# Tribal TANF Essentials for Seasoned Staff

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Tulsa, OK

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ADMINISTRATION FOR
CHILDREN & FAMILIES

# Conversation Topic Ideas

**Key Tribal TANF Requirements**

- Allowable Uses of TANF by Purpose

- TANF Eligibility

- Work Participation Requirements and Engagement

- Work Activities

- Calculation of the WPR

- Work Requirement Disregards and Exemptions

- Time Limits for Assistance and Exemptions

**Elements that Contribute to a Successful Program**

- Case Management/ Coaching Practices

- Work Readiness/Career Development

# Disclaimer

These materials are summary in nature and not inclusive of all ACF guidance and TANF policy. The content provided is intended for training and informational purposes and should not be relied upon as official policy issuances of ACF.

These materials are intended for specific use by directly funded Tribal TANF grantees. It does not cover requirements for 477 programs. Grantees that have questions about the content of these materials should contact their ACF Regional Office.
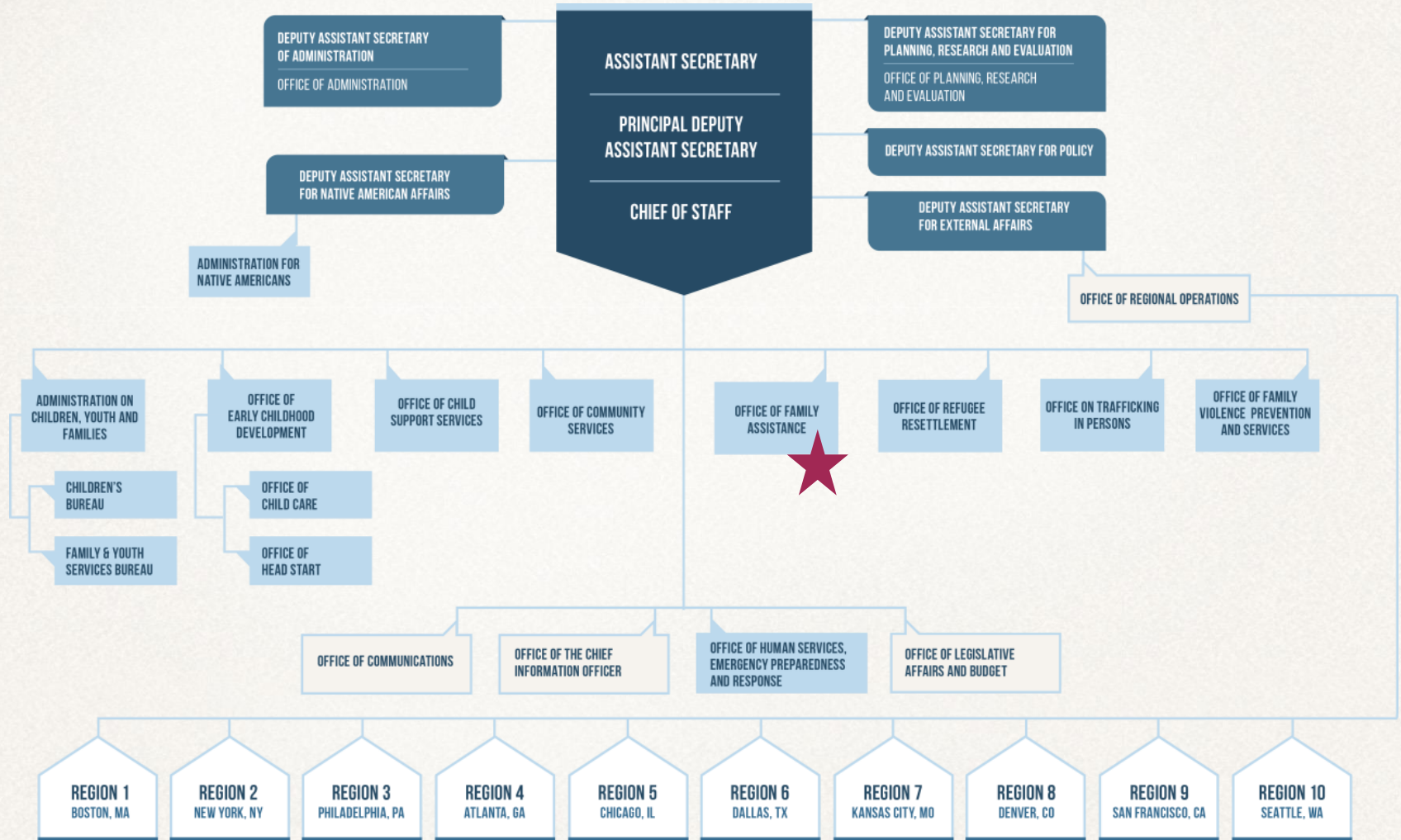
# Agenda

Organization Overview

Historical Background

Key Tribal TANF Program Requirements

Elements that Contribute to a Successful Program

Key Fiscal Requirements

Tribal TANF Reporting Requirements

Resources and Tips for Tribal TANF Programs

# Organization Overview

# Administration for Children & Families (ACF)-- Organization

# Administration for Children and Families (ACF), Office of Family Assistance (OFA)

**ACF** promotes the economic and social well-being of families, children, individuals, and communities through the provision of funding, guidance, and technical assistance, and fostering strategic partnerships.

**OFA** administers federal grant programs that foster family economic security and stability, including the TANF program and the Tribal TANF program, Native Employment Works, Healthy Marriage and Responsible Fatherhood grants, Health Profession Opportunity Grants, and Tribal TANF-Child Welfare Coordination grants.

U.S. Department of Health and Human Services (HHS)

Administration for Children and Families (ACF)

Office of Family Assistance (OFA)

10 Regional Offices
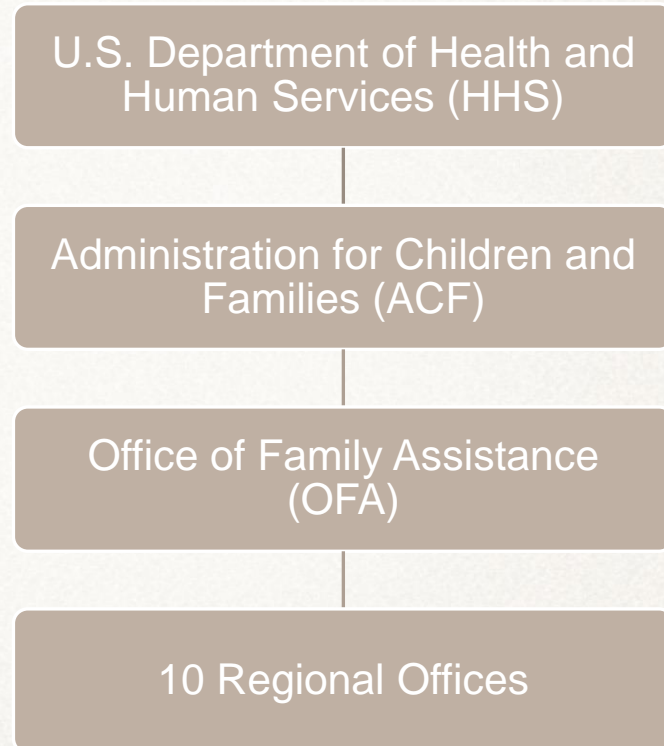
# Office of Family Assistance Divisions

**Office of the Director** *(Each OFA Division reports to the Director/Deputy Director)*

| Division of State TANF Policy | Division of Discretionary Grants | Division of Technical Assistance and Special Initiatives | Division of Data Collection and Analysis | Division of Tribal TANF Management and Regional Operations |

**OFA Divisions** work together to administer federal grant programs that foster family economic security and stability.

OFA Regional Units collaborate with states, tribes, and other grantees, as well as other divisions within ACF to assist in the administration of OFA discretionary grants

# ACF Regional Offices
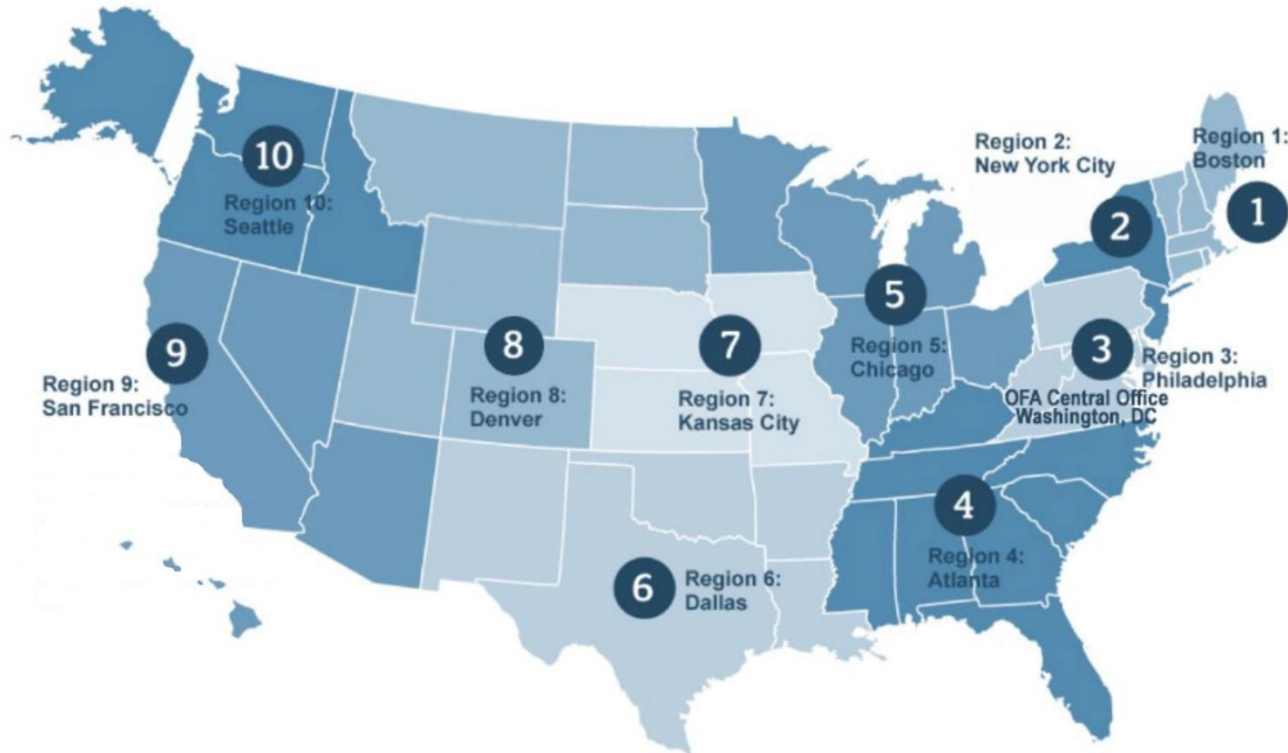


**Region 1 - Boston**
Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, Vermont

**Region 2 - New York City**
New Jersey, New York, Puerto Rico, U.S. Virgin Islands

**Region 3 - Philadelphia**
Delaware, Maryland, Pennsylvania, Virginia, West Virginia, District of Columbia

**Region 4 - Atlanta**
Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, Tennessee

**Region 5 - Chicago**
Illinois, Indiana, Michigan, Minnesota, Ohio, Wisconsin

**Region 6 - Dallas**
Arkansas, Louisiana, New Mexico, Oklahoma, Texas

**Region 7- Kansas City**
Iowa, Kansas, Missouri, Nebraska

**Region 8 - Denver**
Colorado, Montana, North Dakota, South Dakota, Utah, Wyoming

**Region 9 - San Francisco**
Arizona, California, Hawaii, Nevada, American Samoa, Micronesia, Guam, Marshall Islands, Republic of Palau, Northern Mariana Islands

**Region 10 - Seattle**
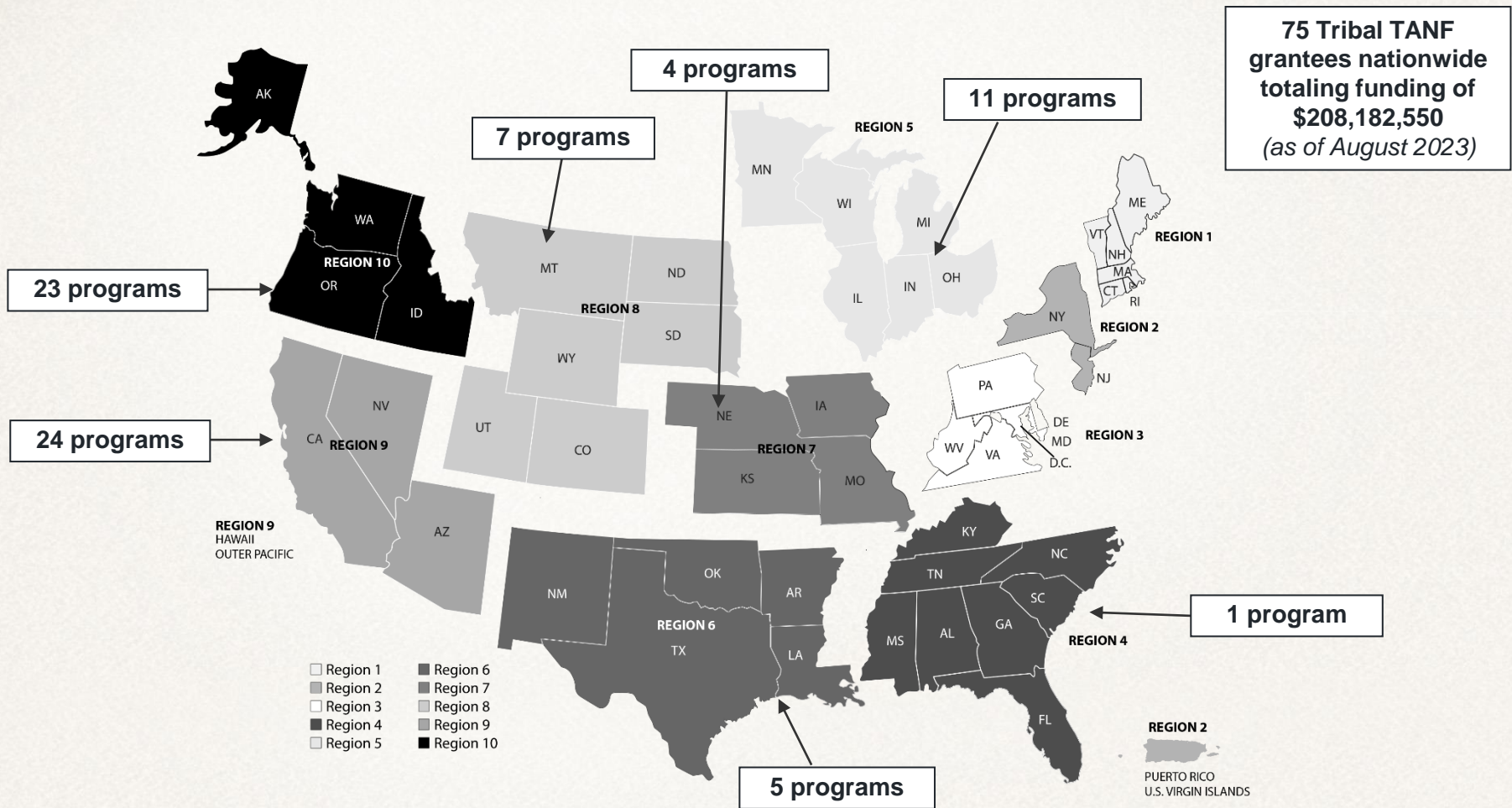Alaska, Idaho, Oregon, Washington

# ACF/OFA Regional Team

- Regional teams provide technical assistance and guidance to help jurisdictions improve program administration, compliance, and outcomes.

- Regional teams are there to engage in ongoing conversations with grantees and ensure that program implementation aligns with federal requirements and grantee plans.
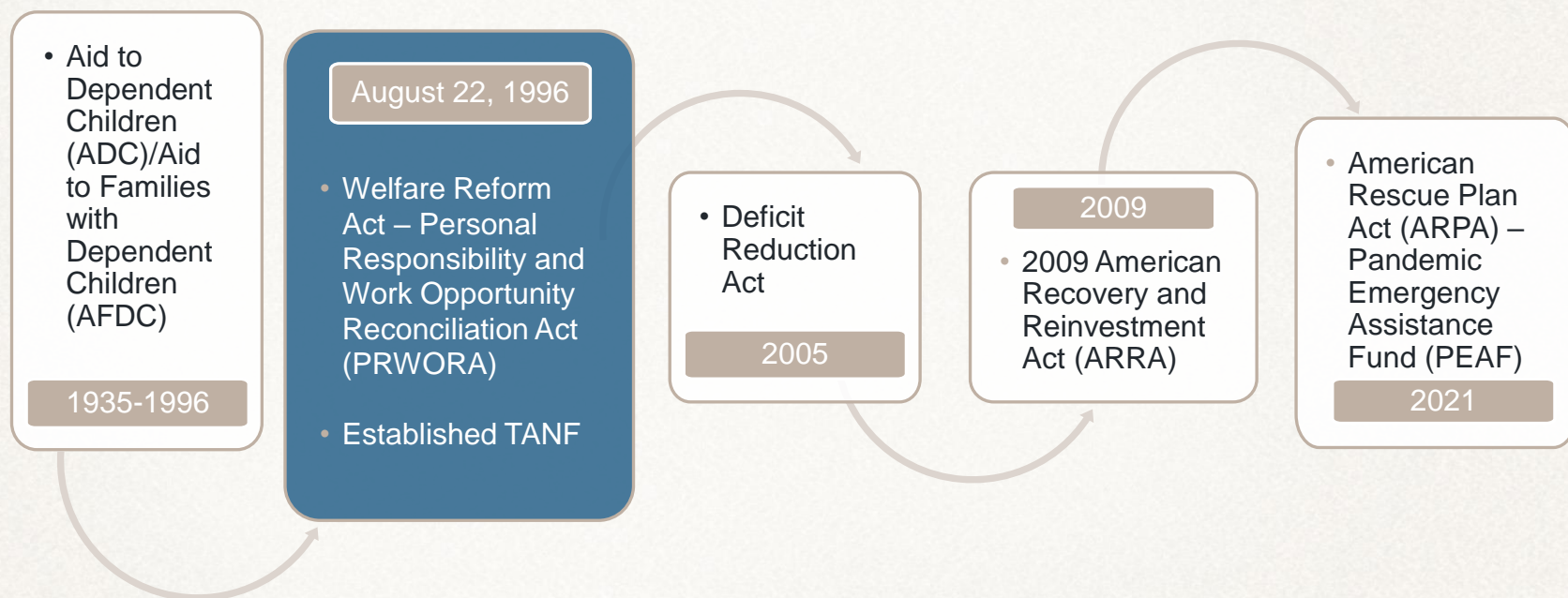
# Tribal TANF Program Locations



75 Tribal TANF grantees nationwide totaling funding of $208,182,550 (as of August 2023)

7 programs

4 programs

11 programs

23 programs

24 programs

1 program

5 programs

# Historical Background

# Legislative History of TANF

- Aid to Dependent Children (ADC)/Aid to Families with Dependent Children (AFDC)

  1935-1996

August 22, 1996

- Welfare Reform Act – Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA)

- Established TANF

- Deficit Reduction Act

  2005

2009

- 2009 American Recovery and Reinvestment Act (ARRA)

- American Rescue Plan Act (ARPA) – Pandemic Emergency Assistance Fund (PEAF)

  2021

# The Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA)

The Personal Responsibility and Work Opportunity Reconciliation Act of 1996 is the welfare reform law that established the Temporary Assistance for Needy Families (TANF) program.

**Important changes included**:

- Replaced the federal-state match under AFDC with the **TANF federal block grant** with a **state** maintenance-of-effort (MOE) requirement *(MOE requirement does not apply to Tribes)*

- Created tribal provisions

- Established time limits for families with an adult receiving federally funded assistance

- Included new work requirements

- Outlined penalties for non-compliance with work requirements

- Required cooperation with Child Support Enforcement

# Governing Law, Regulations, Official Guidance and Resources for Tribal TANF

**Program**
- Title IV-A of Social Security Act, Section 412, Direct Funding and Administration by Indian Tribes
- 45 CFR Part 286: Tribal TANF Regulation
- The Approved Tribal TANF Plan

**Fiscal**
- 45 CFR Part 75: Uniform Administrative Requirements, Cost Principles, and Audit Requirements for HHS Awards
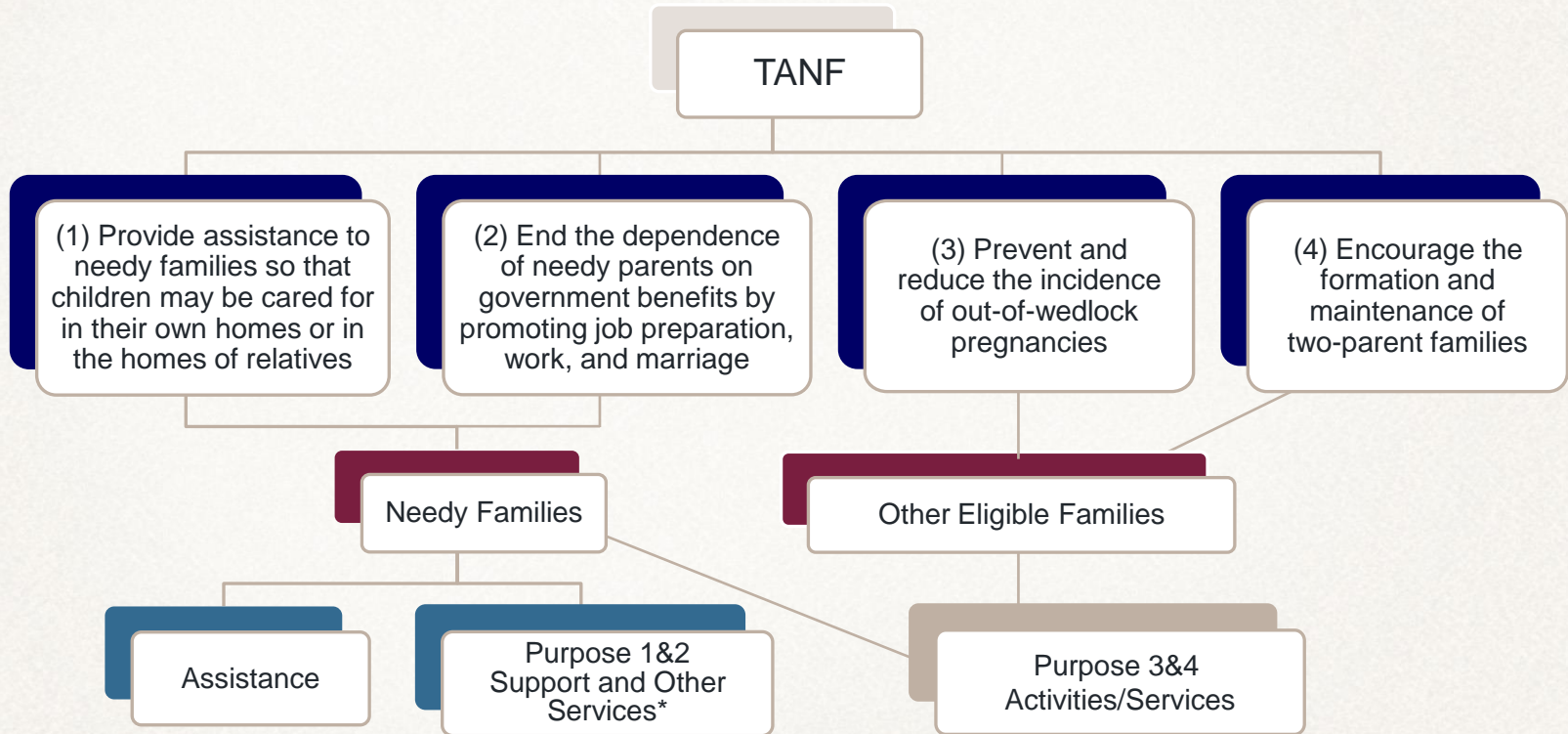- Grant Terms and Conditions

**Other Resources**
- ACF issued: Policy Announcements (PA), Policy Instructions (PI), and Information Memorandums (IM), Q&A's
- OFA website
- OFA Peer TA resources

# Key Tribal TANF Requirements

# TANF Allowable Uses



TANF

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

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

(3) Prevent and reduce the incidence of out-of-wedlock pregnancies

(4) Encourage the formation and maintenance of two-parent families

Needy Families

Other Eligible Families

Assistance

Purpose 1&2 Support and Other Services*

Purpose 3&4 Activities/Services

*This also includes work activities, non-recurrent short-term benefits, refundable tax credits, etc.

Social Security Act, Title IV, Section 401

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# TANF Purpose 1:

**Purpose 1: Provide assistance to "*needy*" families so that children may be cared for in their own homes or in the homes of relatives.**

- **Needy family:** income and/or resource standards established by the tribe; may establish a variety of income and resource standards for "assistance" and other services and benefits.

- Regulatory definition of "assistance" (defined at 45 CFR 286.10).

  - Cash, payments, vouchers, and other forms of benefits designated to meet a family's ongoing basic needs (i.e., for food, clothing, shelter, utilities, household goods, personal care items, and general incidental expenses).

  - **Supportive services** such as child care and transportation provided to families that are <u>not</u> employed.

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# TANF Purpose 2:

**Purpose 2: End the dependence of "*needy*" parents on government benefits by promoting job preparation, work, and marriage.**

- **Needy parent:** income and/or resource standards established by the tribe; includes noncustodial parent.

- Activities that promote and/or support any one of the three objectives - job preparation, work, and marriage -- would be consistent with this purpose.

- Examples of support services or activities include:
  - Job or career advancement activities
  - Marriage counseling
  - Financial support for child care services
  - Employment services (including to increase the noncustodial parent's ability to pay child support)

# TANF Purpose 3:

**Purpose 3: Prevent and reduce the incidence of out-of-wedlock pregnancies**

- **Eligibility:** not limited to "needy" families or individuals with a financial need; however, the program must establish and implement objective criteria regarding qualifications for Purpose 3 services/supports.

- Examples of support services or activities include:
  - Sex education programs
  - Teen pregnancy prevention activities
  - After-school programs that can be reasonably calculated to reduce the incidence of out-of-wedlock pregnancies

# TANF Purpose 4:

**Purpose 4: Encourage the formation and maintenance of two-parent families**

- **Eligibility:** not limited to "needy" families or individuals with a financial need; however, the program must establish and implement objective criteria regarding qualification for Purpose 4 services/supports.
- Examples of support services or activities include:
    - Healthy relationship classes
    - Couple's communication classes
    - Premarital counseling
    - Marriage counseling
    - Initiatives to promote responsible fatherhood
    - Parenting skills training

# Tribal TANF Plan

The Tribal TANF Plan is submitted with the initial Tribal TANF application, and must outline the tribe's approach to providing welfare-related services:

- **Time Period:** Covers a **three-year** period
- **Plan Content and Processing:**
  - Outlined in regulation (45 CFR Part 286 Subpart C)
    - Required information including work participation requirements
    - Submission timelines
    - Process for review and approval
  - Tribal TANF Plan Guidance & Tribal TANF Plan Requirements available on OFA Website
- **Renewal Timeline:** every **three years** and must be approved by OFA prior to the expiration of the current plan
- **Plan Submission**
  - Submitted under signature of the Tribal Chairperson or designee and accompanied by a Tribal resolution
  - Submitted to OFA via the Online Data Collection System (OLDC)
- **Plan Changes**
  - Plan may be amended to reflect program service and policy changes
  - Amendments must be submitted 30 days before proposed implementation
  - All amendments are approved for the first day of the month

# TANF Eligibility

Key eligibility components for participation in TANF:

- Service area

- Service population

- Member of federally-recognized tribe and/or meet the tribe's definition of an Indian family

- If the tribe would like to serve non-Indians, they must secure approval from the state

- Income

  - **"Assistance":** "Needy" families (only) who meet the eligibility criteria determined by the tribe and contained in the Tribal Family Assistance Plan

  - **"Non-assistance" under Purpose 1 and 2:** (e.g., NRST, work subsidies, childcare and transportation to those working): "Needy" families only, but limitations associated with assistance do not apply

  - **Purpose 3 and 4:** Any member of the service population can receive services

(45 CFR Part 286.10, 45 CFR Part 286.20, 45 CFR Part 286.75)

# Work Participation Requirements

The work participation requirements reflect the strong focus in PRWORA on moving recipients to work and self-sufficiency.

- The tribe's negotiated minimum work participation requirements must be outlined in the approved TFAP, and include:
  - The work participation rate for <u>all</u> families (including 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.

(45 CFR Part 286.80)

# What If Individual Work Participation Hours Are Not Met?

- Recipients, with few exceptions, must engage in an approved Tribal TANF work activity 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(a)(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 (45 CFR 286.135(a)(3)).

- Tribes determine the sanctions against individuals who refuse to engage in work activities in the absence of good cause.

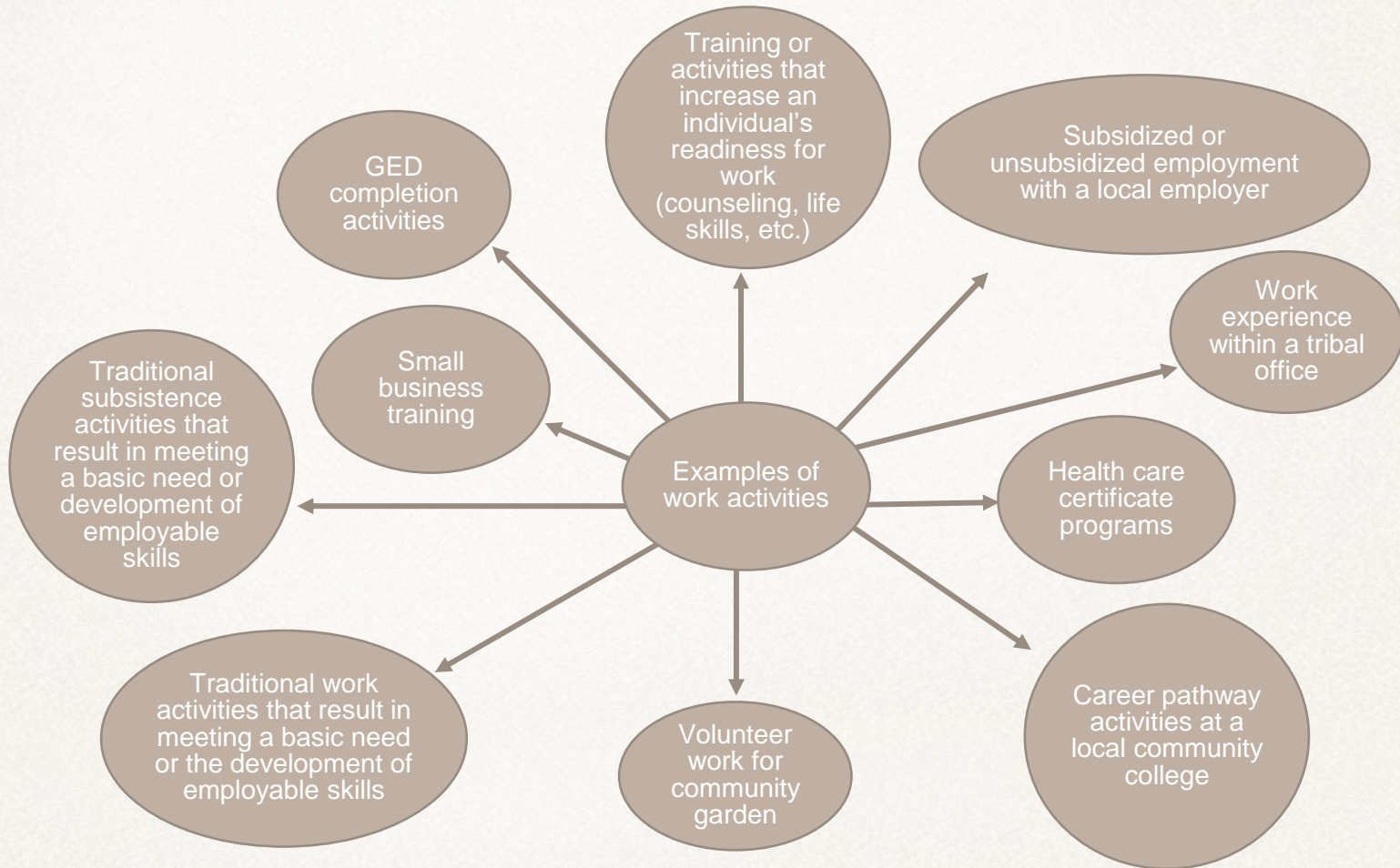*Only excused from individual sanctions, not removed from Work Participation Rate (WPR)*

# Work Activities
# That Count Towards the WPR

(1)  Unsubsidized employment;

(2)  Subsidized private sector employment;

(3)  Subsidized public sector employment;

(4)  Work experience;

(5)  On-the-job training (OJT);

(6)  Job search and job readiness assistance; (within the limitations noted at 286.105)

(7)  Community service programs;

(8)  Vocational educational training; (within the limitations noted at 286.105)

(9)  Job skills training directly related to employment;

(10) Education directly related to employment, in the case of a recipient who has not received a high school diploma or a certificate of high school equivalency;

(11) Satisfactory attendance at secondary school or in a course of study leading to a certificate of general equivalence, if a recipient has not completed secondary school or received such a certificate;

(12) Providing child care services to an individual who is participating in a community service program; and

(13) Other activities that will help families achieve self-sufficiency

(45 CFR Part 286.100)

# Examples of Work Activities

Training or activities that increase an individual's readiness for work (counseling, life skills, etc.)

GED completion activities

Subsidized or unsubsidized employment with a local employer

Work experience within a tribal office

Traditional subsistence activities that result in meeting a basic need or development of employable skills

Small business training

Examples of work activities

Health care certificate programs

Traditional work activities that result in meeting a basic need or the development of employable skills

Volunteer work for community garden

Career pathway activities at a local community college

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# Work Participation Rate (WPR)

$$WPR = \frac{\text{Number of families receiving TANF assistance that include an adult who is meeting work requirements}}{\text{Total number of families that include an adult receiving TANF assistance}}$$

45 CFR 286.85(c)

# 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 assessed, they may dispute the penalty, provide reasonable cause, or establish and complete a Corrective Compliance Plan.

45 CFR 286.195 thru 286.240

# Work Requirements Disregards and Exemptions

**Disregarded -** TANF family is <u>not included</u> in the calculation of the work participation rate if:

- A family has a child under 12 months.

OR

- Required to participate, but not participating; and sanctioned for the reporting month, but not sanctioned for more than 3 months within the preceding 12-month period.

**Exempted -** Individual will not be penalized for failure to engage in work (i.e., good cause exception); however, the TANF family <u>is included</u> in the calculation of the work participation rate.

# Time Limits for Assistance

- Eligibility for TANF assistance (as defined at 45 CFR 286.115) is time limited.

  - *The regulations require that tribes propose time limits which reflect the intent of Congress that TANF should be temporary.*

- Time limits, exceptions to time limits, and percentage of the caseload to be exempted from the time limit due to hardship must be included in the tribe's TANF plan (45 CFR 286.115 & 286.120).

- Tribes must count all prior months of federally-funded TANF assistance received, except for any month that is exempted by statute or regulation (45 CFR 286.125).

# Time Limit Exemptions

**Required Exemptions:**

- 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.


**Optional Exemptions:**

- 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)

# Elements that Contribute to a Successful Program

# Practices that Contribute to Client Success

**Two common program components** that support TANF participant success include:

- Case Management/Coaching
- Work Readiness/Career Development

# Effective Case Management/Coaching

- Actively engages and empowers the client

- Involves ongoing assessment to:

  - Identify needs (and address them)

  - Identify strengths and assets (and utilize them)

- Takes a whole family approach

- Facilitates engagement with caretakers to ensure positive development outcomes in child-only cases

- Included strong collaboration and partnerships

# Effective Work Readiness & Career Development Support

- Actively engages client in preparing for work
- Assesses needs, strengths, and interests
- Addresses barriers (to entering and maintaining employment)
- Provides training and education
- Engages employers
- Connects clients to opportunities
- Develops strong partnerships and collaboration
- Can include:
  - Work experience
  - Subsidized employment
  - Career pathways

# Key Fiscal Requirements

# 45 CFR Part 286: Allowable Use of TANF Funds

Expenditures that are reasonably calculated to accomplish the purposes of TANF, including but not limited to:

- The provision to low-income households of assistance in meeting home heating and cooling costs;

- Assistance in economic development and job creation activities;

- The provision of supportive services to assist needy families to prepare for, obtain, and retain employment;

- The provision of supportive services to prevent out-of-wedlock pregnancies, and assistance in keeping families together.

45 CFR Part 286.35

# 45 CFR Part 286: Improper Uses of TANF Funds

A tribe **may not** use Tribal Family Assistance Grant (TFAG funds):

- To provide assistance to families and individuals who:

    - do not meet the eligibility criteria in the TFAP;

    - have exceeded the allowable time limit;

    - or are not citizens of the United States or meet the definition of "qualified aliens."

- **To contribute to or to subsidize non-TANF programs.**

- For the construction or purchase of facilities or buildings.

- For services or activities prohibited by 45 CFR Part 75, subpart E.

Tribes **must use** program income generated by the Tribal Family Assistance Grant for the purposes of the TANF program and for allowable TANF services, activities, and assistance.

All provisions in 45 CFR Part 75 are applicable to the Tribal TANF program.

45 CFR Part 286.45

# 45 CFR Part 286: Administrative Costs

Administrative costs means costs necessary for the proper administration of the TANF program.

- For example, personnel costs for those staff conducting accounting, preparation of program plans/budgets/schedules, and fraud & abuse units are **included** as administrative costs.

It excludes the direct costs of providing program services:

- For example, personnel costs for those staff providing program services (including case management), and information technology systems and computerization needed for tracking and monitoring are **excluded**.

45 CFR Part 286.55 and 45 CFR Part 286.5.

# PART 75—UNIFORM ADMINISTRATIVE REQUIREMENTS, COST PRINCIPLES, AND AUDIT REQUIREMENTS FOR HHS AWARDS*

This Uniform Guidance was implemented in 2014 and is an authoritative set of rules and requirements for federal awards that synthesizes and supersedes guidance from earlier OMB circulars

- Subpart A—Acronyms and Definition
- Subpart B—GENERAL PROVISIONS
- Subpart C—PRE-FEDERAL AWARD REQUIREMENTS AND CONTENTS OF FEDERAL AWARDS
- **Subpart D—POST FEDERAL AWARD REQUIREMENTS**
- **Subpart E—COST PRINCIPLES**
- Subpart F—AUDIT REQUIREMENTS

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# Subpart D—POST FEDERAL AWARD REQUIREMENTS

Standards for Financial and Program Management

- Performance Management

- Financial Management

- Internal Controls

- Cost Sharing or Matching

- Revision of Budget and Program Plans

- Methods of Procurement to be Followed

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# Subpart D—Internal Controls

**45 CFR Part 75.303:**

Grantee must:

- Establish and maintain effective internal control over the federal award.

- Comply with federal statutes, regulations, and the terms and conditions of the federal awards.

- Evaluate and monitor compliance with statutes, regulations, and the terms and conditions of federal awards.

- Take prompt action when non-compliances are identified including those from audits.

- Take reasonable measures to safeguard protected personally identifiable information (PII) and other sensitive information.

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# 45 CFR Part 75 Sub-Part E Cost Principles

**Purpose:**

- Establishes principles for determining the allowable costs incurred by non-federal entities under federal awards.

- Are for the purpose of cost determination.

- Are designed to provide that federal awards bear their fair share of cost recognized under these principles except where restricted or prohibited by statute.

# Cost Principles: Prior Approvals

- Prior written approval is required for the purchase of capital equipment with a unit cost of $5,000 or more.

- Prior approval is required for software purchases that equal or exceed $5,000 *(software is part of the Information Technology system and classified as equipment)*.

- If you do not obtain prior approval, only the depreciation value, based on the estimated useful life of the equipment, can be charged annually (to the federal TANF grant) until the equipment is fully depreciated.

(45 CFR Part 75.2, 45 CFR Part 75.407, 45 CFR Part 75.436, 45 CFR Part 75.439)

# Cost Principles: Prior Approvals

These items are further defined as:

**Equipment** means an article of nonexpendable, tangible, personal property having a useful life of more than one year and a unit acquisition cost of $5,000 or more.

**Acquisition cost** means the price of the asset, including the cost to put it into place. Any modifications, attachments, or accessories needed to make the equipment useable are considered part of the purchase price.

(45 CFR Part 75.2, 45 CFR Part 75.407, 45 CFR Part 75.439)

# Determining Allowable Expenses

In determining whether or not an expenditure or activity is allowable, a program must consider the fiscal regulation at 45 CFR Part 75.403 through 75.405:

- Is the expenditure necessary for the performance of the program?
- Is the expenditure reasonable?
- Is the expenditure allocable?
- Is the expenditure allowable?

# Tribal TANF Reporting Requirements

# Tribal TANF Required Reports

Tribal TANF programs must submit three reports to OFA. Two reports are related to program delivery and the third is related to program expenditures:

(1) **A quarterly data report** (**program**) submitted within 45 days following the end of each quarter.

(2) **196T :** a **quarterly financial report** submitted within 45 days following the end of each quarter in OLDC

(3) **Annual Report (program)** due 90 days after the end of the Fiscal Year which it covers and submitted in OLDC. Elements of the Annual Report are outlined in 45 CFR 286.275

| Federal Calendar Quarter | QTR Start: | QTR Ending: | Report Due: | Quarterly Data Report | Quarterly Financial Report | Program Annual Report |
|---|---|---|---|---|---|---|
| QTR 1 | Oct. 1 | Dec. 31 | Feb. 14 | X | X | |
| QTR 2 | Jan. 1 | Mar. 31 | May 15 | X | X | |
| QTR 3 | April 1 | June 30 | Aug. 14 | X | X | |
| QTR 4 | July 1 | Sept. 30 | Nov. 14 | X | X | X |

45 CFR 286.255 and 45 CFR 286.275

# The Online Data Collection (OLDC) System

- OLDC is an electronic data collection system for submitting ACF program and fiscal reports and program plans.

- All ACF reports are required to be submitted electronically.

- All Tribal TANF Plans are submitted electronically in the OLDC system attached to the SF-424M report.

- Password and username required to access OLDC.

- Helpdesk available for support at: help@grantsolutions.gov

- User guides available; contact Regional Program Specialist.

45 CFR 75.342 & 75.341 and 45 CFR 286.265

# Resources and Tips for Tribal TANF Programs

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# OFA Website

- OFA's website offers a variety of information on TANF, Tribal TANF, and other tribal programs.
  - OFA website: https://www.acf.hhs.gov/programs/ofa/

- OFA maintains a list of helpful questions and answers on the Tribal TANF program. This list covers topics such as: TANF assistance, eligibility, funding, work activities, child-only cases, and more.
  - Helpful Q&A: https://www.acf.hhs.gov/ofa/faq/q-tribal-tanf

# OFA PeerTA

**OFA PeerTA** facilitates information sharing across agencies that implement TANF.

**The OFA PeerTA website** is a communications and dissemination vehicle that supports organizations serving TANF and low-income families.

**On the website**, state, tribal, and local TANF agencies can request TA; connect with peers from around the country; and learn about innovative programs, new OFA initiatives, the latest research on effective strategies supporting economic mobility, and upcoming TA events.

**The website is a repository for all OFA TA activities.** It includes:

- Training and Technical Assistance (TTA)
- Resource Library
- Peer Connections
- Learning Center

To visit the site, go to:
https://peerta.acf.hhs.gov/.

# Helpful Tips

- All services must meet a statutory purpose of TANF and be included in the Tribe's TANF Plan.

- Ensure eligibility for all services.

- Keep good records: document, document, document!

- Establish effective communications strategies with your primary partners and collaborators (leadership, OFA, community partners).

# NEW Program Requirements

# NEW Purpose

The NEW Program provides eligible Indian tribes, including Alaska Native organizations, the opportunity to provide work activities and services to their needy clients.

NEW programs support:

Job *Readiness*
Job *Placement*
Job *Retention*

# NEW Program Plans

Grantees must administer NEW programs in accordance with:
- ✓ Their approved NEW plan
- ✓ Applicable statutory and regulatory requirements

NEW Plans must be renewed every three (3) years
- OFA regional teams assist with plan renewals

# Program Flexibility

**NEW grantees have flexibility to determine:**

- Service area
- Service population
- Equitable eligibility criteria
- Work activities
- Supportive services
- Program outcomes
- Whether to serve TANF clients

These elements must be included in the NEW program plan.

# Service Area & Population

A Tribe must specify in its NEW plan:
- ✓ The *population* it intends to serve; and
- ✓ The Tribe's *geographic service area*

*Note:* A tribe may define its service area differently from its Bureau of Indian Affairs service area.

- An explanation must be included if this is the case. (45 CFR 287.110(a))

# Eligibility

NEW plans must include eligibility criteria
- Programs must have internal procedures to ensure that eligibility requirements are met and documented
- Criteria must be equitable

Eligibility can be based on selective factors
- Participation in another program, such as TANF
- Specific criteria like single parents, unemployed individuals, teen parents, veterans, etc.

Tribes may implement a prioritization system
- E.g.: Priority to serve under-employed single mothers
- E.g.: Priority to serve veterans

# Work Activities

Tribes have the flexibility to design their work activities, provided they directly relate to education, training, or job readiness.

*Examples of allowable work activities include:*

- Educational activities
  - GED
  - Remedial
  - Vocational
  - Alternative education
  - Post secondary education, job readiness activities
- Job search, skills training, job development and placement

- Training and employment activities, including OJT
- Pre/Post employment or job retention services
- Subsidized, unsubsidized, or private sector employment
- Job creation activities
- Community work experience
- Community service
- Traditional subsistence activities

# Supportive & Job Retention Services

Tribes can design their program to provide the supportive and job retention services they determine are necessary for a client to participate in the NEW program.

| Examples of Supportive Services |
| --- |
| Transportation |
| Child care |
| Uniforms |
| Tools |
| Employment-related counseling |
| Financial literacy |
| Educational supplies |

*(45 CFR 287.125)*

# Bonuses, Rewards, & Stipends

**OFA TIP**

- NEW funds can be used to provide clients with bonuses, stipends and performance awards.

- Criteria should be equitable and outlined in your NEW plan.

*NOTE:* These allowances *may* be counted as income in determining eligibility for some programs, such as TANF or other need-based programs.

*(45 CFR 287.135)*

# Performance Measures

- Each grantee must develop their own performance standards and measure their program results.

- Plans should outline:
  - At least two or more goals related to preparing clients for work
  - A description of two or more measurable outcomes that will be used to determine the effectiveness of the program.

- NEW grantees share information about their programs' outcomes on the annual report.

*(45 CFR 287.145)*

# Goals *vs.* Performance Measures

| Examples of *Goals* | Examples of *Performance Measures* |
|---|---|
| "All participants without a HS diploma will be referred for GED classes" | "10 participants will complete their GED" |
| "Work ready participants will be referred to employment agencies and offered resume writing services" | "20% of participants who complete a NEW program activity will enter unsubsidized employment" |

# Providing Coordinated Services

- Coordinating with other programs helps bridge service gaps, prevents the duplication of benefits, and provides comprehensive support to clients.

- Consider coordinating with programs who serve the same individuals.

- Opportunities for coordination can include:

  - TANF
  - WIOA services
  - Child-care

  - Transportation agencies
  - Local colleges
  - Businesses

# NEW & TANF Coordination

If a NEW program chooses to serve TANF clients, it should coordinate between NEW and TANF.

NEW grantees should coordinate with the State or tribal TANF agencies on:

- Eligibility criteria for TANF recipients to receive NEW services
- Exchange of case file information
- Prevention of duplication of services
- Changes in client status that result in loss of cash assistance, Medicaid, or other services
- Identification of work activities related to work participation requirements
- More areas are listed under 45 CFR 287.115

*(45 CFR 287.115)*

# Online Data Collection (OLDC) System

- OLDC is an electronic data collection system used for submitting:
  - Program plans, renewals, amendments
  - ACF narrative and statistical reports
  - NEW fiscal reports for carryover funds from FY2015 and earlier

- All NEW Plans and reports are submitted electronically in the OLDC system and attached to the SF-424M report form.

- A password and username is required to access OLDC.

- Helpdesk support is available at help@grantsolutions.gov

- Contact a Regional Program Specialist for a user guide.

*(45 CFR 75.342 & 75.341 and 45 CFR 286.265 )*

# Plan Amendments

Plan amendments are required for substantial changes.

- 45 CFR 287.85 defines a substantial change as:
  - a change in the agency administering the NEW Program
  - a change in the designated service area *or* population
  - a change in work activities provided
  - a change in performance standards

A plan amendment can be requested at any time.

- Amendments must be submitted to OFA no later than 45 days prior to the proposed implementation date

Regional office staff can help!

*P.L. 102-477 programs should contact the Bureau of Indian Affairs for additional information.*

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# Program Support & Technical Assistance

OFA regional teams provide direct support to help grantees improve their:

- NEW program administration
- Program outcomes

OFA staff can assist with technical questions and offer guidance to help grantees implement their programs according to their approved plan and federal requirements.

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# Fiscal Requirements

# NEW Funding

The NEW Program is a fixed block grant:

- NEW funds are distributed annually, not quarterly
- NEW grant award amounts are set at FY 1994 Tribal JOBS funding levels.

NEW programs must have an approved plan to receive funding.

# Carryover Balances

NEW programs can utilize carryover funds without fiscal year limitations.

- Develop plans to utilize funding
- Consider scope and sustainability of plans
- Amend your program plan, as required

Work with financial contacts in your tribe and the regional office staff to determine if your program has carryover balances

# Carryover Balances

Use carryover balances to innovate your program!

Resources for brainstorming:
- OFA Peer TA
- Pathways to Work Evidence Clearinghouse

Remember to think about sustainability!

# NEW Reporting Requirements

# Annual Reporting Requirements

**#1** Annual Financial Report

**#2** Annual Narrative & Statistical Report

Submit reports electronically via OLDC *or* PMS

Due Every Year

**September 28**

*P.L. 102-477 programs should contact the Bureau of Indian Affairs for additional reporting information.*

# Annual Financial Report

Grantees are required to report expenditures to ACF annually

- A separate annual report must be submitted for each NEW grant until all the funds are expended.

> Use **SF-425** to report expenditures
> Due every year on **September 28th**

Reports must be submitted electronically

- Expenditures from FY 2016 or later are reported through the HHS Payment Management System (PMS)

- Expenditures from FY 2015 or earlier are reported through the On-line Data Collection System (OLDC)

# Annual Narrative & Statistical Report

- NEW grantees must submit an annual narrative and statistical report each year, using the OMB-approved NEW program report form.

- Reports cover the July 1 — June 30 program year and must be submitted into OLDC by September 28th of each year.

| Part 1 – **Narrative Report** Summarizes the noteworthy achievements during the report period and identifies barriers encountered, and the actions taken to resolve them. | Part 2 – **Statistical Report** Summarizes the number of clients served, their characteristics, the activities and services provided, and outcomes achieved |
|---|---|

- The information collected in these reports can be used by the program to evaluate program objectives, measure performance, and assess allocation of resources.

- Data from these reports is shared in the annual report to Congress.

# Resources

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# Regulations, Guidance, & Resources

## *Program Resources*

- 45 CFR Part 287: NEW Regulation: The basic rules and guidelines governing all general aspects of NEW

- Native Employment Works (NEW) Plan Guidance

- The Tribe's approved NEW Plan

## *Fiscal Resources*

- 45 CFR Part 75: Omni Circular (Uniform Guidance): The rules and guidelines governing allowable costs and fiscal management

- More on Grant Terms and Agreements

## *Other Resources*

- OFA's Website for Native Employment Works Resources

- OFA Peer TA Website

# Common Acronyms

**TANF**—Temporary Assistance for Needy Families

**ACF**—Administration for Children and Families

**CFR**—Code of Federal Regulations

**OFA**—Office of Family Assistance

**OLDC**—Online Data Collection

**TFAP**—Tribal Family Assistance Plan

**WPR**—Work Participation Rate

**RO**—ACF Regional Office (i.e., ACF Region IX)

**CO**—OFA Central Office (Washington DC)

# Thank you!