

Samish Indian Nation



Career & Education Pathways Program

P.L. 102-477 Three (3) Year Plan

January 1, 2025 – December 31, 2027

Submission Date: October 8, 2024

Resolution: 2024-03-023

Adopted: TBD

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Narrative

The Samish Indian Nation (Nation) is governed by a seven-member Tribal Council elected to oversee the welfare and resources of the Nation; its constitution, economic development, policies, legislation, enrollment, and justice. A General Council—all voting age citizens—maintains active participation in both the governance responsibilities and cultural gatherings of the Nation. Today, the Nation’s leaders move in the traditional Samish ways and use tools of the modern-day world. The Nation offers to its citizens a wide variety of opportunities such as:

- Housing assistance
- Preschool and Head Start
- Elders services
- Natural resources management & protection
- Healthcare and wellness
- Social Services
- Vocational Rehabilitation
- Culture
- Language
- Workforce Development
- Education Assistance
- Preservation & Archives

The Samish work with state and federal agencies on numerous grants to protect the environment and preserve natural and cultural resources, as well as creating a sound economic base for our Nation and each individual family. The Samish are strong and committed people. We are committed to reestablishing our homelands, strengthening our tribal culture and language, demonstrating traditional stewardship of cultural and natural resources, and being a contributing force in the economic base of our region. In short, the Nation is continuing in the ways of their ancestors, carrying forth the values and visions of a strong Samish Indian Nation.

Mission:

To preserve the traditional knowledge and skills of our citizens, enrich our Nation, and enable our people to thrive.

Vision:

To be a collaborative, self-governing sovereign nation with culturally enriched and engaged citizens throughout our traditional territory.

Values:

The Samish Indian Nation values those who act out of spiritual purity with vision, dignity, integrity, and pride in our culture and traditions. The Samish Indian Nation believes in creating a respectful, compassionate organization and community that mentors and nurtures individuals, values cooperation and harmony, seeks to find balance, happiness, and grace while remaining committed to the creation of a high-quality government delivering the highest quality programs.

The core values that structure the work of the Samish Indian Nation are:

- Perseverance
- Collaboration
- Generosity
- Humor
- Honesty
- Transparency
- Integrity
- Inclusivity
- Passion
- Optimism
- Compassion

Samish Culture and Language

The Samish Indian Nation is the successor to the large and powerful Samish Tribe, a signatory to the Treaty of Point Elliott in 1855. The Nation's traditional territory stretches over a wide region of the Salish Sea in Northwest Washington, from the tops of the Cascades Mountains to the far western shores of the San Juan Islands. The beauty, abundance, and variety of the region since time immemorial provides a rich backdrop for our history and cultural traditions that remain strong today.

Linguistically and culturally, Samish are part of the Coast Salish, speaking a dialect of Coast Salish known as “Straits Salish” Language directly connects Samish citizens to their families, cultural concepts, history, and place in an authentic and timeless way.

The Samish were historically comprised of four important social groupings: the family, the house group, the villages, and the Nation as a whole. High class tribal citizens married far outside of their surroundings and relations, fostering a network of “kinships”. Tribal citizens relied on these relationships during bad times in order to be able to access areas of food and shelter that were not currently in their home territory.

Samish people were respected for their spiritual strength as well as their skillful carving of canoes and construction of longhouses. One of those longhouses on the eastern end of Samish Island measured several hundred feet with some documents reporting it to be as long as 1,250 feet. In the 1830s and 1840s, the Nation had over 2,000 citizens. Twelve years later at the time of Treaty of Point Elliott negotiations, raids from Northern Tribes and epidemics of measles, smallpox, tuberculosis, and influenza had decreased the Samish population to about 150. Documents show 113 Samish were present in Mukilteo at the time of the Point Elliott Treaty signing in 1855.

Our Relationship with Nature

Samish oral history includes teachings of the plant people, the sea creatures, the fur bearing and winged creatures. These stories passed down from our ancestors convey how both the natural and spiritual worlds entwine and cannot be separated. These teachings, also called our chelängen or schelängen, guide Samish people in their daily lives and offers a unique and irreplaceable system of beliefs, which takes us through the transitions of life from birth to death and beyond.

Our elders would often tell us when we were growing up that, “When the tide goes out our table is set for dinner.” Nearly everything we need to survive can be found living on the beaches or in the waters close to shore. In gratitude for accepting any one of these gifts we always use a prayer or a song of thanks for the gift that was left for us by the ancestors to survive such as the clam, the oyster, the salmon, the waters, the air, the roots, and everything else in nature.

As saltwater people living close to forested and prairie shores, Samish collectively accessed a wide variety of traditional foods; women and children harvested sprouts, bulbs, roots and shoots, berries, shellfish, sea urchins, and crab. Men organized beach seines, reef nets, and weirs to manage dozens of distinct fish runs, including all five species of Pacific Salmon, smelt, herring, steelhead trout, halibut, sucker, chub and occasionally sturgeon. Men also arranged hunting parties for upland birds, waterfowl, small game, deer, elk, and seal in season.

Treaty Rights, Recognition and Territory

In March of 1958, the Indian Claims Commission (ICC) made four significant findings regarding the Samish Nation in its efforts to pursue land claims against the federal government for land that was taken by the Treaty of Point Elliott in 1855 without adequate compensation. First, the court ruled that the Samish Nation bringing the case had continuously existed as a functioning tribal government from the time of first European contact in 1792 up through the date of the court’s decision. Second, the court ruled

that the Samish Nation bringing the case was the successor in interest to the historical Samish Nation that signed the Treaty of Point Elliott. Third, regarding the historical territory exclusively occupied by the Samish, the ICC held that, “The Samish held Samish Island, Guemes Island, eastern Lopez Island, Cypress Island, and Fidalgo Island.” Fourth, the ICC held that the area ceded by the signatory tribes in the Treaty of Point Elliott includes the whole of the areas alleged by petitioner to have been used and occupied by the Samish Indians in aboriginal times.” The ICC awarded (minimal) compensation to the Samish Nation for the inadequate compensation paid by the United States under the Treaty of Point Elliott to the Samish Nation for the lands it had exclusively occupied in aboriginal times and that had been ceded in the treaty.

As a treaty signatory, the Samish Nation’s legal existence continued unless expressly terminated by an Act of Congress. Because most Samish tribal citizens refused to relocate to one of the reservations established by the Point Elliott Treaty and instead remained in their traditional territory practicing their traditional lifestyle, the federal government had limited contact with the Nation over the years. The federal government never had a formal list of the Indian tribes it officially recognized until the late 1970s. The Samish Nation was on an internal list of federally recognized tribes prepared by a clerk in the Interior Department in 1966, listed with other tribes that had not adopted a constitution under Section 16 of the Indian Reorganization Act. Then in 1969, in what a federal appeals court called an “arbitrary” and “wrongful” act, the same Bureau of Indian Affairs (BIA) clerk left Samish off the revised internal list of tribes. The clerk testified 24 years later that there was no reason why she dropped Samish off this list. Even though there was no authority to do so, the Interior Department soon started using this internal list to determine which tribes were federally recognized and which were not; since Samish was no longer on the list, the Interior Department started to treat the Samish Nation as unrecognized. It took over 25 years of administrative and federal court proceedings to finally gain a full and fair trial where the Samish Nation could prove that it had continuously existed as an Indian Nation and should never have been dropped from the list of federally recognized tribes. In 1995, after an 8-day trial and numerous depositions and extensive discovery of federal documents, an Administrative Law Judge found that the Samish Nation was descended from the Treaty Samish, met all the regulatory requirements necessary to qualify as a federally recognized Nation, and that there had been no legal or factual basis for the BIA to have dropped the Samish Nation as a federally-recognized Nation in 1969. In April 1996, the Samish Nation was formally re-recognized by the United States Department of Interior. A federal appeals court later ruled in 2005 that the Samish Nation should have been federally recognized as a historical Nation in 1969.

Samish has continued to pursue the trust obligations required of the Department of Interior, and to that end obtained 76 acres of land into Federal Trust in 2006. Samish is seeking Department of Interior acknowledgement of the Nation's eligibility to take further lands into trust.

Total Samish Citizens by Age Group as of May 8, 2023

Age Group	
0-9	298
10-19	399
20-29	402
30-39	304
40-49	283
50-59	259
60-64	119
65+	295
Total	2359

Total Samish Citizens by County as of May 8, 2023

County	
Island	35
San Juan	4
Skagit	156
Snohomish	171
Whatcom	147
Other	513

General Provisions and Programs to be Integrated

Statutory Authority

Public Law 102-477 in the Indian Employment, Training, and Related Services Demonstration Act of 1992, as amended by Public Law 106-568, the Omnibus Indian Advancement Act of 2000. Public Law 102-477 is unique among federal legislation, in that it allows federally recognized tribes and Alaska native entities to combine formula-funded federal grants funds, which are employment and training-related into a single plan with a single budget and a single reporting system.

Samish Indian Nation’s three (3) year plan beginning January 1, 2025 is authorized by Samish Tribal Resolution to implement an integrated program using a single plan, single budget, and single report for four Federal Programs with three Federal Agencies. The Samish Indian Nation Tribal Council supports and approved the submission and operation of the employment and training/477 plan. See attached Tribal Resolutions.

As authorized by the Indian Employment, Training, and Related Services Demonstration Act of 1992, Public Law 102-477, effective October 1996, as amended, Samish Indian Nation has identified and proposed the following federal programs to be integrated:

***U.S. Department of Health and Human Services – Administration for Children and Families
Child Care Development Fund***

***DOI/BIA – Department of Interior/Bureau of Indian Affairs
Social Services – Welfare Assistance***

- *(GA) Program including*
- *Adult Care Assistance,*
- *Child Assistance,*
- *Emergency Assistance*

***U.S. Department of Education – Rehabilitation Services Administration
American Indian Vocational Rehabilitation Services (AIVRS)***

The Samish Higher Education Fund, funded directly by Samish Nation, will be integrated into the overall service delivery of the CEP Program and will be available to CEP clients who qualify as funding allows. This plan will be effective from January 1, 2025 – December 31, 2027.

Program Service Area

The Samish Indian Nation Career & Education Pathways Program (CEP) service area will include, but is not limited to, the following areas in Washington State – unless the client is otherwise unserved – and as long as the client does not receive the same services from another tribe/program.

- Island County
- San Juan County
- Skagit County
- Snohomish County
- Whatcom County

Data Collection and Reporting

The Samish Indian Nation will meet all statutory and regulatory data collection and reporting requirements pertaining to the integrated P.L. 102-477 funding for the program.

Fiscal Accountability

The year in which the Samish Indian Nation receives and/or expends funds will comply with the accountability provision 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 audit report required by Chapter 75 of Title 31, United States Code. It is the intent of the CEP Program to continue to follow the federal regulations regarding the monies received by all federal funding agencies and to follow all federal and state regulations as required in administering the integrated plan of P.L. 102-477.

Samish has its own strict policies surrounding confidentiality of records and all 477 services will have complete confidentiality.

Information in a client's file or record will contain all the information required by the CEP Program reporting system or other relevant reporting requirements. Information acquired by the CEP Program is the property of CEP and shall only be used and released for purposes directly connected with the administration of the CEP Program except when required by law.

Use, release, and obtaining of personal information by the CEP Program shall conform to applicable state and federal regulation. Standards of confidentiality of client information will be defined in our policies and procedures manual.

Goals of the Career & Education Pathways Program

The Samish Indian Nation adopts the following goals for its CEP Program. Each of these goals is consistent with the purposes of P.L. 102-477.

- To improve the effectiveness of employment, training, childcare, education, and related services through integration, streamlining processes, and reducing barriers to accessing those services.
- To promote and expand social and economic development activities that increase the physical, intellectual, cultural, spiritual, and emotional health of our tribal citizens.
- To foster self-sufficiency by providing services steeped in Coast Salish culture that enables tribal citizens to seek gainful employment and pursue educational goals.
- To serve tribally determined goals consistent with the policy of self-determination and self-governance.

The Samish Indian Nation has designed the CEP Program to help tribal citizens within our service area—unless otherwise unserved—to achieve economic self-sufficiency. To promote the best chance for success for our tribal citizens, the CEP Program will provide intensive case management, training, and employment services that are designed to help individuals:

- Identify and resolve barriers to employment;
- Gain work experience;
- Further their education;
- Obtain and maintain full-time paid employment; and
- Advance in the workforce.

The Samish Indian Nation has provided employment, training, and related services through programs such as vocational rehabilitation, higher education assistance, and childcare for many years. The Samish Indian Nation will combine tribal, federal, state, and other resources to support individuals and provide access to services that will meet the basic needs of tribal citizens, as well as help our clients to establish a stable environment conducive to self-sufficiency. Our CEP Program will offer financial assistance to clients in need of job training and higher education so they can gain job skills and work towards self-sufficiency. The combination of these programs under one plan will allow us to streamline services and improve service delivery for our clients.

Internally, Samish Indian Nation has developed an intake system that will screen clients for need and eligibility for all Samish programs including employment and training services, housing, healthcare, and childcare needs, and other services to support the goal of increasing self-sufficiency and closing gaps in resources for tribal citizens. Samish Indian Nation understands the importance of providing wraparound services and support systems. This will be a priority within our 477 program and other services offered within the Nation.

Comprehensive Strategy

Geographic Description and Economic Conditions

The Samish Indian Nation's traditional territory includes much of Northwest Washington, from the Cascade Mountains to the east to the San Juan Islands to the west. Abridgement of treaty rights prohibited the recognition of the Samish as a sovereign nation for many years and a reservation was never established for the Samish Nation.

Today, the Samish Indian Nation has acquired more than 200 acres of land on and around Fidalgo Island and have their own facilities, including an early learning center, in Anacortes, WA. The tribal government is made up of seven council members. The Samish Tribal Designated Statistical Area (TDSA) encompasses San Juan County and the western portion of Skagit County (Figure 1). However, the Samish TDSA does not accurately represent the geographic spread of enrolled tribal citizens within the 5-county service area.

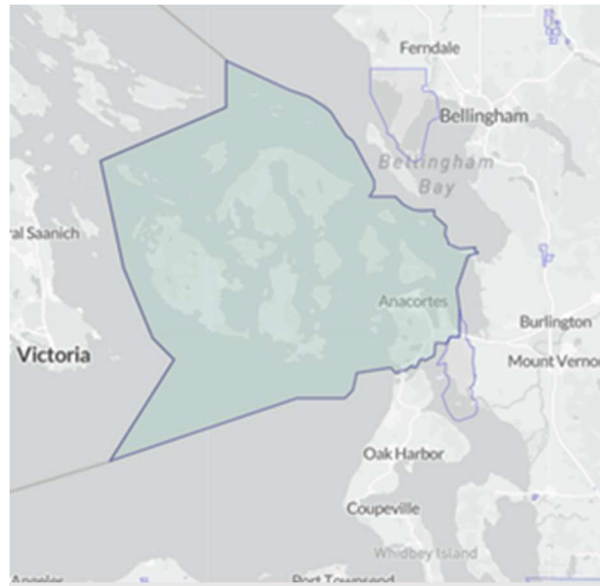


Figure 1: Samish Tribal Designated Statistical Area

Samish Indian Nation's 5-county service area is situated in the northwest corner of Washington state. The five counties that encompass the service area each border the beautiful Pacific Ocean and account for 6,416.2 square miles of Washington's land mass. The Western Regional Climate Center describes the service area as having cool and comparatively dry summers and mild, wet, and cloudy winters. During the wet season, it is not uncommon for this area to record 20-25 days per month of precipitation. The area is home to eight federally recognized tribal reservations and numerous citizens of tribes from outside the area.

Island County

Island County is composed entirely of islands. It contains two large islands, Whidbey and Camano, and seven smaller islands. It is bordered to the north by San Juan County, to the south by Kitsap County, to the east by Skagit and Snohomish County, and to the west by Clallam and Jefferson Counties. Island County has a total area of 517 square miles, of which 208 square miles is land. Island County is home to beautiful state parks, historic lighthouses, and hiking trails.

San Juan County

San Juan County is home to the traditional territory of the Samish Indian Nation. San Juan County is composed of more than 400 islands and rocks with elevations above mean high tide. San Juan County has a total area of 621 square miles, of which 147 square miles is land. Most of the county's populations lives on the four largest islands, Orcas Island, San Juan Island, Lopez Island, and Shaw Island. These four islands are the only county islands served by the Washington State Ferries. San Juan County is bordered to the north and west by British Columbia, the east by Whatcom and Skagit Counties and to the south by Island County.

Skagit County

Skagit County is home to the Upper Skagit Reservation and off-reservation trust land, Sauk-Suiattle Reservation, Swinomish Reservation and off-reservation trust land, and the Samish Indian Nation Traditional Territory and trust land. Skagit County is known for its broad, fertile valley of the Skagit River and the cultivation of tulips. Skagit County has a total area of 1,920 square miles. Skagit County is bordered to the north by Whatcom County, to the south by Snohomish County, to the east by Okanogan and Chelan Counties, and to the west by Island and San Juan Counties.

Snohomish County

Snohomish County is home to the Stillaguamish and Tulalip reservations and off-reservation trust lands. Snohomish County is the third most populous county in Washington State. Snohomish county is bordered to the north by Skagit county, to the south by King County, to the east by Chelan County, and to the west by Island County.

Whatcom County

Whatcom County is home to the Nooksack Reservation and off-reservation trust land and the Lummi Reservation. Whatcom County has a total area of 2,503 square miles. Whatcom County borders British Columbia to the north, Skagit County to the south, Okanogan County to the east, and San Juan County to the west.

Data Collection

Collecting demographic data that accurately reflects the lived realities of Samish citizens is difficult because many citizens live outside of the Samish TDSA. While over 2,400 people are currently enrolled in the Samish Indian Nation, only 1,112 people identifying as either fully or partially American Indian and/or Alaska Native reside in the Samish TDSA. The U.S. Census additionally does not differentiate between different American Indian Tribes, so it is impossible to determine whether these residents are citizens of the Samish Indian Nation. Similar issues arise when gathering data outside of the Samish TDSA. Given these constraints, we have elected to present demographic data for residents identifying as American Indian and/or Alaska Native and as two or more races from our 5-county service area from statistical data provided for the Nooksack, Lummi, Upper Skagit, Sauk-Suiattle, Swinomish, and Tulalip reservations, which are located within the 5-county service area, in the 2017-2021 American Community Survey 5-year estimates. There was no data available for the Stillaguamish Reservation, which is also located within the service area.

The U.S. Census Bureau 2020 Census data for American Indians in the Samish Indian Nation's service estimate unemployment levels in the 5-county service area to average 8.3%. This is higher than the 2020 Census unemployment rate for Washington State at 6.1%. The cost of living in the 5-county service area averages 125.72 or 25.72% higher than the national average.

An estimated 14% of American Indian/Alaska Natives living within the 5-county area identify as having a disability. Between 11.1% of 25.9% of American Indian/Alaska Natives living within this area are living below the federal poverty level, which is significantly lower than the poverty level within Washington State due to the high cost of living.

The reservations and statistical data provided in the 2017-2021 American Community Survey 5-year estimates gave a range of high school completion rates within these areas of 77.3% on the Upper Skagit Reservation to 97.9% on the Sauk-Suiattle Reservation.

Tribal citizens within Samish Indian Nation's 5-county service area are employed in educational services, healthcare, and social assistance more frequently than other employment industries. This is outlined in the table below.

2020 U.S. Census Data – Employment Industry by %	
Agriculture, forestry, fishing and hunting, mining	2.7%
Construction	9.6%
Manufacturing	9.9%
Wholesale Trade	2%
Retail Trade	9.6%
Transportation and warehousing, and utilities	5.2%
Information	1.6%
Finance and insurance, and real estate and rental and leasing	4.7%
Professional, scientific, and management, and administrative, and waste management services	11.1%
Educational services, and health care, and social assistance	20.3%
Arts, entertainment, and recreation, and accommodation, and food services	10.8%
Other services except public administration	5.1%
Public administration	7.4%

Public Hearing

Two public hearings were held for the current, operating CCDF plan on January 6, 2023 and January 30, 2023. Notice of these virtual public hearings was posted on the Samish Indian Nation Early Learning Center webpage. Public input will be sought at least once per plan period through a public hearing. The Career and Education Pathways (CEP) Program P.L. 102-477 Plan will be posted on the Samish Indian Nation webpage for public review for 20 days. A virtual public hearing will be held once the review period has passed, and the Tribe will consider all comments and concerns received from the public hearing for integration into the CEP Plan.

Services to be Provided

The services provided by the Samish Indian Nation CEP Program will be integrated at all stages, beginning with the initial intake meeting. In general, CEP Program applicants who meet residency criteria will qualify for services if they can provide proof of citizenship in a federally recognized tribe – or in some cases – certificate degree of Indian blood descendency, and demonstrate a need for employment, training, social, or related services. Additional qualifications may be required based on services available.

Outreach Services

Samish Indian Nation recognizes the value of established partnerships with community resource providers and stakeholders. Samish Indian Nation Career & Education Pathways Program will conduct outreach services such as attending at job fairs, meeting with community providers, employer site visits, and attending tribal and community events. Program information will be disseminated through brochures, group presentations, and flyers.

Outreach is conducted with the following goals:

1. To provide information about the program to individuals who may be eligible for services
2. To inform community organizations of services provided by the program
3. To identify potential partnership organizations and potential employers for clients
4. To keep a continuously updated resource guide for clients to access services not provided by the program

Program Eligibility

The basic requirements for someone to be eligible to become a client of the CEP Program include, but are not limited to, the following:

- Application (signed and dated)
- Residency within service area
- Tribal enrollment verification or BIA Certificate Degree of Indian or Alaska Native Blood (CDIB)
- Signed and dated Individual Service Plan

And meet at least one at-risk criteria, such as, but not limited to, if otherwise unserved:

- Low income
- Houseless or at risk of houselessness
- Unemployed
- Under employed
- At risk youth
- Elderly
- Veteran
- Disability
- Re-entry
- Domestic Violence victims
- In Need of childcare
- Other at-risk criteria

Eligibility will be determined based upon a signed and completed intake application form, which attests the information on the application is true to the best of the applicant's knowledge. The application also acknowledges that such information is subject to verification and that falsification of any information will be grounds for denial of services, client termination, or may lead to a fraud investigation as outlined in the CEP policy manual.

Additional documentation and income guidelines may be required to receive some services under this plan as defined in policy and procedures.

Application Process

An applicant who is certified as eligible for services and meets all the program eligibility requirements will be referred to the appropriate staff for further assistance and service referral(s).

The Samish Indian Nation has implemented a single intake system for all potential clients who apply for services integrated under this program plan.

The intake application will be used to establish eligibility for the various services offered through the CEP Program. The intake application and process will address specific barriers to employment, education, and other goals. The intake process may involve the collection of personal information of the individual or family's needs, their educational background, and work experience.

CEP Program client information is confidential. Confidential information includes any and all data that identifies an applicant, client, or service. The CEP Program will restrict the use and disclosure of information about individuals receiving services. The CEP Program will not release individual or family information except as specifically authorized in writing by the recipient or as required by law.

In the event the applicant appears to require intensive case management to include financial assistance, they will be screened for such eligibility which may require additional documentation.

The client's file or record will be expanded over time to include information that tracks the client through his or her individualized plan services from the initial determination of goals through and including the outcomes at the conclusion of the client's time with the program.

The information in the file or record will contain all the information required by the program reporting system or other relevant reporting requirements. Standards of confidentiality of client information, client requirements/responsibilities, and the appeal process will be defined in our policy and procedure manual.

The application must be signed and dated. The date that the application is complete is the day the intake will be entered into the database system for calculation of appropriate services and benefits. Applicants have the option to apply for services if he or she believes they are eligible.

CEP staff will be responsible for making sure that the client's intake application is complete, client information is entered into our client database, and all required eligibility documents, as applicable, are attached. Once staff have gathered the necessary intake documentation, it will be forwarded to the appropriate supervisor for approval. Once the intake application is approved, it will be given to a program staff and the client will be scheduled for an assessment.

The program will provide a written notice to the applicant of approval or denial within 60 days from the date of application. Services will be rendered based on the date of a completed application.

Assessment

Clients may be assessed to accurately determine their employment/training/education needs or their challenges to achieving self-sufficiency.

Assessment tools, if needed, to determine aptitude and interest may be used prior to referring clients to occupational placement or training. Standardized tests will be used to determine academic achievement. All testing will be administered by qualified personnel, either through tribal staff or through approved educational facilities with the ability to conduct such training. At the CEP staff's discretion, type and use of assessment tools may vary and/or be waived if warranted.

Assessments concerning trauma, substance use, mental health, or physical or cognitive disability may also be utilized. When CEP Program staff make a recommendation for such assessments and the client agrees, CEP Program staff will make a referral to a provider that serves as a partner to the program. CEP Program staff will work with the counselor or physician to share information that would be conducive to developing an appropriate ISP.

Based on the information gathered at intake and assessment, CEP Program staff will assist in identifying challenges that might prevent a client from achieving their goal of self-sufficiency. Any challenges that might be identified will be a basis for the development of an individual plan.

Case Management and Development of an ISP

Case management includes the planning, development, and coordination of support services to address barriers such as, but not limited to, things like childcare, education, and training opportunities that are designed to provide the individuals with a wide array of services necessary to prepare them for employment. CEP Program staff will be assigned to each client at the time of eligibility determination and enrollment into the CEP program. That program staff will work with the client to develop their Individual Service Plan (ISP) and will guide the client through the various stages of their ISP, including job retention and the post-employment services phase. Job retention and post-employment services consist of activities such as but not limited to providing eligible clients with supportive services to maintain their current employment, obtaining an industry specific credential for advancement, and other training to support wage progression.

Employment can be defined as a client being engaged in paid employment, self-employment, or other work activities identified in the client's ISP. Traditional hunting and gathering activities include, but are not limited to, preparation for hunting/harvesting, processing, and storing of fish, shellfish, wild game, and other traditional foods. Other activities include the creation, development, and marketing of arts and crafts that are made to sell to provide income.

Job training can be defined as activities that include technical or vocational courses leading to an occupation or employment.

Educational training can be defined as an accredited program, which leads to an academic diploma, degree, or certificate.

Dual credit can be defined as Running Start, CTE Dual Credit, College in High School, Advanced Placement, International Baccalaureate, and Cambridge International. Students can enroll in more than one type of dual credit course in the 16 national career clusters:

- Agriculture, food, and natural resources
- Architecture and construction
- Arts, A/V technology, and communications
- Business, management and administration
- Education and training
- Finance
- Government and public administration
- Health science
- Hospitality and tourism
- Human Services
- Information Technology
- Law, public safety, corrections, and security
- Manufacturing
- Marketing
- Science, technology, engineering, and mathematics
- Transportation, distribution, and logistics

Before any services can be provided under the CEP Program, the Individual Service Plan (ISP) must be developed and included in the client's file. The ISP is used to record the client's assessment outcomes and it clearly identifies the client's past education and employment experience, as well as the client's strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choices regarding the employment goal. The information gathered and recorded on the ISP is used by the client and the program staff to make decisions about appropriate CEP Program participation and services. This is also the tool that will be used to measure client progress through the CEP Program. Therefore, appropriate time and care should be taken in the development of an ISP.

The ISP will be developed in consultation with the client and will outline the client's individual responsibilities and commitment as well as the services to be provided. The ISP also identifies what steps will be taken and who will do what. The services may be of a financial or non-financial nature and the client will be required to sign their ISP. This joint understanding of the requirements for the CEP Program gives direction to the client and establishes benchmarks and goals for the CEP Program to gauge success.

While developing the ISP, the program staff will identify the appropriate services available from the CEP Program or from any other services available in the area. Relevant resources will be identified that may assist the client in overcoming challenges. Any service deemed beneficial or necessary, regardless of the providing source, may be linked to the client's services under their program ISP to maximize the assistance available. The program staff will assist the client in identifying barriers that may prevent the client from becoming self-sufficient and the approach will be one of self-help. Generally, the participant will be guided through the process of removing or overcoming the challenges themselves rather than the staff intervening directly to eliminate them.

The ISP will include long-term goals for the client as well as short-term or interim benchmarks to measure progress. Clients who do not fulfill their responsibilities or commitments will be carefully assessed prior to being approved for any additional assistance. ISPs will be updated every three months, or as the client's needs and situation changes.

Allowable activities are intended to increase and enhance useful soft- and hard-skills for job search, job acquisition, and job retention. Examples of skills gained through allowable activities could include

adhering to attendance expectation and timeliness, following instructions, wearing appropriate work attire, exhibiting appropriate behavior and other soft- and hard-skill building enhancements. Examples of allowable employment, training, and related activities for the ISP will include, but are not limited to, the following:

- Paid employment
- Subsidized work in private sector
- Subsidized Tribal employment
- Work experience
- On-the-job training
- Workshops and activities that support and lead to entrepreneurship, may include but are not limited to, business readiness, business law, steps for acquiring licenses, operating a business on tribal land, taxes, marketing, and OSHA standards
- Work Search – Job Readiness Assistance
- Vocational training and education
- Job Skills (employment-related training)
- Education Related to employment
- Life Skills training in preparation for job skills training
- Attending high school or GED completion
- Post-secondary education
- Volunteer – employment & training
- Approved community service
- Treatment of medical diagnoses by a licensed provider, may include but are not limited to, treatment of mental health disorders by a licensed mental health professional, treatment of substance use disorders by a licensed substance use disorder professional, treatment of physical conditions by a physician, physical therapist, or other medical practitioner
- Cultural and traditional activities that would reasonably lead to self-sufficiency and healing of intergenerational trauma, may include but are not limited to, weaving, carving, beading, storytelling, traditional hunting and gathering activities including preparation for hunting/harvesting, and processing and storing of fish, shellfish, wild game, and other traditional foods.

Annual Recertification

- a. Annual recertification must be completed every year for every client.
- b. Annual recertification may include a home visit.
- c. The next review date should be set one year from the most recent review date.
- d. Current clients shall review proof of residency, releases of information, and all expired eligibility documents annually, or their case shall be closed.
- e. Clients shall be notified at least 15 days before their review date and will have until the end of the month to renew their application.
- f. Clients who do not renew their application shall be sent a 10-day closure notice.

Cultural Activities and Education Services

When tribal citizens participate in cultural and traditional activities, they develop healthy social and work circles, heal from intergenerational trauma, and are better grounded in their culture and its values of hard work, respect, and communal responsibility. This connection, and the opportunities we seek to develop

within the CEP program will translate to real and positive connection points for tribal citizens to increase financial literacy, work readiness skills, healthy living, healthy peer networks, the intergenerational transmission of cultural knowledge, and gainful employment and workforce skill sets that lead to long term self-sufficiency. Samish Indian Nation is committed to fostering self-sufficiency for current and future generations by providing a comprehensive family support system steeped in Coast Salish culture that enables tribal citizens to seek gainful employment at or above a living wage and pursue education and training goals.

Our tribal citizens benefit from the sustained company of academics and professionals who, in addition to doing good cultural revitalization work, are living lives that are financially and culturally healthy and serve as important role models for others at risk. We believe that reconnecting our younger citizens to their elders, connecting our elders to our youth and connecting our citizens to people who are good examples of leading healthy, successful lives ties directly to the goals of the CEP Program.

The CEP Program may provide a variety of cultural activities, training, and education services, and other activities to eligible clients. These activities and services are allowable and are considered an integral part of the ISP, in addition to the preservation of our language and culture. Cultural activities, training, and education services will be tied to the goals of the CEP Program, will be reasonable, and will have established objective criteria to self-sufficiency.

Non-Financial Services

Samish Indian Nation's CEP Program is committed to reducing poverty by encouraging clients to seek training, education, and work experiences that prepare them for careers in fields that are high-skill, high-wage, and in-demand industry sectors.

Samish Indian Nation's CEP Program will prioritize informed choice for our clients when developing their ISP goals by assisting clients to assess current wages, job growth projections, education or training requirements, general schedules, and other aspects of the client's chosen goal. This process will ensure that this goal is a good fit for the client's individual needs and that the client fully understands the requirements of someone in that particular role.

Although some of the activities will be conducted directly by the CEP Program, others will be delivered through partnerships with local service providers. The list is subject to change as the CEP Program develops based on client needs and available community and tribal resources.

A variety of non-financial services may be provided to all clients. Our focus is helping our citizens achieve economic self-sufficiency and not relying on public assistance. These services do not have income guidelines but may have other requirements depending on the service provided. These non-financial services may include but are not limited to:

- Basic academic remedial or literacy training
- Information and referral services
- Job readiness training to include but is not limited to employer expectations, acceptable work behavior, personal motivation, life skills, communication skills, resume and job application preparation, interviewing techniques, employee rights and responsibilities, job accommodations, salary and fringe benefits awareness, job retention assistance, consumer education (budgeting, credit, banking, etc.), and labor market information

- Job placement assistance
- Benefits counseling
- Disability-related skills training
- On-the-job supports
- Financial literacy
- GED Preparation and High School 21+
- Internships, mentorship, and job shadowing
- Small business plan assistance
- Networking and building social capital
- Labor market exploration
- Customized employment services
- Vocational rehabilitation for individuals with disabilities which will include, but is not limited to, job accommodations, disability-related skills training, rehabilitation technology assessment, reader services, interpreter services, personal attendant services, technical assistance, high school to career transition planning for high school students with disabilities, and benefits counseling for individuals who receive social security benefits.

CEP Program staff will conduct the following activities to assist clients to access unsubsidized job openings:

- Promote program services and provide technical assistance to employers
- Communicate with employers to locate new job openings
- Direct referral of job-ready clients to job openings
- Refer clients for financial or childcare services, if eligible
- Maintain the CEP Program website with information about local job fairs, training opportunities, job openings, and other job-related resources.

The vision for economic development within Samish Indian Nation will be provided through coordination with local community colleges and apprenticeship programs to provide individuals with rigorous academic content and relevant technical knowledge and skills needed for further education and careers. These may include high-skill, high-wage, or in-demand industry sectors or occupations, which, at the secondary level, are aligned with state academic standards. The CEP Program will provide supportive services to adult and secondary students to ensure their educational success. High school students will be introduced to careers in science, technology, engineering, and mathematics (STEM), apprenticeship opportunities, and career and technical education (CTE) opportunities, which will help them achieve academic success and prepare for in-demand careers. The CEP Program will provide adult learners, dislocated workers, and secondary students with opportunities to receive recognized post-secondary credentials and to become employed in high-skill, high-wage, and in-demand industry sectors. Some applicants to the CEP Program may be considered “unemployable individuals” due to multiple barriers that have impacted their ability to maintain employment or complete a training program. If a client is unlikely to return to work or complete a training program, assistance and referrals to the Social Security Disability Program will be required. The program is dedicated to helping clients in accessing services that fit their needs, including but not limited to, advocacy and referrals to apply for Social Security Disability Insurance Benefits.

Collaboration and Partnerships

Cooperative working agreements among state agencies, tribal governments, and other employment, training, and related service providers within the service area improve and expand employment opportunities for clients needing employment, training, and related services. The CEP Program will continue all cooperative working agreements developed with the DSUs and other TVR programs within the service area. These cooperative working agreements will be reviewed on an annual basis and revised as needed.

Client Assistance Program

Clients with disabilities receiving tribal vocational rehabilitation services under the Career and Education Pathways program have access to the Client Assistance Program (CAP) through Washington State. This program is a free advocacy service that provides information about vocational rehabilitation programs, processes, and services. The CAP may represent recipients of tribal vocational rehabilitation services if a disagreement occurs that the client cannot resolve on their own. Clients of tribal vocational rehabilitation will continue to be provided with information about the CAP during intake and periodically throughout the tribal vocational rehabilitation process.

Classroom Training (CRT)

Job readiness services enhance employability skills to secure, retain, or advance in employment. The CEP Program will provide virtual and in-person workshops that will assist clients to build skills in the following areas:

- Digital literacy
- Career exploration
- Resume and cover letter development
- Interviewing skills
- Dress for success
- Identifying and integrating values into career development
- Problem solving in the workplace
- Managing stress
- Financial literacy
- Life skills
- Building self-esteem

Economic Development and Job Creation

The CEP Program may allocate up to 10% of integrated funds under this plan for economic development and job creation activities. The CEP Program will partner and collaborate with Samish Indian Nation leadership to develop internship, subsidized, and unsubsidized positions within Samish.

These funds may be used to offer services similar to, but not limited to, the following to stimulate economic development and job creation:

- Leadership training to assist eligible clients to develop skills for successful leadership and managerial roles within or outside Samish Indian Nation
- Surveys and research to determine feasibility of new economic ventures for Samish
- Recruitment of potential employees from the CEP Program's labor pool for positions within or outside Samish Indian Nation
- Hosting networking events, including conferences or other gatherings, to build social capital and identify possible economic development opportunities
- Others as determined needed and beneficial by Samish Indian Nation.

Support Services

As part of the case management process, the CEP Program staff will identify challenges and barriers and will assist clients in removing identified barriers to education, training, and/or employment that may impede their participation in services. Support services often make the difference between continued employment and a client's ability to gain employment.

The CEP staff may utilize supportive services at any time to assist the client in overcoming barriers, but support services are not an entitlement. Where possible, a client must share the cost of supportive services. Program staff will assist clients to review their income and expenses to assess their eligibility for support services and their ability to share costs for supportive services. Other resources within the community should be explored and exhausted prior to program payment to ensure program funding remains available for those situations where there are no other resources available.

The need for a supportive service must be specific, identified in the ISP, and directly related to an approved work activity, education, training, or employment goal. All support service amounts will be limited and will be determined based on funding and as set forth in Samish policy. Restrictions apply on the type of supportive services clients can receive and will be detailed in policy and procedures. Support services request must be approved by the CEP Director and may require additional documentation as outlined in the CEP policies & procedures manual.

Support services will vary between clients, but it is likely that most, if not all, clients will require some form of supportive service. CEP staff will determine and verify what supportive services and program activities are necessary to enable individuals to be successful clients.

The CEP Program will provide support services that may include, but are not limited to, the following and additional eligibility and documentation may be required as outlined in the policy manual:

- Transportation assistance
- Childcare related expenses
- Employment related expenses
- Housing related expenses
- Clothing/job uniforms
- Household needs/groceries
- Rehabilitation technology expenses
- Medical support services that address a barrier to employment
- Job retention, job advancement, transitional services, or other employment-related services that do not provide basic income support
- Educational activities designed to increase self-sufficiency, job training, and work
- Job-related or educational costs
- Small business assistance
- Removal of barriers to employment
- Community economic and job development
- Domestic violence services and activities
- Culturally relevant employment and training related support services
- Emergency support services as defined in Policy

- Other support services determined to be reasonable and beneficial may be approved by the CEP Director.

Work Experience

Work Experiences (WEX) will be utilized to enhance job skills, employer recruitment, and job placement services for eligible clients entering employment. WEX clients will complete a generic job application, which will be kept on file for employment opportunities. A client may be placed at a job opening for a maximum of six months to assist with developing the proper skills and training needed to enhance themselves and become employable. They will be provided with client support funding, based on funding availability, at the discretion of the CEP Director and the Citizen and Client Services Executive Director.

Subsidized Employment

Subsidized employment provided clients with a training period to gain and/or improve the knowledge and skills necessary to perform work requirements. Policies, procedures, and monetary standards for subsidized employment are contained in the CEP policies and procedures manual.

Childcare Services

Service Integration

At the commencement of the P.L. 102-477 integration, all parents with children currently enrolled in programs served by the Samish Indian Nation-administered CCDF program will be required to participate in the CEP Program. Enrollment in the CEP program will begin at the family's 18-month review immediately following the inception of the 477 plan. This includes following all requirements of the program including required participation in the allowable activities as described in this plan. Samish Indian Nation is a small allocation grantee for CCDF funding.

Clients of the CEP Program who do not currently have children enrolled in these programs but have indicated on their intake that they would benefit from childcare, will be referred to the Early Learning Center Director to receive childcare services.

Definitions

Indian Child: Any Samish enrolled, including descendant of an enrolled member, under the age of 13, and any Federally recognized Indian children under the age of 13 or any child under the age of 13 who is eligible for enrollment in a Federally recognized tribe as prescribed by Federal Law, and any descendant of an enrolled member of a Federally recognized tribe not served by any other tribe within the service area.

Child to Staff Ratio: Samish follows Washington State's DCYF Health and Safety Standards. CCDF directors, assistant directors, program supervisors, lead teachers, assistant teachers, and any other early learning providers counted in staff-to-child ratio, or who could potentially be counted in ratio, are required to have current pediatric and adult first-aid and CPR training.

Group Sizes: For infants—aged between 1 and 11 months—the group size is 4 infants to 1 caregiver. For toddlers—aged from 12 to 29 months—the group size is 7 toddlers to 1 caregiver. For preschool children—aged from 30 to 60 months—the group size is 10 children to 1 caregiver. For school-age children—aged 6 to 12 years—the group size is 15 children to 1 caregiver.

Income: Gross cash income includes earned income, military income (including pay and allowances), veterans benefits, Social Security benefits, unemployment compensation, and public assistance benefits.

Health and Safety Standards

The Samish Early Learning Center takes the welfare of their children seriously and follows Washington State and Department of Children, Youth, and Families (DCYF) health and safety standards. All caregivers are trained during a pre-service week.

Prevention (including Immunizations) and Control of Infectious Diseases

The CCDF Program Director works directly with Samish Health and Human Services Registered Nurse in coordinating health trainings. As a result, Samish Early Learning Center staff are trained on Bloodborne Pathogens, HIV/AIDS and Medication Administration and receive a certificate.

Prevention of Sudden Infant Death Syndrome and Use of Safe Sleep Practices

Samish Early Learning Center follows safe infant sleep practices when infants are napping or sleeping by following the current standard of American Academy of Pediatrics concerning safe sleep practices including SIDS/SUIDS risk reduction including but not limited to:

- a. Actively supervising infants by visibly checking every fifteen minutes and being within sight and hearing range, including when an infant goes to sleep, is sleeping, or is waking up.
- b. Placing an infant to sleep on his or her back or following the current standard of American Academy of Pediatrics. If an infant turns over while sleeping, the provider must return the infant to his or her back until the infant is able to independently roll from back to front and front to back.
- c. Not using a sleep positioning device unless directed to do so by an infant's health care provider. The directive must be in writing and kept in the infant's file.
- d. Sufficiently lighting the room in which the infant is sleeping to observe skin color.
- e. Monitoring breathing patterns of an infant.
- f. Allowing infants to follow their own sleep patterns.
- g. Not allowing blankets, stuffed toys, pillows, crib bumpers, and similar items inside a crib, bassinet, or other equipment if occupied by a resting or sleeping infant.
- h. Not allowing a blanket or any other item to cover or drape over an occupied crib, bassinet, or other equipment where infant's commonly sleep.
- i. Not allowing bedding or clothing to cover any portion of an infant's head or face while sleeping and readjusting these items when necessary.
- j. Preventing infants from getting too warm while sleeping, which may be exhibited by indicators that include, but are not limited to, sweating; flushed, pale, or hot and dry skin, warm to the touch; a sudden rise in temperature; vomiting; refusing to drink, a depressed fontanelle; or irritability.

Administration of Medication, Consistent with Standards for Parental Consent

All medication prescription or non-prescription can only be administered with written signed consent by the parent. The medications must be labeled and in the original container. Prescription medication must be in its original container with the name of the child, medical provider, dosage and storage instructions. All medication is kept in a medication box inaccessible to children. All unused medication is returned to the family.

Prevention of and Response to Emergencies due to Food and Allergic Reactions

All children with food allergies must provide written documentation of the food allergy and medical treatment plan required to treat food allergies. All children with food allergies are posted in classrooms and in food services kitchen with allergy and treatment information.

Building and Physical Premises Safety

Samish Early Learning Center (ELC) keeps indoor and outdoor early learning program space, materials, and equipment free from hazards and in safe working condition. Samish ELC makes inaccessible to toddlers and preschoolers any equipment, material, or objects that may pose a risk of choking, aspiration, or ingestion. Samish ELC does not use window blinds or other window coverings with pull cords or inner cords capable of forming a loop and posing risk of strangulation to children. No window coverings are secured to the frame of a window or door that is used as an emergency exit in a way that would prevent the window or door from opening easily. Samish ELC makes inaccessible to children wires or similar items capable of forming a loop around a child's neck that are not used during supervised early learning program activities. Samish ELC makes inaccessible to children plastic bags and other suffocation hazards. Samish ELC ensures that firearms, guns, weapons, and ammunition are not on the premises. Samish ELC prevents children from walking into or through a glass door, window, or other glass barrier, by placing

stickers or artwork at the children's eye level on the glass. Indoor climbing structures are not placed next to windows unless the window is made of safety glass in order to prevent harm from shattered glass. Equipment, materials, and other objects on the premises that have splintered edges, sharp edges, points, protruding nails, bolts, or other dangers are repaired, removed, or made inaccessible to children. Equipment, materials, or products that may be hot enough to injure a child are made inaccessible to children.

Prevention of Shaken Baby Syndrome, Abusive Head Trauma, and Child Maltreatment

All staff are required to complete State of Washington Prevention and Identifying Shaken Baby Syndrome/Abuse Head Trauma training as approved by the Washington State Department of Youth and Family Services.

Handling and Storage of Hazardous Materials and the Appropriate Disposal of Bio-Contaminants

All hazardous materials are stored and labeled out of accessibility to children. Bio-contaminants are placed in leak proof sealed heavy duty plastic bags and or containers and then disposed of out of the building by the waste management services.

Precautions in Transporting Children

All Samish Early Learning Center (ELC) staff and staff drivers must undergo bus transportation safety training and protocols annually. All families must sign permission for children to receive transportation services. All children must wear the appropriate child restraint harnesses on the school bus during transportation. The school bus is given daily safety inspection checks to verify all equipment is in safe and working order before children receive transportation services. The bus driver must have a current CDL driver's license and attend required training to keep current. A bus driver and bus monitor must be present during any transportation of children. All attendance of children on the bus must be recorded and verified at the beginning and end of each transportation event. All transportation vehicles must undergo regular routine maintenance for maintenance and any necessary updates or repairs.

Pediatric First Aid and Cardiopulmonary Resuscitation

Center directors, assistant directors, program supervisors, lead teachers, assistant teachers, and any other early learning providers counted in staff-to-child ratio, or who could potentially be counted in ratio, must have a current pediatric and adult first-aid and CPR certificate. Samish Early Learning Center staff are all required to be trained on first aid and CPR as a requirement in order to work in classrooms with children.

Recognition and Reporting of Child Abuse and Neglect

All Samish Early Learning Center staff must attend annual and refresher trainings on recognition and reporting of child abuse and neglect. All staff who suspect child abuse and neglect are mandated to report to the CPS department.

Ongoing Training for Service Providers

All teaching and center administration staff train using the Washington State STARS training. All childcare providers must also complete Child Care Basics, a 30-hour pre-service training that addresses the foundational concepts of working with children who have developmental disabilities. This training also provides information on the developmental continuum and offers providers theoretical information and practical skills to employ when working with different age groups of children. All Department of Children, Youth, and Families required trainings are developed in multiple languages. Professional development requirements align with both best practices for children and best practices for educators of

children, youth, and their families. State early learning guidelines and professional competencies are embedded to guide the development of content and delivery of learning opportunities for professional working with a variety of age groups. The state adheres to a set of professional development and culturally responsive guidelines for development on content and delivery and incorporates the state's racial equity framework.

Required Qualifications for Caregivers/Teachers

All teachers must be at least 18 years old, pass a comprehensive background check, have a high school diploma or equivalent, a CDA, AA, BA, or enrolled in a plan to receive one, and attend all required preservice requirements as stated in the Washington State WACS (including STARS 30 hours basics).

Required Qualifications for Directors

Directors must be at least 18 years old, have a bachelor's degree, at least 2.5 years and experience managing a childcare center, have 2 years' experience as a teacher, pass a comprehensive background check, and have their continued professional development progress documented annually.

The Tribe also works closely with the Anacortes School District with children with disabilities and they help assess and recommend a clear path forward for the children, with parent involvement.

Monitoring and Enforcement

The Samish Indian Nation follows the Health and Safety Standards established by the State of Washington for monitoring and enforcement.

Background Checks

Applicants are notified by the Human Resources Department when their background has been completed and they are eligible to begin working in the childcare center. For checks completed and approved by the Department of Children, Youth, and Families, they notify the applicant through email when the background check is completed. There is no alternative to this background check process.

Emergency Response

The Samish Early Learning Center (ELC) follows a written emergency response plan. The plan is reviewed and approved by the Samish Indian Nation. The plan includes protocols on how to respond to fire, natural disasters, and other emergencies that might affect the ELC. It has emergency preparedness plans, including fires that may require evacuation, an evacuation floor plan that identifies room numbers or names of rooms, emergency exit pathways, emergency exit doors, and emergency exits, and methods to be used for sounding an alarm and calling 911. The plan also covers actions to be taken by a person discovering an emergency, how the ELC will evacuate children, where the alternate evacuation location is, and what to take when evacuating children, including but not limited to:

- a. First-aid kits
- b. Copies of emergency contact information
- c. Child medication records
- d. Individual children's medication, if applicable.

The plan also addresses how the provider will maintain the required staff-to-child ratio and account for all children, how parents or guardians will be able to contact the early learning program; and how children will be reunited with their parents or guardians after the emergency event. It goes over earthquake

procedures including what a provider will do during an earthquake, how a provider will account for all children, and how a provider will coordinate with local or state officials to determine if the licensed space is safe for children after an earthquake.

Samish ELC will keep on the premises a three-day supply of food, water, and life-sustaining medication for the licensed capacity of children and current staff for use in case of an emergency. Samish ELC will practice and record emergency drills with staff and children as follows:

- a. Fire and evacuation drill once each calendar month
- b. Earthquake, lockdown, or shelter-in-place drill once every three calendar months

All emergency drills will be conducted with a variety of staff and at different times of the day. All drills must be recorded on a department form and will include the date and time of the drill, the number of children and staff who participated, the length of the drill, and notes about how the drill went and how it may be improved.

Exemptions for Relative Care Providers

Samish Early Learning Center currently only provides center-based childcare services.

Continuous Quality Improvement

The Tribe manages Quality Improvement through ongoing community assessments; self-assessments; program evaluations; surveys to parents, providers and Tribal leaders; and sign-up sheets for meetings with parents, families, and the community.

Expected Program Outcomes and Results

Samish Indian Nation will ensure that the CEP Program will meet statutory requirements of all federal grants/programs to be integrated as expected of a 477 program. The CEP Program is designed to provide services and support to prepare individuals for careers that lead to self-sufficiency.

Overall expected results and outcomes for the CEP Program will include:

- Increase high school graduation rates among clients;
- Increase access and availability of culturally relevant childcare services;
- At least 90% of the Cash Assistance recipients who are deemed eligible for employment will enter unsubsidized employment *or* actively engage in allowable work search activities.

Non-Duplication of Services

Any individual who accesses financial or support services through the CEP Program must not also receive assistance for the same identified needs from another program. Assistance from any other source may be used to supplement, but not duplicate, the service provided through the CEP Program.

In order to prevent clients from receiving duplicative assistance from more than one source, the CEP Program will enter into agreements with the State of Washington and collaborate with other tribal programs for the exchange of client information. Enrollment in the CEP Program does not waive the individual's right to access other non-duplicative services they may be eligible for provided by Samish Indian Nation, the tribal nation the client is a citizen of, or any city, county, state, or federal service they may be eligible for.

Uniform Grievances and Appeals Procedure

Clients are provided information regarding the grievances and appeals process during application and periodically during service delivery.

There are many instances when a client may disagree with decisions made by the CEP Program. Examples include, but are not limited to, the following:

- Not being eligible for program services
- Requirement to get a medical, psychological, or other evaluation
- The CEP Program not approving the employment goal selected for the ISP
- Denial of a choice of a service provider
- Refusal to allow a client to pursue a self-employment goal
- Refusal to provide a specific program service
- Decreasing, suspending, or terminating services
- Closure of the client's case
- Denial of post-employment services

To begin the process for grievance resolution, individuals must first submit written notice to the program within 10 business days of the decision or issue that includes the following information:

1. The decision or the issue(s) you are appealing.
2. The reason you are appealing the decision.
3. Client or client representative signature and date; and
4. Indication of the process you want to use to resolve the decision or issue(s) through Administrative Review, Mediation, or Fair Hearing.

Before pursuing the following grievance methods, we encourage individuals to try to work things out directly with their program staff first. If that does not work, they are encouraged to pursue the following methods for grievance resolution. It is recommended they start with an Administrative Review first and then move to Mediation and/or Fair Hearing Trial if the grievance remains unresolved.

Administrative Review

During an Administrative Review, the CEP Program will review the disagreement by having the individual or his/her representative meet with the program staff’s supervisor, and/or have the CEP Director try to resolve the issue. The results of the Informal Resolution will be given in writing within 10 business days. If the individual is not satisfied with the results of the Administrative Review, they still have the right to a higher appeal, and it is recommended they proceed with a written request for a Mediation within 10 business days of receiving the results of the Informal Resolution.

Mediation

Mediation is a voluntary alternative for resolving disputes with the CEP Program, and both parties must agree to mediation for a mediation conference to take place. Mediation involves meeting with the CEP Program and an impartial and qualified mediator to try to resolve the dispute. The mediator is not an employee of the CEP Program. The mediator will help facilitate the meeting and help both parties consider solutions to resolve the disagreement, but the mediator does not make decisions for the CEP Program. Discussions occurring and information provided during a mediation conference cannot be used as evidence in any subsequent due process hearing or civil proceeding. The CEP Program must pay for all fees relating to the mediation.

Anticipated Revenue and Expenditures

The anticipated budget for the Samish Indian Nation P.L. 102-477 CEP Program is illustrated in the following table(s) for the calendar period cover January 1, 2025 – December 31, 2027. These tables are based upon the assumption the congressional appropriated dollars will remain constant from year to year for federal programs consolidated within this plan.

Anticipated Annual Revenues for January 1, 2024 – December 31, 2024

*Based on funding amounts for FY 2023-2024

	Agency	Program Name/ FY Appropriation	Funding Amount
1	DOE/RSA	American Indian Vocational Rehabilitation Services	\$535,363
2	DHHS/ACF	Child Care Development Fund (CCDF)	\$654,036
5	DOI/BIA	General Welfare Assistance	\$139,129

Anticipated Expenditures

Expenditure Category	Amount
Administrative	\$362,256
Non-Administrative	\$966,272
GRAND TOTAL	\$1,328,528

Career and Education Pathways Program Management

The CEP Program is an integrated set of services provided by Samish Indian Nation. The day-to-day operations are governed by Samish Indian Nation's Tribal Council, which is composed of four officers: a chairman, vice chairman, secretary, and treasurer as well as three council member positions. As the CEP Program is a tribal program, the Tribal Council has the final authority to establish goals and policies and to oversee its implementation.

The Tribal Council has appointed the Chief Operations Officer and the Chief Financial Officer with the administrative responsibility of the day-to-day operations of the tribal government.

Service coordination, management, and monitoring of compliance with statutory regulations will be overseen by the Chief Operations Officer and the Citizen and Client Services Executive Director and the services fall under the Citizen and Client Services branch of the tribal government. Under this branch, the Social and Community Service sector oversees the Early Learning, Elders Services, and Social Services. Also under this branch, the Citizen Services sector oversees Tribal Vocational Rehabilitation, Education, Culture, and Language services. Also under this branch, the Essential Services sector oversees Housing and Health programs. The CEP Director will be the primary tribal contact responsible for submitting the annual narrative and statistical report. The Compliance Executive Director is responsible for submitting the Nation's annual fiscal reporting.

Samish Indian Nation has included an organizational chart with this plan submission.

Contact Person:

Citizen and Client Services Executive Director
P.O. Box 217
715 Seafarer's Way Suite 103
Anacortes, WA 98221
Phone: 360-293-6404

Financial Management

The Samish Indian Nation Finance Department provides financial controls for the CEP Program. The Finance Department is responsible for all traditional financial services through formal accounting practices, internal control procedures, and reporting of financial status. This system provides a structure for financial organization and management of all grants and contracts. Through this system, Samish Indian Nation is able to safeguard federal funds and provide effective delivery of program services that support all programs offered by Samish Indian Nation, including the CEP Program. Annual single audits are on file with the Finance Department.

All financial activities of the CEP Program are conducted in accordance with the provisions of applicable OMB Circulars, Federal Regulations, and Samish Indian Nation Finance Policies & Procedures. Samish Indian Nation's CEP Program will comply with the P.L. 102-477 annual reporting requirements of a single financial, statistical, and narrative report as well as current federal and state cash assistance reporting requirements unless no longer required under the law.

Career and Education Pathways Waiver Requests

Department of Education – Rehabilitation Services Administration
American Indian Vocational Rehabilitation Services

- 34 CFR 371.40 – Relating to match requirements.
- 34 CFR 75.210(e) – Relating to approval of key project personnel.

Rationale for waiver regarding Match Requirements

The tribe operates a single integrated program. Participants and staff are not distinguished by the source of the funding for their services and salaries. Separate match funding and tracking based on one funding source would not be feasible.

Regulatory requirements that are inconsistent with each other are to be waived. For example, neither General Welfare Assistance nor Childcare Development Funds require match funding and tracking. To specifically track match funding for one funding source in an integrated program would be inconsistent with the purposes of P.L. 102-477 program.

Granting this requested waiver would not be inconsistent with the purposes of the P.L. 102-477 program – rather, the requested waiver would further those purposes. Additionally, this requested waiver would not be inconsistent with any provision of the law from which the program derives its authority and that is specifically applicable to Indians.

Rationale for waiver regarding Approval of Key Project Personnel

The tribe operates a single integrated program. Personnel are not distinguished by the source of the funding for their salaries or services provided. Obtaining approval for project personnel would not be feasible.

Regulatory requirements that are inconsistent with each other are to be waived. For example, neither General Welfare Assistance or Childcare Development Funds require approval of key project personnel. To specifically request approval of key project personnel would be inconsistent with the purposes of P.L. 102-477.

Granting this requested waiver would not be inconsistent with the purposes of the P.L. 102-477 program – rather, the requested waiver would further these purposes. Additionally, this requested waiver would not be inconsistent with any provision of the law from which the program derives its authority and that is specifically applicable to Indians.

Department of the Interior – Bureau of Indian Affairs, General Assistance

General Assistance provides financial aid to eligible tribal members for essential needs such as shelter, food, utilities, and clothing with the aim of increasing self-sufficiency.

Attachments

Attachment 1: Tribal Council Resolution approving application

Attachment 2: Samish Org Chart approved 07/31/2024

Attachment 3: Statewide Cooperative Agreement between Samish Indian Nation and Department of Social and Health Services, Division of Vocational Rehabilitation, and Department of Services for the Blind