

P.L. 102-477

PROPOSAL

October 1, 2024 – September 30, 2029

Submitted by

Chugachmiut

1840 Bragaw Street, Suite 110

Anchorage, Alaska 99508

SECTION I: PROGRAMS TO BE INTEGRATED

A. U.S. DEPARTMENT OF THE INTERIOR:

- i. Tribal Scholarships
- ii. Job Placement & Training Program
- iii. General Assistance Program
- iv. Social Services
- v. Burial Assistance
- vi. Education Line Officers

B. U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES:

- i. Child Care Development Fund Program (CCDF)
- ii. Native Employment Works Program (NEW)

C. U.S. DEPARTMENT OF LABOR:

- i. WIOA Section 166 Comprehensive Services for Native Americans Program
- ii. WIOA Section 166 Supplemental Youth Services for Native Americans Program

SECTION II: COMPREHENSIVE STRATEGY

A. AUTHORITY

Chugachmiut is an Alaska Native tribal organization; its name means “people of the Chugach Region.” By resolution and through its Articles of Incorporation and Bylaws, Chugachmiut functions as the health & social services, cultural, and educational arm for seven tribal governments. A seven-member Board of Directors governs Chugachmiut, with each board member appointed by their tribal government. Seven tribes are served under this P.L. 102-477 Plan. The Native Village of Eyak established a tribally operated 477 Plan in fiscal year 2024 to serve its membership in Cordova, Alaska.

B. RESOLUTION

Chugachmiut resolution 24-17 authorizing the continued consolidation of programs and the addition of new programs is included, see [Appendix AAA](#).

C. CONSISTENCY WITH THE ACT

Chugachmiut proposes to integrate employment, training, and related services to improve the effectiveness of services, reduce joblessness in the Chugachmiut region, and serve tribally determined goals consistent with the policy of self-determination.

D. GOAL OF THE PROGRAM

One of the primary objectives of the 477 Program is to foster self-sufficiency and economic prosperity within Indigenous communities by promoting education and skill development. Through strategic partnerships with tribal governments, educational institutions, and other stakeholders, Chugachmiut will offer a range of services, including adult education, vocational training, job placement assistance, and supportive services.

Each program under this plan has individual outcomes that are discussed in the applicable section.

E. GEOGRAPHIC DESCRIPTION

The Chugachmiut Region is in south-central Alaska and extends across Prince William Sound and the Kenai Peninsula and encompasses over 15,000 square miles. It is the home of seven tribes with traditional winter and summer settlements that have existed along the Prince William Sound and the Cook Inlet for centuries. Of the seven locations, Valdez and Seward are the only communities that are accessible with a drive on the Alaska highway system. Tatitlek, Port Graham, Nanwalek, and Cordova/Eyak are accessible only by boat or plane.

SECTION III: SERVICE DELIVERY MODEL

A. GENERAL ELIGIBILITY The following standards apply to all programs unless specifically waived in the program description.

- Eligible participants are Alaska Native and Native Americans, who are members of a federally recognized tribe or provide a Certificate of Indian Blood from the Bureau of Indian Affairs
- All eligible applicants must live in the Chugachmiut service area
- Unemployed or underemployed, and demonstrate a need for training, financial assistance or job development.
- Applicants must meet the approved Chugachmiut Board of Directors' income standards (see **APPENDIX BBB**).

B. OUTREACH

The Chugachmiut 477 program conducts outreach by engaging with our tribes by means of various activities aimed at both individual and group engagement and support. Activities will be but not limited to community events, information sessions, consultations, referral, and follow-up support.

C. INTAKE

Applicants applying for services or programs are required to complete the Application for Services intake form. Chugachmiut staff then meets one-on-one with each applicant to evaluate the information and assess the need in relation to the requested program and/or services. An Individual Service Plan (ISP) is developed with each applicant to carry out program goals and ultimately lead to self-sufficiency.

D. RECORDS MANAGEMENT

Chugachmiut's internal Records and Information Management policy applies to each program functioning under this Plan. Additionally, applicant records are maintained by the responsible department within a secured area with access limited to approved staff that are bound by a signed confidentiality agreement.

E. APPEAL POLICY

Chugachmiut's internal Customer Feedback policy applies to each program functioning under this Plan. The policy establishes a timely and fact-based response to customer comments or concerns and provides accountability, rapid resolution, and the responsible delivery of services.

F. WRAP-AROUND SERVICES

Chugachmiut provides wrap around services to support individuals or families to address needs and work towards positive outcomes. Services to be provided will address physical, emotional, social, and educational needs identified at intake or on referral. The goal of wrap-around services is to create a system that provides resources, case management, direct services, and support to promote self-sufficiency.

G. REPORTING

Chugachmiut staff reviews monthly financial reports to monitor program expenditures and submits quarterly financial and narrative reports for Chugachmiut Board of Directors' review. Welfare Assistance, the 477 statistical and narrative, and financial audit reports are submitted to the Department of Interior annually.

H. INCOME AND PAYMENT STANDARDS

The Chugachmiut Board of Directors adopted unified income eligibility standards. Chugachmiut will follow the payment standards published by the State of Alaska Office of Childcare and BIA-Division of Human Services, Welfare Assistance Office for the programs offered through this Plan. As new payment schedules are released, Chugachmiut will incorporate any updates or changes. See **APPENDIX BBB and CCC.**

SECTION IV: INTEGRATED SERVICES

A. SOCIAL SERVICES

General Assistance Program

The General Assistance program provides temporary financial assistance for qualified individuals for essential needs of food, utilities, shelter and clothing. Chugachmiut staff will adhere to the Chugachmiut Board of Directors approved General Assistance Policy and Procedures. Beneficiaries of the program complete an Individual Service Plan (ISP) to establish the needs of the participant and set up a goals framework to reach their self-sufficiency goals.

- **Goal 1:** Chugachmiut will ensure the self-sufficiency of General Assistance beneficiaries so that they have a long-term, secure plan for meeting their financial needs.
 - **Obj 1.1:** Chugachmiut will provide case-management support to GA beneficiaries to support the development of an ISP and provide follow-up on progress of the established goals.
 - **Obj 1.2:** Chugachmiut will provide a life skills training module that will provide learning opportunities to work towards self-sufficiency goals for all participants.
 - **Obj 1.3:** Chugachmiut will implement a metric system to track progress, identify needs, and document successes.

B. BURIAL ASSISTANCE

Providing Burial Assistance services relieves the financial burden on the families affected and supports the goal of promoting self-sufficiency through programs integrated

into this plan. Chugachmiut staff will adhere to the Chugachmiut Board of Directors approved Burial Assistance Policy and Procedures.

- **Goal 1:** Chugachmiut will ensure burial assistance support by making it accessible to everybody who demonstrates need.
 - **Obj 1.1:** Chugachmiut will produce public media and communications information and maintain available technical assistance on the Chugachmiut website.

C. EMPLOYMENT AND TRAINING SERVICES

Chugachmiut will provide supportive services to eliminate barriers for individuals seeking employment or achieving training goals identified in the Individual Service Plan (ISP). In accordance with PL 107-288; Jobs for Veterans Act, Chugachmiut provides preference to Veterans within our communities and service area.

Vocational Training Scholarship Program:

The program provides vocational training assistance to Chugach Tribal Members residing within the Chugach region that are unemployed or underemployed and are in need of tuition assistance for vocational training in order to obtain long-term employment.

Goal 1: Chugachmiut will improve the outreach and impact of vocational training and apprenticeship programs that lead to industry-recognized certifications.

- **Obj 1.1:** Chugachmiut will enhance exposure to career pathways in the communities by presenting opportunities from college and career partners to prospective students.
- **Obj 1.2:** Chugachmiut will actively partner with reputable trade schools to ensure students have career options that are relevant and meaningful to community beneficiaries.
- **Obj 1.3:** Chugachmiut will increase the number of individuals receiving training and support in both apprenticeship and case management program services.

Goal 2: Chugachmiut will collaborate with the Chugachmiut Tribal Education Committee to address the relevant employment and training needs and preferences identified by the community.

- **Obj 2.1:** Social Service staff will participate in the Chugachmiut Tribal Education committee scheduled meetings.

D. EDUCATION SERVICES

Higher Education Program

The program provides Scholarship tuition assistance to Chugach Tribal Members residing within the Chugach region that are in need of tuition assistance for higher education.

- **Goal 1:** Chugachmiut will improve the outreach and impact of scholarship opportunities by partnering with the college or university's resources and infrastructure.

- **Obj 1.1:** Chugachmiut will enhance exposure to career pathways in the communities by presenting opportunities from college and career partners to prospective students.
- **Obj 1.2:** Chugachmiut will partner with colleges to ensure students are connected with an academic mentor, Native student services, and other opportunities.
- **Obj 1.3:** Chugachmiut will implement a metric system to track progress, identify needs, and document successes.

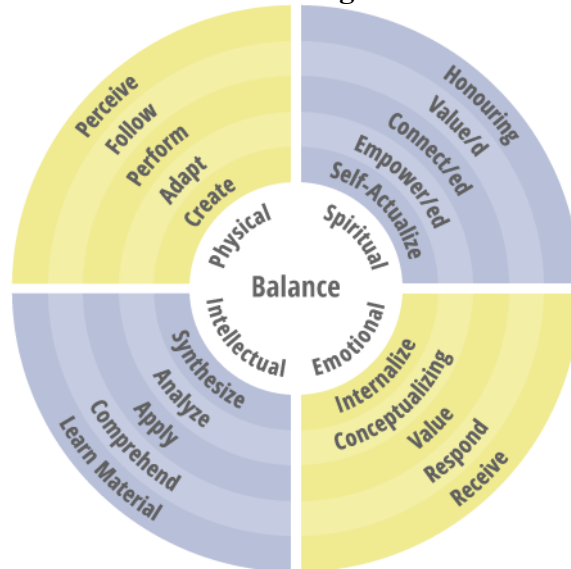
Chugachmiut Tribal Department of Education

The Chugachmiut Tribal Education Department realizes its role in supporting and overseeing programs that ensure Whole Learning. We emphasize that all students should experience programs based on the Chugach languages, people, and places.

The goals in this document are intended as preliminary guiding goals as the Education Department grows into a fully realized Tribal Education Program. In developing a larger needs picture, we have identified a contractual partner to conduct a Community Needs Assessment. This outreach performance will be 15 months long and incorporate four surveys, seven site visits, collaboration with the new Tribal Education Committee, and consultation with the Chugachmiut school district partners.

At this early stage, we recognize the need for Tribal Education Programs to create Whole Learning (see below)¹. Chugachmiut will emphasize the spiritual learning domain in a Western framework that otherwise only teaches intellectual, emotional, and physical education. Our goals are intended to guide a long-term program approach that achieves all four learning domains.

Whole Learning Wheel:



¹ See <https://niccurriculumcommittee.opened.ca/wp-content/uploads/sites/2634/2021/01/Switching-from-Bloom-to-the-Medicine-Wheel-1.pdf> for more on the Indigenizing Learning Outcomes research

¹ See <https://niccurriculumcommittee.opened.ca/wp-content/uploads/sites/2634/2021/01/Switching-from-Bloom-to-the-Medicine-Wheel-1.pdf> for more on the Indigenizing Learning Outcomes research

Education Department Goals

These preliminary goals will guide the department's next 15 months. As Obj 1.3 is completed, the Tribal Education Committee will establish formal, long-term goals.

- **Goal 1** Develop community governance structures that will guide, develop, and oversee the education programs in the Chugach community.
 - **Obj 1.1** Create by-laws and meeting structures for a Chugachmiut Tribal Department of Education governance committee (“the Committee”).
 - **Obj 1.2** Comprise the Committee with representative stakeholders from the seven Chugach communities, including elders, parents, students, and teachers.
 - **Obj 1.3** Provide the committee data and research to create a long-term strategic plan with goals, and objectives to achieve the four domains of Whole Learning.

- **Goal 2** Utilize the results of a multi-dimensional Community Needs Assessment to identify opportunities for improved community education agency alignment for Chugachmiut to deliver education programs based on language, people, and place.
 - **Obj 2.1** Conduct four multi-dimensional Needs Assessments that provide education need opportunities for (1) students, (2) educators, (3) tribal and education providers, and (4) additional organizations.
 - **Obj 2.2** Deliver a report of the findings that summarizes the community's needs and justifies strategic plan recommendations.
 - **Obj 2.3** Identify long-term funding strategies, including compacts, grants, and partnerships that can meet the needs.

- **Goal 3** Initiate collaborative partnerships with community education providers to align sustainable program opportunities and create the whole experience of four-domain learning: intellectual, emotional, physical, and spiritual.
 - **Obj 3.1** Instruct the Chugach community on the four-domain learning model of Whole Learning.
 - **Obj 3.2** Identify opportunities to create collaborative partnerships that meet the shared mission of education students with Whole Learning.
 - **Obj 3.3** Develop comprehensive Memoranda of Agreement that outlines the roles and responsibilities of partner organizations to meet the Whole Learning objectives.

E. CHILDREN’S SERVICES

Youth Services - Chugachmiut provides supplementary youth employment services within the Chugach Region. Youth services are designed to assist eligible recipients residing within the identified service area.

Summer Youth Employment:

Chugachmiut connects with the youth in our communities to participate in an entry-level employment work experience with tribal administrations. Youth receive wages from the tribe which Chugachmiut funds as a partnership and a pass-through agreement. This program provides an opportunity to increase employability, through skill development, establish a work history and exposure to workplace culture.

- **Goal 1:** Chugachmiut will provide opportunities for summer youth employment as youth beneficiaries complete a 4-week summer work experience.
 - **Obj 1.1:** Youth completing the program will demonstrate job satisfaction, confidence, and an understanding of workplace dynamics as indicated on an exit survey.
 - **Obj 1.2:** Youth will demonstrate improved skills related to their work expertise and practical employment skills.
 - **Obj 1.3:** Chugachmiut will provide technical assistance and serve as a liaison with employers to ensure that the summer youth employment opportunity is successful for the participants and provides a benefit for the community.
 - **Obj 1.4:** Chugachmiut will employ a metric system to track progress, identify needs, and document successes for summer youth.

Child Care Development Fund - Chugachmiut receives a small tribal allocation for Child Care Assistance, which is administered by the Community and Family Services Division. Child Care assistance is provided to eligible applicants, employed or enrolled in a training program, and parents of Native American or Alaska Native children. Chugachmiut continues to be the Lead Agency for our Chugach communities for CCDF discretionary funding, the lead agency will continue to receive mandatory funding for those communities receiving CCDF funds direct. CCDF is administered under P.L. 102-477 for FY 2024-2029.

Goal 1: Increase the distribution of information to our tribal communities about the Childcare program.

- **Obj 1.1:** All participants entering unsubsidized employment, enrolled participants attending a training or school will be informed about the availability of the Child Care Assistance Program.
- **Obj 1.2:** Chugachmiut will produce public media and communications information and maintain available technical assistance on the Chugachmiut website.

Goal 2: Provide quality of care activities

- **Obj 1.1:** 9% of our CCDF budget is set-aside for quality spending for providers.
- **Obj 1.2:** Expand training professional development opportunities for providers.
- **Obj 1.3:** Chugachmiut will provide childcare resource and referral services
- **Obj 1.4:** Program success is captured annually by the Statistical and Narrative report

Quality of Care Topics

Chugachmiut endeavors to maintain contact with all providers within the Chugach region to whom we provide Child Care assistance through this program to ensure the highest level of quality care is available within our region. As Chugachmiut does not actively provide Child Care

services we do open dialogue with our providers on a regular basis. Provider concerns are documented, and efforts begin immediately to address each issue as it arises. Chugachmiut provides orientation to the CCDF Program which is made available to providers and prospective providers through the Chugachmiut services application; the Chugachmiut quarterly newsletter; and the Chugachmiut web site.

Chugachmiut provides articles and relevant information via the Chugachmiut newsletter for providers and parents.

Goals for improving

Specific Child Care Development Fund Activities include:

- Chugachmiut does not own/operate Child Care Centers, nor does it employ Child Care providers.
- Pre-approval and calculation monthly childcare costs.
- Prompt determination of eligibility for applicants.
- Payment of childcare costs upon provider invoice submission.
- Collaborative referral process within Chugachmiut to maximize usage of CCDF resources.
- Assistance to participating parents in identifying local childcare delivery resources and options.
- Assistance for parent-selected childcare provider in obtaining business license and other documentation necessary to deliver services under the program.
- Collaboration with the delivery of quality enhancement activities to CCDF parents, families and providers.
- Coordinate with local organizations including schools, tribes, non-profits to share resource information with families about programs for child nutrition, parent resources, family services, child welfare, family mental to ensure families are well informed of resources and programs available to keep them safe and healthy.
- Chugachmiut does not aid through TANF; however, we do provide a referral process to the State Public Assistance offices to ensure that families are moving towards self-sufficiency and basic needs are being met.
- Chugachmiut provides immunization information and immunizations through each of our village Health Clinics.

Chugachmiut references the Payment rates for childcare services based on the 2021 Alaska Department of Health and Social Services' Division of Public Assistance Child Care Market Price Survey Chugachmiut uses the State of Alaska payment rates and base our rates on the Market Rate Survey conducted by the State of Alaska.

Chugachmiut uses a Board of Director approved Income sliding fee scale which is based on income and family size. This assures services for eligible participants. Chugachmiut staff discusses options with each participant reviewing the range of available providers which primarily consists of family and in-home relative care.

Payment Rates for Providers (per child)

See Attachment CCC for Program Rates by Region for: Licensed Center Care, Licensed Home Care and Approved In-Home or Relative Care. Chugachmiut follows the State of Alaska Payment Rates, this assures equal access to childcare for parents in the Chugachmiut area who are employed or are enrolled in a training program.

Public Hearing Process

Chugachmiut will make the 477 Plan and the CCDF plan available for review on our website. A notice for a public hearing to be held via Zoom is posted on our social media platforms and tribes will be notified via email. The hearing will be on July 19, 2024, within the 20-day advance notice requirement. Comments will be documented and applied if appropriate, and a plan revision will be submitted.

Definitions

"Indian Child" is the child or descendant of a member of a federally recognized Indian Tribe residing within the Chugach Region with a Certificate of Indian Blood from the Bureau of Indian Affairs. The child is age: birth to 13 years.

"Tribal Service Area" for each participating tribe or Native Association, "Tribal Service Area" is defined by each individual Tribal Council or BIA. This area may extend beyond the boundaries of their immediate community; however, the Chugachmiut 477 program does not extend past the geographic boundaries of the Chugach Region.

"Quality Efforts" Training, professional development, compliance with health and safety standards, learning materials for children. Chugachmiut employs quality efforts to improve and continue offering quality services for our families and children.

"Relative Providers"

Federal definition includes grandparents, great grandparents, siblings (if over 18 and living in a separate residence), aunts, and uncles, great aunts, great uncles.

Other Services:

Other special services may include referral to the appropriate agency and/or department relating to childcare, healthcare, meals, temporary shelter, and transportation or counseling which may be necessary for participation in the placement or training.

Health and Safety Standard, Monitoring and Inspections.

Licensed Family Child Care, Group Home Care, and Center Care will follow the State of Alaska Standards for health and safety, monitoring and inspections.

Relative providers are exempt from all health and safety standards, monitoring and inspections. Chugachmiut is developing an Orientation Manual with technical assistance provided by an appointed CCDF staff member. To further ensure the safety of our children, we will utilize the Sex Offender Registry and Court view to ensure the provider meets our criteria for being a provider.

Chugachmiut's state of emergency child care preparedness plan is under development in collaboration with CCDF's technical assistance provider.

SECTION V: ANTICIPATED RESOURCES AND EXPENDITURES

Higher Education Scholarships (DOI-BIA)	\$ 25,813.00
Job Placement & Training (DOI-BIA)	\$ 43,655.00
Social Services (DOI-BIA)	\$ 33,264.00
Education Line Officers (DOI-BIA)	\$ 1,152.00
WIOA Adult Comprehensive Services (DOL-WIOA)	\$ 29,826.00
WIOA Supplemental Youth Services (DOL-WIOA)	\$ 6,032.00
Native Employment Works (DHHS-NEW)	\$ 17,652.00
Child Care Development Fund (DHHS-CCDF)	\$313,805.00
General Assistance	<u>\$ 30,000.00</u>
Total Anticipated Annual Revenues	\$ 501,199.00
Direct Program Expenses	\$ 430,512
Program Administration/Indirect	<u>\$ 070,687</u>
Total 477 Program Expenditures	\$ 501,199.00

Chugachmiut has an Indirect Cost Rate negotiated with the Department of Health and Human Services, Region X, see **APPENDIX DDD**.

The Chugachmiut 477 program integrates nine different programs, each with its own restrictions regarding the indirect cost rate that may be assessed. A separate, internal departmental budget for each individual program is established when funding is received. The indirect cost rate provided on the SF-424 and SF-424A are an average of all accumulated indirect cost rates for each program.

SECTION VI: REQUIRED WAIVERS

Bureau of Indian Affairs:

- 25 CFR 20.201-20.210; 20.306 relating to redesign, eligibility criteria and level of payments for General Assistance.

Replace with: 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 Chugachmiut 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.

Replace with: Chugachmiut has adopted a unified hearings and appeals process for all programs integrated in the Plan.

Department of Labor and Department of Health and Human Service-Office of Childcare:

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

Replace with: This waiver will allow consistency throughout the plan, which utilizes the Chugachmiut Board of Director adopted Poverty guidelines in determining eligibility. Operating in small rural communities, in many cases, Chugachmiut is the only program that provides services to youth. Therefore, it is critical that Chugachmiut assist all students in need of special assistance. Chugachmiut 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.

Replace with: Chugachmiut has adopted a unified hearings and appeals process for all programs integrated in the Plan.

- 45 CFR 98.32 relating to complaints.

Replace with: Chugachmiut has adopted a unified hearings and appeals process for all programs integrated in the Plan.