment – check stub or time sheet to show less than full-time hours, rate of pay from check stub or statement from employer and tax returns or previous check stubs. This is to show earnings not consistent with previous level of pay.
3. Recipient of lay-off notice – need copy of layoff notice or statement from previous employer. Layoff had to have been within six (6) months of application.
4. Requires Skill Enhancement to obtain, retain, or advance – Need statement from current employer that details specifically what skills are required, how they relate to their current position or how the skills will allow advancement, how long the applicant has to acquire the skills, any other relevant information such as preferred vendors, length of training, estimated cost of training, etc. Case manager will submit all documentation to director for approval.
5. Meet one of the Social Services eligibility criteria – homeless, endangered, etc.

Services to Be Provided

The mission of Osage Nation Financial Assistance Department is to work for the reduction of poverty, the revitalization of low income communities, the empowerment of low income families and individuals in rural and urban areas to become fully self-sufficient, particularly those persons attempting to transition off of public assistance, and to open to everyone the opportunity to live in decency and dignity. The programs offered include, but are not limited to, the following:

Referral Services:

All applicants will receive referral services. Applicants will complete the intake process including assessments and development of the Individual Self-Sufficiency Plan (ISP). ONFA personnel will review the assessment and ISP and make appropriate referrals.

Case Managers will work together with clients to determine if and when referrals are needed. Every client will receive a referral to Osage Nation TASC for drug screening. The following referrals may also be completed by the case manager on behalf of the client:

- ON TASC for Alcohol/Drug assessment – any drug screenings that come back with a positive result will be referred to TASC for a full assessment. This assessment must be completed by applicant to remain in compliance with the program. Assessment will be sent from TASC to the Financial Assistance Department in order for all requirements to be incorporated into the client's ISP. Failure to follow the recommendations from TASC and remain in compliance with the TASC department will result in non-compliance with the client's ISP and therefore result in their case being closed. Case Manager will follow-up with the TASC department monthly to monitor compliance and will case note in the client's folder and CRM.
- SNAP benefits or ON Food Distribution – Case manager will refer all clients to apply for SNAP benefits or ON Food Distribution if they are not already receiving benefits. This will be identified in the initial meeting when developing the ISP. The case manager will make this one of the client's goals in their ISP if needed and follow-up with client to ensure completion. Completion of this tasks will be notes in the case file and CRM.
- Workforce Tulsa – All job seeking clients will be referred to workforce Tulsa. The case manager will schedule monthly with workforce Tulsa to be on site to assist clients with signing up for services and showing them how to job search on-line. Workforce Tulsa provides this department with weekly "hot job" lists and monthly trainings available. These notifications and opportunities will be shared by the case manager with clients who fit the criteria for the jobs or training opportunities. These opportunities will be communicated through email, phone, or in writing. This communication will be documented by the case manager in CRM.
- Vocational Rehabilitation – For clients who self-disclose of disabilities or who present medical documentation of disability be it long or short term will be referred to the Oklahoma Vocational Rehabilitation. The case manager will schedule assessment on client's behalf with the Oklahoma vocational rehabilitation office out of Bartlesville. All results from any assessments or testing will be copied into the client's folder and uploaded into CRM. Clients are required to attend any and all assessments or testing recommended by Oklahoma Vocational Rehabilitation. These requirements will be included in the client's ISP. Failure to remain compliant with those requirements will result in non-compliance with their ISP and result in case closure. This will be documented by the case manager in the case file and CRM.

- Family Violence department – If a client discloses an issue with domestic violence a referral to our Osage Nation Family Violence department will be initiated by the case manager. If the client is a referral from Family Violence, we will include their counseling sessions into their ISP. If they are currently in a subsidized program with Family Violence that requires compliance, the case manager will include the requirements in their ISP and check with the department monthly to ensure compliance with their department and plan. Failure to remain compliant with their family violence plan will result in non-compliance with their ISP and result in case closure. This will be documented in the case file and CRM by the case manager.
- Wageworks – All Osage clients will be asked if they are currently receiving the health benefit card. Any Osage client who is not currently signed up will have this task added to their ISP. This task will be followed up with by the case manager to ensure it is complete. This task completion will be noted in the case file and CRM.
- Other referrals can be made on behalf of the client by the case manager dependent upon needs, assessments, and ISP. All referrals will be documented by the case manager in the clients file and CRM.

Eligibility Determination:

All persons entering the Program will be required to establish eligibility for the various services provided. Those found eligible for services will participate in an assessment and develop a Self Sufficiency Plan.

Once an applicant has completed the application and gathered all required documentation, an appointment will be made for them to come into the office and meet with a case manager. All requests for appointments will be made within five (5) business days. Case manager will review application, complete ISP, refer to alcohol/drug screening, and verify all documentation. Case manager will communicate with client if there is any further documentation that needs to be submitted or any other tasks that must be completed in order to complete the eligibility process. Case manager may contact other departments and entities on the client's behalf in an effort to obtain any missing documentation such as child support information, housing information, IIM account information, social security administration, etc. When case manager has collected all required documentation, an income worksheet will be completed to ensure client meets income guidelines for services. After the Case Manager has verified that applicant meets all eligibility requirements they will enter the application into CRM (for instructions on how to enter cases into CRM please see user guide 477 CRM user Guide, or TANF CRM User Guide 1 depending on what services client is applying for). Case manager will then submit clients file to director for approval.

File will include the following for basic services:

- Check list
- Complete Application

- CDIB/Membership cards for everyone on application (case manager will verify Osage nation membership in CRM and initial to verify that there are no flags)
- Social Security Cards for everyone on application
- Photo Identification for all Adults on application
- Proof of residency
- Verification of Selective Service registration
- Verification of Family Unit income for past 30 days
- Completed Income Worksheet

Files for clients applying for TANF cash benefits will include the following:

- Check list
- Completed Application
- Membership cards(s) and/or CDIB card(s) from a federally recognized tribe for each household member
- Photo Identification for each adult household member
- Social Security Card(s) for each household member (not applicable for children under six months)
- Birth Certificate(s) for each household member (not applicable for children under six months)
- Shot records(s) for each child in household
- Proof of school enrollment of each child grades K-12
- Verification of food stamps
- Provide proof of third trimester pregnancy if applicable
- Marriage Certificate/Divorce Decree
- Proof of open Child Support Case
- Custody Paperwork from Caretakers (must be a legal court document); if applicable
- Joint Custody Paperwork (must be a legal court document); if applicable
- Federal Tax Return - If you have joint custody provide the most recent federal tax return validating which parent claimed the child or children
- Verification of residency (current utility bill in applicant's name or certification of address form)
- Verification of household income for the past 30 days from the date of application (if unemployed complete Unemployment Statement) Include checking & savings bank statements

Director will review case file and CRM application. Director will approve application in CRM and deactivate the application selecting "Verified". Director will then approve case and sign income worksheet. Director will return file to case manager. Case manager will then draft a letter to client informing them that their application has been approved and that they are eligible for services. The type of services will be detailed in the letter and if they were approved for cash assistance the letter will

detail their payment level and any pro-rated amount. Letter will be mailed to client and a copy will be placed in their file.

Orientation and Initial Assessment:

All clients will be required to participate in a home visit or an office orientation as required for eligibility determination. The orientation is designed to provide an overview of services available and client responsibilities. Clients will complete a basic assessment which will be used by the case manager to determine the referrals and initial needs of the client. All clients will be required to participate, including those with a possible exemption from work activities. Assessment begins during the application process and continues as needed throughout the participant's involvement. The results of initial and on-going assessments guide the self-sufficiency planning process.

All clients will be given an appointment date within five (5) business days of request. Clients will not be given an appointment on same day of picking up an application. This is to ensure that the client has sufficient time to gather all the documentation required. If client misses the appointment, it is their responsibility to make contact with the Financial Assistance Department and request another appointment. Client will be advised to schedule at least two (2) hours for this appointment. The intake specialist will coordinate with a case manager to schedule the appointment and communicate this appointment with the client. The case manager will ensure that they schedule at least two (2) hours for each client. Case manager will also coordinate with ON TASC to ensure that alcohol/drug screening can be done on the same day. If client comes to the appointment without all the required documentation they will have to be rescheduled for another date. The case manager is unable to continue with the appointment if they are unable to provide the documentation. Exceptions will be made on a case by case basis depending upon the documentation missing and any barriers or issues with obtaining the documentation. The case manager will utilize their training and expertise to determine if the appointment can continue with the documentation provided.

Self-Sufficiency Plan:

The ISP will be completed with eligible participants before services will commence. The ISP will include a brief description of family/individual strengths and skills, barriers to self-sufficiency, short- and long-term goals, services to be provided, steps towards self-sufficiency and a brief description of the desired outcomes. This ISP is considered a non-legal working agreement between the participant and the Program, clearly defining the rights, responsibilities and obligations of both parties. The result of successful planning is elimination of financial dependency. For some individuals/families in a crisis situation or experiencing personal circumstances beyond their control, the initial goal of self-sufficiency planning will be reduction of financial dependency to the greatest possible extent.

All clients are required to develop a self-sufficiency plan (ISP). This ISP is a living document and is expected to be updated and changed frequently. The ISP is to be driven by the client with the assistance of the case manager. The goal is to set short and long term goals that are obtainable. The ISP will detail the goal and the activities required to meet that goal both for the client and the case manager. For every goal the client has the case worker will also have responsibility either in assisting, monitoring,

updating, etc. When a client achieves a goal listed on the ISP the ISP must be updated to include the completed of that goal and a new goal established. Each time the case manager will update this form with the client, give the client a copy, and include in the case file and CRM. Clients are ultimately responsible for complying with the activities listed in their ISP. It is the client's responsibility to notify the case manager if they feel a goal or activity is not going to be met. They must request a meeting with the case manager and discuss the issue with the goal/activity and together with the case manager they will either select a new goal or assist the client with achieving the goal. Some goals are required and will not be able to be amended such as those pertaining to compliance with other departments like TASC, Family Violence, Social Services, Vocational Rehabilitation, etc. If a client fails to make progress on their ISP and has not communicated with the case manager about any issues or barriers impeding progress, the case manager will close the client's case due to non-compliance.

Case Management:

The department will employ an integrated case management approach to service delivery. The following steps will be taken for each client;

- a.) Participants are assessed through self-reporting of skills, needs and barriers during joint interview with case manager(s) to help clients in identifying skills, needs, and barriers. If applicable, further assessments will be completed in the areas of mental health/substance abuse, vocational rehabilitation, and/or education evaluation depending on recommendation and referral of case manager.
- b.) Individual/family case plans/self-sufficiency plans are developed taking into consideration all assessments and the client's current circumstances. Plans will denote the responsibility and goals of the client as well as tasks for the case manager. ISPs are reviewed and signed by client and case manager.
- c.) Reassessments are done on a regular basis to ensure that participants continue to progress towards their goals. At a minimum, reassessments will be conducted every three (3) months.

All clients will be assigned a main case manager depending upon type of services. If the applicant is applying for TANF or GA cash assistance, their main case manager will be the Social Work Case Worker. If the applicant is wanting education assistance or employment assistance their main case manager will be the Employment and Training Coordinator. If the applicant is a youth under the age of 20, then their main case manager will be the Youth Coordinator. Clients applying for multiple services can have multiple case managers working with them on a daily basis but each will be given one main case manager to ensure effective communication and overall case management.

Case management services will be on-going with the assigned case manager making/attempting to make contact with each client at least twice (2) monthly. These contacts/attempts to contact will be put in the case notes section of CRM. Any staff that comes into contact with a client will log that interaction into the case notes section of CRM.

ISP forms are developed by the Financial Assistance Director and only approved forms will be utilized in developing a client's ISP. Other assessments may be done when necessary and will be determined by the case manager in cooperation with the client.

At a minimum, case managers will schedule with clients to reassess their ISP, goals, and status every three months. These meetings must be held in person. The case manager will send a letter to the client detailing the date of time of the appointment. The case manager will also try and communicate this appointment by phone and give each client at least one courtesy call to remind them of the appointment. It is the client's responsibility to inform the case manager if they are unable to attend the scheduled appointment. An alternate appointment date must be set within one (1) week of the original appointment. If a client fails to keep the alternate appointment their case will be closed due to non-compliance.

Case manager is responsible for all documentation to be uploaded into the clients CRM case file. Case manager instructions are located in ONTIS labeled "Document Manager User Guide." Refer to guide for individual steps and instructions.

Education Assistance:

Education Assistance can include, but not limited to: General Educational Development (GED) certificate completion, vocational/occupational training, basic education, soft-skills and referral.

The financial Assistance Department will exercise tribal preference and veteran preference in conjunction with the need level of each client. Preference and priority will be exercised in the following order:

Osage and Veteran Preference priority method:

- Disabled Veteran Osage Member
- Veteran Osage Member
- Osage Member
- Disabled Veteran who is a parent/spouse of an Osage Member
- Veteran who is a parent/spouse of an Osage Member
- Parent/spouse of an Osage Member
- Disabled Veteran Native American
- Veteran Native American
- Native American

Depending upon client volume and funding levels, the Director may institute a waiting list for education assistance.

The following services are available to clients who have identified education as a goal on their ISP.

- a.) **GED Completion:** All eligible participants without a high school diploma or GED will receive assistance in obtaining a GED certificate. The service must be justified in the Plan. Services may include payment of necessary testing fees, tuition, books, supplies, fees, stipends and other supportive services when applicable.

Client must have identified GED classes as a goal on their ISP. The case manager will assist the client in identifying GED classes available in their area. The client must enroll in an accredited GED classes, with the assistance of the case manager if necessary.

- b.) **Adult Basic Education:** Adult basic education services will be provided to participants who need to improve reading, writing and/or math skills in order to be employed, compete in the job market or participate in a vocational/occupational training program.

Client must have identified a need for basic education classes in their ISP. Case manager will assist client in identifying classes that will meet the educational need. These classes will be short-term, can be completed in less than 3 months, and offered by an accredited entity.

- c.) **Vocational Education:** Vocational education services are available to participants pursuing vocational degrees or certifications from accredited schools. Services may include payment of tuition, fees, books, stipends and related support services. Applicants will be referred to other funding sources as well.

Client must have identified trade school as a goal on their ISP. If applicable, all clients must apply through Osage Nation Education department for payment of tuition. All other funding sources and resources must be applied for by the client. Case manager is to verify that all other sources have been identified. Client is responsible for applying and submitting proof of enrollment to case manager. Client is responsible for any costs associated with the application process. Applicant may apply with the following accredited certifiable training institutions:

- Tri-County Technology of Bartlesville or Pawhuska
- Tulsa Welding School
- Central Technology of Drumright and Sapulpa
- Center of Professional Studies
- Tulsa Technology Center
- Pioneer Technology Center of Ponca City
- Wings Health Care Training
- Cosmetology Educational Institutions
- Other - Director approved

- d.) **Occupational Training:** All eligible participants can receive occupational training. This training must be justified in the ISP. Generally, such training will be short term and occupation specific. Normally, such training will be completed in six months or less. Services may include assistance in enrollment, payment of tuition, books, fees and other supportive services. Students may also receive stipends, if justified in the ISP, to enable them to successfully complete training.

Client must have identified occupational training as a goal on their ISP. Clients who are underemployed must demonstrate how occupational training will assist them in securing full-time employment. Clients who are currently employed must submit documentation from present employer on how this training is necessary for either continuing employment or for advancement. Clients who are currently employed full-time will not be eligible for stipends. Client must submit proof of enrollment.

- e.) **Skills Training:** Each participant will be required to attend program mandated trainings. The case worker will provide each participant with a schedule of trainings and classes that have been identified for the participant to attend. Transportation can be provided at the request of the applicant at least 24 hours in advance. Anyone unable to attend a mandatory training will be required to submit documentation to show just cause why they were unable to attend. Further information will be outlined in our policy.

Clients must have training or job searching as a goal on their ISP. Skills training classes will be scheduled by the financial assistance department. Each month, clients will receive a calendar with mandatory skills trainings classes. This calendar will be accompanied by notification of date, time, and location of each class. Transportation is available for those clients with transportation listed as a barrier in their ISP. Transportation requests must be made by the client at least 24 hours in advance of the start of the class. It is the client's responsibility to notify their case manager if they are unable to attend any mandatory training. Client is responsible for submitting documentation to show just cause as to why they were unable to attend. Acceptable reasons for not attending a mandatory training are: illness, Dr. appointment, court appearance, job interview, pre-scheduled appointment. Any other reasons must be communicated with case manager before classes and client must receive an exception from attendance by the case manager. When case manager receives a request from client to be exempt from a mandatory class, case manager must document the request in CRM and notify the client in writing of the decision. Case manager must case all requests with the director, director will also sign decision notification. Failure to attend a mandatory class will result in termination of education assistance and possible case closure.

Incentives – Incentives are available to clients attending approved education/training classes that have identified a need for assistance to financially attend classes in their ISP. Incentives are

not guaranteed and dependent upon funding each year. Clients will be paid on a bi-weekly basis for class attendance. Each fiscal year, the director will set the rate for full-time and part-time daily stipend amounts. Full-time is defined as over 4 hours per day. Part-time is defined as less than 4 hours per day. These amounts will be sent to each current client in writing and given to every new client upon intake. These amounts can be adjusted at any time by the director. If an adjustment is made during the fiscal year, notification will be sent to each client in writing.

Tuition, Fee's, and supplies – As to not duplicate services, our assistance is limited to short-term education/training needs that are not addressed by other programs. All other financial resourced for tuition, fees and supplies must be applied for and/or exhausted. All required supplies will be requested by the client on a supportive services form. These forms will be made available to the client by the case manager upon request. All requests must be accompanied by documentation to support the request. This documentation can be a supply list, letter from instructor, etc.

Time sheets - The case manager will supply the client with a time sheet form that is to be completed by the client and signed by the client and the instructor. It is the client's responsibility to get this time sheet signed and submitted to the case manager. All time sheets are due into the financial assistance office by 4:00 p.m. each Thursday. Late time sheets will result in stipend checks being delayed. Time sheets submitted on time will result in stipend checks being available for pick up the following week on Friday after 3:00 p.m. Timesheets may not be altered and must be complete including the dates, hours of training each day and totaled. Timesheet may be submitted by fax, email or in person.

Participation hours – clients who are receiving TANF or General Assistance benefits will be allowed to count training/education class time toward their participation hours and job searches. Case manager will inform TANF and GA clients of these opportunities. Clients utilizing these trainings/education classes for participation or job searches will not be paid a stipend.

Progress - The client must show progress in their education classes/training to continue to receive stipend and services. This progress can be shown by grades, improved testing scores or a statement from instructor on their progress. The case manager will monitor the client's progress through case management and assessments. The case manager will also be in communication with the instructor on client's progress. If case manager determines that progress is not being made, a letter will be sent to the client detailing the issue and setting a meeting to discuss. Case manager will meet with client to determine if there are barriers preventing the progress and if there is anything that can be done by our office to assist. Client will then be placed on an improvement plan. If client does not follow improvement plan their stipends and services will cease and could cause case to close for non-compliance.

Termination – The following are grounds for termination from education assistance:

- Violations of the attendance policy as defined by school
- Falsifying timesheets

- Intentionally misrepresents, conceals, or withholds a material fact for the purpose of establishing or maintaining eligibility.
- Failure to maintain passing grade
- Failure to make positive progress
- Failure to attend mandatory training class
- Failure to follow improvement plan

Clients will be notified in writing by the case manager of termination. Notification will detail the reason for termination and will include an appeal form. Client must follow Grievance and Appeals Procedure.

Clients that have been terminated are not eligible for Education Assistance or Employment Assistance for six (6) months beginning on date of termination.

Termination from education assistance does not prevent any client from continuing with TANF or General Assistance benefits.

Employment Assistance:

The financial Assistance Department will exercise tribal preference and veteran preference in conjunction with the need level of each client. Preference and priority will be exercised in the following order:

Osage and Veteran Preference priority method:

- Disabled Veteran Osage Member
- Veteran Osage Member
- Osage Member
- Disabled Veteran who is a parent/spouse of an Osage Member
- Veteran who is a parent/spouse of an Osage Member
- Parent/spouse of an Osage Member
- Disabled Veteran Native American
- Veteran Native American
- Native American

Clients may be placed on a waiting list due to high volume of applicants, limited opportunities, and limited funding.

The following are services that are available to clients who identified employment as a goal on their ISP.

- a.) **Employment Counseling:** All eligible participants will receive employment counseling/coaching. Staff will maintain current information regarding local labor markets and job opportunities. The Tulsa workforce center will be utilized to its full

potential to assist participants in obtaining employment. Staff will also utilize local employment service providers in the local area.

Case managers will work with each client to assess employment goals, barriers, and needs. Case manager will identify opportunities for each client based upon their level of qualifications, barriers, and needs. Case managers will notify clients, in writing, of upcoming opportunities offered by financial assistance as well as other entities such as Workforce Tulsa, Osage Nation Casino, job fairs, etc.

- b.) **Job Search Assistance:** All participants will receive job search assistance. Staff will utilize current job demand listings available to direct job ready participants to appropriate job openings and provide necessary supportive services if justified in the Case Plan.

Clients will have an opportunity to come to the financial assistance office and receive assistance from case manager on creating a resume, job searches, applying for jobs, etc. Clients must set an appointment for job search assistance. Case manager will ensure that access to a computer and the internet are available for the client and assist client with uploading resumes, job search sites, etc. Case managers will also notify clients of advertised job openings and job fairs. When available, transportation will be provided to clients to attend activities such as job fairs, recruiting activities, interviews, etc. All job seeking clients will also be enrolled in Tulsa Workforce in order to utilize their services and search engine.

- c.) **Career Development:** Work experience will be available to all eligible participants when justified in the ISP. All payroll services will be provided by the Osage Nation. Public, private, non-profit and Tribal employers will be utilized. Generally, this service will be utilized for short-term placements. Special projects are allowable but must be specific to the enhancement of career development of the participant. The amount of eligible hours to be worked under a special project will vary depending upon the project. This service is for those lacking work history, appropriate transferrable skills, little to no employment skills and those needing appropriate references. This service may be offered in conjunction with other services such as occupational training or Classroom Training. Specific details for each participant of Work Experience will be included in a standard agreement and job description.

This program will provide work experience at the Osage Nation in work-sites identified by the Employment & Training Coordinator. Training may not exceed 6 weeks cumulative or 240 hours (whichever is greater) and work-sites should provide full-time or part-time employment at the end of job training. Special projects are allowable but must be specific to the enhancement of career development of the participant. The amount of training hours will vary depending upon the project and can be extended with Director approval.

Departments within the Osage Nation must request in writing to the financial assistance department the need for work participation clients. The request must contain a job description, a supervisor responsible for training and development of the client, work schedule, and any other pertinent information. The work site must offer potential long-term career opportunities by having an advertised available position or a vacant position within two (2) months. If department is requesting work experience clients for a special project they must submit a detailed project summary, estimated time to complete project, job description, supervisor responsible for training and development of the client, work schedule, and any other pertinent information.

All requests will be sent to the Director of Financial Assistance department. Director will meet with case managers and support staff to determine if any current clients meet the requirements, skill level, and are job ready. If multiple clients meet the minimum requirements, Osage Nation preference will be utilized. If multiple clients have preference the following will be used by the staff to determine preference:

- Number of months on program (clients on program longer get preference)
- No previous work experience (first time clients receive preference)
- Clients receiving TANF or GA benefits
- Clients supporting children

Once a client has been identified and chosen by the financial assistance staff, a work-site agreement is signed by the department.

The Employment and Training coordinator will be responsible for the monitoring of the client and work site. Weekly visits will be made by the employment and training coordinator to the work site. All issues that arise at the work-site must be communicated by the supervisor to the employment and training coordinator. The employment and training coordinator will meet with the work site supervisor to discuss any issue that arise and develop a resolution plan. The employment and training coordinator must document all communication in the client's case notes in CRM.

If applicable to a specific work-site, client may have to submit to background checks, fingerprint checks, sex offender registry, and any other databases utilized by the Osage Nation for employees and/or volunteers. Any expenses incurred with these checks will be the responsibility of the Osage Nation Financial Assistance department.

Issues that arise due to client's abilities, conduct, attendance, etc. will be discussed with the client by the employment and training coordinator. An improvement plan

will be created and signed by the client and coordinator. This plan will become part of the clients file, incorporated into their ISP and documented in CRM by the employment and training coordinator. Failure to adhere to the improvement plan will result in termination from work experience.

A department can choose to not continue with a work experience client at any time. They must notify the employment and training coordinator in writing as to the end date and cause with as much detail as possible. This correspondence will be reviewed by the employment and training coordinator, uploaded into the CRM case file, and if applicable incorporated into the clients ISP.

Clients requesting a second work experience will not be eligible for the same work site. The purpose of work experience is for the client to gain valuable work experience and assist in building of their resume. They are eligible for work experience in another work-site that would give them other skills and help further their skill set.

- d.) **On the Job Training (OJT):** Paid on the job training will be a service provided to eligible participants if justified in the ISP. Work sites will be developed in the public, private and Tribal sectors. Employers will direct hire the participant for permanent employment and treat the participant as any other employee in the same or similar position. The employer will cover payroll and will be reimbursed for up to 75% of the starting hourly wage by the 477 Program. Supportive services may be provided to the participant to ensure successful employment and if justified in the ISP. Employers who abuse this service by purposely not maintaining the participant at the end of the training period will not be utilized again. Specific details of the OJT will be included in a standard agreement.
- e.) **Direct Job Placement (DP):** This service is available to eligible participants who have the opportunity to become employed soon after application for services. Once the job has been secured and verified, supportive services may be provided as necessary to ensure successful employment. Services will be justified in the ISP and further details regarding eligibility will be detailed in Policy.

Clients who have recently received an offer of employment, within the last thirty (30) days may apply for assistance to help secure that opportunity. The services must be consistent with the client's ISP. Client must provide an official employment offer with requirements for any and all services requested. Assistance for clothing must be submitted on a supportive service request form and be accompanied by either a dress code or written statement from employer detailing what is required. Transportation assistance can be requested on a supportive service request and must be accompanied by estimated cost of travel/commute. Transportation must have been listed as a barrier on the client's ISP. All supplies, tools, or necessary

items that the client must have to start employment can be requested on a supportive service request with documentation from the employer that it is required.

Relocation assistance is available to those clients that were unable to secure employment in their location of residence. Client must have been unemployed and job searching for at least three (3) months prior to receiving an employment opportunity. Case manager will verify job searches and document in case file in CRM. Location of new employment must be farther than fifty (50) miles from current residence or client must demonstrate that transportation barriers are too great to overcome and must be near public transportation or walking distance. Clients are only eligible for relocation assistance once (1) every three years with a maximum benefit amount of \$2,000. All other resources must be utilized prior to seeking relocation assistance. Case manager will verify all other resources and document in case file in CRM. Clients must submit official offer of employment with start date with any assistance request. Relocation assistance request must be submitted on a supportive service request form.

Time sheets – all work experience clients will be required to complete and sign time sheets every two weeks. The employment and training coordinator will verify time sheets for completeness and appropriate signatures. The employment and training coordinator will be responsible for submitting time sheets into accounting by Monday of the pay week before 10:00 a.m. Client's incentive earnings will be received on the same schedule as the Osage Nation pay schedule.

Termination – Participants may be terminated for the following reasons:

- Violation of the worksite attendance policy
- Not following confidentiality agreements
- Falsifying timesheets
- Insubordination
- Refusal of work site
- Failure to follow improvement plan
- Illegal drug use
- Intentionally misrepresents, conceals, or withholds a material fact for the purpose of establishing or maintaining eligibility.

Clients that have been terminated are not eligible for Education Assistance or Employment Assistance for six (6) months beginning on date of termination.

Youth Services:

The purpose of the youth service program is to provide supplemental employment and training and related services to eligible youth. Summer employment opportunities and other employment opportunities may be available throughout the school year.

The youth program will provide temporary job opportunities in work-sites identified by the Youth Coordinator. The number of weeks and number of slots available will be pre-determined by the director pending funding availability. This determination will factor in fiscal year funding level, supplemental appropriations, availability of work sites, and number previous year youth.

This program will work with youth age fifteen (15) to twenty (20) who need work experience and training. At least 85% of the participants in this activity must be economically disadvantaged. The remaining 15% of the participants may qualify if determined "At-Risk". The mission is to provide self-sufficiency skills to youth by offering services to include, but not limited to, the following:

- a.) Provide youth part-time and full-time work experience
- b.) Increase financial literacy knowledge
- c.) Setting long-term and short-term goals
- d.) Providing specialized workshops and training

Application – Clients applying for youth work experience must complete an application. This application will be made available on the Osage Nation Financial Assistance website. The youth coordinator will be available to assist any client with the application process. The youth coordinator will develop a plan and time table for the summer youth program. This time table will detail application dates, training dates, and program dates. At least six (6) weeks before the beginning of the summer youth program, flyers/announcements will be developed by the Youth Coordinator. These flyers/announcements will be distributed by the Osage Nation Communications Department to advertise for the program. These flyers/announcements will detail the dates for applicants to apply and start dates for the program.

Selection Process -

The financial Assistance Department will exercise tribal preference and veteran preference in conjunction with the need level of each client. Preference and priority will be exercised in the following order:

Osage and Veteran Preference priority method:

- Disabled Veteran Osage Member
- Veteran Osage Member
- Osage Member
- Disabled Veteran who is a parent/spouse of an Osage Member
- Veteran who is a parent/spouse of an Osage Member

- Parent/spouse of an Osage Member
- Disabled Veteran Native American
- Veteran Native American
- Native American

Clients may be placed on a waiting list due to high volume of applicants, limited opportunities, and limited funding.

Placement Procedure- Placement will be determined based upon available work-sites. As work-sites are identified the Employment & Training and/or Youth Coordinator will recommend participant placement based upon participant interest, current skill set, preference priority and availability of work sites.

Participants shall not be placed in work-sites with direct family members that have the authority to supervise the participant in any fashion.

Work-site supervisors will sign an agreement, provide a job description and be responsible for monitoring hours worked. Supervisors are required to mentor and equip the participant with job skills necessary in becoming successful employees.

Timesheets - all youth clients will be required to complete and sign a time sheet. The youth coordinator will be responsible for reviewing the client's time sheet and ensuring correct signatures are acquired. These time sheets will be supplied by the youth coordinator and will be signed by the work site supervisor, youth, and the youth coordinator. The youth coordinator will be responsible for submitting those time sheets to the accounting department on the Monday of the pay week before 10:00 a.m. Client's incentive earnings will be received on the same schedule as the Osage Nation pay schedule.

Trainings – All youth clients are required to complete training classes. These classes and schedules will be set by the youth coordinator and distributed in writing to each youth applicant. Training classes will be mandatory. These training may include the following:

- Financial literacy (budget preparation, introduction into banking services and managing bank accounts, etc.)
- Resume building
- Application building
- Cultural classes
- Etiquette and dressing for success
- Basic life skills classes

Compensation - Participants will be paid on a bi-weekly basis and may not exceed 40 hours per week. The hourly pay rate may not fall below the federal minimum wage rate and may exceed the Osage Nation minimum wage rate.

Evaluations – Youth participants will be given evaluations at the end of their work experience. These evaluations will be completed by their work site supervisor. These evaluations will be distributed and collected by the youth coordinator. The evaluations will be utilized to determine the level of bonus incentives each youth is eligible. The amounts of bonus incentives will be pre-determined by the director based upon available funding. Youth must successfully complete the entire work experience program including all trainings to be eligible for the bonus incentive. The youth coordinator will calculate all of the evaluations and distribute the bonus incentives to eligible youth along with a letter detailing their evaluation scores.

Termination – Participants may be terminated for the following reasons:

- Violation of the worksite attendance policy
- Not following confidentiality agreements
- Falsifying timesheets
- Insubordination
- Refusal of work site
- Failure to follow improvement plan
- Failure to attend mandatory training classes
- Illegal drug use
- Intentionally misrepresents, conceals, or withholds a material fact for the purpose of establishing or maintaining eligibility.

Clients that have been terminated are not eligible for Education Assistance or Employment Assistance for six (6) months beginning on date of termination.

Economic Development:

Economic development projects and initiatives will be determined on a case by case basis in collaboration with some or all of the following partners: Tri-county business development center, Osage Nation Executive branch and departments, Osage Nation LLC's, Pawhuska Chamber of Commerce, and any other organizations identified to benefit in the project or initiative. Up to 25% of the yearly amount budgeted to the Osage Nation 477 program will be used for economic development. Projects and initiatives will include, but not be limited to, the following activities: Business grants for expansion or start-up, small business loans for the purchase of equipment or capital expenses, purchase of equipment to be donated to business for expansion or start-up, training for personnel and/or management to benefit business. All businesses will be either tribally owned or Native American owned and agree to a commitment of utilizing the Osage Nation 477 program for staffing and the creation of new jobs for Native Americans. All projects and initiatives will be submitted to the Division of Workforce and Development office for prior approval before any funds are expended.

Other Related Services:

- a.) **Childcare:** Payments for childcare assistance will be available to participants that have identified childcare as a barrier in their ISP in order for them to fully participate in activities. Further eligibility criteria regarding eligibility, payment standards and childcare providers are included in our policy.

Clients needing assistance with childcare must have identified childcare as a need and/or barrier in their ISP. Client must submit verification to show that lack of childcare is preventing participation in the program, inability to attend trainings, or inability to accept work experience or employment. Case manager and client will meet to discuss the barrier and develop a plan to help remedy the childcare barrier. All other resources must be utilized including Osage Nation child care department services. Only if client does not qualify for child care assistance through either the Osage Nation or the Oklahoma Department of Human Services or if they are unable to utilize approved providers, they can submit a supportive service request for temporary child care expenses.

Case manager will supply client with a child care provider form for the provider to complete. The provider must fully complete the form and submit to background and Sex Offender Registration and Notification Act (SORNA) checks. All provider applications will be reviewed by the case manager and director. Director will be responsible for approving all providers. Client and provider will receive notification in writing of director's determination.

Case manager will provide time sheets to the approved provider to be completed bi-weekly. Timesheets will include provider name and address, child name, parent name, dates of service, and length of time child was in their care. Timesheets must be signed by provider, client, and case manager. Timesheets must be submitted with documentation by the client to verify activities during the time of services. Timesheets will be verified by the case manager. Timesheets must be submitted to the financial assistance office by 4:00 p.m. on Thursday to be processed and have check available the following Friday.

Case manager will continue to monitor the need for childcare assistance. Client must continue to search for alternate options such as other resources, other providers, etc. Assistance will be re-evaluated on a monthly basis by the case manager. Assistance is limited to three (3) consecutive months. Request for assistance after three (3) consecutive months can only be approved by the director with verified justification for the extension.

- b.) **Supportive Services:** Supportive Services are those services, which are needed to assist a participant in being successful in maintaining on-going compliance with their ISP. Services include, but are not limited to: clothing, tools/equipment, relocation assistance

for employment, transportation, fines, fees, etc. Support Services are not set entitlements and are based on the individual needs of each participant and justified in the ISP. No supportive services or payments will be paid unless the client/family is actively participating in approved work activities or other required activities as outlined in their ISP. Client/family must be in compliance with program requirements and not currently under a sanction. If under a sanction, supportive services are only available to assist the minor children and limited to vendor pay.

Supportive services are authorized on a Federal Fiscal Year cycle from October 1 to September 30. Supportive services are not guaranteed and are dependent upon current funding levels. Supportive service requests that are denied due to funding levels are not eligible to be appealed.

Supportive services are available to all clients who are currently in compliance with the program. Clients may submit requests for supportive services on a supportive request form made available by their case manager. All supportive request forms require documentation to verify the need and case managers can assist clients in filling out the form and collecting appropriate documentation. Clients must submit supportive service requests at least five (5) business days before requested items are needed. This allows sufficient time to review requests, make determination, and arrange for payment. Supportive request forms are submitted to the director by the case manager within two (2) business days of request. Director will review and make a determination of supportive service request within two (2) days. Director will return supportive request form to the case manager. Case manager will notify the client of the director's determination and arrange for delivery of request if approved.

Clients who are currently on sanction status are not eligible for supportive services, except for requests specific to the needs of a minor child. Those supportive service requests are only eligible for vendor pay.

Child only cases are only eligible for supportive services for the direct needs of a minor child. Supportive services cannot be utilized to meet the needs of the family unit such as rent, utilities, car repair, etc.

Supportive service request must support a goal on the client's ISP. Documentation must be submitted with the request to validate the need of the request and how it correlates to a goal on the ISP.

- c.) **Diverted Services:** This service is available to eligible participants who have been employed for a minimum of 45 calendar days and are at risk of losing their employment. Applicants must provide documentation of need and evidence how this service will assist them in retaining employment or prevent job loss. This service will not pay traffic fines, bills incurred prior to employment, or costs incurred from illegal activities. Further details regarding eligibility and available services are included in policy.

Clients applying for diverted service must be an approved client and complete all steps for eligibility. The need for diverted services must be identified in the clients ISP. Case manager will verify with the clients currently employer the current needs of the client to retain employment. Case manager will work with client to develop a plan to address the needs identified.

Plan and all requests will be uploaded into the clients file by the case manager.

Needs will be submitted on a supportive service request form and follow the supportive services policy. Case manager will follow up with client thirty (30) days after services were provided to document if services were able to assist in the client's ability to retain employment. The results will be noted in the case file by the case manager.

- d.) **Incentives:** All participants will be eligible for incentives based on achievements met on their case plan. Incentives can include but are not limited to: Wal-Mart gift cards, Visa gift cards, and gas cards. The Program may provide door prizes to events sponsored by the Program that meet program goals and client goals.

Incentives are authorized on a Federal Fiscal Year cycle from October 1 to September 30. Incentives are not guaranteed and are dependent upon current funding levels.

Clients who successfully close their case are eligible for incentives. Clients must have been an active client for at least three (3) months and completed at least four (4) goals on their ISP.

Case manager will fill out an incentive request form on behalf of the client. This form will be submitted to the director for approval. Director will make determination within five (5) days and submit back to the case manager.

If an incentive is given to a client, the client must sign that they received the incentive. This will be copied and placed in the client file and a copy sent to accounting by the case manager.

If incentives are proposed for an event, the case manager organizing a program event will submit a request in writing to the director. This request will detail the agenda of the event, place, date, time, and how the event supports program and/or client goals. This request will also include any incentives requested to distribute during the event. This request must be received by the director at least thirty (30) days before the scheduled event. The director will review and make a determination within five (5) business days.

Incentives given out during program sponsored events will be signed for by participants in the event. These signatures will be copied and submitted to accounting along with the agenda of the event and how it supports a program goal.

Priority of service will be given to Native American Veterans for all applicable services within this plan. Once all Native American Veterans have been served, if funding levels diminish/deplete or work experience spots become scarce, the approved Osage Nation preference policy will be followed.

Cash Assistance – Tribal TANF

The Osage Nation has operated the Tribal TANF Program since May 4, 1998, and the nation recognizes the responsibility of responding to the needs of low income families who reside within the service area. By implementing the Tribal TANF Program, the Nation assures the highest quality of governmental services. These services will help clients and aid their endeavor toward self-sufficiency and personal responsibility. The approach to providing welfare related services is the design and management of a program that will augment needy families' endeavors toward becoming independent, employed and productive citizens through cash assistance, supportive services, assessments, life skills and financial literacy training. The Tribal TANF Program funding, consistent with the needs of the qualified applicants, will be utilized to fulfill this approach.

Osage Nation assures the following as described in 45 CFR Part 286:

1. Provide assistance to needy families so that children may be cared for in their own homes or in the homes of relatives;
2. To end the dependence of needy parents on government benefits by promoting job preparation, work, and marriage;
3. To prevent and reduce the incidence of out-of-wedlock pregnancies and establish annual numerical goals for preventing and reducing the incidence of these pregnancies;
4. To encourage the formation and maintenance of two-parent families;
5. Assist recipients making the transition to employment;
6. Tribal TANF grantees also will be expected to meet work participation rates and other critical program requirements in order to avoid penalties and maintain their federal funding;
7. Client needs will be identified in the service area and populations;
8. Identify the causes of long-term underemployment and dependency, and work with families, communities, businesses, and other social service agencies in resolving employment barriers

Eligibility Requirements (specific to TANF Clients)

1. One adult and at least one dependent child
2. One caretaker relative and any number of dependent children with an eligible relationship to the caretaker relative
3. Two adults, married or living together as a couple, with any number of dependent children. A stepparent will be included in the assistance unit as a second parent

4. Minor head of household with a child must be emancipated and attending High School/GED or equivalent training program
5. A woman in the third trimester of pregnancy
6. Participant must be willing to pursue child support against absent parent(s) unless good cause exists

Good cause for non-cooperation exists when:

- The child was conceived as the result of rape or incest
- The child was a victim of child sexual abuse or severe emotional or physical abuse
- Cooperation is reasonably expected to result in serious emotional or physical harm to the dependent child or adult.
- Determination that continuing efforts to obtain support or establish parentage would be detrimental to the dependent child or adult.
- The program may determine good cause on a case by case basis.

All approved clients wanting to apply for cash assistance – TANF must also meet the requirements listed above. A TANF questionnaire must be completed by the client with assistance from the case manager. Case manager will review the additional questionnaire and verify all information and documentation submitted to support the additional requirements and income verification.

At least one member of the family unit must be Native American as evidenced by a membership card from a federally recognized tribe, a certificate of degree of Indian blood (CDIB) or other official acknowledgment of membership by a federally recognized tribe.

All children on a care taker application must be Native American as evidenced by a membership card from a federally recognized tribe, a certificate of degree of Indian blood (CDIB) or other official acknowledgment of membership by a federally recognized tribe.

Marriage Incentive

Keeping families together is one of the basic goals of TANF. Osage Nation promotes family preservation and uniting families.

To be eligible for the Marriage incentive, the clients must show proof that they were recently married by submitting an original marriage certificate from the state where they were married. They may spend this money any way they wish.

This incentive is available only once in a lifetime for any individual, unless the death of a spouse occurs. One of the recently married adults must be a current TANF recipient or a non-needy caretaker.

Marriage incentives are authorized on a Federal Fiscal Year cycle from October 1 to September 30. Incentives are not guaranteed and are dependent upon current funding levels. Current clients receiving

cash benefits – TANF may submit a request to their case manager for a marriage incentive. The request must contain documentation to verify that they were legally married.

Case manager will submit the request to the director within five (5) business days of receipt of the request. The director will have five (5) business days to make a determination and submit back to the case manager.

Clients are eligible for up to a \$1,000 marriage incentive. If approved by the director, the case manager will submit a payable request to accounting with the received documentation for processing. Case manager will notify the client in writing of the determination and place a copy in the clients file and in CRM.

Clients are only eligible for this incentive once (1) a lifetime. Only exception is if a death of a spouse had occurred and must be documented.

Educational Incentive

- Upon completion of a high school diploma or GED
- Per semester "A" Honor Roll certificate or a 4.0 average
- Per semester "B" Honor Roll certificate or a 3.0 average
- Perfect attendance for the entire school year to be paid at the end of the school year

Educational incentives are authorized on a Federal Fiscal Year cycle from October 1 to September 30. Incentives are not guaranteed and are dependent upon current funding levels.

Children receiving cash benefits are eligible for education incentives. Adults who have identified an educational goal on their ISP are eligible for education incentives.

Case manager will request grades from clients each semester/trimester dependent upon school program. Once received, the case manager will request an educational incentive on a supportive service request form to the Director with grades attached as supporting documentation.

Upon completion of a high school diploma or GED the client may receive an education incentive of \$300 payable to the client in form of check. Case manager will submit payable to the accounting department with director's approval and supporting documentation.

Clients receiving a 4.0 average or "A" Honor Roll are eligible for an education incentive of \$300 payable in a Wal-Mart shopping trip. Case manager will secure the Financial Assistance Wal-Mart credit card and accompany the client on a trip to Wal-Mart where the client is able to purchase up to \$300 worth of items. Some items are excluded such as cigarettes and/or smokeless tobacco products and accessories, alcohol, and firearms and/or ammunition. After purchase, case manager will have client, guardian if under 18, sign the receipt to show proof of receipt of the items. The receipt will be submitted to the

accounting department by the case manager and a copy placed in the client's file.

Clients receiving a 3.0 average or "B" Honor Roll are eligible for an education incentive of \$100 payable in a Wal-Mart shopping trip. Case manager will secure the Financial Assistance Wal-Mart credit card and accompany the client on a trip to Wal-Mart where the client is able to purchase up to \$100 worth of items. Some items are excluded such as cigarettes and/or smokeless tobacco products and accessories, alcohol, and firearms and/or ammunition. After purchase, case manager will have client, guardian if under 18, sign the receipt to show proof of receipt of the items. The receipt will be submitted to the accounting department by the case manager and a copy placed in the client's file.

Clients who have had perfect attendance for the entire school year are eligible for an education incentive of \$300 payable in a Wal-Mart shopping trip. Case manager will secure the Financial Assistance Wal-Mart credit card and accompany the client on a trip to Wal-Mart where the client is able to purchase up to \$100 worth of items. Some items are excluded such as cigarettes and/or smokeless tobacco products and accessories, alcohol, and firearms and/or ammunition. After purchase, case manager will have client, guardian if under 18, sign the receipt to show proof of receipt of the items. The receipt will be submitted to the accounting department by the case manager and a copy placed in the client's file.

Transitional Services

Clients who have succeeded in obtaining full-time employment will remain on the Program and eligible for transitional services. Clients will be required to show proof of employment and copies of their check stubs. At that time, the client's employment status and rate of pay will be evaluated to determine whether client's cash assistance will be reduced or ceased. Clients will be eligible for supportive services up to ninety (90) days, unless closed for non-compliance.

Once cash assistance has ceased, clients will be eligible for a work incentive of \$400 per month up to 3 months. The client must maintain full-time employment and provide employment income verification.

The overall goal for all clients is to become self-sufficient. For families who are receiving cash benefits it can be difficult to transition and sustain self-sufficiency even after securing full-time employment. Cash assistance families transitioning off the program due to employment will remain on the program for ninety (90) days after traditional cash benefits cease. Client's case must be in compliance and not currently sanctioned. During the ninety (90) days they will continue to receive all services eligible to active clients. In lieu of receiving the monthly cash benefit, they will receive a set amount of \$400 per month per family. In order to receive this transitional cash benefit they must submit to their case manager documentation to show that they have maintained full-time employment. This can be documented by submitting time sheets, check stubs, or notarized letter from employer.

Case manager will process a payable for the client's transitional cash benefit and submit to

director for approval with supporting documentation. Director will verify and sign payable within two (2) business days and return to case manager. Case manager will submit to accounting for processing. All copies of payables and checks are to be placed in the clients file and uploaded into CRM.

Work Activities and Participation Requirements

The Program will require a parent(s) receiving assistance to engage in approved "work activities" to strengthen the client's employment capabilities.

The minimum work requirement for a family that includes an adult in the assistance unit is 20 hours per week. In a two-parent family, both parents will be required to participate in the work activities and meet a minimum 30 hours per week. The minimum work participation rate for all families will be 40%. The minimum required hours per week must be attributed to work activities listed below:

1. Unsubsidized employment
2. Subsidized private sector employment
3. Subsidized public sector employment
4. Work experience
5. On-the-job training
6. Job search and job readiness
7. Community service programs
8. Vocational educational training
9. Job skills training directly related to employment
10. Education directly related to employment for individuals without a high school diploma or certificate of high school equivalency
11. Satisfactory attendance for individuals without a high school diploma or certificate of high school equivalency
12. Providing child care services to an individual who is participating in a community service program
13. Barrier removal (counseling, chemical dependency treatment)
14. Independent Life Skills Training
15. Post-Secondary Education
16. Volunteer Activities

17. Cultural Activities

18. Other as defined by Case Manager

Participation Allowance Incentive for families that meet the required weekly hours on the assigned work activities, may be eligible for a \$50 weekly incentive to be paid on a monthly basis.

During every client's initial orientation and assessment, the case manager will go over the participation time sheet, appropriate work activities, hours to be met, and deadline for submitting. Clients are also required to attend a monthly training on "How to complete and submit participation time sheets". Case manager will notify clients of this training in writing.

Clients who are required to participate will create a plan at the beginning of each month on how they are going to meet their participation hours. Case manager will assist the clients in developing this plan each month and help arrange for opportunities to gain participation hours.

Case manager is responsible for assigning a Work Participation Status code to each member in the TANF household in CRM. Please refer to "TANF Work Part Codes info" and "TANF CRM User Guide 1" for assistance in inputting the codes. These codes must be entered into CRM at same time as application information. Case manager is responsible for updating this code when/if a client's work participation status changes. Case manager is responsible for verifying the work participation status codes at the end of each month before running the Month End Process.

A client's participation should match the goals listed on their ISP. For example, if a client's main goal on the ISP is to gain full-time employment then at least 75% of their participation hours need to reflect activities 1 through 6 on the approved activities list. If a client's goal is to obtain their GED and improve their skill set, then 75% of their participation hours need to reflect activities 8 through 11. The remaining hours can be made up by other approved activities.

Restrictions:

- Activities that benefit any Osage Nation employee personally is prohibited
- Activities for direct family members is prohibited
- Volunteer activities must be performed at an established not-for profit organization and are limited to only 5 hours per week

The client is responsible for providing documentation to support all participation hours. This can be done by submitting job application notifications, having instructor of classes sign off on time sheet, have pastor or other official at nonprofit entity sign time sheet, or by time sheet if working in unsubsidized or subsidized employment.

The case manager is responsible for verifying all participation time sheet. Case manager will ensure that all activities listed are in compliance with the approved 477 plan and policy and that client has submitted appropriate documentation. Case manager will then create a payable in CRM for each week that the client successfully met their participation hours. Once case manager has verified and signed participation time sheet

and created corresponding payable, then they will submit to the director for approval. Director has final approval.

Work Activity Exemptions

Families exempt from the requirement to participate in work activities include only the following categories:

1. Child-only TANF cases (Non-needy caretaker cases)
2. Families in which all caretaker relatives have been determined to be physically or mentally unable to perform gainful activity, and verified by a medical professional
3. Persons over age 55
4. A person responsible for the care of an elderly person or a disabled dependent, as defined in Americans with Disabilities Act
5. Persons whose individual circumstances determined by the Case Manager and the Director, may be exempt due to extraordinary situations
6. Mothers six weeks after birth of child
7. Pregnant women in their last trimester (physician verified high risk pregnancy)

Clients who are unable to participate in approved activities must meet one of the seven (7) exemptions listed above. It is the client's responsibility to provide documentation to support any exemption. Number 1, and 3 will be documented by the case worker and noted in the case file, and in CRM as exempt.

Medical documentation will only be accepted if signed by a licensed physician. Medical documentation must directly show the inability of the client to perform any type of work if exempting for number 2.

Pregnancy documentation will be accepted by OBGYN or women's clinic. It must document the trimester of pregnancy.

Exemption due to extraordinary situations must be documented by the case manager and submitted to the director. Director will review all documentation and ensure that both case manager and client have taken all steps necessary to remedy any barriers for the client to be eligible for work activities. Director may only approve this exemption for no more than two (2) months. After two months, case manager and director must staff the case and see if client is still experiencing the same situation and requires and extension. Director must approve any and all extensions and document in the case file.

Client will be notified of the director's decision to exempt based on extraordinary situations in writing within ten (10) business days of the request.

Good Cause for non-compliance

An individual will be excused from a sanction if the non-compliance resulted from one of these reasons and the Case Manager is notified and agrees:

1. Unavailable childcare: The parent or caretaker relative in a one-parent family cannot find appropriate and available childcare for a child living in their home under six years of age.

The Case Manager will verify through Osage Nation Child Care and the State the following:

- a) Appropriate Child Care; State or Tribally Certified, within a reasonable distance from the home or worksite is unavailable. Reasonable distance is determined by the Case Manager and whether or not transportation is available
 - b) Informal Child Care by relative or other arrangements is unavailable or unsuitable. "unsuitability of informal care" is defined as a relative household that does not meet minimum health and safety standards according to Osage Nation Child Care
 - c) Appropriate and affordable formal Child Care arrangements are unavailable. This will be determined case by case by the assigned Case Manager and will include the following factors: Debt to income ratio
2. Domestic Violence - Meeting the requirement interferes with the participant's attempt, or an attempt by a member of the participant's immediate family, to escape domestic violence or its escalation
 3. Age - the limited strength and stamina of a participant over age 55 prevents them from meeting the requirement
 4. Crisis - a sudden and temporary situation beyond the family's control occurs, and it affects the health of a family illness, death, or a tragedy of nature. The illness must be verified by a doctor's statement
 5. Court - the participant must appear in court or serve on a jury
 6. Transportation - necessary transportation breaks down or becomes unavailable, and the participant lacks a reasonable alternative
 7. Bad Weather - weather conditions prohibit travel
 8. Hazard - the work is more hazardous to the individual than to the average worker employed in a similar job
 9. New Baby - a single parent with a child under one or a woman with a high-risk pregnancy (must provide physicians note)

It is the client's responsibility to notify the case manager if they are experiencing any issues meeting their required participation hours. It is the client's responsibility at the first of the month when developing the participation plan to notify the case manager of any upcoming issues that might affect their ability to meet all of their hours.

Case manager will work with client to provide alternate opportunities or solutions to assist in meeting participation hours. For example: if transportation becomes an issue after plan has been established, the case manager will remedy by either providing transportation or offering alternate activities. If the current work experience or employment becomes a hazard, the case manager will either work with employer to modify the job duties or provide alternate activities.

Case manager and client must develop a new participation plan if alternate opportunities need to be made available or if client feels they are unable to meet any activities currently listed on their plan. The reasons, documentation, and revised plan will be noted in the case file by the case manager and cased with the Director.

Reporting Requirements

Each household is required to submit on a month basis, a Monthly Eligibility Report (MER) that reflects any changes to the assistance unit such as, but not limited to:

- a) Family Size
- b) Earned and unearned income
- c) Address change

The Monthly Eligibility Report (MER) is due on the last business day of each month. Participants who fail to submit the required MER, will not receive a payment, until one is received. Failure to meet deadline will result in a case sanction.

It is the client's responsibility to ensure that any changes are reported to the case manager immediately. No less than monthly, clients are required to submit a MER to their case manager by the last day of the month. Case managers will provide the MER form to all clients either in person or by mail. It is the client's responsibility to ensure that they have the MER form in ample time to complete and submit by the last day of the month. If the last day of the month falls on a Saturday, Sunday, or Holiday, the MER must be received the prior day.

Any MER that is received after the deadline will result in payment being delayed and client will be placed on a sanction. If client is already on a sanction level, they will advance to the next sanction level.

Case manager will date stamp the MER to verify it was received by the deadline and be responsible for verifying information submitted.

Case manager is responsible for entering MERs into the CRM system. When case manager receives MER and participation time sheet, case manager must follow the Month End process. Please refer to user guide "TANF Month End Process User Guide" and "TANF Month End Process Review" both located in ONTIS.

TANF Limits – 48 months

Applicants (including children) who have recently arrived in our TANF program service area and who are receiving assistance from another TANF program shall be eligible for TANF in Osage Nation TANF program when they satisfy the residency requirement and are otherwise eligible. However, TANF benefits cannot be authorized until eligibility in the other TANF program is terminated. Verification of end of eligibility is required. Clients are required to sign a Fraud Statement stating they are not receiving duplicate services.

At no point will a person be eligible for benefits from more than one Tribal or State TANF program. If a person has received benefits for a specific month through another program, they will not be eligible for benefits from Osage Nation TANF until the first day of the next month. “First day, first pay” logic applies.

The time limit is the foundation of welfare reform, re-creating welfare as a temporary program focused on employment and self-sufficiency. The nature of the TANF program makes it vital for adults to find paid employment as soon as possible, so that income from work and other sources, such as child support, may replace TANF benefits.

Families living in the Osage Nation service area will not be exempt from the time limit (unless at a future time a specified portion of the service area has more than a 50% increase over the local adult population unemployment rate). At that time the families living in that area may be exempt from the 60-month time limit. A family new to the Osage Nation TANF program will carry with them the prior countable months from any other program that is funded by the Temporary Assistance for Needy Families (TANF) block grant.

The 48-month assistance limit applies only to families that include an adult in the assistance unit.

Effective Month of Assistance

1. A month in which a family is eligible and is issued a TANF payment of any amount is considered to be a month of assistance, with two exceptions:
2. A month in which a family receives only childcare, other supportive services, and/or extended case management from TANF is not considered a month of assistance.
3. Transitional services are not considered to be assistance for the purposes of the 48-month limit.

Each adult in the mandatory filing unit is considered to have received assistance in the month that a family receives a payment.

Calculation of Months

The TANF program tracks the number of months of TANF received by an adult. The following rules are applied in calculating the number of months. The “48-month” time limit may be waived on a case by case basis.

Months That Count

1. Prorated months – a month, in which any amount of TANF payment is received, regardless of the number of days the payment covers, is a countable month.
2. The pregnant woman is in her third trimester.
3. The single parent is unable to participate in work activity due to lack of available and appropriate childcare for a child under the age of six.

Months that DO NOT count

1. Minor children – a month in which an individual receives TANF as a minor child is not counted.
2. Suspended TANF case – a month in the TANF case is suspended and no cash assistance is paid.
3. Ineligible overpaid case – a month in which a family received a TANF payment but the family was later determined to be ineligible and is under direction to repay the entire benefit.

Exemptions from the “48-month” time limit

When a family has received a total of 48 countable months of assistance from Osage Nation TANF program, eligibility ends unless the family receives an exemption from the “48-month” limit.

Maximum number of exemptions allowed

A maximum of 20% of the TANF caseload, with one or more adults in the assistance unit, may be exempted from the 48-month limit and continue to receive TANF.

Determining Exemptions Process

Families reaching the limit will receive a notice after their 42 month of countable assistance advising them that benefits will end after the 48 month unless they apply for and are granted an exemption.

Exemptions will be granted on a case-by-case basis after examining the family’s circumstances. Families will not be guaranteed an exemption simply because they claim one of the exemption reasons listed in this section. Exemption determinations will include a review of the program’s capacity to exempt the family without exceeding the 20% limit.

Exemption Criteria

Only families that meet one of the following criteria will be considered for exemptions:

1. Domestic Violence
2. Incapacity
3. Caring for a Disabled Child
4. Hardship
5. Parent caring for the other incapacitated parent

Families exempted from the 48-month limit will continue to be eligible for assistance. It is in the family's best interest to continue to work toward self-sufficiency. Only on a case by case basis will a family be exempt from working toward self-sufficiency. Even families with circumstances compelling enough to receive an exemption from the 48-month limit will need some means of support when they eventually lose eligibility for TANF due to the age of the youngest child or other reasons not related to the 48-month time limit.

Case manager will inquire about all previous benefit months from client during initial orientation. It is the case manager's responsibility to contact all other TANF entities that the client may have been served by to verify any benefits months received. The case manager will request from Osage Nation Accounting Department any and all details regarding any previous assistance received by the client from the TANF program.

Case manager will check to see if any of the months do not count as describes in the plan under "months that DO NOT count". If any of these situation arise, case manager will document and deduct those months from the client's total. Case manager is responsible for entering the total number of TANF months received into the CRM system. Please refer to "TANF Award Months" in ONTIS for detailed instructions inputting into CRM. Case manager is responsible for monitoring the total number of TANF months and notifying clients when they reach month 42. This notification will be sent to the client in writing by the case manager and will include the process for requesting an exemption.

Clients who have reached 42 months of TANF assistance or more, can request an exemption from the Director. This request must be submitting in writing to the Director and contain any and all supporting documentation. Families will not be guaranteed an exemption simple because they claim on of the exemption reasons listed in the approved plan. Many factors will be used to include but not limited to: age of children in case, number of sanctions, number of goals met, length of time between services, ability to show successes in ISP, etc. Director will review request and make a determination within ten (10) business days. This determination will be communicated to the client in writing. Requests denied due to exceeding the 20% limit are not eligible for appeals.

Penalties and Sanctions

The client must continue to cooperate and comply with all program requirements and with all components of the ISP. Non-compliance will result in sanction being imposed, which will result in a reduction in the monthly cash assistance. The client will not be eligible for supportive services until the sanction has been lifted, and the client has regained a good standing with the program.

Sanction Provisions

First non-compliance month – Cash assistance payment will be reduced by 25%. When the sanction is imposed the client will receive written notification stating the reason for the sanction and the corrective action that must be taken to end the sanction.

Second non-compliance month – Cash assistance payment will be reduced by 50%. The case will be on “vendor pay” status until the sanction is removed. When the sanction is imposed the client will receive written notification stating the reason for the sanction and the corrective action that must be taken to end the sanction.

Third non-compliance month –The case will be closed. The client is eligible to re-apply ninety (90) days after closure date.

If a client voluntarily closes the case while in a sanctioned status and re-applies within six (6) months, the client returns at the prior sanction level.

All clients when sanctioned at the first level are required to meet with assigned Case Manager.

Resolved sanctions will restore the grant to normal status the following benefit month.

Preconditions

Penalties imposed by other County/State TANF programs will transfer to our TANF program.

Changes in household composition

Sanctions are assessed against families. When a sanctioned individual leaves or enters an assistance unit, the sanction follows them and stays with them until the sanction is lifted.

If the individual who leaves one assistance unit enters another assistance unit that is in compliance, the sanction does not follow. However, the individual may not be included in the assistance until they have demonstrated compliance for one month. The income of the individual is considered for grant calculation of the new unit.

Financial Assistance Department will comply with 45 CFR 261.14 in regards to penalties and sanctions. Clients will receive a sanction for non-compliance. Non-compliance can be achieved by the following:

- Not submitting MER's, participation time sheets, and/or job searches by the deadline
- Failure to attend a mandatory class/training/meeting/appointment
- Failure to recertify
- Failure to meet the required number of participation hours (all must be verified)
- Failure to meet the required number of job searches (all must be verified)
- Failure to meet goals/tasks outlined in the ISP
- Failure to remain compliant with other Osage Nation programs that are directly related to the client's ISP – For example, if required to complete a full drug and alcohol assessment with TASC or failure to attend counseling sessions.

Any client who is on a sanction level when their case is closed will return at the same sanction level if they reapply in the future. Client is responsible for disclosing any previous sanctions imposed by any TANF program. Case manager is responsible for verifying the last TANF month the client received assistance and if there were any sanctions in place.

Any sanctions imposed by other TANF agencies will be enforced on client upon entry into the program. Client is responsible for disclosing any previous sanctions imposed by any TANF program. Case manager is responsible for verifying the last TANF month the client received assistance and if there were any sanctions in place.

Only exception is if a client on a sanction with the Osage Nation 477 program voluntarily closes their case and does not re-apply for seven (7) months.

Case manager will present any case in danger of being sanctioned during the bi-weekend case staffing. All efforts will be made to ensure client has all resources to avoid sanction. Case manager will note the staffing of the case and any resources provided in the case notes. Case manager imposing a sanction onto a client will notify the client in writing of the sanction, reason for the sanction, what the sanction entails and appointment time for client to meet with case worker regarding sanction. All clients who receive a sanction are required to meet with the case worker to discuss sanction, update ISP, and develop a corrective action plan.

All clients will start at the first sanction level unless they are a returning client who left on a sanction level. In those cases, the client will advance to the next sanction level.

Income

Determining whether financial need exists, involves two separate but related processes as follows:

1. Determine if an applying TANF family assistance unit has non-exempt resources that do not exceed the \$3,000 resource limit.
2. Determine if the family has a net monthly income that does not exceed Osage Nation TANF Income Standard appropriate to their TANF family size and type.

If these determinations show the TANF unit is eligible and meets all other eligibility factors, the assistance unit is then eligible to receive TANF benefits. A separate computation is done to determine the amount of payment.

It is the client's responsibility to ensure that they have disclosed any and all resources and income sources. The case manager will determine which, if any, are countable in compliance with approved 477 plan. Case manager will enter all forms of countable income into the clients CRM case for calculations to determine if family is eligible for TANF cash benefits. Please reference "TANF CRM User Guide 1" located in ONTIS for instruction on entering into CRM.

Resource Limits

A family or child will not be eligible for TANF if they have non-exempt resources in excess of \$3,000. 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 \$3,000 limit to determine if eligibility exists. In all situations the applicant/client is responsible for providing the required documentation to determine if a resource is exempt. Failure to

provide the required documentation will result in the resource not being exempt. The \$3,000 resource limit can be reached by any combination of the following types of resources:

1. Cash on hand or deposited into bank accounts.
2. The equity value of countable motor vehicles, mobile homes, trailers, boats, ATV, etc.
3. Countable non-cash personal property such as cash or loan value of insurance, value of stocks and bonds, etc.
4. Luxury items, personal or household, such as coin collections or fine art.

Availability

1. Monthly Income

Initially, all the incomes of the applying household must be considered, regardless of their sources or types.

Availability is measured first in terms of the dependent children, secondly in terms of the parent. Availability may be actual or assumed. Conditions of assumed availability are:

Any money (except for TANF or SSI Income) received by a natural, step-parent or adoptive parent who resides with his/her TANF child- or children assumed to be totally available to the applying children.

These are assumed to be available for the family unless otherwise exempt:

1. Money received by a legally married person is assumed to be totally available to the person's spouse if the couple is living together.
2. Earned or unearned income of a legally married step-parent is assumed to be available to meet the needs of the spouse and step-child (ren) if they reside with the applying household.

Total Net Monthly Income

Total net monthly income means the total of the net monthly earned and unearned incomes of all adults in the assistance unit and all unearned income of all children in the assistance unit.

Garnishments and Recoupments

Garnishments are funds withheld from an income source due to an outstanding debt a person is legally obligated to pay. Garnishments are counted when determining the gross countable income from any source.

Recoupments are funds withheld from a benefit program voluntarily or involuntarily, and are used to repay a prior overpayment from that benefit program. The countable income amount from any benefit source is reduced by the amount withheld for recoupments.

The amount and reason for withholding of funds from any source must be verified in order to determine if the funds were withheld due to a garnishment or recoupments.

Non-custodial Child Support Payments

Child support payments paid by TANF clients who are non-custodial parents in the assistance unit for children living outside of the unit will not be excluded from the net income.

Verification of Income

All income that is determined to be available to any member of the TANF assistance unit must be verified. Verification obtained must be documented in the case file. Specific problems in verifying various kinds of income are discussed in the sections on each kind of income.

Case manager is responsible for verifying all income and making the determination if it is countable. Clients are responsible for disclosing all income received from ALL household members.

Income Period

TANF eligibility is determined on a calendar month basis. If a person is eligible for one day of a calendar month, they are eligible for the entire month (first day of the month eligible, pay for the month). In determining if income eligibility exists, the previous calendar month period is used to determine what income may be available to the applicant/recipient. All income that is received is considered to be available.

Circumstances for anticipating Income

In many situations, the Case Manager can determine eligibility and/or payment by simply adding up the amounts of separate incomes actually received in the past calendar month by all the members of the TANF assistance unit.

The actual income for the first month of eligibility will be used to determine the benefit for the first month. The first benefit month may be prorated based on the eligibility date.

To determine the second month and all subsequent months the prior month's actual net income is used to determine the benefit amount.

If a TANF client becomes employed the case will remain active until the income exceeds the allowable income for the type and size of family.

Income Types

While there are many sources of income, all income is separated into two types for TANF purposes: earned and unearned.

It is important to determine if income is either earned or unearned for certain deductions are permitted to net amounts of earned income which are not allowed to unearned income.

When an applicant reports income of a type that is not clearly either earned or unearned, the case manager must examine the degree of activity the applicant invests or expends in order to generate or receive the income. If no direct, personal effort or activity is required, the income is unearned.

Earned Income

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

Earned income for self-employed people defined:

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

Jury Duty Payments and Witness Fees

Jury duty payments and witness fees count as earned income in the month of receipt. Any portion of a jury duty payment or witness fee that is designated as per diem or as a reimbursement for such items as food, lodging, parking, or transportation is disregarded.

Contractual Income

Individuals who are employed under a contract and are not paid for their contractual work on at least a monthly basis will have their earnings count in the month received. However, any draws or wages received in advance of the contractual earnings are treated as earned income in the month received.

Subsidized Work/Training Programs

Participants in other Workforce Innovation and Opportunity Act (WIOA) programs may receive periodic income from participation in a WIOA program. This income may be earned or unearned.

1. Unearned WIOA Income

All unearned WIOA payments (supportive services) are exempt and do not count in the eligibility determination or payment computation.

2. Earned Income

Income earned from participation in the Youth Employment and Training Program by children in the assistance unit is disregarded.

Earned WIOA payments count as income in the payment computation if the WIOA participant is a minor head of household/parent or adult parent in the assistance unit.

Dependent Child Earned Income

Exempt the earned income of a TANF dependent child.

Self-employment Earnings

Self-employment endeavors vary depending upon the nature of each self-employment enterprise. Exact instructions fitting every situation are impossible to provide. Therefore, TANF staff must use “prudent person judgment” in determining all factors related to budgeting self-employment income and must carefully and thoroughly document relevant information.

Relevant information includes the type of verification used to determine adjusted gross self-employment income and allowable costs of doing business (noting expenses which are not allowed).

Monthly Earned Income Calculation

1. Add verified gross income from each pay period, and
2. Divide the total by the number of pay periods considered, and
3. Divide gross monthly income by 4.3 for weekly amounts, by 2.15 for bi-weekly amounts, by 2 for semi-monthly amounts and by 1 for monthly amounts, and

Unearned Income

Unearned income includes, but is not limited to, all income that is not considered earned income. It includes:

1. Retirement benefits, social security benefits, and Veterans pensions,
2. Dividends and interest,
3. Unemployment compensation,
4. Direct child support,
5. Royalties,
6. Per capita payments, revenue sharing, casino bonuses, etc.,
7. Contest or lottery prizes and bingo winnings,
8. Payments from any type of cash assistance program,
9. Deposits into joint accounts, owned by a TANF applicant, or recipient adult or child and another person inside or outside the economic unit, or direct cash gifts by someone who is not in the economic unit.

Child Support Income

Child support payments are considered as unearned income and are counted at 50% against the monthly benefit until an established pattern of payment is achieved, which is 6 months of consistent payments. Once six (6) months of consistence child support payments have been received then those payments will be counted dollar for dollar against the monthly benefit. If multiple children are in the TANF economic unit then child support is tied directly to each child for which the support was received. If child support is only being received for one child and other children remain in the TANF economic unit, then that child may be removed from the grant as to not diminish support for the other minor children.

In-kind Income

Any income which is paid "in-kind" rather than in cash to any member of the TANF economic unit is not counted in determining eligibility or payment except as noted below:

1. The Case Manager must verify that contributions are made in such a way that actual cash does not pass through the hands of any member of the TANF economic unit.
2. Any cash contribution made directly to any member of a TANF economic unit is considered as income.
3. In-kind earned income received as full or partial compensation for services rendered such a rent reduction in exchange for managing apartments or "working off" a store bill, will be counted as earned income. Verification of circumstances and dollar value must be obtained.

Educational Assistance

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

Money payments that fit this category are usually made at the beginning of the fall and spring school semesters. They are usually made under the Basic Education Opportunity Grant (BEOG), Supplemental Education Opportunity Grant (SEOG), or the State Student Incentive Grant Program (SIG).

Educational Grants and Awards

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

This computation is done as follows:

1. Total all educational grants, scholarships, fellowships, veterans' educational benefits, etc. Do not add any other type of earned or unearned income unless it is received specifically because of the student's status and must be used to pay tuition and fees.
2. Subtract from the above total that portion of any grant or scholarship used to pay tuition and fees at any institution of education (including correspondence schools, vocational schools, and schools for the handicapped).
3. Subtract the actual amount paid for books, school supplies, and any special clothing, or tools, or other items that are considered normal to the clients' course of study. Transportation expenses, if public transportation is not available.
4. Subtract actual expenses paid and reasonably anticipated to be paid for childcare necessary to attend school,
5. The remaining amount of the grant or scholarship is considered available income in the countable month of receipt. Any amount retained in subsequent months is considered an available resource.

These deductions from grants and scholarships are also given to anyone outside an assistance unit whose income is used to determine TANF eligibility and payment amount. Verification of source, amount, duration and deductible expenses is required.

Gifts

\$100 DISREGARD FOR GIFTS

This program will allow for the disregard of unearned income in the form of small cash gifts, not to exceed a total of \$100 per person per month.

For purposes of this disregard, the term "gift" includes cash presents normally given on occasions such as birthdays, graduation, or Christmas, or cash which is not a bona fide loan (i.e., a "loan" for which the lender and the person receiving the loan express no expectations of repayment). Gifts must not be reoccurring on a regular basis. The Case Manager must use prudent judgment to determine if the gift is a regular payment given to a TANF family to assist with household needs versus a bona fide gift.

Exclusion

The \$100 disregard limit applies to each person whose needs are included in the grant and to each person whose needs are excluded but whose income is defined as available to the assistance unit.

Gifts Exceeding \$100

The \$100 disregard is given to any single gift that does not exceed \$100. If a single gift exceeds \$100, the total dollar amount over \$100 counts as unearned income.

Gifts pertaining to Child Support

In cases where the absent parent (or alleged father/mother) occasionally sends money to the child(ren) or the parent/caretaker relative, it may be difficult to tell whether these payments are gifts, which may be disregarded under this section or direct child support. If either one of the parents involved states that a particular payment is for support of the child, the payment must be treated as direct child support and must be directed to the appropriate child support enforcement agency.

Documentation

Casual and inconsequential income disregards should be documented in the case file.

Trust Fund Income

Payments made to Native Americans for natural resources, i.e. Headright, are not counted as income in determining eligibility or payment amount for applicants and recipients.

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

Per Capita Payments / Tribal Distribution payments

Per capita payments or tribal distribution payments made to enrolled members of a particular tribe with revenue generated from gaming or tribally owned economic enterprises, are considered unearned income and NOT excluded from income calculations or payment amount.

SSI Recipients (Supplemental Security Income)

The policies in this section apply to adult applicants and recipients.

1. Separate Economic Units

All income of an adult who is receiving SSI and (Social Security Disability) SSDI and who is living in a TANF household and is a member of the TANF economic unit will be disregarded in determining eligibility and payment amounts of applicants and recipients.

SSI and TANF persons living together will be treated as completely separate economic units, regardless of the legal or family relationships between them. No person may receive SSI and TANF benefits in the same calendar month. Any person who is on SSI or SSDI will not be part of the TANF grant.

2. Potential SSI Eligibility

Any TANF applicant who resides with an adult or child who has potential eligibility for the SSI program should be referred to SSI to make application(s) if it would be to the household's financial advantage.

The Case Manager must be determining TANF eligibility under normal procedures.

3. Client Responsibility

The TANF recipient or applicant is required to notify Osage Nation TANF within 10 days after a member of the economic unit or assistance unit begins receiving SSI benefits. Application for SSI benefits is not a condition of TANF eligibility. If any of the persons in a TANF household appear to have SSI eligibility, they should be informed of their potential eligibility.

Separating Income from Resources

Unless specified as a resource in policy, any monies received in a calendar month are considered to be income in the month of receipt. If any of that same money remains available to the client in the next month, it is considered to be a resource.

Except in specific situations listed in policy, any cash payment can only be considered as income for one month. When it is counted as income depends on the day the client actually receives it. For an employee's income, it does not matter when a paycheck was earned, only when it was received.

Income of excluded children

1. Child's Income

The earned or unearned income of any child who is not a part of the TANF economic unit is not counted in determining initial or continuing eligibility or in calculating the grant amount.

It is not necessary to verify earned income sources or amounts belonging to such a child. However, it may be necessary to verify that the amounts of certain types of unearned income the applicant claims belong to the child who is not included are accurate and do in fact belong specifically to that child. This will be particularly necessary in cases of child support payments and social security payments.

2. Child Support Payments

If the child is not included in the assistance unit, the amount of court-ordered child support, which the court has ordered for that child, is not counted unless the child is not in the home. If the child is not in the home and the parent in the TANF unit is still receiving child support for the child the income is counted. Verification is available in the court order. If the court only specifies a total amount, the Case Manager must divide the amount actually received by the number of children for whom support was ordered to determine what amount to disregard for each child who is not included in the economic unit.

3. Social Security Payments

Particularly in situations involving a deceased parent, the remaining parent (or other caretaker relative) may be receiving a single SSA check each month, even though that check includes separate amounts of benefits for him/her and for each of his SSA-eligible children. The Case Manager must verify the amount of SSA paid to the survivor as payee for any child who is not included in the assistance unit.

Payment Calculation

For eligibility, the amount of the TANF payment is calculated using the current month's income for the first month. The payment is calculated retrospectively using the previous month's income for each month thereafter.

Case manager will follow all steps listed in the approved 477 plan to determine what is countable income for the initial eligibility and first payment. Case manager is responsible for entering this information into the CRM case file, CRM will auto calculate the first payment utilizing the information entered by the case manager, the date of approval, number of days in the month, and family size.

Each month following the initial month, case manager will review the clients MER and document any income or resources reported. Case manager will then update the CRM client file to include any income or resources for the previous month. Case manager will utilize the method listed in the approved 477 plan "Calculating the Payment Amount" when clients have reported income. CRM will utilize the data entered to calculate the monthly benefit. Case manager will then deduct any reductions due to sanctions.

Disregards and Work Incentive Deductions

Individuals who are working may be eligible to receive work incentive deductions.

The earned income deduction disregards a portion of net earnings.

STANDARD PAYMENT TABLE

Grant including Adult(s)

Family Size	1	2	3	4	5	6	7	8	9
Grant Amount	\$240	\$300	\$388	\$481	\$561	\$642	\$723	\$794	\$865

Grant including Child Only/Caretaker

Family Size	1	2	3	4	5	6	7	8	9
Grant Amount	\$116	\$227	\$320	\$413	\$496	\$583	\$635	\$729	\$798

These number reflect the COLA increases up to 2018. These amounts will reflect the COLA increase for 2019 when they become available. These figures were derived from the Social Security Administration. A table with each year's increase is provided in the attachments

Adults who have earned income are entitled to disregard up to the standard deduction of \$225 and multiplied by 75% of the adjusted or remaining earned income. The remaining earned income is then reduced dollar for dollar. *For example:*

Earned Income	\$505
Standard Deduction	\$225
Remainder	\$280
Multiplied	75%

Amount used towards their grant as countable income is \$210.

Calculating the Payment Amount - Example

Total Earned Income Less Standard Deduction = Countable Income

Grant Amount from Table for a family size 6	\$642
Less Countable Income	(-\$210)
Less Unearned Income	(-\$50)
Less Sanction	(-\$161)
Less Over payment	(-\$25)
Plus Underpayment	\$0
Equals Amount to be paid	\$196

Minimum Payment

When the Case Manager determines that the client will be eligible for a grant payment of less than \$10 the client will not be issued a benefit for that month and shall be notified. A month where payment is not issued does not count towards the 48-month time limit.

Case manager will notify client in writing if the payment was less than \$10 and explain that they will not be receiving a check and that it will not be counted against their total TANF months. This notification will be placed in the clients file.

Corrective Payments

Corrective underpayments of less than \$10 must be made, if the total TANF entitlement for the payment month is at least \$10.00.

See section on Underpayment Corrections on Page 55 for details.

Maximum Payment Levels

TANF grants may be increased each year by a percentage amount equal to the Social Security Cost of Living Allowance (COLA) annual increase based on funds availability.

Beginning of each fiscal year, the Director will issue a new standard payment table based on increases issued by the Social Security department. The project specialist is responsible for updating this information into CRM for payment calculations. The Case manager will notify each applicant in writing of new payment standard and when their payments will be increased.

Payee Information

In most TANF cases, payments will be made to the parent/caretaker relative with whom the eligible children are living, even though the parent/caretaker relative may not be included in the assistance unit. However, there are certain exceptions:

1. If the parent/caretaker relative wants some other person at another address to receive, but not be able to access, monthly TANF benefits, the case manager may establish an "in care of" mailing address. This can only be done at the written request of the client, and the client's reason for making the request should be identified and documented in the case file.
2. An applicant or recipient can ask the case manager to allow a second person to be able to receive and access the TANF benefits (also known as alternate or sub-payees). This can be done if the recipient makes a written request, and the recipient signs the request. The case manager has the right with prudent judgment to refuse such a request. This is done only for "good cause", such as when the applicant or recipient is known to be unreliable or unavailable. TANF Director's approval is required on all sub-payee decisions.

Protective Payee

Any minor head of household must be established as a protective payee case. The protective payee will receive the benefit and make the benefit available to meet the needs of the TANF family.

The selection of a protective payee is to be made with the recipient's participation and consent, to the extent possible. TANF has the right to intervene on behalf of the client and establish the protective payee.

The following persons cannot be appointed as protective payees:

1. Any employee or contractor who determines financial eligibility for the family.
2. Any employee of an Osage Nation TANF who is responsible for money or bills related to the recipient family.
3. Landlords, store owners, or other vendors of goods or services who has a relation to the recipient.

Protective payee period ends when the minor head of household reaches age 18.

It is the client's responsibility to notify the case manager if they feel the need for an alternate or sub-payee. This request must be submitted to the case manager by the client in writing detailing the

reasoning for the request. Case manager will submit request to the director within two (2) business days of receiving the request. Director will review and make a determination within five (5) business days. Client will be notified in writing of the director's decision.

Client is responsible for requesting that an alternate or sub-payee be removed in writing and submitting to the case manager. Case manager will remove the alternate or sub-payee from receiving the benefit within five (5) business days. It is the client's responsibility to ensure that the request is submitted in enough time for the case manager to remove them before the next benefit has been processed.

Minor head of household must discuss protective payee options with the case manager. The case manager will ensure that the individuals suggested do not qualify as listed in the approved 477 "Protective Payee" section. Case manager with approval of the Director, may deny the protective payee options suggested by the minor if there is just cause to intervene on the client's behalf. Protective payee will be removed by the case manager upon the minor turning 18.

Case manager is responsible for documenting in clients file and in CRM when alternate, sub-payee, protective payee is selected or removed.

Initial Payment

The first payment made to an approved applicant is prorated to the date of receipt of a completed and identifiable application provided the client is determined eligible.

The addition of new members to the TANF assistance unit will be added to the next month's payment. No prorating will occur.

A TANF case must close in the month that the client no longer meets the eligibility requirements, unless the case is in suspension due to over-income.

Case manager is responsible for entering all information into the clients CRM case file for CRM to calculate the initial payment. Client is responsible for notifying case manager of all changes to the household, including the addition of new members. Client is responsible for submitting documentation to support the addition to the household. Case manager will input the new member's information into the clients CRM case file upon notification, however the payment amount will not increase until the following month payment. Case manager will notify the client in writing when there has been a change in the household and that changes effect on the monthly payment amount.

Underpayment Correction

When an eligible recipient receives TANF benefits in a smaller amount than that to which they are actually entitled, Osage Nation TANF will recalculate the payment and include the additional amount in the next payment. The client will be given written notice.

Case manager will case note the underpayment in the clients file and the reason for the underpayment. Case manager will then increase the following months benefit amount by the amount underpaid. Case

manager will notify client in writing of the error and the adjustment that will be made on the next benefit payment.

Over Payments

When a recipient receives more TANF benefits than he/she is entitled to, an overpayment has occurred. An overpayment can occur in only two ways – the client/recipient causes an error, or the Case Manager causes an error. Overpayments MUST be repaid, regardless of who makes the error or the circumstances/reasons for the overpayment.

Overpayments can be caused by some of the following situations –

1. The client fails to accurately report income coming into the assistance unit.
2. The client fails to report countable resources.
3. The client reports lost or stolen grant check, a replacement check is issued, and the client cashes both checks.
4. The client withholds information or provides fraudulent information for the purpose of establishing initial or continuing eligibility.
5. The client fails to report a child/adult being aided has left the assistance unit.
6. The Case Manager makes a computational or data entry error which results in an overpayment.
7. The Case Manager erroneously issues more than one grant check in a month.

Additionally, an overpayment “follows” the Primary Individual (PI) of the overpaid unit if that client’s _____ case is closed.

The TANF program may not recoup overpayments for other States/Tribes.

Upon discovery or suspicion of overpayment, the case manager must immediately notify the Director. The Director and project specialist will perform an audit on the case file and review all documents relevant to the suspected overpayment. Once it has been determined that an overpayment occurred, the Director, project specialist and case manager will formulate the amount of the over pay and develop a re-payment plan. Client will be notified in writing of the overpayment and subsequent re-payment plan. Client may follow the appeal process if they disagree with the occurrence of an overpayment.

If client leaves the program before completing the re-payment, they will be required to complete it upon re-entry into the 477 program.

Collaborative Efforts

The Tribal TANF Program works collectively with each supportive service program underneath the Executive Branch umbrella. Each applicable program has a standard referral system which; is tracked by the Nation’s Customer Relations Management System. The Tribal TANF Program shares information, with client consent, with other programs to help meet immediate and long-term needs. Clients have access to the following programs that offered through the Nation’s government:

1. Osage Nation Childcare collaborates with Tribal TANF in the following manner:
 - a) Referrals

- b) Reduced payment rates
 - c) Slots reserved for clients seeking job opportunities
 - d) Tribal TANF provides information to clients regarding Childcare assistance
 - e) Childcare Program informs parents who receive TANF benefits about the exception to the individual penalties associated with the work requirement for any single custodial parent who has a demonstrated inability to obtain needed child care for a child under 6 years of age
 - f) Coordinate with TANF to ensure that TANF families with young children will be informed of their right not to be sanctioned if they meet the criteria set forth in the TANF statute and Plan
 - g) In fulfilling this requirement, the following criteria or definitions are applied by Tribal TANF to determine whether the parent has a demonstrated inability to obtain needed child care
2. Osage Nation Counseling Services are responsible for working with clients that upon a positive drug screen develop a substance abuse plan or domestic violence and begin addressing barriers that will ensure job readiness in the future.
 3. Osage Nation Food Distribution and Tribal TANF share many of the same clients. The Food Distribution Program and Tribal TANF make aware of services and refer clients quite often.
 4. Osage Nation Crisis Assistance Program is available to support the needs the clients in a Crisis situation such as a victim of natural disaster or domestic violence.
 5. Osage Nation Housing Program provides housing assistance to clients that meet income based criteria. Tribal TANF and Housing work closely to ensure families have the assistance needed to ensure housing needs are being met.
 6. Osage Nation JOM Program works with Native youth throughout the reservation. Many of the Youth belong to TANF families and supportive services are offered to children such as school supplies and tutoring.
 7. Osage Nation Social Services Programs provide, if needed, family preservation and access to Indian Child Welfare assistance. This program also works closely with the Osage County Department of Human Services.
 8. Osage Nation Wazhazhe Youth Academy provides after school program services to families within the service area.
 9. Osage Nation Head Start Early Learning Program provides educational services to low-income based families within the service area.
 10. Osage Nation Prevention Program works to provide certain classes that related to Strengthening Families. The Tribal TANF program ensures the applicable clients and their children attend these classes.
 11. Osage Nation WIC Program is available to clients that meet the income base guidelines and provides referrals to TANF.

Case manager will assist client with any referrals that have been identified on the client's ISP. Referrals can be made to assist in overcoming barriers, alternate resources, or as part of goals listed on the client's ISP. Case manager is responsible for documenting all referrals and entering into the clients file.

Case manager will follow up with client to ensure referrals were helpful and if client needs further assistance.

Cash Assistance (General Assistance)

Pursuant to the existing statutory and regulatory authority 25 U.S.C. § 13d-3 and 25 C.F.R. §§ 20.202 to 20.210, the Osage Nation may operate General Assistance under an approved tribal redesign plan. Consistent with 25 U.S.C. § 13d-3, notwithstanding any other provision of law, the Nation may, by appropriate changes in eligibility criteria or by other means, change eligibility for General Assistance or change the amount of General Assistance payments for individuals within the service area of the Nation who are otherwise deemed eligible for General Assistance payments so long as such changes are applied in a consistent manner to individuals similarly situated. Any net increase in costs to the Federal Government, which result solely from tribally increased payment levels for the General Assistance Program, must be met exclusively from funds available to the Nation from within its Tribal Priority Allocation.

The Tribal Redesign Plan has specifically been developed to implement an enhanced definition of a Native American, or Indian as defined in 25 CFR Subpart A--Definitions, Purpose and Policy. Besides being a member of an Indian Tribe, applicants with a certificate of degree of Indian blood (CDIB) or other official acknowledgment of membership will be eligible to apply for General Assistance. Enhancing the criterion for eligibility will provide more Native Americans residing in the service area the opportunity to apply for welfare assistance; serve adults, age 18 or older, without dependent children; and increase the level of payment as described in the Payment Standard section IV.

The Osage Nation has identified an adequate funding level for its General Assistance Program and agrees to receive a fixed amount of \$66,254 per year. This level of funding is based on historical data from the authority to obligate documents. The fixed amount of funding is based on an average of the previous nine years of actual Welfare Assistance funding received. The nine years include FY08 through FY16. Savings realized through the tribal redesign plan will be used at the Nation's discretion.

Purpose

The General Assistance Program serves low-income Native American adults, within the Osage Reservation (Osage County), by providing monthly temporary financial assistance for a limited time.

The goal of the General Assistance program is to increase self-sufficiency and independence. Employable General Assistance clients must work with the case manager to develop and sign an Individual Self-Sufficiency Plan (ISP). The ISP must outline the specific steps the individual will take to increase independence by meeting the goal of employment. Unemployable clients must work with the case manager to develop an ISP. The plan incorporates the steps needed to assist individuals to resolve economic, interpersonal, and/or other problems, to achieve self-sufficiency and independence.

General Assistance is a secondary, or residual resource, and must not be used to supplement other financial assistance programs. To ensure there is not a duplication of services, the Osage Nation operates many financial assistance programs that are specific to the needs of modest income constituents such as rental assistance, commodities and utility assistance. Therefore, applicants with dependent children are required to apply for Temporary Assistance for Needy Families (TANF) and follow TANF regulations outlined in the approved TANF plan. Both programs provide temporary welfare

assistance and serve different family types. General Assistance serves adults without dependent children while TANF serves families with dependent children.

Eligibility Requirements

To be eligible for assistance an applicant must meet all of the following criteria:

1. Lack sufficient resources to meet essential needs as defined;
Essential needs are defined as shelter, food, and clothing as included in the standard of assistance provided to the client.
2. Have available resources, earned (net income) and unearned income for the past thirty days that do not exceed the payment standard.
Client must submit all forms of income to the case manager during application process. The case manager will verify the information and determine what is countable and in the date range.
3. Comply with applicable General Assistance policy & procedures
Case manager will provide client with copy of the 477 plan, MER form, and job search form.
Case manager will inform client of all deadlines and instruct on how to complete all forms.

To be eligible for General Assistance an applicant must:

1. If unemployable, develop and sign a ISP with the assistance of the case manager;
2. Complete an initial drug screen to identify barriers, if any;
3. Provide verification of unemployable criteria, if applicable;
4. Apply concurrently for financial assistance from other state, tribal, county, local, or other federal agency programs for which the client is eligible;
5. Not receive any comparable public assistance.

Redetermination

Redetermination is an eligibility evaluation process conducted by a case manager to assess the eligibility and need for continued financial assistance that requires:

1. Reviewing eligibility every three months for all clients from the date of application approval;
2. Whenever there is a change in status that can affect a client's eligibility or amount of assistance clients must immediately inform the case manager of any such changes;
3. An office or home visit;
4. An estimate of income, living circumstances, household composition for the month(s) for which financial assistance is to be provided; and
5. Appropriate revisions to the ISP.

Eligibility for general assistance will be re-determined every three (3) months for all individuals; and whenever there is a change in status that can affect a recipient's eligibility or amount of assistance. Clients must immediately inform the case manager when any such changes occur. Failure to report changes by the client may result in sanctions and/or case closure. If failure resulted in over-payment of monthly cash assistance the following months cash assistance will be reduced by the amount of the over pay.

Case manager will notify client in writing of upcoming re-determination meeting. Notification will contain date and time of appointment along with a list of any required documentation. It is the client's responsibility to inform the case manager if they are unable to attend the scheduled appointment. An alternate appointment date must be set within one (1) week of the original appointment. If a client fails to keep the appointment their case will be closed due to non-compliance.

Case manager will follow same process as initial eligibility determination during redetermination. Client will be required to complete a drug screen in accordance with the Osage Nation Financial Assistance drug policy.

Case manager will update all information in case file and CRM to reflect most recent information and set a new redetermination date.

Payment Standard

The General Assistance payment standard is the current Osage Nation Tribal TANF grant amount for an adult. This payment standard is the base amount used to determine General Assistance eligibility and payment level. The current payment standard without shelter costs is \$180. The current payment standard with shelter costs is \$240. These amounts are subject to change only with plan approval by amending the TANF grant amount for an adult, unless it is an increase each year by a percentage amount equal to the Social Security Cost of Living Allowance (COLA) annual increase based on funds availability.

Pro-rated amounts are available when a client is deemed eligible, has completed the ISP, and an initial drug screen. The effective date will be the date the application is approved.

When a client is responsible for shelter costs, the client may receive 100% of the payment standard. If the client is not responsible for shelter costs, the client may receive up to 75% of the payment standard.

If the payment standard chart has been increased to reflect the COLA increase, the case manager will issue notifications to every client detailing the change and what their new payment standard will be going forward.

Case manager is responsible for entering all client data into the CRM system and ensuring that CRM reflects the payment standard accurately. If a change to the payment standard has occurred the Project Specialist is responsible for updating this information in CRM so that it will continue to automatically calculate payments.

Income

Earned income is cash or any in-kind payment earned in the form of wages, salary, commissions, or profit, from activities by an employee or self-employed individual. Earned income also includes:

1. Any one-time payment to an individual for activities which were sustained over a period of time (for example, the sale of farm crops, livestock, or art work produced by the client; and
2. With regard to self-employment, total profit from a business enterprise (i.e., gross receipts less expenses incurred in producing the goods or services). Business expenses do not include depreciation, personal business and entertainment expenses, personal transportation, capital equipment purchases, or principal payments on loans for capital assets or durable goods.

Unearned income includes, but is not limited to:

1. Income from interest; oil and gas and other mineral royalties; gaming income per capita distributions; rental property; cash contributions, such as child support and alimony, gaming winnings; retirement benefits;
2. Annuities, veteran's disability, unemployment benefits, and federal and state tax refunds;
3. Per capita payments;
4. Income from sale of trust land and real or personal property that is set aside for reinvestment in trust land or a primary residence, but has not been reinvested in trust land or a primary residence at the end of one year from the date the income was received;
5. Financial assistance provided by a state, tribal, county, local, or other federal agency.

Resources are considered to be available when liquid assets are converted to cash.

It is the client's responsibility to disclose all forms of income and provide verification. Case manager will assist client with obtaining income verification when applicable. Case manager will ensure clients sign a release of information form so that case manager can obtain information on their behalf. Case manager is responsible for determining which types of income will be utilized to calculate payment and which are counted as resources. Case Manager will follow approved 477 plan and the approved Osage Nation General Assistance redesign plan with regard to any and all income.

Calculating Earned and Unearned Income for Eligibility and Payment Standard

The case manager will compute eligibility by doing the following:

1. Include all income for the past thirty days from the date of application;
2. Include net income with regards to wages;
3. Verify that the monthly amount does not exceed the payment standard;
4. Recurring income from Oil and Gas royalties, interest, and surplus funds will be based on the past year, from date of application, less \$2,000 and divided by 12 months to determine eligibility;
5. Recurring contractual income will be based on the past year, from date of application, and divided by 12 months to determine eligibility;
6. Determine whether or not shelter costs should be included in the Payment Standard.

The case manager must not provide General Assistance payments for any period before the date of approval.

Case manager is responsible for entering all verified income into CRM to calculate a client's monthly payment. This process is to be done simultaneously when entering the client's application into the CRM system. Application date field must be entered with the date all information was submitted, initial orientation completed, and client sent for drug screening. Process complete date is the date that any outstanding documentation was received, drug screen results received, and case manager has entered all information into CRM.

Case manager will add up all income received by the client in the last 30 days from date of application. If amount received exceeds the amount listed in the payment standard chart the application is denied

due to over income. If the income received does not exceed the standard payment amount the amount is entered in the "monthly income" box in the clients CRM case application.

Case manager will complete the income section in the CRM application screen. If client has a recurring contractual income, case manager will take the amount received in the last fiscal year, divide by 12, and enter that amount into the "Monthly Income" box in the clients CRM case application.

Case managers will utilize the income sheet received from the Bureau of Indian Affairs IIM account information to verify Headright income for the last fiscal year. Information will be entered into the "Headright" boxes listed in the clients GA case application. Case manager will add up the amount received and subtract \$2,000 from that amount. Any amount remaining will be divided by 12 and that amount will be entered into the "monthly income" box.

Client must provide documentation that they pay and/or are responsible for shelter cost. Shelter cost is either rent, mortgage, homeowner's association dues, or lot rent. Client must submit a copy of their signed lease agreement to verify rent. Client must submit a mortgage statement to document the monthly payment. Client must submit a statement from the homeowners association to show monthly dues. Client must submit a lease agreement or statement from the mobile home or other entity charging lot rent.

Case manager will verify documentation of shelter cost and select "pays rent" in the clients CRM GA case.

Once case manager has entered all client information into CRM it is given to the director for verification of application. Director will review the hard file information with the information entered into the CRM case application. Once verified by the director, the director will select "deactivate" button in CRM and choose "verified" as the status, and select OK. The CRM system will then automatically calculate the monthly assistance amount and the first payment amount. The first payment amount will take into account any income received and the date of approval by the director. Client will receive a pro-rated first check as calculated by CRM.

Employment Requirements

Employable clients must:

1. Actively seek employment, including the use of available state, tribal, county, or local employment services. The client must seek employment and provide evidence of monthly efforts to obtain employment in accordance with the client's ISP. Job searches are required each month and, if evidence of job searches is not received, administrative proceedings may be initiated to deem the client ineligible for further assistance;
2. Make satisfactory progress by meeting goals outlined in the ISP;
3. Accept local and seasonable employment when it is available; and
4. If the client does not seek and accept available local and seasonal employment, or quits a job without good cause, actions may be initiated to deem the client ineligible for further assistance.

Case manager will assess each client during the initial orientation and assessment and determine if the client is employable. Clients will be provided a job search form, case manager will explain the form and how to complete during the orientation. Client will also be scheduled for monthly training classes on

how to fill out and complete job search forms. Clients are required to complete nine (9) viable job searches per month.

A viable job search must contain the following:

- Business must have open and advertised position
- Client must meet the minimum qualifications of the position
- Client must not have background limitation that would prevent ability to be hired at position
- Must not have applied for same position in last thirty (30) days (cannot keep applying for same position each month)

Job searches are due into the Financial Assistance office by the 20th of each month. If the 20th falls on a Saturday or Sunday, they must be received on the preceding Friday. Any job searches received after the 20th of the month will result in client being non-compliant and subject to sanction and/or case closure. It is the client's responsibility to ensure that job searches are received by the Financial Assistance Office.

Case manager is responsible for verifying all job searches. Verification can be made by print outs of application confirmations, email confirmations, or contacting the employer directly.

Clients are required to make satisfactory process toward meeting goals they set in the ISP. Each goal will have action items with time frame to complete items. Satisfactory process can be measured by completing those tasks within the set time frame. Please see ISP policy and Case management policy for further details.

Employable clients are required to accept local and seasonable employment when available either by un-subsidized employer or by subsidized employer. Only exemption will be if client has a disability or medical condition that would prohibit them from performing the job duties. It is the client's responsibility to submit documentation to the case manager if they feel they are unable to perform the tasks. Verification of medical condition that would prohibit the activity must be signed by a physician. Case manager will verify the documentation and compare it to the job duties, if client is unable to perform duties they may be exempt from accepting the position.

Clients that refuse employment or work experience assignments will have their case closed and will not be eligible to reapply for ninety (90) days.

Unemployable Requirements

Unemployable clients:

1. A person suffering from a medical injury, illness or incapacitation must provide proof thereof; and it will be documented in the ISP that the illness or injury is serious enough to temporarily prevent employment; and
2. A person will comply with any referrals made by the case manager and outlined in the ISP.

Clients who are unable to work temporarily due to serious illness or injury must document condition by a medical statement signed by a licensed physician. The statement must detail the condition and how it

impedes the client's ability to work. The statement must list any restrictions on work activities and how long the client is unable to perform any work activity.

Clients deemed unemployable by the case manager and director are still required to meet the goals listed in their ISP. Clients must attend all mandatory appointments, assessments, classes, etc. Failure to make progress on their ISP and remain in compliance will result in sanction and/or case closure.

Penalties and Sanctions

The client must continue to cooperate and comply with all program requirements and with all components of the ISP. Non-compliance will result in sanction being imposed, which will result in a reduction in the monthly cash assistance. The client will not be eligible for supportive services until the sanction has been lifted, and the client has regained a good standing with the program.

Sanction Provisions

First non-compliance month – Cash assistance payment will be reduced by 25%. When the sanction is imposed the client will receive written notification stating the reason for the sanction and the corrective action that must be taken to end the sanction.

Second non-compliance month – Cash assistance payment will be reduced by 50%. The case will be on "vendor pay" status until the sanction is removed. When the sanction is imposed the client will receive written notification stating the reason for the sanction and the corrective action that must be taken to end the sanction.

Third non-compliance month – The case will be closed. The client is eligible to re-apply 90 days after closure date.

If a client voluntarily closes the case while in a sanctioned status and re-applies within six (6) months, the client returns at the prior sanction level.

All clients when sanctioned at the first level are required to meet with assigned Case Manager.

Resolved sanctions will restore the grant to normal status the following benefit month.

Financial Assistance Department will comply with 45 CFR 261.14 in regards to penalties and sanctions. Clients will receive a sanction for non-compliance. Non-compliance can be achieved by the following:

- Not submitting MER's, participation time sheets, and/or job searches by the deadline
- Failure to attend a mandatory class/training/meeting/appointment
- Failure to recertify
- Failure to meet the required number of participation hours (all must be verified)
- Failure to meet the required number of job searches (all must be verified)
- Failure to meet goals/tasks outlined in the ISP

- Failure to remain compliant with other Osage Nation programs that are directly related to the client's ISP – For example, if required to complete a full drug and alcohol assessment with TASC or failure to attend counseling sessions.

Any client who is on a sanction level when their case is closed will return at the same sanction level.

Only exception is if a client on a sanction with the Osage Nation 477 program voluntarily closes their case and does not re-apply for 7 months.

Case manager imposing a sanction onto a client will notify the client in writing of the sanction, reason for the sanction, what the sanction entails and appointment time for client to meet with case worker regarding sanction. All clients who receive a sanction are required to meet with the case worker to discuss sanction, update ISP, and develop a corrective action plan.

All clients will start at the first sanction level unless they are a returning client who left on a sanction level. In those cases, the client will advance to the next sanction level.

Confidentiality

All client information is confidential. The program will take such steps it deems necessary to restrict the use and disclosure of information about individuals and families receiving assistance under the program attributable to funds provided by the federal or state government. The program will not release or disclose client information unless authorized by policy, state data sharing agreement, funding agreements, administrative rule, or by court order.

Confidential information includes but it not limited to all verbal, written, printed and electronic display of data that can identify any specific name or social security number.

Fraudulent Activity

1. Fraud

Fraud is an intentional action, inaction, or statement made by an individual for the purposes of obtaining benefits to which he or she is not entitled.

2. Intentional Program Violation (IPV)

An intentional program violation is an action taken by an individual that intentionally misrepresents, conceals, or withholds a material fact for the purpose of establishing or maintaining a family's eligibility for benefits, or for increasing or preventing a reduction in the amount of the individual/family's benefit. Public assistance fraud is frequently referred to as an Intentional Program Violation (IPV). An IPV may occur with or without a dollar loss. An IPV includes:

- a) Making false or misleading statements, either orally or in writing,
- b) Concealing or withholding information,
- c) Failing to report, as required, changes in income, resources, or any other factors affecting eligibility.

Example:

An IPV may result from intentionally giving false information about income or resources, failing to report when a child leaves the assistance unit or concealing information when an absent parent returns to the household.

When the Case Manager believes an individual is withholding or concealing information, or receives a complaint alleging an applicant or recipient may be committing fraud, the Case Manager will refer the case to the Director. The Director will investigate and decide whether to deny, reduce or terminate assistance/services or place on the voucher system or conduct a fraud investigation, which may result in referring the case for criminal prosecution.

Penalties

The Director will conduct an investigation to determine the level of penalty associated with a fraudulent case. This may warrant one or all of the following:

- a) Recoupment of overpayment,
- b) Denial of further services
- c) Reimbursement of funds spent on supportive services
- d) Or Action determined by Attorney General's Office

Data will be compiled which may include interviewing employers, case managers, or other individuals with direct knowledge of the client's situation, to ascertain the facts.

Upon completion of the fraud investigation and case is deemed an intentional program violation (IPV), the Director will file a criminal complaint with Osage Nation Attorney General's Office.

Data Collection and Reporting

Osage Nation will comply with all statutory and regulatory collection and reporting requirements pertaining to Tribal TANF, General Assistance, Job Placement and Training, and WIOA.

Grievance and Appeals Procedure

1. Any applicant or participant may write a written complaint within 10 business days of said incident to the Department Director
2. The Department Director will review and respond within 10 business days stating resolution
3. The participant may appeal resolution to the Director of Operations within 10 business days
4. The Director of Operations will determine any appeal thereafter and resolution

If after using this procedure, the participant is not satisfied, they have the right to file a documented grievance to: Attention: Division Chief, Division of Workforce Development, Room 20 M.S.-20 SIB, 1951 Constitution Avenue, N.W., Washington DC 20245.

Questions or complaints alleging a violation of the nondiscrimination provisions of WIA Section 188, may be directed or mailed directly to the Director, Civil Rights Center, U.S. Department of Labor, Room N-4123, 200 Constitution Avenue, N.W., Washington DC 20210 for processing

Definitions

Adult means a person age 18 or older.

Applicant means the person making the application for financial assistance.

At Risk means the youth is experiencing or has experienced one of the following: School dropouts, basic skills deficient, education attainment that is one or more grade levels below the grade level appropriate to their age group, pregnant or parenting, have disabilities including learning disability, homeless or runaway, offenders, face serious barriers to employment as defined in the ISP, in need of emotional, behavioral, or substance abuse counseling, whose peer group exhibits one or more of the above barriers, or exhibits a lack of or extremely low self-esteem.

Case Management means the activity of a case manager in assessing client barriers, case planning, coordinating and linking services for clients, monitoring client progress, advocacy, tracking and evaluating services provided, such as meeting goals in Individual Self-sufficiency Plan (ISP). Activities also include providing direct services to the client and accountability of funds, data collection, reporting requirements, and documenting activities in the case file.

Cash Assistance means monthly assistance for those eligible for TANF or GA cash benefits

Childcare means amounts paid to cover the costs of child care when identified as a barrier to employment or achieving self-sufficiency.

Client is an eligible Native American individual and/or family receiving financial assistance or services.

Direct Placement means short term support services to assist recently hired individuals address barriers to employment.

Diverted Services means funds are made available to prevent eligible participants from coming on assistance.

Economic Development means funds expended that support economic development projects and/or initiatives that have been pre-approved by the U.S. DOI-BIA-OIS Division of Workforce Development.

Economically Disadvantaged means income below the 200% poverty guideline.

Eligible Relationship, as to determine caretaker relative cases, is a family relationship established either by blood or legally by marriage.

Employable means a person who is physically and mentally able to obtain employment, and who is not exempt from seeking employment.

Essential Needs mean shelter, food, and clothing as included in the standard of assistance provided to the client.

Family means group of individuals who are living together as one economic unit and related by blood, marriage or a legal capacity.

Financial Assistance means General Assistance for basic essential needs.

Full-Time Employment means working at least 32 hours per week for the same employer.

General Assistance means financial assistance payments to an eligible person for essential needs.

General Eligibility means the basic qualifications applicants must have for services, excluding cash benefits and economic development.

Incentives means program will provide incentives to clients that achieve a significant goal on their case plan. Staff nominates clients and is approved by the Director.

Incentive Payments means amounts given to clients in approved vocational/occupational training classes.

Individual Self-sufficiency Plan (ISP) means a plan designed to meet the goal of employment through specific action steps and is incorporated within the case plan for the general assistance client. The plan is jointly developed and signed by the client and case manager.

Native American means a person who is a member of an Indian tribe, as evidenced by a membership card from a federally recognized tribe, a certification of degree of Indian blood (CDIB) or other official acknowledgment of membership by a federally recognized tribe.

Occupational Training means tuition, books, and/or other costs associated with clients attending

On-the-Job Training means 75% of client's salaries that are paid to the employers to help offset the cost of their salaries during the training period.

Payment standard is the amount from which net income, resources, or in-kind are subtracted to determine eligibility and payment levels.

Program Supplies means supplies that are directly related to achieving goals of clients. Can include but not be limited to: supplies for classes that include more than one clients or groups of clients, case folders used specifically for client cases, flash drives used to store client information and given to them for job applications, and any other supplies that are directly related to client use or use for the benefits of the clients.

Public Assistance means those programs of financial assistance provided by state, tribal, county, local and federal organizations including programs under Title IV of the Social Security Act (49 Stat. 620), as amended, and Public Law 104-193.

Recurring Income means any cash, earned or unearned, received on a monthly, quarterly, semiannual, or annual basis.

Resources means income, both earned and unearned, and other liquid assets available to a person to meet current living costs, unless otherwise specifically excluded by federal statute. Liquid assets are those assets in the form of cash or other financial instruments, which can be converted to cash, such as savings or checking accounts, promissory notes, mortgages, and similar properties, and retirements and annuities.

Salaries means direct service employees including Director (partial), Project Specialist (partial), social work case manager, employment and training case manager, transportation/youth services case manager, and intake specialist.

Service Area means a geographic area designated by the Assistant Secretary - Indian Affairs where the Osage Nation provides financial assistance. Such a geographic area designation can include the reservation, near reservation, or other geographic location.

Shelter Costs means rental expense.

Social Security Disability Insurance (SSDI) means cash assistance provided under Title II of the Social Security Act, as amended.

Supplemental Security Income (SSI) means cash assistance provided under Title XVI of the Social Security Act (49 Stat. 620), as amended.

Supportive Services means all services identified as a supportive services that assist clients with achieving goals listed in their case plan/ISP. Can include, but not limited to, the following: work attire, tools/equipment, transportation, shelter, utility assistance, car repair, fines and/or fees, and other items needed to remove barriers to employment or self-sufficiency.

Temporary Assistance for Needy Families (TANF) means one of the programs of financial assistance provided under the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA).

Temporary Medical Injury, Illness, or Incapacitation means client has been evaluated by a medical doctor and determined unable to work for a period of one (1) week up to eleven (11) months.

Travel and Training means travel and training expenses directly related to direct service employees in their efforts to obtain trainings and expand knowledge of 477 and assisting clients.

Unemployable means a person who is suffering from a temporary medical injury, illness, or incapacitation.

Vocational Training means tuition, books, and/or other costs associated with client attending

Work Experience means work incentive payments for clients participating in work experience

Youth, in reference to the youth work experience, will be defined as any youth between the ages of 15 and 19 and currently in school or just graduated from school.