The Tribal TANF grantee’s definition of each work activity. (BBNA TANF Plan, section 13 – Work Requirements – 13.4 Acceptable work activities)

UNSUBSIDIZED EMPLOYMENT
In paid employment, the participant receives income in cash or in-kind as wages, salary, or commission from an employer in exchange for work performed. Paid employment also includes self-employment. In paid employment, the employer pays the entire cost of the participant’s wages and benefits, and receives no wage subsidy from a public agency in exchange for employing the participant.

BASIC EDUCATION
Education activities enhance a participant’s ability to gain employment. Some classes provide very basic reading instruction and other classes will upgrade skills needed to enter employment. A high school diploma or GED is often necessary in an urban setting to gain employment at a level of sustaining self-sufficiency.

WORK SEARCH
Work search, whether conducted independently or in a group setting will depend on the needs of the participant. During Self-Initiated Work Search, a participant may:
- Contact employers and apply for paid work;
- Register for work with the Alaska Employment Service (DB2);
- Network informally with other job seekers in the Career Center;
- Attend mock interview practice;
- Turn in job logs to their TANF Case Worker;
- Update their resume and review with TANF Case Worker.

PRE-EMPLOYMENT SKILL TRAINING
These activities help prepare participants for employment by gaining knowledge about topics such as general workplace expectations, work ethics, interview skills, urban versus rural workplace norms, and needed child care arrangements. Participants also develop attitudes needed to compete successfully in the labor market.

JOB SKILLS TRAINING
Jobs skill training involves participation in an organized educational program that directly relates to preparation for employment. This training gives the participant specialized
knowledge, abilities, and job skills. Depending on the program and the participant’s expected goals, job skills training may be as elaborate as an apprenticeship program or as simple as a job sampling placement. Often programs provide combinations of vocational training, basic education, and job sampling, for example the Job Corps program. Job skills training may include short term classes on budgeting, information and resource gathering skills, and/or basic computer classes.

A Job skill training typically last less than a year, and often is condensed into short, intense courses of instruction. These programs generally offer specific diplomas or other formal certification of skill level.

**ON-THE-JOB TRAINING (OJT)**

On-the-Job Training (OJT) creates a job opportunity by subsidizing the employers’ training costs when they hire and train a Tribal Temporary Assistance participant. Tribal Temporary Assistance Supported Employment Coordinator promotes the use of OJT among employers and work with TANF Case Workers to fill OJT job orders. TANF Case Workers screen participants and refer appropriate candidates to the Supported Employment Coordinator.

Once the participant is hired, an OJT training plan is negotiated by the employer, the participant, and the Supported Employment Coordinator based upon the requirements of the specific job. The OJT payment helps to reimburse the employer for the cost of the training, while the employee gains new skills and abilities essential to perform the job.

The goal of OJT is for the trainee to become a permanent, unsubsidized paid employee after satisfactorily completing the training plan. An OJT employee’s working conditions and benefits must be equal to those provided to a regular employee employed a similar length of time and doing the same type of work.

Employers can be reimbursed up to 50 percent of the wage paid to the trainee. Reimbursement for the OJT training is limited to six months or 1040 training hours. Employers may also qualify for the Work Opportunity or Welfare-to-Work Tax Credits as a result of the OJT hire.

**VOCATIONAL TRAINING AND EDUCATION**

Vocational Training provides marketable job skills, rather than opportunities for career change. Care must be taken in assigning this activity to ensure the training prepares the participant for the earliest paid employment opportunity, that it leads to long term self-sufficiency, and that it concludes within the TANF participant’s 60 month lifetime limit on benefits.

Generally, the length of Vocational Training activities should not exceed 12 months, however, if the participant’s circumstances and need warrant additional training, it may be approved up to 36 months. Participation in Vocational Training beyond this limit doesn’t count toward meeting participation target; however the supervisor may approve training
activities that exceeds this limit when the training offers viable employment opportunities with earnings that allow the family to leave TANF prior to the 60 month limit.

**JOB SAMPLING**

Job sampling means an activity assigned by the TANF Case Worker that achieves a useful public purpose and provides the participant the opportunity to:

- learn, improve, or apply job skills;
- enhance the participant’s employability by acquiring recent work experience and employer references;
- try out an occupation in order to make an informed decision about its suitability as a career; or
- refurbish publicly assisted housing

Job Sampling places a participant at an unpaid work site that provides an opportunity to gain specific job skills and work experiences. The specific nature of the job skills and work experience sought requires the Supported Employment Coordinator/Community Work Coordinator to match the participant with the work site. Work Search often accompanies or immediately follows a Job Sampling placement. Vocational Training activities that require the participant to perform unpaid work may count as Job Sampling if it offers a balanced program of classroom instruction and unpaid work. If the training offers 50% or more unpaid work time, then count all time spent in the training as Job Sampling.

**COMMUNITY WORK EXPERIENCE AND JOB SAMPLING**

Community Work Experience and Job Sampling offer participants unable to find paid employment an opportunity to perform unpaid work. A participant is often assigned or approved to participate in these activities after completing a Work Search that did not result in paid employment. The assignment could also include a combination of other work activities, such as Education, with an assignment to Job Sampling or Community Work Experience. Participants living in areas with high unemployment also may be assigned to these activities if the lack of paid employment opportunities precludes them from finding a paid job.

**SELF-INITIATED TRAINING (SIT)**

During Employability Assessment, the TANF Case Worker may discover a participant already takes part in training or higher education they initiated on their own. Typically SIT programs involve college or other post-secondary type of education the participant enrolled in prior to selection for a work program. Based on a current assessment of the participant’s employability, and if the SIT meets all the criteria listed in this chapter, the TANF Case Worker may approve it as a training activity. It is wise to take into consideration funding status. Stopping an educational plan may incur immediate debt and no gain from having incurred the debt.

Approval criteria:
If another agency helped establish the SIT, then compare their employability assessment and training plan with the criteria. Also, determine the agency’s willingness to cover the SIT costs.

The participant is demonstrating acceptable progress through grades and attendance records.

The SIT fits into the Time Limits and allows the participant to be fully self-sufficient before their 60 months is up.

The participant will add paid work or work experience to build their resume and maintain a full 40 hours per week of activity. Make certain study time is allowed for in combining activities.

**COLLEGE EDUCATION**

This activity prepares a participant for professional or paraprofessional occupations consistent with their employment goals. Often this activity is referred to as post-secondary education (PSE) or University education. Expect college to prepare a participant to enter a paid job that quickly leads to TANF case closure.

**WORK: SUBSIDIZED WORK**

In Subsidized Work, the participant works for a non-profit, governmental or private sector employer and receives a wage or salary. Subsidized Work differs from paid employment because a public agency finances all or part of the participant’s earnings. This financing is called a wage subsidy. Subsidized Work differs from Job Sampling and Community Work Experience because it offers a wage and allows placement with private sector employers. Subsidized Work participants become regular employees of their employer, and earn the same wages and benefits paid to other entry-level employees. The employer covers workplace injury, lost income protection, and liability insurance costs.

Subsidized Work opportunities currently include:

- On-the-Job Training;
- Supported Employment;
- Youth Work Experience (via BBNA Education Department)

The features of Subsidized Work include:

- Creation of a new paid job opportunity, which is filled by the participant.
- Incentives to employers, including wage subsidies, tax credits and training support. The length of time an employer may receive a wage subsidy is limited to 6 months.
- Employment for Temporary Assistance participants. Once the wage subsidy ends, the employer is expected to retain the OJT participant as an employee. Under Supported Employment the employer is encouraged to but is not required to hire the participant.

**COMMUNITY WORK EXPERIENCE**

Community Work Experience means an activity assigned or approved by the TANF Case Worker that achieves a useful public purpose and contributes to the common good of the community, including subsistence activities.
Community Work Experience offers participants an opportunity to meet Tribal Temporary Assistance program requirements when paid employment is unavailable. Work Search and Paid Employment are the preferred activities. Unlike Job Sampling, participation in Community Work Experience takes few job skills. Tasks performed may be repetitive or involve menial labor. Typically, the work experience gained by the participant has greater value than the skills learned.

**SUBSISTENCE**
Subsistence activities means the noncommercial, customary, and traditional harvest of wild, renewable resources for use as food, shelter, fuel, clothing, tools, or transportation and must contribute to the common good of the community and achieve a useful public purpose.

**SELF-EMPLOYMENT**
Self-employment may be a viable means of paid employment, especially in communities with limited job opportunities. Although some self-employment ventures may lead to self-sufficiency, others may produce little net income. When working with the participant on their self-employment plan, it is important to help them assess income potential, meeting income goals, and length of time to meet the income goal. Does the participant have a business plan? Does the participant understand self-employment taxes? Will they be able to meet their medical needs when off of all assistance? Is this endeavor more appropriately a hobby which can bring in supplemental income rather than a full time endeavor which will bring them to full self-sufficiency? Will their current skills be better utilized in the labor market?

If the TANF Case Worker finds the self-employment venture unprofitable, then the TANF Case Worker may work with the participant to reduce or rearrange self-employment hours, and then help them identify transferable skills which will lead to self-sufficiency through another means of employment.

- *A description of the transitional services provided to families no longer receiving assistance due to employments.* (BBNA TANF Plan, Section 11.1.2.-Transitional Services) TANF adult participants and TANF youth may be eligible for support services payments for up to 12 months after they become employed and lose eligibility for the TANF cash grant due to excess income (i.e. income that exceeds the BBNA Tribal TANF eligibility standards). The post supportive services include: transportation, child care, work clothing, work tools, housing assistance, remedial medical services, grooming and other items and/or services considered essential for participation in work.

- *A description of how a Tribe will reduce the amount of assistance payable to a family when an individual refuses to engage in work without good cause pursuant to 286.145.* (BBNA TANF Plan Section 15 Penalty - SANCTION Policy)
The amount of the penalty for non-cooperation with CSSD, failure to develop and comply with a FSSP, or failure to participate in work or self-sufficiency activities, is 40% of the maximum payment for the family size.

If the non-cooperation continues for more than four months, the family’s cash assistance may be reduced by 75% of the maximum payment for the family size.

If the parent or caretaker does not cooperate for eight months, the family may be penalized the full amount of their cash assistance. The case is closed and the family must reapply to receive further benefits.

However, the progression from the 40% to the 75% reduction or from the 75% to the full family sanction is not automatic. The following actions must be taken before the family’s assistance can be reduced by 75% or their case closed:

- Complete a home visit. If a home visit cannot be completed, document the attempts to make the visit.
- Consider any information obtained from the home visit, other information about the family, and the availability of services in the community that might fit the family’s needs.
- Document that the health, safety and well-being of the children in the family will not be significantly jeopardized by imposition of the 75% or 100% reduction in assistance.

If a home visit is not or cannot be attempted, the family’s assistance cannot be reduced further.

- **The average monthly number of payments for child care services made by the Tribal TANF grantee through the use of disregards, by the following types of child care providers.**
  - Not Applicable.

- **A description of any nonrecurring short-term benefits provided, including:**
  (BBNA TANF Plan Section 11.1.3)
  - The eligibility criteria associated with such benefits, including any restrictions on the amount, duration, or frequency of payments;
    - BBNA program participants may be eligible for Nonrecurring Short-term Benefits: Subject to the availability of funds, the BBNA TANF Program may provide Non-recurring Short-term Benefits, i.e. emergency or crisis assistance, to needy families as provided at 45 CFR 286.10 (b) (1)

  Nonrecurring Short-term Benefits are benefits that:
  - Are designed to deal with a specific crisis situation or episode of need:
  - Are not intended to meet recurrent or ongoing needs; and
  Will not extend beyond four months.
• Any policies that limit such payments to families that are eligible for TANF assistance or that have the effect of delaying or suspending a family’s eligibility for assistance.
  i. Before an individual can be penalized, they must be given:
    1. Written notice that explains:
       • The requirement they must meet;
       • The activity that must be completed and when it must be completed; and
       • The consequence of not meeting the requirement.
    2. An adequate amount of time (10 days, at a minimum) to meet the requirement.

Before a penalty takes effect, applicants must receive adequate notice, and participants must receive a timely notice of adverse action. Both applicants and participants must be given the opportunity to demonstrate good cause for not meeting the program requirement.

• Any procedures or activities developed under the TANF program to ensure that individuals diverted from assistance receive information about, referrals to, or access to other programs benefits (such as Medicaid and food stamps) that might help them make the transition from Welfare-to-Work.

• Other support services such as substance abuse and other related job retention services will be made available through close collaboration and coordination with agencies such as the Bristol Bay Area Health Corporation and other social service agencies available in the Bristol Bay service area.

• A description of the procedures the Tribal TANF grantee has established and is maintaining to resolve displacement complaints, pursuant to 286.110. This description must include the name of the Tribal TANF grantee agency with the lead responsibility for administering this provision and explanations of how the Tribal TANF grantee has notified the public about these procedures and how an individual can register a complaint. (BBNA TANF Plan Section 16 Rights and Due Process)

• All TANF applicants/participants are provided their rights and responsibilities at the time of application and required to sign their rights and responsibilities.

• The participant who disagrees with the decision regarding their TANF case will contact the staff in a timely manner to complete an Informal Discussion to resolve the dispute. If this discussion results in a resolution, no further action will be taken. If the complaint is not resolved satisfactorily, the participant may prepare and submit a written Formal Grievance to the Tribal TANF Program Manager no later than 30 calendar days from the time of the occurrence of the event that resulted in the grievance.

The written statement must be filed using the BBNA Official Complaint Form. Fill in the following items:
1. Person Filing Claim
2. Date
3. Where you may be contacted, including mailing address
4. Explain nature of complaint
5. Requested Remedy

When the complaint is one that affects the cash assistance of the participant, the participant may request continued cash assistance without reduction until the grievance hearing decision. If, however, the grievance is not upheld, the participant will need to pay back to BBNA the amounts that are determined to be received in error.

Once the Formal Complaint is submitted, the TANF Program Manager will conduct the initial review or select another internal investigator (BBNA employee) or an external independent investigator to conduct the review at BBNA's discretion. If the participant does not agree with the decision reached at the initial review, it will be forwarded to the Chief Executive Officer for review and decision. If the participant does not agree with the Chief Executive Officer review and decision, then they may request a Hearing and bring legal representation.

- Tribes electing the FVO must submit a description of the strategies and procedures in place to ensure that victims of domestic violence receive appropriate alternative services, as well as an aggregate figure for the total number of good cause domestic waivers granted.
  - BBNA does not have the FVO.