

Exploring Tribal TANF (Tribal TANF 101)

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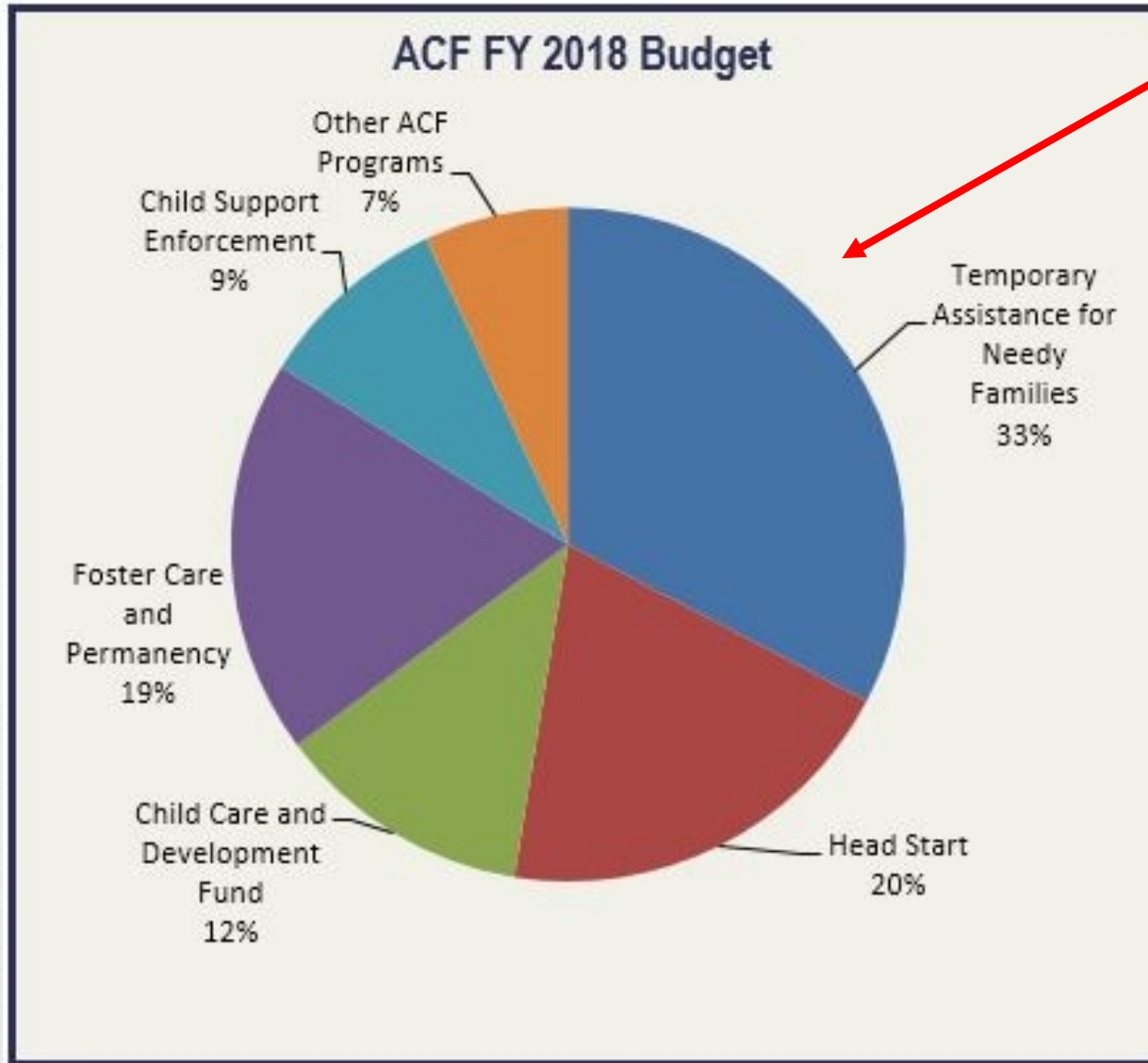
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Objectives

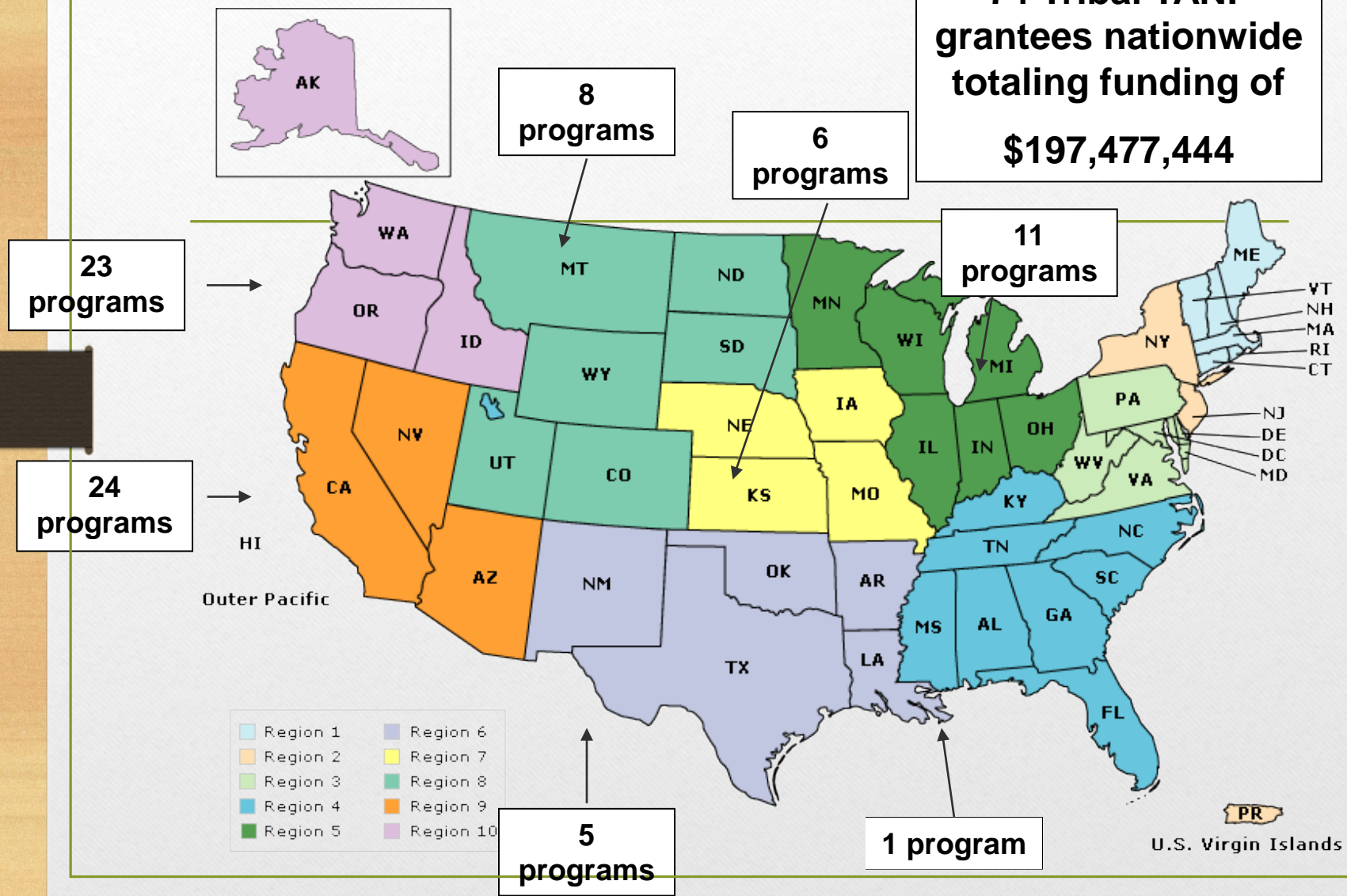
- Provide an overview of TANF, including
 - Budget and Approved Tribal TANF programs
 - TANF Purposes
 - Common uses of TANF
 - Time limits
 - Work participation activities and requirements
 - Reporting
- Discussion with Quinault Indian Nation
- Explore ways to enhance your program
 - Evaluate program structure and outcomes
 - Prioritize services
 - Establish and maintain partnerships

State and Tribal TANF Federal funding

Total TANF Block Grant – \$16.7B



**74 Tribal TANF
grantees nationwide
totaling funding of
\$197,477,444**



TANF

Purpose #1

Provide assistance to **needy** families so that children may be cared for in their own homes or in the homes of relatives

Purpose #2

End the dependence of **needy** parents on government benefits by promoting job preparation, work, and marriage

Purpose #3

Prevent and reduce the incidence of out-of-wedlock pregnancies

Purpose #4

Encourage the formation and maintenance of two-parent families

2 Populations

Needy Families

Other Eligible Families

2 Services

Assistance

Support Services

Common Uses of TANF – *some examples*

- Basic assistance payments
- Heating and cooling assistance
- Supportive services, such as, child care, transportation, clothing, etc. when participating in an approved work activity
- Education & training
- Counseling
- Job skills training and professional training
- Employment services for non-custodial parents that enhances their ability to pay child support
- Teen pregnancy prevention programs
- Parenting skills training
- Fatherhood activities
- Non-medical substance abuse treatment

TANF Funds

A Tribe may continue to use amounts awarded, without fiscal year limitation for assistance, benefits, and services allowed under the Tribal TANF regulations and/or defined in the ACF-approved TANF plan.

Effective Case Management

- Engages and empowers the client
- Involves ongoing assessment to
 - identify needs (and address them) and
 - identify strengths and assets (and utilize them).
- Ensures that the needs of the whole family are evaluated
- Facilitates engagement with caretakers to ensure positive development outcomes in child-only cases.

Time Limits for Assistance

- Eligibility for TANF assistance (as defined at 45 CFR 286.10) is time limited.
 - The regulations require that Tribes propose time limits which reflect the intent of Congress that TANF should be temporary.
 - The maximum time limit is 60 months
- Time limits and exceptions to time limits must be included in the Tribe's TANF plan.
- The Tribe must count prior months of TANF assistance funded with TANF block grant funds, except for any month that was exempt or disregarded by statute or regulation.

Are There Exceptions to the Time Limits?

Exemptions that are not optional:

- Cases which do not include an adult head of household (child only cases)
- Cases in which the adult lived in Indian Country or in an Alaskan Native Village in which at least 50% of the adults were not employed

Exemptions that are optional:

- Cases with hardship, as limited and defined by the tribe
- If the family includes someone who has been battered or subject to extreme cruelty

(Refer to 45 CFR 286.115 - 286.120)

Work Participation Requirements

- The Tribe's negotiated minimum work participation requirements must be outlined in the approved TFAP, and include
 - The work participation rate for all families (or one- and two-parent families)
 - The minimum number of hours per week that adults are required to participate in work activities.
- Rates are negotiated during the Plan renewal process.

Work Participation Rate (WPR)

Number of families receiving TANF assistance that include an adult who is meeting work requirements

Total number of families that include an adult receiving TANF assistance

45 CFR 286.85(c)

Examples of Work Activities

- Employment (unsubsidized or subsidized)
- Job search/ job readiness
- Work experience
- Career pathways activities
- Education directly related to employment
- Vocational training/apprenticeship
- Participation in training or activities that increase or provide for an individual's readiness for the job market (counseling, life skills, etc.)
- Community service
- Small business training/entrepreneurship
- Traditional subsistence activities (e.g. hunting, fishing, gathering, farming, herding, etc.)
- Traditional work activities (e.g. pottery making, weaving, wood carving, jewelry making, etc.)

What If Individual Participation Hours Are Not Met?

- Recipients, with few exceptions, must work as soon as they are job ready or face possible sanction or termination of benefits
- Tribes can waive work requirements for victims of domestic violence (45 CFR 286.140(3)), for single custodial parents who are unable to obtain acceptable child care (45 CFR 286.150(a)), or for good cause* as described in the approved TFAP.
- Tribes determine the penalties against individuals who refuse to engage in work activities.

**Only excused from individual sanctions, not removed from WPR*

What If Tribal Work Participation Rates Are Not Met?

- Tribes are subject to fiscal penalties if they fail to meet the minimum work participation rate(s) established in their approved TFAP.
- If Tribes fail to meet their negotiated WPR and a penalty is issued, they may dispute the penalty, provide reasonable cause, or establish and complete a corrective compliance plan.

Discussion with the Quinault Indian Nation Tribal TANF Program

Plan in place

- Incorporate Plan, IGA, governing laws and regulations into policies
- Educate, educate, educate – what, when, how and why to all that will listen
- Make notes on errors or additions for renewal
- Modify as needed

Renewal

- Research, a lot
- Work with your neighbors
- Leave what works and modify what does not. “In case scenario”
- Reference policies in the Plan

Discussion with the Quinault Indian Nation Tribal TANF Program (Cont.)

Challenges

- To think outside of box
- Wording
- Being in the know

Accomplishments

- Approval of new services – sharing
- Wording that works for both
- Quick and seamless approval

Successfully Operating and Enhancing Your Program

- Evaluate program structure and processes
- Track and evaluate program outcomes
- Review eligibility criteria
- Prioritize services
- Establish and maintain partnerships
- Seek additional funding sources

Evaluate Program Structure and Processes

- Evaluate roles and assess the need to professionalize or add roles/positions
- Periodically assess staff skills and abilities; provide training to address needs
- Assess control mechanisms and organizational systems
- Evaluate capacity

Track and Evaluate Program Outcomes

- Track program data and performance measures
- Apply a Logic Model to evaluate how your program components are contributing to program outcomes
- Identify which services have the most effective outcomes
- Evaluate service gaps and needs

This is an ongoing process!

Review Eligibility Criteria

- Through the Tribal TANF Plan, the Tribe determines
 - Population and geographic area to be served
 - Definitions of “needy family” and “Indian family”
- Possible considerations:
 - Is it time to review your program’s eligibility criteria?
 - How best can you allocate your limited resources?

Prioritize Services

- If the Tribe will not provide the same services, assistance, and activities in all parts of the service area, the TFAP must indicate any variations (*45 CFR 286.75(a)(3)*).
- If the Tribe opts to provide different services to specific populations, including teen parents and individuals who are transitioning off TANF assistance, the TFAP must identify these services and the circumstances under which they will be provided (*45 CFR 286.75(a)(4)*).

Establish and Maintain Partnerships

TANF and....

- Tribal Government
- Tribal Community
- State/County/Federal TANF offices
- Other Tribal Agencies and programs – Housing, Transportation, Native Employment Works, etc.
- WIOA
- ICWA
- Child Support
- Child Welfare
- Child Care
- Local Businesses
- Health Agencies
- Schools, including community colleges

Seek Additional Funding Sources

- Pursue additional funding opportunities to support your program
- Sources for information
 - Child Welfare Coordination Grants
 - Healthy Marriage and Responsible Fatherhood Grants
 - www.grants.gov
 - www.FoundationCenter.org

Retrocession

What happens if a Tribe is unable or unwilling to continue administering a TANF program?

If a Tribe no longer wishes to continue operating a Tribal TANF program, it may retrocede the program. This means that the tribe stops providing TANF services to the approved service population in the approved service area, and the attributable funding is returned to the state (*Refer to 45 CFR 286.30*).

Governing Law and Regulation for Tribal TANF

- Program
 - Title IV-A of the Social Security Act
 - Tribal TANF Regulations at 45 CFR Part 286
 - OFA Tribal TANF Guidance Document
 - The Approved Tribal TANF Plan
- Fiscal
 - 45 CFR Part 75--Omni Circular (Uniform Guidance)
- Other Resources
 - ACF issued Policy Interpretations (PI), Policy Announcements (PA), and Informational Memorandums (IM)
 - OFA website: <http://www.acf.hhs.gov/programs/ofa/>
 - Peer TA resources

Action Planning

Thank you!