

# *Tribal Temporary Assistance for Needy Families*



*The Initial Steps for Tribal TANF:  
Submitting a letter of Intent (LOI)*



# Presented by the Office of Family Assistance

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Felicia Gaither, PHD  
Director, Division of Tribal TANF  
Management  
(202) 205-8354  
Washington, D.C.  
[felicia.gaither@acf.hhs.gov](mailto:felicia.gaither@acf.hhs.gov)

Mikaela Smith  
TANF Program Specialist  
ACF Region IX  
San Francisco  
[mikaela.smith@acf.hhs.gov](mailto:mikaela.smith@acf.hhs.gov)

Eric Keller  
Program Specialist  
Division of Tribal TANF  
Management  
Washington, D.C.  
[eric.keller@acf.hhs.gov](mailto:eric.keller@acf.hhs.gov)

Tonya Taylor  
Program Specialist  
Division of Tribal TANF  
Management  
Washington, D.C.  
[tonya.taylor@acf.hhs.gov](mailto:tonya.taylor@acf.hhs.gov)





# Outline

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- Regional Office role
- Central Office role
- Letter of Intent: required components
  - Intended implementation date
  - Intended service population
  - Intended service area
- Important items to consider
- Plan requirements



# Regional Office Role

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- The Regional Office is your primary contact for Tribal TANF program development, with the first step being the Letter of Intent
- To begin the process, please contact the Regional Program Manager or your assigned Program Specialist in the Region





# Regional Office Contacts

Region	States & Territories	Manager	Phone Number
I	CT, MA, ME, NH, RI, VT	Carol Monteiro	(617) 565-2462
II	NJ, NY, PR, VI	Frank Ceruto	(212) 264-2890, ext. 133
III	DC, DE, MD, PA, VA, WV	Eileen Friedman	(215) 861-4058
IV	AL, FL, GA, KY, MS, NC, SC, TN	LaMonica Shelton	(404) 562-2938
V	IL, IN, MI, MN, OH, WI	Thomas Schindler, Acting	(312) 886-9540
VI	AR, LA, NM, OK, TX	Larry Brendel	(214) 767-6236
VII	IA, KS, MO, NE	Gary Allen	(816) 426-2236
VIII	CO, MT, ND, SD, UT, WY	Larry Brendel, Acting	(214) 767-6236
IX	AZ, CA, HI, NV, AS, GU, MP	Julie Fong	(415) 437-7579
X	AK, ID, OR, WA	Frank Shields	(206) 615-2569



# Central Office Role

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- Reviews LOI
- Supportive role to the Region Office
- Assists with coordination with BIA, if necessary
- Determines funding amount for the Tribal Family Assistance Grant
- Provides final approval of Tribal TANF programs





# Letter of Intent Components

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- The Letter should be addressed to the Regional TANF Program Manager
- Intended implementation date
- Intended population to be served
- Intended service area
- Identify Tribal contact with whom ACF will be working
- Signature of Tribal leadership







# Letter of Intent Components (cont.)

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- An acceptable Letter of Intent informs ACF of a Tribe's intent to operate a TANF program, and provides a clear description of the service area and population that a Tribe proposes to serve.
- The Letter enables ACF to request from the State the data necessary for negotiation of a Tribal Family Assistance Grant.
- The proposed service area and population must be clear and specific so that ACF can request and the State can provide, accurate data.
- The Letter of Intent does not confer legal rights to serve the area and/or population.





# Intended Implementation Date

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Factors to consider when determining your proposed date:

- The proposed implementation date can change, often because of an extended negotiation period with the State.
- The Tribe must be ready to open its doors and begin serving clients on the official start date.
  - Reminder: TANF does not provide for start-up costs/ infrastructure
- Please reference the Table at 45 CFR 286.160 for timeframes.
- Prior to starting the Tribe needs to have an MOU in place with the County/ State to transfer cases.
- Prior to the start date the Tribe needs to have staff hired, data systems in place, and policies and procedures documented.





# Intended Implementation Date (cont.)

<b>Implementation date:</b>	<b>Letter of intent due to ACF and the State:</b>	<b>Formal plan due to ACF:</b>	<b>ACF notification to the State due:</b>
January 1, February 1 or March 1	July 1 of previous year	September 1 of previous year	October 1 of previous year.
April 1, May 1 or June 1	October 1 of previous year	December 1 of previous year	January 1 of same year.
July 1, August 1 or September 1	January 1 of same year	March 1 of same year	April 1 of same year.
October 1, November 1 or December 1	April 1 of same year	June 1 of same year	July 1 of same year.

Source: 45 CFR 286.160



# Intended Service Population

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Who does the Tribe plan to serve?

- Serve only Tribal members
- Serve all Federally recognized tribal members
- Serve non-Indians (need State approval)

Will the Tribe serve the same population on the reservation and off-reservation?





# Intended Service Area

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What service area does the Tribe propose to serve?

- On reservation
  - Please specifically indicate which Reservations in which Counties the Tribe is proposing to serve.
- Off-reservation BIA-service designation
  - Does the Tribe have a BIA-designation?
  - Does it share that designation with any other tribe(s)?





## Intended Service Area (cont.)

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Concurrence might be necessary:

- If the Tribe wants to serve an area where it shares a BIA-designation, it must obtain a resolution from the other tribe(s).
  - Please consult with Regional Staff about the necessary resolution content
  - These resolutions must be submitted to ACF before ACF can formally accept the Tribe's Letter of Intent.
- If the Tribe wishes to serve an off-reservation area where no BIA-designation has been established, the Tribe must obtain approval from the State.





# Important Items to Consider

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- If the Tribe submits a Letter of Intent for an area that is already being served, then the Letter will be deemed unacceptable
- Conduct due diligence
  - To the extent possible, conduct research and take steps to learn about what the caseload data is based on the area you want to serve and establish what the potential caseload will be based on your proposed service area and population.
  - Data must relate to 1994 based on regulation
  - Potential data sources: Census Bureau data, BIA data, data from other Federal programs





# Tribal Family Assistance Plan Requirements

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- Required elements in a Tribal Family Assistance Plan are located at 45 CFR 286.75 and include:
  - Eligibility criteria, including a definition for “needy family,” income and resource limits, etc.
  - Description of the assistance, support services, and work activities to be offered, and the means by which they will be offered
  - The goals for the TANF program and the means of measuring progress toward those goals
  - Assurance that the Tribe provided a 45-day public comment period
  - Identify employment opportunities and how the Tribe will enhance such opportunities







# Tribal Family Assistance Plan Requirements

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- Required elements in a Tribal Family Assistance Plan are located at 45 CFR 286.75 and include:
  - Describe the appeal (dispute resolution) process
  - Provide the Work Participation requirements and minimum work hours per week (to be negotiated with ACF)
  - Describe the penalties/sanctions for refusing to engage in required work activities
  - Provide time limits for assistance and any exemptions

More information on required elements can be found at:

[http://archive.acf.hhs.gov/programs/ofa/dts/guidance/tribal\\_tanf\\_plan.html](http://archive.acf.hhs.gov/programs/ofa/dts/guidance/tribal_tanf_plan.html)





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# Questions and Answers

*The Administration For Children and Families*

