Association of Village Council Presidents
P.L. 102-477 Plan
January 1, 2024 through December 31, 2026

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I. PROGRAMS TO BE INTEGRATED

The Association of Village Council Presidents (hereinafter AVCP) proposes the integration of the following programs under this PL 102-477 plan. The breakdown by department and program are as follows:

A. U.S. DEPARTMENT OF THE INTERIOR:
i. Higher Education Program
ii. Job Placement & Training Program
iii. Adult Basic Education Program
iv. Johnson O' Malley Program
v. General Assistance Program

B. U.S. DEPARTMENT OF LABOR:
i. WIOA Section 166 Comprehensive Services for Native Americans Program
ii. WIOA Section 166 Supplemental Youth Services Program for Native Americans Program

C. U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES:
i. Child Care Development Fund Program (CCDF)
ii. Native Employment Works Program (NEW)
iii. Tribal Temporary Assistance for Needy Families Program (TANF)
iv. Low Income Home Energy Assistance Program (LIHEAP)

This Tribal Service Delivery Plan will be operational and in place for three years from January 1, 2024 through December 31, 2026.

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II. COMPREHENSIVE STRATEGY

TRIBAL AUTHORITY

The Association of Village Council Presidents (AVCP) is one of the 12 regional Alaska Native Claims Settlement Act (ANCSA) Native non-profit organizations in Alaska and acts as a social-services arm of the region's 56 federally recognized Tribes. Since its establishment by the regional Tribal Councils in 1964, AVCP has grown to become a large and diverse social service agency, tribal rights advocate, and community development organization. AVCP works for the benefit of all the tribal governments and the people of the Yukon-Kuskokwim Delta. AVCP's programs include those that provide human development, social services, community development and other culturally relevant programs that enhance our culture and traditions.

Tribal Resolution Approving Plan

At the time of initial approval of our P.L. 102-477 Plan in the mid-nineteen nineties, BIA was sent the original P.L. 102-477 Tribal Resolutions. These resolutions remain in effect unless a tribe elects to contract for any one of the programs directly. To date, the only communities operating Child Care Development Fund (Discretionary only) grants directly include Akiachak, Akiak, Kwethluk, Mountain Village and Bethel (ONC). Some of the Tribes operate their own BIA Higher Education, Job Placement & Training, Adult Education and Johnson O' Malley (JOM) programs. WIOA, TANF, LIHEAP and NEW are regional programs. An updated AVCP resolution authorizing the continued consolidation of programs and the addition of new programs is included as **Addendum B**.

Public Notice and Comment Period.

On July 13, 2023, AVCP's draft 2024-2026 P.L. 102-477 Plan was posted on the AVCP website, and notice of the draft plan was sent to all AVCP Tribes. Tribes were also advised in the notice that hard copies of the plan were available upon request. A public hearing on this plan was scheduled 46 days later for August 28, 2023, and notice of the public hearing was sent out on August 7, 2023, to all AVCP Tribes, and broadcast on the AVCP Facebook page. The notice listed the time and location of the hearing along with instructions for submitting public comments in person, via phone, email, or mail. The public hearing took place on August 28, 2023, at the AVCP Tugkar conference room, from 11:00 a.m. to 1:00 p.m. The Tribes and Tribal Members in the AVCP service area were afforded the opportunity to participate in person at the AVCP Tugkar office building in Bethel, Alaska, or telephonically. Additionally, the AVCP website has the contact information for all AVCP programs, as well as an email link for comments of any kind to be provided at any time throughout the year. Any public comments submitted before or during the hearing will be considered in finalizing the proposed plan amendment. AVCP records any comments received, and the AVCP Quality Improvement department regularly conducts surveys seeking Member Tribal participation and feedback. *See* **Addendum K.**

CONSISTENCY WITH THE ACT

AVCP has been contracting P.L. 93-638 programs well before the passage of P.L 102-477. The AVCP service delivery model is consistent with Public Law 102-477 Indian Employment, Training and Related Services as amended most recently in 2019. The effective dates for this plan are January 1, 2024 through December 31, 2026.

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AVCP Tribal Service Provider & Service Area Description

The Tribal Council Presidents of each of the 56 federally recognized Tribes are known as the AVCP Full Board of Directors. The full board of directors, comprised of one delegate representative from each Tribal Council, comes together during the annual convention each fall to conduct business. The AVCP region is divided into 13 sub-units. Each unit elects a representative to sit on AVCP's Executive Board. The Executive Board ("the Board") is the legal governing body of AVCP. The Board also includes an At-Large Chairperson, a Traditional Chief and Second Chief. The Executive Board members are elected every three years in staggered terms. These elections take place at the annual convention. The Executive Board hires a Chief Executive Officer who oversees the day-to-day operations of the organization.

AVCP's main offices are based in Bethel, Alaska, the largest town in Southwest Alaska and the regional hub of the Yukon-Kuskokwim Delta, an area that is approximately 59,000 square miles and roughly the size of the State of New York. AVCP's fifty-six (56) Member Tribes reside in forty-eight (48) small, isolated villages all across the region, and AVCP has staff in every community. AVCP operates over twenty major programs organized under AVCP's division structure, which groups similar services and operations together for greater accessibility and efficiency.

The AVCP Region encompasses the majority of the communities on the Kuskokwim River, all villages in roughly the lower third section of the Yukon River, and the villages along the Southern Coast of the Bering Sea. Specifically, the boundary, which follows the same lines as Calista, the ANCSA for-profit corporation of the region, goes from Kotlik on the northern side of the Yukon Delta, up the Yukon River to Russian Mission and south along the Bering Sea coast to Platinum, and then up the Kuskokwim River to Stony River, and includes Lime Village.

The 56 Federally recognized Tribes located in the in the AVCP service area are:

Akiachak, Akiak, Alakanuk, Aniak, Atmautluak, Bethel, Bill Moore's Slough, Chefornak, Chevak, Chuloonawick, Crooked Creek, Chuathbaluk, Eek, Emmonak, Georgetown, Goodnews Bay, Hamilton, Hooper Bay, Lower Kalskag, Upper Kalskag, Kasigluk, Kipnuk, Kongiganak, Kotlik, Kwethluk. Kwigillingok, Lime Village, Marshall, Mekoryuk, Mountain Village, Napakiak, Napaimiut, Napaskiak, Newtok, Nightmute, Nunapitchuk, Nunam Iqua, Ohogamiut, Oscarville, Paimiut, Pilot Station, Pitka's Point, Platinum, Quinhagak, Red Devil, Russian Mission, Scammon Bay, Sleetmute, St. Mary's (Algaaciq and Andreafski tribes), Stony River, Toksook Bay, Tuluksak, Tuntutuliak, Tununak, Umkumiut. A map of the AVCP/Calista Region is included in **Addendum H**.

Social and Economic Conditions in the AVCP Region

The 2021 U.S. Census reported a total population of 26,917 people living in the AVCP region, with 87.22% or 22,318 people identifying as Alaska Native/American Indian. While the Alaska Statewide unemployment rate in May 2023 was 3.6%, in the two census districts that make up the AVCP region, the unemployment rate was significantly higher. The Bethel Census Area's unemployment rate in May 2023 was 9.1%, and in the Kusilvak Census Area along the coast of the Bering Sea, the unemployment rate reported in May 2023 was 13.6%

The 48 remote villages of the AVCP region are not connected by road to one another, nor to the rest of Alaska. English is a second language for many tribal members who continue to practice a millennia-old hunting, fishing and gathering way-of-life, congregating at home village sites in the winter, and moving to fish camps in the summer.

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Chronic Competitive Disadvantage

Alaska Natives and Native Americans have long had considerable disadvantages in competing with non-Natives for better paying jobs. Lack of resources or knowledge of possibilities for education, trainings, and scholarship options, lack of permanent full-time jobs available, lack of affordable housing near employment, complex personal and family issues, deep historical trauma, and now climate change related natural disasters and other impacts, are just some of the barriers people face. These issues are compounded if an individual lives in an area where there are not sufficient resources available to help break down those barriers. The American Indian and Alaska Native (AI/AN) labor force in the AVCP Region continues to make progress in overcoming barriers and preparing for employment, but many continue to struggle to enter the job market and secure adequate employment as evidenced by the AVCP region's unemployment rates, which as noted above are triple and quadruple the statewide average.

Economic Opportunities: Changing Economic Picture

Opportunities for year-round employment are not readily available in the AVCP region. Aside from state, local, and tribal government employment, AVCP's client and community services, the health care system, and the school districts are the primary employing entities with full-time positions around the region. The rest of the employment opportunities are typically seasonal in nature, such as most construction projects.

Many of occupations in the AVCP region are vocational in nature, however, there are huge shortages in the skilled labor market as well; teachers, pilots, nurses, doctors, and attorneys are some of the skilled positions available in region that are often filled by importing workers from outside the AVCP region.

In the past few years, infrastructure development in this region, including a strong push to bring faster internet to the AVCP region is creating new employment opportunities. As these employment opportunities become available, based on industry and type, AVCP will continue to assist all eligible members in this region with employment and training needs.

Fishing and the Economic Ramifications

Commercial fishing has been a major part of the area's economy in years past. Now, due to the catastrophic decline in salmon numbers in both the Yukon and Kuskokwim Rivers, it is almost non-existent. Recently, there has been little to no commercial fishing opportunities, while both the Kuskokwim and Yukon Rivers have either been closed completely or highly regulated for subsistence salmon harvests. Most families that have harvested summer salmon have done so on a very limited basis, storing only a small number of salmon for winter consumption.

The lack of commercial fishing income has put a strain on already limited local earning opportunities. Little to no salmon subsistence harvest has also strained families; forcing them to purchase high-priced store-bought food staples for their families. Limited earning has also prompted individuals to seek cost of living assistance, while others are searching for opportunities that will enable them to become active members in the workforce through higher education or vocational training.

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GOALS OF THE PROGRAM & INTEGRATION OF SERVICES AND EXTERNAL PARTNERSHIPS

The goal of AVCP's service delivery model is to strengthen our Tribes and Tribal Families' stability and security to ensure their health and vitality for seven generations to come. We accomplish this by holistically supporting our Tribal Families through a wrap-around service model that supports the people in our region from birth to the grave.

AVCP fully integrates all federal programs providing employment, education, training, and related services, and provides extensive access to workforce and related services throughout the region. Through a strong network of village-based employees including over 30 village-based Tribal Workforce Offices, AVCP serves tribal members in all 48 tribal communities in the AVCP region. Our programs are integrated to provide workforce readiness, child care, parenting support, and family prevention services. This integrated approach improves effectiveness in that is reaches clients in their communities, provides better access to the entire range of services, and is more efficient to administer. AVCP's services are braided across all of the divisions to provide the most comprehensive and holistic service delivery to our Tribes and Tribal Members.

Yuut Elitnaurviat

We partner closely with Yuut Elitnaurviat (YE), the regional vocational training center of Western Alaska, which offers culturally relevant and regionally responsive training programs that combine intensive academics and on the job training. AVCP frequently sends eligible clients to YE's established trainings such as welding, construction trades, Certified Nursing Assistant (CNA), Toyo stove repair, and Commercial Driver's License training.

Additionally, AVCP partners with Yuut to bring Village Peace Officer Basic and Advanced training to the region, and AVCP works together with YE to provide GED support, tutoring, and testing services to the whole region. AVCP also identifies training needs in region and works with YE to develop new training programs. Finally, AVCP developed an Air Frame & Power Mechanics program and in 2019 turned that training operation over to YE, who has since successfully graduated two classes of A&P Certified Mechanics. These students are guaranteed employment at airlines in region upon graduation.

ECONOMIC DEVELOPMENT

AVCP 477 may use up to 25% of the combined 477 funding a year for economic development.

Region-Wide
At the regional level, AVCP partners with all regional entities in many different ways to provide joint services, community or regional projects, and regional advocacy efforts. AVCP has been designated by the Economic Development Agency as the coordinating entity for the Yukon Kuskokwim Regional Comprehensive Economic Development Plan or the "CEDs Plan." The CEDs Plan is a 5-year region-wide planning tool that engages our 56 Member Tribes, all regional entities like the Yukon Kuskokwim Health Corporation, the Regional Housing Authority, Calista, the regional ANCSA for-profit, YE, and all other regional stakeholders to identify the region-wide economic development priorities. These plan sets the foundation for the funding of these projects, which in turn creates job opportunities throughout the region.

Community-Level
At the community level, AVCP partners with local and regional businesses and entities to identify workforce needs, then partners with YE and others to ensure there is a trained workforce to take advantage of opportunities.

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Family Level
AVCP works with families to identify and alleviate barriers to their employability. AVCP may provide programs such as short-term employment programs, on-the-job training, and subsidized employment opportunities, as well as a small business program, which will assist eligible tribal members in creating a business plan, filing the necessary paperwork, learning basic bookkeeping, and other support needed to create and manage a small business.

III. AVCP'S PROGRAM SERVICE DELIVERY MODEL

Over the past six years, AVCP has organized all the programs under a new division structure. This structure supports the integration of similar program services to provide increased access to services for clients, greater efficiency in service delivery, and increase the services provided overall. Additionally, our divisions are organized into two "centers," the Family Service Center Divisions and the Resource Center Divisions. While AVCP has meticulously developed this new program structure, our programs are physically housed in three separate locations in aging, cramped structures. AVCP has plans to build a new facility that can house all of our programs in the next five years, and the "center" concept was born from the process of envisioning how we could best organize ourselves in a new space. The Family Service Center's three divisions are: the Family Services Division, the Benefits Division, and the Workforce Development Division. All three of these divisions provide primarily client-focused services, like cash assistance, family wellness, access to scholarships and training, and child care. The Resource Center divisions are the Land & Cultural Resources Division, the Community Services Division and the Community Development Division, which contain programs that offer primarily community-focused services like the protection of our lands and resources, infrastructure and residential construction, and support for the development of public safety infrastructure and tribal courts. Some of our divisions are still in the development process, and all of the divisions are engaged in a continuous quality improvement process, which strives to find new or better ways to provide our services. The divisions use a "braided services" model, partnering across divisions in myriad ways to provide temporary, pilot, and new program services at AVCP.

NAVIGATION SERVICES

1. Wrap-Around Service Delivery Model

For our client-focused services, the foundation of the service delivery model rests on the expansion of the role of navigators throughout these programs. A navigator is a guide that assists Tribal Members with identifying barriers, providing ongoing support, and finding the services our families need in all areas of life: economic, wellness, and parenting support. These three interconnected areas, when integrated, provide complete wrap-around services for our tribal families.

Family Economic Stability Support

Many AVCP programs support the economic stability and self-sufficiency of our Tribal Members. For example, AVCP's Tribal Workforce Navigators, who are located in over 30 village-based Tribal Job Centers throughout the AVCP region, provide in-person service delivery at the village level. These programs help Tribal Members to identify and overcome barriers such as:

- The lack of hands-on training opportunities in region;
- The lack of access to higher education and certified training opportunities;

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- Prospective employers lack of knowledge about our local workforce;
- Tribal Members without a high school diploma or GED;
- Tribal Members lacking a driver's license or other necessary foundational identification and paperwork;
- The lack of essential job-specific skills and basic work-readiness skills; and
- Criminal history

Personal and Family Wellness

In this second domain, AVCPs programs work to identify families in need of culturally based wellness interventions and support. Through staff such as the Community & Family Support Specialists and the Prevention Navigators, AVCP provides referrals to, and follow-up with, our Healthy Families program, as well as other referrals and supports, to connect tribal families to the traditional knowledge that has sustained our families for millennia. Some of the barriers identified by these navigators are:

- The impact of compounding historical trauma;
- The lack of adequate and culturally appropriate counseling opportunities;
- The loss of security in the absence of village and family support systems; and
- The loss of subsistence practices as fishing opportunities diminish.

Parenting Support

Finally, AVCP provides child care through center-based and in-home child care programs, and through these programs, AVCP helps the parents and care providers of our youngest tribal members to navigate health, safety, and developmental concerns, and supports the healthy growth of families and children. Some of the barriers identified by these navigators are:

- The lack of safe indoor spaces for children;
- The lack on early childhood assessments to identify and provide early intervention for children with developmental delays;
- The lack of resources to assist parents with behavioral concerns; and
- The lack of tuberculosis testing capacity; hearing and vision screening and other preventative health measures.

None of these obstacles in any of the three domains are insurmountable. Through culturally based wrap-around resources and braided support, our Tribal Families can thrive and be self-sufficient. Healthy Native Families is the goal, and our programs continue to work towards developing services that better prepares individuals, families, and potential employees, so they can take advantage of job opportunities and thrive.

2. Outreach, Intake, Eligibility & Assessment

Outreach & Intake

Outreach is a very important component of navigation through AVCP's large village-based network of staff. Technology in Southwest Alaska has improved over the last several years, but access to reliable internet is still not a reality throughout much of the region. Moreover, the AVCP region is such a large geographic area with 48 unique, diverse, and remote tribal communities, all of which makes outreach more difficult. Thus, having staff available

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throughout the region who can spread the word about new program services and assist interested Tribal Members with the breadth of our services, is a vital component to the AVCP service delivery model.

This village-based navigation system also provides much greater access to services in the intake process. For example, the navigators in our local workforce development offices assist clients with our new integrated cash assistance application or our new consolidated training and scholarship application. They are trained in the breadth of services available at AVCP, which allows them during the intake process, to identify additional services outside the workforce development sphere that the client might be interested in. The fact that intake happens at the community level, where AVCP's staff are in a good position to identify barriers, has greatly increased the access to services at AVCP.

Finally, AVCP continue to streamline the application processes for the individual client program services, to allow greater access to services through the fewest points of entry. One-stop-shop applications, integrated program software, and the braided services across the divisions are all driving in this direction. This work will in turn continue to strengthen the navigation services overall.

Eligibility

AVCP will assist eligible applicants to acquire the education, training, job skills, and related support necessary to achieve self-sufficiency.

The basic requirements for eligibility under the 477 (some major program exclusions noted, others found in program description section):

- Enrolled member of a federally recognized Tribe; *
- A resident of the AVCP Service area for the past thirty days;**
- Have completed the application including signature and additional documentation;
- Have completed an assessment and/or planning tool as directed by the AVCP navigator;
- Are under employed, unemployed, or low-income; ***
- Males 18-25 years old must supply a selective service number;
- Applicants seeking training must be at least 18 years old or an emancipated youth, at least 16 years old.

* Clients with children who are receiving cash assistance are excluded from this requirement.
** Higher Education is excluded from this requirement.
*** This applies to non-cash assistance training services clients.

Due to the high-level of unemployment, the lack of employment opportunities, and the high cost of living, a person's income status would not be a limiting factor for most applicants.

Priority of Services

AVCP may develop and evaluate the priority of service criteria for its programs as needed.

Assessment

Assessment tools are essential to provide a roadmap of the strengths and needs of an individual and/or a family unit. The main assessment tool currently used to support employment, education, and training assistance for our tribal

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families is the AVCP Individual and Family Self Sufficiency Plan (IFSSP), but AVCP may use any other assessment tools that assist our tribal members. The IFSSP is developed with the support of a navigator, and the goal is to identify the barriers a family faces in achieving self-sufficiency and set attainable goals to overcome those barriers. The navigator works with the client on a weekly basis to provide assistance, support, and measure progress. Sometimes despite everyone's best efforts, a client does not make progress towards self-sufficiency. It is at this point when the relationship established at the village-level is so essential. A local navigator working with a client and family may realize that other issues such as substance abuse, mental health concerns, domestic violence, or cognitive barriers may be the root cause. In those cases, the navigator can make referrals and work with our other AVCP programs to provide support around these other needs. For example, AVCP uses a child abuse and neglect screening tool in our Prevention Unit to identify families in need of additional wellness support services. These families are provided services through the Healthy Families program.

The end-goal of this work is to provide the most holistic, client-centered, wrap-around service possible, and to create a community-level safety net for our Tribal Families.

B. Employment, Education, & Training Services

1. Employment Services

The goal of this program is to support the economic self-sufficiency of Tribal Members throughout in the AVCP region. Our village-based job centers provide job-readiness and employment services to assist Tribal Members to achieve self-sufficiency.

Employment activities are guided by the assessment and planning tool that all job center clients create in partnership with the AVCP Navigators. These plans identify an individual's potential barriers to employability, their employment goals, and the services available and steps required to attain those goals. There are many tools available to the AVCP Navigators to assist clients in overcoming barriers to employment. In addition to education and training services outlined below, other employment services include: comprehensive job search resources, job skill development including resume building, assistance with the application process, interview skills, placement support, community service program placement, support with traditional subsistence activities, assistance obtaining a driver's license and other necessary documents, subsidized and unsubsidized public and private sector work experience and employment, and more.

Work Experience Opportunities

AVCP may offer work experience services to qualified clients including On-the-Job Training (OJT), short term work experience, and summer internships. The OJT program is an employer-based training program designed to provide clients who may already have some work experience, an opportunity to gain additional skills. The goal is for clients to be hired by the employer on a permanent basis after their training period has concluded. Short-term work experience can assist participants to become more competitive in the labor market. This type of work activity is considered subsidized employment in the public sector or in private non-profit agencies. Work situations are temporary, and again participating employers are strongly encouraged to offer the client permanent employment at the conclusion of their program. The main purpose of the program is to allow an individual to develop occupational skills and good work habits and to expose them to various occupational opportunities. Work experience programs are targeted towards the

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less competitive segments of the local workforce, including younger and elderly persons. Finally, summer internships are short programs to introduce youth and young adults to the work opportunities available through AVCP.

GED Services

AVCP works directly with Yuut Elitnaruvik (YE) to provide ABE/GED services to youth and adults in all 56 tribes. These services are provided as much as possible around the region, and at YE in Bethel. AVCP Workforce Development Division contracts with YE to hire GED Facilitators in villages around the region that have high numbers of individuals who do not have either a high school diploma or GED.

Supportive Services

Support services are offered to participants to address participant barriers in preparing for, obtaining, or retaining employment. Support services are individualized on a case-by-case basis and listed on the participants Individual and Family Self Sufficiency Plan, or other work plan. Supportive services are such services that provide support for job seekers to obtain or retain employment. Services will be provided when it is determined that they are essential for gaining or maintaining employment, for the successful completion of training or educational programs, and for other valid self-sufficiency goals.

Supportive services may include but not limited to, transportation, training, child care, work-required clothing, tools and special equipment, licensing or professional fees, limited health and other assessments and cash assistance as necessary to identify/remove barriers, GED remedial services, job skills, job readiness, on-the-job training, rent, and living stipend. The applicant must meet income requirements, demonstrate a financial need, and supply necessary documentation.

Other Barriers to Self Sufficiency

If a client identifies barriers outside the scope of employment, training, and scholarship services, AVCP's wrap-around service model allows the workforce navigators to engage the assistance of other navigation services to assist families in achieving their goals.

2. Education/Scholarships

In addition to employment services, AVCP provides higher education scholarship services to eligible tribal members and cash assistance clients. The goal of the program is to provide opportunities and support for students to pursue higher education through financial assistance and career counseling. Students must be degree seeking (associates, bachelors, graduate, or professional degree). Students must be admitted to an institution of higher education that is accredited by national, or regional accrediting agency, is a candidate for accreditation, or is an eligible institution. Accredited institutions include universities, colleges, community colleges, and tribal colleges. Scholarships will be open to all fields of study and degree programs.

Scholarship amounts awarded are based on availability of funds and on the overall unmet need of each individual student, taking into consideration all funding secured from any other funding agencies.

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3. Training Services

Short- and long-term occupational training services are offered throughout the region and include job and/or skills development. These services assist tribal members in becoming self-sufficient, with the obvious additional benefits of increased economic opportunities, enhanced self-worth, and development of positive role models for others.

Training services depend on the needs of the individual, the type of jobs in demand, and where the client is willing to travel and live. Eligible participants must be unemployed, underemployed, or of low income. The Bethel Census Area has a poverty level of 27% and the Kusilvak Census Area has a poverty level of 39.1%, together these two census areas cover the AVCP Region. With these high poverty levels, much of the population qualifies as low income. Additionally, because of the statistical realities of very few employment opportunities available to clients in the AVCP region, most remaining applicants are eligible for services under the unemployed or underemployed categories.

AVCP will provide training services to both compact tribal members and non-compact tribal members. Prior to final determination of eligibility, the Tribal members of non-compact Tribes must contact their Tribe to request funding for training services. If they are denied funding for training services, or the amount of funds they are provided is less than needed to attend the training, we will consider their application for funding. AVCP we will assess overall need taking the other available funds into consideration.

Training facilities and services required for vocational training programs may be arranged through other AVCP divisions and contracts or agreements with outside agencies, establishments, or organizations.

C. BENEFIT SERVICES

1. CASH ASSISTANCE

AVCP provides cash assistance both to families with children and for Tribal Members who do not have children.

a. Cash Assistance For Families

Four Goals of the Program

The four overriding goals of the AVCP cash assistance plan are:

1. Assist needy families so that the children can be cared for in their own home;
2. Reduce the dependency of needy families by promoting job preparations, work, and marriage;
3. Prevent out of wedlock pregnancies; and
4. Encourage the formation and maintenance of the two-parent family.

Only needy families, as defined in this plan, may receive cash assistance (see Financial Eligibility below) or any benefits or services pursuant to goals 1 or 2 above. "Needy" means financially deprived, according to income and resource criteria established in this Plan.

AVCP may provide services (and related activities) that do not constitute cash assistance to individuals and family members who would be eligible for services that meet goals 1 or 2 above.

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AVCP may use program funds to provide workforce development activities (trainings, scholarships, professional development services, business development services, and subsidized employment) that do not constitute "assistance" to individuals under the age of 25 who are not receiving cash assistance benefits, but still fall under the category of "needy," and fit the criteria for the kind of services that meet goals 3 or 4 listed above.

Eligibility for Cash Assistance

1. Tribal Enrollment:

- In a two-parent household, either the head of household or the other adult applicant in the household unit must be enrolled in a federally recognized Alaska Native or American Indian tribe; or
- In a one-parent household, the person making applications must have biological children that are of Alaska Native or American Indian descent that are enrolled in a federally recognized tribe; or
- In child only household units, the child(ren) must be eligible to enroll or are enrolled in a federally recognized tribe.
- A pregnant woman in her third trimester must be bearing a child that is of Alaska Native or American Indian descent and will be eligible to be able to enroll in a federally recognized tribe once born.

Acceptable Documentation of Tribal Eligibility:

AVCP will rely upon self-identification to make the initial determination of whether a person is an Alaska Native. Should verification become necessary acceptable documentation may include but is not limited to:

- Tribal Enrollment Card from a federally recognized tribe or village
- Written acknowledgement by Tribe that at least one member of the assistance unit is Alaska Native/American Indian or a member of or are eligible for membership by a tribe in the AVCP service area.
- ANCSA Enrollment
- Birth Certificate showing Alaska Native
- Enrollment under the Alaska Native Claims Settlement Act
- Eligibility for receipt of benefits or services from the Indian Health Service or Bureau of Indian Affairs.

2. Non-Financial Eligibility Requirements.

- Family Includes Caretake Relative and Dependent Child.

To be eligible for assistance under this Plan, a family must include a caretaker relative and one or more dependent children or a woman in the last trimester of her pregnancy.

A "dependent child" is a child under 18 years of age, or a person under 19 years of age if the person is a full-time student in a secondary school or in vocational or technical training, whether the training can be completed by age 19 or not.

A dependent child also includes persons who may be a caretaker and are themselves an applicant for assistance such as a minor parent applying for assistance for their own dependent children. However, a minor parent must live with an adult caretaker relative or another approved relative, and a minor parent must be a full-time student until he or she completes high school or its equivalent, unless the minor parent has a condition that causes him or her to lack the requisite capacity.

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A "caretaker relative" is a person who provides the care and control of the dependent child and/or who is:

a. a biological or adoptive parent or step-parent to the dependent child;
b. a biological or adoptive relative to the child within the fifth degree of consanguinity;
c. a person who is or was married to a biological or adoptive relative to the child within the fifth degree of consanguinity if the person has maintained a caretaking role with the dependent child for a significant period of time; or
   a. a caretaker to the child based on tribal custom or law; or
   b. a step-sister, step-brother, or step-grandparent.

- Residency.

All recipients of cash assistance benefits for families with children must be a resident of the AVCP service area. A "resident of the service area" means an individual physically present in the service area and living in the service area voluntarily with the intention of making a home in the service area. A child present in the service area will be considered a resident of the service area if the child is living in the service area with a caretaker relative who is also a resident under this section.

3. Financial Eligibility Requirements: Needy Families.

- 185% Eligibility Test.

All applicants and recipients have eligibility benefits determined prospectively. Incomes of each member of the economic unit are identified, exempt incomes are disregarded, gross monthly incomes are computed, and the monthly income of each person is totaled and compared to the 185% eligibility standard. If the economic unit has income less than or equal to the 185% eligibility standard, the unit will receive assistance.

- Maximum Benefits.

The amounts of assistance for basic living expenses may not exceed the following:

a. for a dependent child living with a non-needy relative caretaker, $452 per month, plus $102 for each additional child;
b. for a dependent child living with at least one needy parent or relative caretaker, $821 per month, plus $102 for each additional child and $102 for a second needy parent if the second parent is physically or mentally unable to perform gainful activity as defined by department regulation; or
c. for a family consisting solely of an eligible pregnant woman, $514 per month.

- Non-Duplication of Benefits.

AVCP's cash assistance recipients may not receive duplicative assistance from other State or Tribal programs.

- Resources.

A family or child will not be eligible for cash assistance benefits if they have non-exempt resources in excess of $2,000. Certain types of real and personal property are exempt. Exempt resources are not counted against the resource

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limit. Non-exempt or countable resources are those which must have their value totaled and matched against the $2,000 limit to determine if eligibility exists on the factor of resources.

The $2,000 resource limit can be reached by any combination of the following types of resources:

a. cash on hand or deposit;
b. the equity value of countable motor vehicles, boats and snow machines;
c. countable non-cash personal property, i.e. cash or loan value of insurance, value of stocks and bonds, etc.;
d. countable real property other than the home the family lives and the land the home sits on; and/or
e. "luxury" items, personal or household.

- Availability of Resources.

To be counted under the exemption the resource must be actually available to meet the needs of the child. The resource must be cash or convertible to cash. AVCP has adopted the State of Alaska's rules regarding availability of resources with the exception that limited entry fishing permits shall not be considered as a liquid asset to be counted in determining eligibility.

If a child for whom application is made lives with their natural or adoptive parent, all the resources and income available to the parent are considered to be equally available to the child. However, if the child is living with any other caretaker relative, resources belonging to that caretaker relative are not considered available to the child. For program purposes, all the resources of a husband or wife are automatically considered available to the other spouse, as long as the spouses reside together.

The "one day - one month" principle applies to resources. If, on any single day of a calendar month, a family unit meets the resource requirements, the family is resource eligible for the entire month.

Benefits and Shelter Standards. **Addendum P**

State of Alaska Standard. AVCP has determined that it is in the best interests of the program to minimize differences between the income limits applicable to the recipients of the State of Alaska's Alaska Temporary Assistance Program and recipients of the AVCP's cash assistance program. Therefore, the AVCP has adopted the two-tiered income limit test used by the State of Alaska. Thus, gross countable earned income of self-employed and employed individuals may not exceed the State's 185 percent eligibility standard and the countable gross income, adjusted by applicable deductions, may not exceed the State's need standards.

Cooperation with Child Support Enforcement.

Cash assistance participants must cooperate with the AVCP and the State of Alaska Child Support Enforcement Division (CSED) or their tribe (when a tribe operates a child support enforcement program) in their efforts to establish paternity and to establish, modify, or enforce a child support order for a dependent child with an AVCP cash assistance family. An AVCP cash assistance applicant may not begin to receive benefits until he or she has assigned all rights to child support to AVCP for the period for which benefits are paid. AVCP will authorize the distribution of child support pass though payments to recipients. AVCP will condition eligibility for cash assistance on the assignment of child support.

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AVCP may retain some child support collections to reimburse for cash assistance expenditures, and will distribute the excess back to families. AVCP will reinvest all collection surplus back into the program.

Diversion Payments.

AVCP may offer a diversion payment program as an alternative to recurring reliance on cash assistance benefits for families with a job-ready member. Families that qualify for the diversion program may choose a lump sum payment in lieu of ongoing assistance. Diversion payments will provide short-term financial assistance to meet critical needs, in order to secure or retain employment. Diversion payments do not count toward the sixty-month time limit for receipt of cash assistance. The payment amount is based upon actual, immediate needs and may not exceed two months' worth of cash assistance benefits. A diversion payment will count as income if the family reapplies for cash assistance benefits within three (3) months. A family may receive a diversion grant only once in a twelve-month period, however the grant may be paid in more than one installment.

Sixty-Month Limit for Cash Assistance

AVCP has determined that it will implement the State of Alaska's time limits to minimize the differences between AVCP's cash assistance program and the State's ATAP for communities in the AVCP service area with sufficient employment opportunities. Thus, families will not be eligible for a cash assistance payments if the family includes an adult who has received benefits from a TANF program in this or another state or Tribe or a TANF-funded program in another state or operated by another tribe, for a total of 60 months. AVCP will count prior months of assistance funded with TANF block grant funds, except for any month exempt or disregarded by statute or regulation. The AVCP cash assistance program operates consist with the four goals listed above, and the purpose of cash assistance is to encourage self-sufficiency. AVCP uses the 60 month time limit to allow cash assistance program participants enough time to receive and complete the training or education required to obtain a sufficient income to support a family, provided the participants have been living in a location where sufficient job/income-generating opportunities are available.

Exemptions from the 60 Month Limit

a. Living in an Exempt Community

In determining the number of months for which an adult has received assistance under a state or tribal program, AVCP shall disregard any month during which the adult lived in Indian Country or an Alaska Native village if the most reliable data available with respect to the month (or a period including the month) indicate that at least 50 percent of the adults living in Indian Country or in the village were not employed. "Indian Country" shall have the meaning given such term in section 1151 of Title 18, United States Code.

AVCP follows the State of Alaska ATAP Addendum 1: Exempt Alaska Native Villages. *See Exempt Alaska Native Villages List*. **Addendum Q**

b. Hardship Exemptions.

During or after 60 months of non-exempted participation, a family may continue to receive benefits if AVCP determines that the family qualifies for a hardship or domestic violence exception. Time limit exemptions may not exceed 20% of AVCP's caseload. Hardship exemptions include:

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- adults with a physical or mental inability to perform gainful activity (verified by a doctor or appropriate medical authority);
- caretaker relatives who are caring for a child who is experiencing a disability;
- victims of ongoing or recent domestic violence, if the physical, mental, or emotional well-being of the victim would be endangered by a strict application of the limit;
- for families who have suffered a fire or devastating damage to a home. Families may be provided support to replace beds and essential furniture; and
- Families who have exceeded their 60-month time limit, but reside in communities that changed from Non-Exempt communities to Exempt due to village population fluctuation.

*Reunification***.**

AVCP supports the reunification of all tribal families, and will assist and support those efforts in every way possible.

Work Participation Requirements and Activities.

- Self Sufficiency Plan and Assessment.

Every family receiving cash assistance benefits that includes an able-bodied adult must complete an Individual and Family Self-Sufficiency Plan. The plan outlines the steps the family will take to increase their independence, identifies specific milestones to indicate progress, and indicates the services the AVCP will provide to assist the family toward their goals. The steps to independence include contributions to the community a family can make to offset benefits the family receives when paid employment is unavailable. AVCP will work with the family to assess skills, work experience, educational needs, and barriers to achieving independence, and employability of each adult caretaker and parent who is age 18 or who is not attending secondary school and is without a high school diploma or GED.

- All Parent and Two Parent Families Participation Rates.

Cash assistance recipients will participate in AVCP's work readiness and self-sufficiency programs. These programs, promote regional job creation and provide recipients with job preparation and support services designed to help them gain and retain paid employment, or community services when paid employment is unavailable. AVCP believes that the following participation rates represent realistic and appropriate standards, in light of such factors as a high rate of educational training deficiencies, prevalence of mental health, substance abuse issues, and a substantial long-term unemployment rate among its cash assistance client population.

Federal Fiscal Year	All Families
October 1, 2023 – September 30, 2024	32%
October 1, 2024 – September 30, 2025	32%
October 1, 2025 – September 30, 2026	32%

- Individual Participant Requirements.

AVCP believes that the following average participation hours/per week standards reflect what can reasonably be expected from our cash assistant recipients. There is a requirement of twenty-five (25) hours per week of work participation. These twenty-five (25) hours per week of work participation hours may be shared between a two- parent family. A significant number of cash assistance participants will have been out of school for a long time and it would

be unrealistic to expect they have the discipline needed to participate in a full week of activities especially in extremely high unemployment communities. This would interfere with the maximum number of program participants being able to participate.

Federal Fiscal Year	Participation Rates
October 1, 2023 – September 30, 2024	25 hours
October 1, 2024 – September 30, 2025	25 hours
October 1, 2025 – September 30, 2026	25 hours

- Acceptable Work Activities.

The AVCP Benefits Division requires parents or caretaker relatives to participate in acceptable work activities for twenty-five (25) hours each week. Acceptable work activities include:

a. Basic education
b. Job search (with such limitations as provided in 45 CFR 286.105)
c. Assessments
d. Job readiness activities (with such limitations as provided in 45 CFR 286.105)
e. On-the-job training
f. Subsistence and cultural activities
g. Vocational education training
h. Job sampling or work experience
i. Approved community work service
j. Job skills directly related to employment
k. Education in subjects in which there is a reasonable chance of obtaining employment
l. Sheltered/supported work
m. Work experience
n. Subsidized public or private sector employment
o. Unsubsidized employment
p. Providing child-care services for individuals participating in community work service
q. Eldercare
r. Community service activities
s. Other activities developed by AVCP to meet needs of an individual cash assistance participant as related to one of the four goals listed above.

- Exemptions.

A cash assistance participant who is subject to work participation requirements may be exempt from work activities because of certain family situations or because participation would cause unreasonable hardship. A parent may be exempt because they are:

a. Needed in the home to care for a disabled person;
b. A caretaker of a child under 6, when the following is not available:
    1. “Affordable child care,” which is considered child care not above the State of Alaska child care rates;
    2. “Appropriate child care,” which includes child care facilities and homes licensed by the State of Alaska or approved by AVCP’s Youth & Child Unit;

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3. "Reasonable distance child care," which is child care within one-hour's commute to activity; and/or
4. "Suitable informal child care," which includes an in-home provider approved by the AVCP Youth & Child Unit.

c. Determined to be physically or mentally unable to perform gainful activity as verified by a doctor or appropriate medical authority;
d. A caretaker of a child under age 13 months; and/or
e. A parent or caretaker has been or is a victim of domestic violence.

The exemption from participation in work activities for domestic violence will be for a length of time individualized to meet the parent's or caretaker's needs. Individualized responses and service strategies will be determined with the parent or caretaker and other social service organizations, including the state, consistent with the needs of the parent or caretaker. If it has been determined that it is necessary for further protection of the victim, an additional length of time can be provided.

Clients exempt from the work activity requirements are still required to engage in other activities documented on the IFSSP that prepare the individual to participate in work activities when the exemption is no longer in place. If clients do not participate satisfactorily in these activities, they can be penalized for not complying with their IFSSP.

Individuals who are exempt from work activities may be referred to other programs or agencies for services such as vocational rehabilitation, counseling, substance abuse treatment, or other services.

- Good Causes for Non-Cooperation.

Cash assistance recipients who fail to perform work participation activities, or who fail to accept and/or maintain employment, will be subject to sanctions, except when they are able to demonstrate good cause for such a failure. A cash assistance recipient who is subject to work participation requirements may be exempt from work activities because of certain family situations or because participation would cause unreasonable hardship.

Supportive Services.

Consistent with the integration of services, AVCP provides supportive services as described above, to all qualifying clients to support their employment and self-sufficiency. Supportive service payments are not automatic or an entitlement. Each request will be examined to determine the need. Applicant's personal resources must be considered prior to authorization of a supportive service. Once the need is determined, supportive services may pay for:

a. Job referral and placement services
b. Work subsidies
c. Job search assistance
d. Job counseling
e. Personal and family counseling, including:
    1. domestic violence prevention - child, elder, and spousal
    2. abuse prevention;
    3. financial;
    4. health and hygiene; and etc. (e.g. cleaning supplies, bed bug sprays, and lice treatments)
    5. Substance abuse counseling.
f. Substance abuse treatment

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g. Transportation
h. Child Care
i. Elder Care
j. Initial screening for qualification for other related programs and services, e.g. Food Stamps, GA, TWEP, etc.
k. Referrals to other tribal, state, and local support services and related employment and training programs
l. Health service systems referrals
m. Eye glasses and/or dental care as related to obtaining or keeping a job, if other insurance options have been exhausted or determined to not covering the costs
n. Housing referrals and assistance
o. Clothing, tools, and equipment needed for training or to get or retain a job
p. Books and supplies for job-related educational activities
q. Educational counseling and services
r. Educational programs, including, Adult Basic Education, GED, and stay in school initiatives
s. Youth services and activities related to TANF goals
t. Traditional cultural support activities
u. Nonrecurring, short-term benefits (emergency assistance)

Transitional Services.

If an adult member of the family is employed at the time their cash assistance case closes, and within one year of the cash assistance case closing the client needs supportive services to retain their job, and they do not have another means to pay for the supportive service request, the benefits specialist or workforce development navigator will authorize the supportive service request as long as it falls within the supportive service request items listed above.

Sanctions/Penalties

Sanctions are intended to induce cooperation with the AVCP cash assistance requirements on the part of the participants who, without sanctions or the threat of sanctions, would fail to do so. The sanction process is progressive in that it will have graduated levels of response to program violations: the more serious the program violation, the more severe the sanction. Penalties/Sanctions for non-cooperation may result in vendor payments or reduction in benefit. In addition, a participant sanctioned at a certain level will be at-risk of higher level of sanction for future violations. Built into this progressive sanction process, however, is the opportunity to mitigate the impact upon direct support and benefits to the needy children of affected families.

Agreements, Compacts and Subawards

Cash assistance services will be provided directly by AVCP on behalf of tribes in the region until requested by the tribe to deliver services directly at the tribal level through a memorandum of agreement. These memorandums of agreement will be executed with those tribes in the region who request to deliver direct welfare related services by the tribe; and who also have the demonstrated financial and administrative capacity and capability to deliver services directly at the tribal level.

AVCP may enter into subaward agreements with outside organizations to directly carry out supported activities outlined in this plan at the tribal level. Per AVCP's policy, the subaward must have a formal written subaward contract/agreement that meets the specific administrative, financial and reporting requirements of this plan. AVCP provides ongoing monitoring of subaward agreements to ensure compliance with this plan. AVCP is responsible for

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subrecipient spending and reporting actions, which must conform with all the terms and conditions outlined in this plan. Subawardees cannot use funds received from AVCP to form their own subaward with other third-party organizations (third tier subaward) and must only use the subaward to provide direct services at the tribal level.

Fiscal Accountability Assurance.

For each fiscal year during which AVCP receives or expends funds pursuant to a block grant under Section 412 of Title I - Block Grants for Temporary Assistance for Needy Families, the fiscal accountability provisions of Section 5(f)(1) of the Indian Self-Determination and Education Assistance Act (25 U.S.C. §§ 450c(f)(1), relating to the submission of a single agency audit report required by chapter 75 of Title 31, United States Code, applies. All administrative costs may be commingled and AVCP shall be entitled to the full amount of such costs under each program or department regulation.

Retrocession.

If AVCP elects to retrocede its Cash Assistance program back to the State and Federal government, it will give ninety (90) days notification to the Department of Interior and comply with all the statutory and regulatory requirements pertaining to retrocession.

b. Cash Assistance To Tribal Members Without Children

The General Assistance Program serves low-income Alaska Native and Native American adults, within the AVCP service area by providing financial assistance for a limited time.

The goal of General Assistance is to provide specific, short-term financial assistance for basic essential needs (food, utilities, transportation and/or shelter) that will help achieve personal well-being, family unity, economic and social stability. Participants struggling with basic needs simply do not have the capacity to meet or maintain an education, job training program, achieve self-sufficiency, and participate in AVCP Cash Assistance program without addressing the immediate needs before them.

For participants to be eligible for General Assistance, an applicant must apply concurrently for financial assistance from other state, tribal, county, local, or other federal agency programs for which he/she is eligible and not receive any other comparable public assistance.

General Eligibility Requirements:

1. Tribal Enrollment:

AVCP will rely upon self-identification to make the initial determination of whether a person is an Alaska Native. Should verification become necessary acceptable documentation may include but is not limited to:

- Tribal Enrollment Card from a federally recognized tribe or village
- Written acknowledgement by Tribe that at least one member of the assistance unit is Alaska Native/American Indian or a member of or are eligible for membership by a tribe in the AVCP service area.
- ANCSA Enrollment
- Birth Certificate showing Alaska Native
- Enrollment under the Alaska Native Claims Settlement Act.

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- BIA or I.H.S. eligibility for receipt of benefits or services from the Indian Health Service or Bureau of Indian Affairs.

2. Additional Eligibility Factors.

- AVCP will not implement the 50% reduction in a participant's grant based on the seasonal reduction for July, August, and September;
- AVCP will not count child support payments that a participant is actively paying from earned/unearned income as resources for eligibility purposes;
- Participants that have no shelter allowance and are applying for assistance are eligible for temporary cash assistance for food and hygiene items. The participant will be encouraged to apply for food stamps.
- For cash assistance recipients with an open case, when they become employed they will be provided a one-time earned income deduction.
- Cash assistance for tribal members without children will be paid directly to the vendors.
- Participants of cash assistance for tribal members without children must actively be seeking employment and required to turn in three work searches per week.

3. Residency

Applicant or head of household must reside in an AVCP compacted village.

4. Non-Duplication of Benefits

AVCP's cash assistance recipients may not receive duplicative assistance from other State, Federal or Tribal programs, except the State of Alaska Food Stamp program.

2. ENERGY ASSISTANCE (LIHEAP)

AVCP's 477 services are successful because of our wrap around service delivery model that takes a holistic approach to addressing the needs of the whole family. The Tribes of the AVCP region live in some of the most inhospitable environments in our nation. For our Tribal Members to be able to concentrate on work, training, or their education, they need assurance that the heat will go on and the pipes will not freeze. Like other supportive services that help people get from cash assistance to self-sufficiency, LIHEAP is temporary, a stopgap to carry a family over until income stabilizes and the need no longer exists. Section 16 of the LIHEAP assurances states that the funding can be used to educate and counsel households on reduction of home energy costs, which in turn can help reduce the need for energy assistance. This emphasis on education to create meaningful long-term change directly aligns with AVCP's service delivery model, which provides education, training, and one-on-one support to help participants achieve lasting success and self-sufficiency.

Program Components

The following services will be provided for heating assistance:

a. Heating Assistance - Operates year-round
b. Crisis Assistance - Operates year-round
c. Weatherization Assistance - Operates year-round

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Eligibility

In order for families to be eligible for assistance under this section they must have income under 150% of Poverty level. Families that are receiving SSI, TANF, or SNAP will be considered categorically eligible.

1. Heating Assistance:
   a. Asset Test Required: no
   b. Subsidized Housing: qualify for heating assistance at a reduced rate if they receive a utility allowance, but may be eligible for a heating deposit
   c. Priority System: Elderly, Disabled, Young Children, Date Stamp Order
   d. Determination of Benefits Include: Income, Family Size, Home Energy Cost or Need (Fuel Type, Climate/Region, Dwelling Type). Additional eligibility requirements may apply.
   e. Renters who live in subsidized housing where their heat is included in their rent, do not qualify for a heating assistance grant because they have no cost to pay.
   f. Renters who live in subsidized housing and pay a heating vendor for their heat and receive a utility allowance will receive 50% of their benefit because they are already receiving a utility allowance and are not paying 100% of their utility costs.
   g. Benefits Levels: Minimum $10, Maximum $2,000

AVCP may provide in-kind services, such as space heaters, blankets, and one time weatherization kits.

2. Cooling Assistance: AVCP does not provide this service.

3. Crisis Assistance Additional Eligibility Requirements:
   a. Definition of Crisis: The household must be within 48 hours of shutoff, out of fuel, or within a day of depleting fuel supply. Also, their income for the month prior to the date they signed their application must be less than their shelter cost combined (mortgage/rent, electric, and/or heat) for the same period.
   b. Life Threatening Services: Life-threatening crisis application is the same as above except for the outdoor temperature is below -20 or there was a pre-existing medical condition that threatens the life of a household member if the heat is disconnected. Medical verification must be provided at the time of application.
   c. Priority System: Elderly, Disabled, Young Children
   d. Benefits Levels: Maximum one-time benefit that is determined to be ½ the cost of the normal benefit amount. This assistance should be applied for after the client is determined eligible for the main program.
   e. Equipment: heating system repair, heating system replacement

For Crisis Assistance services, AVCP will intervene on behalf of eligible families within 48 hrs.

4. Weatherization Assistance Additional Eligibility Requirements
   a. No asset test is required
   b. Priority System: Elderly, Disabled, Young Children
   c. Renters and Subsidized housing are not eligible

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Outreach & Coordination

AVCP's staff are available year-round in over 30 village-based job centers to assist clients in filling out the one-stop-shop benefits application. This application can be used to obtain any and all of our benefits services including energy assistance. AVCP's staff are trained to assist Tribal Members in determining which services they might be eligible for and supporting them through the application process. Additionally, in the fall-time as we head into the colder months, applications are provided to Tribal Administrators for all 56 Tribes. Finally, applications are mailed to prior-year priority recipients.

Agency Designation

AVCP is a non-profit tribal consortium and will be providing all of the benefit determinations and eligibility for this service. Through the braided-services model, AVCP's in-house construction program will provide the majority of the weatherization services.

Energy Suppliers

AVCP will provide payments directly to vendors for heating, crisis, and weatherization assistance. Direct payments will only be provided to participants who have heat included in their rent, or to homeless individuals who meet eligibility requirements. Participants will be mailed notices of approved amounts that are sent to any vendor. Vendors that AVCP uses will be required to sign a vendor agreement to ensure that participants are treated fairly/equally and that they will charge the eligible household, in the normal billing process the difference between the actual cost of the home energy and the amount of the payment.

Program, Fiscal Monitoring & Audit

To ensure good fiscal accounting and tracking of 477 funds:

a. Staff process applications and calculate grant amounts
b. Supervisors review each grant and e-file prior to grant being approved.
c. The Program manager/supervisor reviews reports from accounting and monitors spending.
d. External auditing firm audits AVCP according to 477 Plan. There are no current findings.
e. Monthly financial meetings are held with accounting staff.

Timely & Meaningful Public Participation

See page 3.

Fair Hearings

See page 37 Section F.

Reduction Of Home Energy Needs

In order to provide participants with information on how to reduce their home energy needs, AVCP may provide assessments and follow up information to improve energy efficiency. This information may be made available at

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AVCP officer around the region and on our website. This may include a training component for participants to learn how to reduce their heating needs and be more informed consumers of utilities. AVCP selects communities based on need to focus our yearly weatherization work. In those communities, our construction crews meet with LIHEAP eligible clients to determine heating issues and work directly with them on improving heat quality and ways to lower home heating and electrical costs.

Leveraging Incentive Program

AVCP does not participate in the leveraging incentive program.

Training

AVCP 477 staff is provided on-going training on an as-needed basis. The 477 national committee also provides training on an annual basis, which usually includes over 100 organization/tribes each year. The staff are provided policies and procedures and they are posted on the department intranet.

Performance Goals & Measures

N/A for tribes.

Program Integrity

AVCP advises all energy assistance clients about the prohibition against fraud/waste and abuse. AVCP has policies and procedures in place to investigate fraud allegations when AVCP has reason to suspect fraud, waste or abuse, and/or receives a tip or referral either via phone, email or through the website. If benefits are reduced or denied as a result of an investigation, the client is advised of their right to an administrative review if they disagree with the determination.

3. BURIAL ASSISTANCE

Funeral expenses often represent a devastating and unexpected expense to the families supported by our 477 program, many of which are barely making it from paycheck to pay check. Those expenses can mean the difference between maintaining gainful employment and falling back into the need for cash assistance; they are essential services related to the purposes underlying the full suite of programs integrated in this plan.

Financial assistance payments for burial assistance will not exceed $2500. There will be an allowable $400 toward a funeral feast or potlatch, based on funding availability. AVCP defines members for our service area as tribal members, shareholders in Alaska Native corporations, or a descendant of either.

Burial assistance requests are processed as quickly as possible (usually within 48 hours) and payments made directly to the provider, or upon the discretion of the division director, to the executor of the application for services.

Additionally, recipients of cash assistance administered through AVCP will automatically be considered categorically eligible for burial assistance.

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4. PREVENTION SERVICES

AVCP works to strengthen family wellness through a variety of programs and services. These services aim to prevent the breakup of our Alaska Native families, prevent the breakdown of our native languages and cultural practices that support our families, and blunt the impact of trauma to our next generation. These services are referred to as "prevention services" and they encompass everything from Healthy Families workshops, Elder counsels, local family-based events and activities, language preservation activities, elder and youth programs, and much more. These programs build on the village-based staff infrastructure, connecting services like our capacity building work in the Tribal Justice program, with our family prevention and intervention work in our Tribal Child Welfare program. As we continue to braid our services and strengthen our wrap-around service delivery model, prevention work will play a vital role in the overall family support provided through our navigation services.

D. YOUTH & CHILD SERVICES

1. YOUTH EMPLOYMENT SERVICES

Youth Employment services are contracted directly with the AVCP region Tribes who operate the program at the village level. Funding is provided to eligible Tribes that complete the funding agreement to carry-out the program. When the available funding is limited, the program is offered on a "first come, first serve" basis. Youth employment is available to Alaska Native and American Indian income-eligible youth between the ages of 14-24, who reside in participating villages in the AVCP region. This program provides experience that activates youth towards local job employment interests and works to increase their experience with integrating employment into their daily lives.

2. JOHNSON O' MALLEY SERVICES

AVCP provides JOM services to meet the specialized and unique educational needs of eligible Indian students, including programs supplemental to the regular school program and school operational support, where such support is necessary to maintain established State educational standards. The desired outcomes of the program are to increase Indian student achievement and encourage the use of cultural enrichment initiatives within JOM programs in place in public schools.

3. CHILD CARE SERVICES

C. CHILD CARE SERVICES

Statement Of Intent

AVCP, as lead agency, provides high quality child care as part of our P.L. 102-477 Plan. AVCP is a large size allocation according to the FY16 CCDF Final Allocation Table. *See* **Addendum** I. Sample AVCP Tribal Authorizing Resolution and FY2022 Child Count Declaration.

Coordinated Delivery of Services Under This Plan

1. Integration of Services and Expected Results

AVCP Family Service Center Programs are coordinating to provide a wrap-around service delivery model that wholly integrates workforce development services such as jobs readiness, education and training, supportive services like cash

assistance and energy assistance, and family support services like quality child care, prevention and family wellness services. This model fully integrates in-home child care services into its employment, education, and training programs, through our navigators in the village-based job centers. Child care services are one of the many tools that our village-based navigators are trained to use to support the overall self-sufficiency of their clients who are working or attending school or a training program. The navigators will either refer a client in need of child care services to the local village-based child care specialist, if one is present in their community, or assist the client with filling out and submitting the child care application directly to the program.

As we continue to develop and deploy more tools and support services through our village-based navigators we expect to see increasing numbers of families achieving sustained self-sufficiency. Additionally, as we further integrate the support for the whole family including increased child development and parenting support to in-home child care clients, we expect to see greater outcomes in the early childhood development of our child care clients.

2. Internal and External Coordination of Services

AVCP's services are coordinated internally through our Family Service Center Divisions, which include the Benefits Division, the Workforce Development Division and the Family Service Center Division. Additionally, our Community Development Division braids its services into these programs as needed to support home renovation, maintenance, and other construction-related client program needs. AVCP's services are coordinated externally through partnerships as needed. Through this coordination and integration, AVCP provides the following services:

a. Health:

AVCP has three, fully developed services, within its Child Care and Head Start programs that rely on referrals to external health partners. First, for families and children eligible for services under the Indian Health Service, AVCP refers to the Yukon Kuskokwim Health Consortium (YKHC) in Bethel or to the YKHC village health clinics, and for all others to the Public Health Nursing in Bethel, to ensure immunizations are current. AVCP also works with the Bethel Family Clinic to provide well-child checks in our center-based programs. Finally, AVCP refers to, and works with, the YKHC Family, Infant, Toddler program (FIT) to support children with developmental and health needs, and otherwise makes general referrals to YKHC for any other documented health concerns. AVCP strives to increase the health assessment tools it uses and to evaluate the needs of our youngest tribal members, as well as increase the number of children assessed overall. As we are able to increase assessments, we will continue to refer those children screened as in-need of additional services to the above-outlined partner health organizations.

b. Education:

AVCP is integrating its Head Start and Child Care programs to increase early childhood education resources and services in our child care centers, as well as the in-home provider network. AVCP works with the local school districts throughout the region to coordinate care and services. Finally, AVCP partners with YKHC's FIT program to identify children with special needs early, and help families receive early education assistance for their children and have access to child development tools and screenings.

c. Employment and Workforce Development:

AVCP's internal program integration allows for parents to receive child care services while they strive to increase their self-sufficiency through opportunities such as:

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- Job readiness activities
- Community work experience
- Approved subsistence activities
- Job search for three months after termination of employment will be allowed if family has become unemployed while on this program.
- Cash assistance parents participating in work activities as assigned, including subsidized and unsubsidized work.

AVCP also works closely with the State of Alaska and other regional employers to recruit parents who are employed and in need of child care services. This allows more people to retain, or advance, in employment.

d. Cash Assistance (Tribal TANF)

AVCP's cash assistance program is fully integrated with Workforce Development and Child Care services through the wrap-around services model. AVCP's village-based navigators work with cash assistance clients to develop plans for self-sufficiency identifying barriers including child care needs and resources through that process, and then making the necessary referrals or assisting in the application process as needed.

Definitions

Indian Child*:* "Indian child" means any unmarried person who is under age eighteen and is either (a) a member of an Indian tribe or (b) is eligible for membership in an Indian tribe and is the biological child of a member of an Indian tribe. Except for the purposes of State proceedings specifically subject to the Indian Child Welfare Act "Indian child" also specifically includes any person under age eighteen who is considered by the Secretary of the Interior to be an Indian child for any purpose, anyone considered by the Secretary of Health and Human Services to be an Indian child for purposes of eligibility for Indian health services, including as a California Indian, Eskimo, Aleut, or other Alaska Native, and any person under age eighteen adopted by an Alaska Native or Native American family.

Tribal Service Area: *See* Section II, Page 3.

Income: Money earned from employment or self-employment.

Working: Participating in wage-earning activities, or subsidized or unsubsidized job assignments, employment search activities, volunteer activities, subsistence activities, and other qualifying "work activities" for cash assistance clients.

Job Training: Qualifying job training events can be of any duration, solely dependent on the needs of the individual, the type of jobs in demand, and where the client is willing to travel and live. Qualifying job training services include all job and/or skills development programs that will assist the tribal member to become employed.

Education: Attendance at an institution of learning in pursuit of a degree, either a high school degree or GED certificate, or at an institution of higher education in pursuit of either an associates, bachelors, graduate, or professional degree. Institutions of higher education must be accredited by national, or regional accrediting agency, or be a candidate for accreditation. Accredited institutions include universities, colleges, community colleges, and tribal colleges.

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Attending Training and Education: Attendance at job training or educational events, including online programming. Attendance covers the number of hours of classroom or training time, and also includes travel time and homework time.

Relative Provider: Grandparent, great-grandparent, aunt or uncle and siblings over the age of 18 (qualifying siblings cannot not be residing in the home). Relative Providers must be at least 18 years of age or older.

Special Needs Child: Homeless children, children in protective services, and children with disabilities. AVCP prioritized services to these children.

Child with Disability: a child with a physical, mental, developmental, or cognitive disability.

Homeless: AVCP uses the definition adopted by Subtitle VII-B of the McKinney-Vento Homeless Assistance Act.

Protective Services*:*

1. Children identified as in need of protective services by the Office of Children's Services (OCS), a regional Tribal Court or Tribal Council, or through a prevention services assessment.
2. Children of essential workers during a state of emergency,
3. Children who are in the care of a relative other than the custodial parent.

Services to these children includes respite care.

Standards And Monitoring Processes – Health And Safety

1. Alaska State Health and Safety: From the State of Alaska's CCDF Plan 2022-2024

All AVCP standards are currently under review. Relative care providers are currently exempted from these standards.

Standard	Licensed Family Child Care, Group Home Care, and Center Care	Standards for Licensed Exempt Family Child Care, In-Home Care.
a. Prevention (including immunizations) and control of infectious diseases	•Immunization; •Hand hygiene; •Cleaning, sanitizing, and disinfecting; •Policy for inclusion/exclusion of children and staff due to communicable diseases and outbreak control; •Prevention of exposure to blood or bodily fluids.	• Immunization • Hand washing • Cleaning, Sanitizing, and disinfecting;
b. Prevention of sudden infant death syndrome and the use of safe sleep practices	•Safe sleep environment and equipment; •Safe sleep practices;	• SIDS risk reduction

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	•Supervision; and •SIDS risk reduction.	
c. Administration of medication, consistent with standards for parental control	•Procedure for permission of administration of medication to include prescription and nonprescription medication; •Storage of medication; •Administration of medication; •Documentation of administration of medication; and •Unused medication.	• Medication in locked cabinet • Medication out of reach of children
d. Prevention of and response to emergencies due to food and allergic reactions	•Identifying between food allergy and food sensitivity; •Plan of care for children with food allergies to include minimization of exposure, feeding plans, and dietary modification; •Response to allergic reaction due to food; •Emergency intervention; and •Documentation of allergic reaction occurrences.	• Response to allergic reaction due to food; • Plan of care for children with food allergies to include minimization of exposure, feeding plans, and dietary modification • Emergency Intervention
e. Safety of Building and physical premises, including the identification of and protection from hazards that can cause bodily injury, such as electrical hazards, bodies of water, and vehicular traffic	•Identification of and protection from hazards, bodies of water, and vehicular traffic; •Active supervision; •Safe indoor and outdoor environments; and •Safety of equipment, materials, and furnishing.	• Active supervision • Safe indoor and outdoor environments • Identification of and protection from hazards, bodies of water and vehicular traffic
f. Prevention of shaken baby syndrome, abusive head trauma, and child maltreatment	•Infant and toddler appropriate developmental practices, to include how to cope with a crying/fussy infant; •Knowledge of shaken baby syndrome and abusive head trauma prevention and identification; and •Recognition of signs of abusive head trauma. •Behavior guidance policies at the provider level that address	• Knowledge of shaken baby syndrome and abusive head trauma prevention and identification; and • Recognition of signs of abusive head trauma.

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	appropriate discipline to prevent child maltreatment.	
g. Emergency preparedness and response planning resulting from a natural disaster or a human-caused event (such as violence at a child care facility), within the meaning of those terms under section 602(a)(1-2) of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5195a(a)(1-2)).	•Written plan and training for handling urgent medical care, threatening incidents, shelter in place, lock down, and natural disasters; •Evacuation and emergency drills, to include policy and documentation; •First aid, food, and water supplies; and •Continuity of Operations Plan (COOP).	• Evacuation and emergency drills, to include policy and documentation; • First aid, food, and water supplies; and
h. Handling and storage of hazardous materials and the appropriate disposal of bio contaminants	•Use and safe storage of hazardous materials; and •Universal precautions, to include prevention and exposure to blood and bodily fluids.	• Universal precautions to prevent and exposure to blood and bodily fluids.
i. Precautions in transporting children (if applicable)	•Qualifications of drivers; •Child passenger safety; •Procedures for supervision and accountability of children; •First aid and emergency roadside supplies, to include emergency contact information; and •Knowledge of environmental hazards, to include indoor and outdoor temperatures of vehicle.	• AVCP does not allow child care providers to transport children.
j. Pediatric first aid and cardiopulmonary (CPR) certification	•The standard is defined as valid current Pediatric first aid and cardiopulmonary resuscitation (CPR) and the following minimum standards are checked during on-site monitoring and inspections: pediatric first aid and CPR certification	• The standard is defined as valid current Pediatric first aid and cardiopulmonary resuscitation (CPR)

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k. Recognition and reporting of child abuse and neglect	•Recognition of signs of child abuse, neglect, and maltreatment; •Importance of reporting; and •Mandated reporting.	•Recognition of signs of child abuse, neglect, and maltreatment; •Importance of reporting; and •Mandated reporting.

2. Caregiver Qualifications

    a. Provider qualifications: Be at least 18 years of age, complete required training, and pass the background check.

    b. Teacher qualifications: Teachers and caregivers must be at least 18 years of age to count in the child-to-caregiver ratios, except in a child care center a caregiver who is at least 16 years old may be counted if they have completed a child care training course or have demonstrated competency in child care to the administrator's satisfaction, they work under the supervision of an adult caregiver, they works within sight and sound of an adult caregiver, and they make up no more than one-fourth of the total caregivers on duty. Teacher/caregiver qualifications also include an orientation of: the facility's policies and procedures, the individual needs of children, emergency procedures, and health and safety measures. Teachers must pass background checks

    c. Director qualifications: The director (administrator) of a child care center must be at least 21 years of age, and must: have an understanding of the development of children; have the ability to care for children; have the skills to work with children, family members department staff, community agencies; and, if applicable, staff of the child care facility; and have management and supervisory skills necessary to handle finances, plan and evaluate programs, and select and supervise personnel, including delegation of responsibility and motivation of staff. The administrator of a child care facility must have at least 12 semester hours of college credits in early childhood development, child development, child psychology, or the equivalent, or must hold either a current child development associate (CDA) credential from the Council for Early Childhood Professional Recognition or a Montessori certificate issued by a program accredited by the Montessori Accreditation Commission for Teacher Education. College credits in management may substitute for three of the 12 required credits. The administrator of a child care center for school age children may substitute relevant college courses, except that at least three semester hours of college credits in child development are required. Directors must pass a background check

3. Health and Safety Training

    a. Pre-service Training:

    State Licensed Providers: State licensed providers will follow all state licensing requirements.

    Licensed Exempt FCC Providers and In-Home Care Providers: All providers are required to complete Pediatric first aid and cardiopulmonary resuscitation (CPR) certification within the first 3 months (90 days) of being a provider through AVCP.

    b. Ongoing Training**:**

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State Licensed Providers: State licensed providers will follow all state licensing requirements.

Licensed Exempt FCC Providers and In-Home Care Providers: Will undergo ongoing training in the above health and safety standards, for example CPR, first aid training, and shaken baby syndrome.

4. Monitoring & Enforcement

State Licensed Monitoring and Enforcement: Monitoring for licensed providers is performed by the State of Alaska, AVCP will obtain a copy of the facility State License to verify compliance. Also, AVCP Child Care may review the state license monitoring reports.

AVCP Monitoring for Licensed Exempt Providers: The AVCP Child Care Program must conduct a home visit/inspection for all new licensed-exempt child care providers. The Child Care Program will conduct a minimum of one (1) announced visit/inspection during the following calendar year. While on site, the staff member will inspect the home/facility to ensure compliance, will document any areas of non-compliance, and discuss these areas with the provider prior to leaving. The provider will provide a plan of action to address any areas of non-compliance within three (3) months. AVCP's Youth & Child Unit staff will support providers to assist them in remedying any safety concerns noted. Staff will also ensure that the provider is compliant with the child/provider ratios. AVCP is continuing to develop its monitoring and enforcement function, including efforts to increase the number of home inspections per year.

5. Inspector Qualifications

State Inspectors: Licensing Specialists under the CCDF Lead Agency, the Child Care Program Office (CCPO) and Municipality of Anchorage (MOA), must meet the state job qualifications and classification for their position as Community Care Licensing Specialists.

AVCP Inspectors: AVCP's Child Care staff must be 18 years of age or older, have the ability to pass a background check and be able to perform all job duties. Child Care staff are trained in how to monitor and inspect CCDF providers. They are required to have knowledge of the health and safety standards, and monitoring enforcement practices used by the AVCP Child Care Assistance program. AVCP Child Care staff must keep current in all health and safety training.

6. Ratio of Inspectors to Facilities

AVCP will have a ratio of licensed inspectors, 1:75 child care programs.

7. Child Ratios

Licensed Child Care Centers Ratios and Group Sizes:

- Infant: birth through 18 months of age, 1:15, 10
- Toddler: 19 months through 36 months, 1:6, 12
- Preschool: 3 and 4 years of age, 1:10, 10

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- School age: 1:14, 28 (kindergarten) and 1:18, 36

License-Exempt Child Care Providers:
- License-Exempt Family Child Care Providers: 1 to 4, Group size 4
- In-home Care Providers: 1 to 6, Group size 6

Licensed Family Child Care
- Total: 1:8, no more than 3 kids under 30 months of age, and no more than 2 kids that are non-ambulatory.

Background Checks

Background Checks completed by Alaska State for state licensed providers

Criminal Background Check Requirements			
Required Components (Unless the Tribe Has an Approved Alternative Approach)	**National**	**Current State of residence: Alaska**	**State(s) of residence last 5 years**
FBI with fingerprint check	AK	n/a	n/a
National Crime Information Center (NCIC) National Sex Offender Registry (NSOR)		n/a	n/a
State criminal registry or repository	n/a	AK	
State sex offender registry or repository	n/a	AK	AK
State child abuse and neglect registry and database	n/a	AK	

Background Checks completed by AVCP

Criminal Background Check Requirements (Licensed Exempt FCC and In-Home Care Providers)			
Required Components (Unless the Tribe Has an Approved Alternative Approach)	**National**	**Current State of residence: Alaska**	**State(s) of residence last 5 years**
FBI with fingerprint check		n/a	n/a
National Crime Information Center (NCIC) National Sex Offender Registry (NSOR)		n/a	n/a
State criminal registry or repository with fingerprints	n/a		

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Criminal Background Check Requirements (Licensed Exempt FCC and In-Home Care Providers)			
State criminal registry or repository without fingerprints		AVCP	
State sex offender registry or repository	n/a	AVCP	
Court view	n/a	AVCP	n/a
State child abuse and neglect registry and database	n/a		

Relative providers are required to complete a background check, as an alternative we will perform a Court View and the State sex offender registry.

Background check requirements apply to all child care providers who receives payment through this program for the care or supervision of children. For license-exempt family child care homes, in addition to the provider, the background check is required for the all individuals in the household over the age of 16 that may have unsupervised access to children.

AVCP will not approve payment for a prospective child care provider if a barring crime or condition is identified while obtaining the background check. Barring crimes and conditions may include (but are not limited to):

1. Refusal to consent to a comprehensive background check.
2. Knowingly making a false statement in connection with a criminal background checks.
3. Being required to register in the State or National Sex Offender registry.
4. Having been convicted of a felony involving:
    a. Murder.
    b. Child abuse or neglect.
    c. A crime against children, including child pornography.
    d. Spousal abuse.
    e. A crime involving rape or sexual assault.
    f. Kidnapping.
    g. Arson.
    h. Physical assault or battery. or
    i. A violent misdemeanor committed as an adult against a child, including child abuse, child endangerment, sexual assault, or of a misdemeanor involving child pornography

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Disaster Relief/State of Emergency

AVCP partners with other regional entities to plan for, and respond to disasters that impact the region. When fires, floods, and other disasters impact communities in region, AVCP partners with the Yukon Kuskokwim Health Corporation and other organizations on the Regional Emergency Response Team, to coordinate evacuations and other necessary relief. When disasters strike that impact multiple communities in the AVCP region, for example Typhon Merbok, AVCP's regional footprint, with village-based staff spread throughout, puts it at the forefront of communication, support, and assistance coordination. Aside from regional entities, AVCP partners with the State Emergency Management Agency, the Federal Emergency Management Agency (FEMA), the National Guard, and the Red Cross. In non-emergent times, AVCP encourages and supports Tribes and communities to create and update emergency plans. AVCP will always defer to a Tribe's emergency management decisions. AVCP's programs have the flexibility to continue providing child care services and waive documentary and other eligibility requirements when necessary during emergency and disaster situations.

Continuous Quality Improvement

AVCP is a large size CCDF grantee, and thus required to spend 12% of its overall CCDF funding on quality improvement activities. Since 2020, AVCP has worked to meet the increase in required spending to improve access to quality child care throughout the region. Starting in 2022, AVCP began planning to integrate the Head Start and Child Care programs at AVCP into one combined Youth & Child Unit. The goal of this plan is to improve child care services overall and increase access to these services around the region. The planning continued into 2023 and full implementation of the planned integration is anticipated to be completed by the end of 2024.

Through this planning process, AVCP determined to focus its quality improvement efforts in four main areas:

1. increasing access to quality child care resources throughout the AVCP region;
2. increasing navigation and monitoring services for providers;
3. increasing staff and provider training, compensation, and retention; and
4. increasing the number of infants and toddlers receiving health and development screenings and assessments.

In all four areas AVCP will identify, develop, and promote culturally appropriate tools, trainings, and support.

Due to the geographic remoteness of the AVCP region, all our children are underserved, as there is a genuine lack of quality care options for parents in every community in the AVCP region. Additionally, we will focus some of our quality improvement resources specially on infants and toddlers, children with disabilities, and children with special needs.

1. Navigation: Recruitment, Access, Outreach, and Increased Case Management

    a. Recruitment, Access and Outreach

The hallmark of AVCP's navigation services is their location in job centers and tribal offices throughout the AVCP region. These village-based staff work directly with tribal members in their communities to connect them with the breadth of services available at AVCP. The Youth & Child Unit is expanding its recruiting efforts through partnership and integration with the Workforce Development Division and other Family Service navigation services. This will amplify the information available at the village level for parents interested in finding quality child care resources, because the

navigation staff are trained to assist clients with the application and eligibility process and will support clients to determine the best services for their children.

AVCP also plans to expand its use of program software to link the programs under the Youth & Child Unit and better assist clients in identifying all available resources, as well as reducing the amount of redundant paperwork. Finally, a new software program will assist AVCP with expanding the case management support services offered in this new unit over the next few years.

Additionally, AVCP will continue to plan targeted outreach events throughout the region to reach as many parents as possible, and through the continuing partnership with our Workforce Development Division will continue engage with employers throughout the region to reach employed parents in need of child care services. Finally, the navigation system helps support parents' access to information about our services, including any records of substantiated complaints for any of our tribally certified providers, which is available upon request. For State licensed providers, AVCP will direct parents to the state website: https://health.alaska.gov/dpa/Pages/ccare

b. Case Management

AVCP's wrap around service delivery model integrates case management or "navigation services" throughout the Family Service Center programs. This allows AVCP to reach a far greater number of clients throughout the region at the village level and to advise them of the full range of available services. Once they become a client in the Youth & Child Unit, the navigation services are being increased to support both families of children in center-based care, as well as families of children electing the in-home provider service.

The foundation of the Youth & Child Unit navigation work is the initial home visit. This event occurs for the first time at the start of all of child care services, and allows the staff the opportunity to work with the parents to create a plan to address parenting concerns, health and safety issues, and referrals to other services as needed. The "family plan" has been a hallmark of the Head Start program for years. For in-home child care providers the Youth & Child unit will have set standards of conduct for the initial and annual home visits, which document compliance with all applicable health and safety requirements. The in-home provider program has always used this initial home visit to do a health and safety evaluation and create a family and provider follow-up plan. These tools will be integrated and expanded to increase the services and support offered in both following the initial home visit.

One tool AVCP is planning to increase through our navigation services is the use of assessment tools for screening vision, hearing, and developmental progress to include all children in in-home child care as well as the center-based programs. Through these assessments the Youth & Child Unit will continue to increase the number of infants and toddlers screened and referred for needed services, which will improve the quality of care to all children especially those with disabilities. Youth & Child Unit navigators will work to increase the follow-up and support for parents related to these referrals.

Another area under development for navigation services in in-home child care is the expansion of services to improve the safety of the child care settings. In partnership with AVCP's Community Development Division, safety issues that are noted upon initial inspection will be referred for minor repairs, including, but not limited to:

1. Repairing stairs/walkways where children have access;
2. Providing safe child play areas; and
3. Repairing windows, carpeting or other safety issues within the child or children's access.

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Finally, the family plans will include behavioral training support, developmental milestones, and where a need is identified will provide supplies such as toys, learning materials, child appropriate bedding, and other items to improve the health and safety of the children.

2. Salaries, Training, and Incentives

AVCP's Youth & Child Unit will offer education, training, technical assistance, monitoring, and support to Child Care staff, Head Start staff, and in-home providers to improve the quality of child care options throughout the AVCP region. AVCP will complete an updated salary study to determine an appropriate and competitive salary structure for the Youth & Child Unit's staff and align the center-based program staff's salaries with the staff supporting the in-home providers.

Additionally, AVCP will create an incentive structure to encourage Youth & Child Unit staff to advance their knowledge of early childhood development, health and safety standards, training specific to supporting children with disabilities, and attain higher education goals. Finally, AVCP will consider an incentive-based program for child care providers to encourage their continued training and advancement in health & safety standards, care for children with disabilities, and developmentally appropriate care. AVCP will provide the tools necessary to improve the quality of care in in-home settings including books, educational games and toys. AVCP will work to develop culturally appropriate child care and parenting materials.

3. Increasing the Supply of Quality Child Care in the AVCP Region

AVCP is committed to increasing the supply of quality child care options available in throughout the region. Through the current planning process, we have identified two main area of focus for this effort over the next several years. First, AVCP's Youth & Child Unit will integrate the Head Start and Child Care programs to increase the number of hours our center-based programs are able to operate throughout the region. Second, AVCP will launch a provider program that will support interested tribal members to start their own business providing child care services in their home. Planned services include, assistance in developing small business plan, filing necessary paperwork, training in basic bookkeeping, special health and safety evaluations, assistance is creating a safe indoor environment for children, and incentives for providers to receive continuing training in early childhood development, caring for children with disabilities and much more. Through these efforts, AVCP plans to increase the supply of quality care available throughout the AVCP region.

Eligibility

AVCP chooses to take advantage of the categorical eligibility option to align CCDF program eligibility requirements with other early childhood programs, including, Early Head Start, and Head Start. All AVCP Head Start students are categorically eligible to receive services covered by CCDF funding. AVCP's Head Start and Child Care, are currently being integrated and when our center-based programs expand their hours through this integration, Head Start students will be eligible to attend the longer child care days.

Children qualifying under categorical eligibility must still:

1. Be an Indian Child;
2. Be under 13 years of age, or under 19 years of age if the child is disabled;
3. Reside in the AVCP Region; and
4. Families must be engaged in qualifying activities to be eligible.

Priority is given to children of families with low income, taking family size into account, and to children with special needs.

AVCP uses a sliding fee scale model to provide financial assistance to eligible families. AVCP will waive the co-pay for children in protective services, and families whose income falls below the 100% of federal poverty guidelines.

Child Care certificates will be issued to eligible parents for a 12-month period. The certificates will include:

1. the names of the eligible children
2. indicate if the approval is full-time or part-time, and if part-time, the exact number of hours/per month for which the family has been approved;
3. the date of authorization; and
4. Any co-payment amount the parents are responsible for.

Low-income families can experience multiple rapid changes within a short period of time, and unemployment and job loss are very disruptive to families. Maintaining a family's eligibility during such changes, for example a temporary period of unemployment or extended leave due to illness, can reduce some of the stress and facilitate a smoother transition back into the workforce. AVCP will not terminate child care services due to temporary changes in parents' work or activities for up to 3 months.

E. Reporting and Expected Results

AVCP will comply with all the statutory and regulatory data collection, and reporting requirements, pertaining to the P.L. 102-477, which allows us to provide one annual narrative, statistical, and financial report on the integrated services under our 477 Plan. This consolidated reporting reduces AVCP's administrative burden and allows for more funds to be spent on direct program services. Through our ongoing Quality Improvement Process, AVCP strives to improve every aspect of our service delivery model and provide the most comprehensive culturally rooted wrap-around services possible at the local level. Through this work we anticipate increasing the number of Tribal Members and families who are educated, employed, and self-sufficient.

F. Fair Hearing and Appeals Policy

Applicants, recipients, household members or legal representatives of the same (herein after referred to as "clients") have the right to dispute any action or decision affecting the benefits or services received through AVCP's 477 programs. These rights are outlined in AVCP's Fair Hearing Policy, attached as **Addendum L.**

Notice of AVCP's Fair Hearing Policy is included on each application for services. Clients are also notified about the policy each time an action is taken that affects the benefits or services received. A copy of the policy is also made available upon request.

The Fair Hearing process is initiated when a dispute is submitted by an applicant, recipient, household member or a legal representative of the same (hereinafter referred to as the "client"). The dispute must be made in writing and submitted within 30 days of the date on which the client was notified about or knew or should have known about the adverse decision or action, which ever occurred first. The dispute will be reviewed by the program's manager within five working days of receipt. If the dispute is determined to have merit, the program's manager will attempt to resolve

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the issue expeditiously. If the issue cannot be timely resolved or if the client is not satisfied with the chosen resolution, the client may request a formal hearing. The hearing must be scheduled within 30 days of the date on which the client submits a request for fair hearing. The hearing will be conducted by a Fair Hearing officer who shall act as an impartial decision maker.

The decision rendered by the Fair Hearing Officer is final and will be implemented by the program's manager without delay.

IV. ANTICIPATED REVENUE AND EXPENDITURES

AVCP 477 Workforce Development - *Anticipated Revenue*

Higher Education Scholarships (DOI-BIA)	$ 507,213
Job Placement & Training (DOI-BIA)	$ 191,414
Adult Education (DOI-BIA)	$ 7,939
Education Line Officers (DOI-BIA)	$ 16,129
Johnson O' Malley (DOI-BIA)	$ 166,378
WIOA Adult Comprehensive Services (DOL-WIOA)	$ 403,514
WIOA Supplemental Youth Services (DOL-WIOA)	$ 163,404
Native Employment Works (DHHS-NEW)	$ 326,075
Child Care Development Fund (DHHS-CCDF)	$ 4,137,233
Tribal Temporary Assistance for Needy Families	$ 5,420,841
Low Income Heating Assistance Program	≠ $ 2,700,000
General Assistance	$ 45,000
Total	**≠$ 14,085,140**

AVCP 477

Direct Program Expenses	$
Total quality and infant/toddler @ 12%	$
Program Administration/Indirect:	$
Total 477 Program Budget:	**$**

V. REQUESTS FOR WAIVER

*Bureau of Indian Affairs***:**

- **25 CFR 20.201-20.210; 20.306 relating to redesign, eligibility criteria and level of payments for General Assistance.**
- **25 CFR 20.307-20.314 relating to calculation of income.**
- **25 CFR 20.326(c) relating to last 6 consecutive months of residency.**
- **25 CFR 20.329-20.330 relating to payment amount for Emergency assistance.**
- **25 CFR: 273.12; 273.15(c); 273.20(e); relating to participant residency & eligibility requirements.**

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These waivers allow for consistency across programs integrated in the Plan concerning eligibility, calculation of resources, and benefits amounts, as well as tailoring these programs to the specific needs of the AVCP region and people. Granting these requested waivers would not be inconsistent with the purposes of the P.L. 102-477 program – rather, the requested waivers would further those purposes. Additionally, none of the requested waivers would be inconsistent with any provision of law (a) from which the program derives its authority and (b) that is specifically applicable to Indians.

- **25 CFR 20.605 Relating to hearings and appeals.**
- **25 CFR 273.16(b)(5) Relating to duties of IEC & grievance procedure.**

AVCP has adopted a unified hearings and appeals process for all programs integrated in the Plan.

Department of Labor:

- **WIOA SEC.3(36) relating to the definition of "low income individual" and "poverty line."**

This waiver will allow consistency throughout the plan, which utilizes the State of Alaska's Poverty guidelines in determining eligibility. Operating in small rural communities, in many cases, AVCP is the only program that provides services to youth. Therefore, it is critical that AVCP may assist all students when we are able if they meet one or more of the 8 categories listed. AVCP also intends not to limit its ability to help youth that are at risk of being non-productive individuals if funding allows.

- **20 CFR 667.600 relating to the grievance system.**

AVCP has adopted a unified hearings and appeals process for all programs integrated in the Plan.

Department of Health and Human Services:

- **45 CFR Part 98.2 relating to the definition of "eligible child care provider."**

Replace with: "A child care provider who is 18 years of age or older who provides child care services only to eligible children who are, by marriage, blood relationship, or court decree, the grandchild, great grandchild, siblings (over the age of 18 living in the same residence), niece, or nephew of such provider, and complies with any applicable requirements that govern child care provided by the relative involved;"

- **45 CFR 98.32 relating to complaints.**

AVCP has adopted a unified hearings and appeals process for all programs integrated in the Plan.

VI. ASSURANCES AND CERTIFICATIONS

AVCP's Assurances and certifications are included as **Addendum F.**

DRAFT