PYRAMID LAKE PAIUTE TRIBE

PROPOSAL TO CONSOLIDATE
VARIOUS FEDERAL PROGRAMS

UNDER P.L. 102-477
INDIAN EMPLOYMENT TRAINING
AND RELATED SERVICES
DEMONSTRATION PROJECT

PROGRAM BEGINNING 2021

SUBMITTED BY:

PYRAMID LAKE PAIUTE TRIBE
208 CAPITOL HILL
NIXON, NV 89424

ANTHONY SAMPSON
PYRAMID LAKE TRIBAL COUNCIL CHAIRMAN

MARCH 20, 2020

OPEN PUBLIC COMMENT (September 11, 2020) – (October 11, 2020)
SUBMIT COMMENTS TO SARAH ADLER, Consultant, sarah@ssgr.us
P.L. 102-477: Indian Employment Training and Related Services Program

EXECUTIVE SUMMARY

A. BACKGROUND
   In 1992, Congress passed P.L. 102-477, enabling Indian Tribes to consolidate various grants that are employment and training related into a single plan and program with the Bureau of Indian Affairs (BIA). The intent of Congress was to test the concept that by consolidating various grants from different Government agencies into a single program, Tribes would be able to streamline the administration and management of those grants.

   In 2017, Congress amended P.L. 102-477, making it a permanent program and expanded grants eligible to be consolidated into a single plan. Since the consolidated funds lose their identity from the original funding source, it is envisioned that Tribes would be creative in designing programs to meet their own needs.

   The Pyramid Lake Paiute Tribal Council approved its original resolution on August 24, 1993, notifying the BIA of its intent to prepare a proposal to consolidate programs under P.L. 102-477. This proposal is intended to extend and fulfill the Tribal Council resolution approved on August 21, 2020 for a program beginning January 1, 2021 with no set date of termination.

B. MAJOR ADVANTAGES
   The consolidation of various grants into a single program will allow the Pyramid Lake Paiute Tribe to operate with a single report format, single budget, one set of policies, one data management system and one management structure. This will simplify the administration and management of these programs, increase accountability and result in significant cost savings due to simplified reporting.

   The P.L. 102-477 (477) legislation authorizes Tribes to seek waivers from applicable statutory, regulatory, administrative requirements or of Federal agency policies or procedures that prevent us from effectively or efficiently implementing the plan.

C. CONCLUSION
   This proposal is vital to the Pyramid Lake Paiute Tribe so that we can develop programs that meet our needs and continue providing needed services to Native Americans residing within our service area.
# Table of Contents

A. FEDERAL PROGRAMS TO BE INTEGRATED 5

B. START DATE OF INTEGRATED PROGRAMS 6

C. CONSISTENCY WITH THE ACT 6

D. COMPREHENSIVE STRATEGY 6

  Governance 6
  Accountability 6

E. GOALS OF THE PYRAMID LAKE PAIUTE TRIBE P.L. 102-477 PROGRAM 7

F. EXPECTED RESULTS 8

G. SERVICES TO BE PROVIDED 8

  Individual Service Plan 9
  Education and Training 11
  Employment Services 11
  Career Counseling 13
  Job-Readiness Training 13
  Job-Retention Services 13
  Supported Work Services 13
  Intensive Case Management 14
  Transitional Services 15
  Supportive Services 15
  Welfare Assistance Services 16
  Child Care Services 18
  Child Care Centers 19
  Youth Services 20
  Comprehensive Youth Assistance 20
  Supplemental Youth Services 21
  Coordination of Services 23

  Services to Employers 24

H. JOB CREATION AND ECONOMIC DEVELOPMENT 25

  Project Subsidies 25
  Project Subsidies: Grants 25
Determination of Percentage / Fund Limitation 25

I. GENERAL REQUIREMENTS FOR CLIENTS 26
   Service Eligibility/Qualification for Services 26
   Income 27
   Selective Service Registration 27
   Veterans 27
   Service Area Map 28

J. GRIEVANCE AND APPEALS PROCEDURE 28

K. BUDGET 28
   Anticipated Revenues 29
   Anticipated Expenditures 30
   Administrative Expenses 32

Appendix A - Survey Results 33
A. FEDERAL PROGRAMS TO BE INTEGRATED

The Pyramid Lake Paiute tribe has integrated the following programs as authorized by the Indian Employment, Training, and Related Services Consolidation Act of 1992 as amended by P.L. 115-93 and P.L. 106-586 with no set date of termination.

<table>
<thead>
<tr>
<th>Funding Source &amp; Program</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Health &amp; Human Services Administration for Children &amp; Families</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Child Care &amp; Development Fund (CCDF)</strong></td>
<td>As permitted by law, any remaining funding is integrated within the Plan. Funding for FY21 and beyond will be included if the program continues to be funded.</td>
</tr>
<tr>
<td><strong>Substance Abuse and Mental Health Services Administration (SAMHSA) Native Connections</strong></td>
<td>As permitted by law, any remaining funding is integrated within the Plan. Funding for FY21 and beyond will be included if the program continues to be funded.</td>
</tr>
<tr>
<td><strong>Substance Abuse and Suicide Prevention (SASP) (formerly MSPI)</strong></td>
<td>As permitted by law, any remaining funding is integrated within the Plan. Funding for FY21 and beyond will be included if the program continues to be funded.</td>
</tr>
<tr>
<td><strong>Bureau of Indian Affairs (BIA)</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Johnson O’ Malley</strong></td>
<td>As permitted by law, any remaining funding is integrated within the Plan. Funding for FY21 and beyond will be included if the program continues to be funded.</td>
</tr>
<tr>
<td><strong>Higher Education</strong></td>
<td>As permitted by law, any remaining funding is integrated within the Plan. Funding for FY21 and beyond will be included if the program continues to be funded.</td>
</tr>
<tr>
<td><strong>Human Services</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Department of Justice</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Office of Violence Against Women (OVW) Tribal Sexual Assault Services Program (TSASP)</strong></td>
<td>As permitted by law, any remaining funding is integrated within the Plan. Funding for FY21 and beyond will be included if the program continues to be funded.</td>
</tr>
</tbody>
</table>
B. START DATE OF INTEGRATED PROGRAMS

The Pyramid Lake Paiute Tribe (PLPT) will began operation of this plan beginning January 2021 with no set date of termination.

C. CONSISTENCY WITH THE ACT

The PLPT, 477-Self Sufficiency Program (SSP) will operate with the intent of P.L. 102-477 which is to integrate employment, training and related services into a single plan and budget. This will improve the effectiveness of the integrated programs and services by reducing joblessness in our Indian communities and meet PLPT tribal goals consistent with the policy of self-governance.

D. COMPREHENSIVE STRATEGY

Governance

The Pyramid Lake Paiute Tribe is a federally recognized Native American Tribe organized under Section 16 of the Indian Reorganization Act (IRA) and is situated in the northwestern part of the State of Nevada. The Tribe is associated with the Kooyooe Ticutta band of Northern Paiutes whose traditional territory included western Nevada, northeastern California, and southern Oregon.

The Pyramid Lake Paiute Tribe is governed by 10 Tribal Council Members who are elected bi-annually in December for staggered two-year terms. The tribe operates under the Indian Reorganization Act Constitution and By-Laws approved on January 26, 1936 by the Department of Interior.

Based upon a 2016 Census, the total resident Indian population was approximately 1,288 individuals. The Pyramid Lake Paiute Tribe is the largest Tribal Reservation in Nevada encompassing 475,000 acres and of this acreage, approximately 112,000 acres (23% of the land) is covered by the surface area of the Pyramid Lake. The residents of the Tribe live primarily in three tribal communities located entirely within the Reservation – Nixon, Sutcliffe, and Wadsworth – which range from 30-45 miles to the nearest metropolitan area of Reno, Nevada.

Accountability
The PLPT is proud to highlight its ability to administer funds under applicable federal requirements.

Within the PLPT, the Tribal Finance Department accepts responsibility for financial reporting and accountability for all grants, contracts, and enterprises. No criminal or fraudulent activity is tolerated or found within PLPT, as evidenced by clean single audits on file with the Federal Audit Clearinghouse.

To ensure PLPT’s ability to continue to safeguard federal funds and provide effective delivery of program services that support the many tribal programs (and specifically the purposes of P.L. 102-477 as amended) PLPT has continued to increase the efficiency of accounting staff through additional training and by upgrading existing systems. Additional improvements have been made each year, and this progress will continue.

E. GOALS OF THE PYRAMID LAKE PAIUTE TRIBE P.L. 102-477 PROGRAM

The Pyramid Lake Paiute Tribe has adopted the following goals for the 477 Program, which are consistent with the purposes of Public Law 102-477.

● To integrate services spanning wellness, education, employment, and training to improve the effectiveness of these services for clients.
● To increase self-sufficiency among PLPT Tribal and community members residing on PLPT Tribal Lands.
● To reduce unemployment and underemployment among PLPT Tribal and community members;
● To serve and support tribally-determined goals consistent with the policy of self-determination and self-governance; and
● To reduce the effects of poverty on PLPT Tribal Lands.

Additionally, PLPT also incorporated two special objectives in the PLPT 477 Plan design and services offered. These are:

● To facilitate the growth of Tribal business, investments, employment opportunities, economic development, and other community-building activities within the area served;
● To address the needs of Native American families residing in the PLPT service area who have demonstrated a dependency on public assistance programs. Special services will be provided to enable these families to receive necessary 477 Program services to become self-sufficient.
F. EXPECTED RESULTS

The Tribe adopts the following performance standards for the next three years of this 477 Plan (January 1, 2021 through December 31, 2024):

- 90% of the PLPT 477 clients receiving Employment services will become employable within one year of receiving services.

- 90% of the youth assisted receiving Supplemental Youth Services will remain in or return to school and earn a high school diploma or GED.

- The PLPT 477 Program will increase employer/job host partners on and off the Reservation by 15% each year between January 1, 2021 and December 31, 2024.

- 90% of the PLPT 477 Clients requesting services to achieve self-sufficiency will achieve self-sufficiency and initiate development of a career.

The Tribe may modify the annual standards, with notice provided to the 477 Program Office in the Bureau of Indian Affairs.

Additional outcomes that are anticipated include, but are not limited to, a 10% increase in the number of clients participating in an education programs earn a degree or certification, a 10% increase in kindergarten readiness for children who attend PLPT Child Care Programs, and a 10% decrease in unemployment rate for PLPT Tribal and community members per year between 2021 and 2024. This will be developed in cooperation with the PLPT Tribal Health Center, PLPT Departments and outside agencies and colleges.

Professional development cannot be overemphasized, especially in the 477 Program. By continually equipping the 477 Case Management Team members with the latest research, techniques, and knowledge will help maintain the effectiveness of the Program. Increasing training opportunities will help all Education staff stay current and improve services for all PLPT students, tribal members, and community members.

G. SERVICES TO BE PROVIDED

Programs directly administered within the Pyramid Lake Paiute Tribe’s 477 Plan will be fully integrated at all stages with great care taken to not supplant federal funding.

The PLPT P.L. 102-477 Plan services are to be provided within the area that includes Nixon, Wadsworth, Sutcliffe, and Fernley, Nevada.
The PLPT 477 Program will provide 477 services to eligible participants, otherwise known as clients. The services will be based on the need of the individual and his/her family. As resources allow, wellness, education, training, employment and related services will be made available, as well as referrals to additional and outside resources. A specialized online data tracking system is used to enroll and track each participant and/or participant family’s individualized program for services, Individual Service Plan and goals (ISP), and outcomes achieved (or not achieved) during and at the conclusion of the participant’s and/or participant family’s program of services.

The PLPT 477 Program offers services based on three priorities: Self-Sufficiency, Career Development, and Career Advancement. The first priority for use of 477 Program resources will be placed on helping clients achieve self-sufficiency. It is the view of PLPT that while our staff serve 477 clients, it is partnership between the 477 client and the 477 staff and active Client participation that influence clients to achieve success. The second priority focuses resources on career development to help clients who require skills development and enhancement obtain or maintain employment. The third priority focuses resources on career advancement to help clients further their career through promotion or advancing employment status.

It must be understood that the concept of Self-Sufficiency applies at a family and an individual level. It also recognizes that to attain self-sufficiency requires access to and success in attaining an education as well as physical and mental health and wellbeing. Therefore, the range of needs, resources, and services for which 477 clients (adult and youth) will be assessed, and which will be delivered by the 477 department directly or through referrals, will be broadly inclusive, as described below.

The PLPT 477 Plan serves very different types of recipients: employers and individual participants. Both are important, and services are adapted to meet their specific needs.

**Individual Service Plan**

All clients are required to develop an Individual Service Plan (ISP). Some clients begin with an Individual Self-Sufficiency Plan that with success evolves into an Individual Services Plan. The 477 Case Manager will interview each client in depth to develop the client’s ISP. The ISP will describe the services to be provided and the client’s responsibilities. Relevant resources will be identified that may assist the client in overcoming barriers. Services available in the PLPT service area will be linked to the PLPT 477 services and additional resources identified in the region will be established with referrals to maximize assistance available for clients.

The ISP will include both short and long-term goals for the client. The long-term goal for adults is employment in an appropriate position based on the client’s training and successes. In some cases, a goal may pertain to education or training efforts. The short-term goal may be direct
employment, if the client is job-ready, or it may represent incremental benchmarks to
demonstrate and document progress toward self-sufficiency. Short-term goals are specific,
critical, and basic requirements necessary for actively pursuing full-time employment. The ISP
will outline the client’s individual responsibilities as well as the services provided through the
477 Program and, if applicable, Coordinated Programs. Services may be financial or
nonfinancial. The approach will be based on a self-empowerment methodology.

Generally, the client will be guided through the process of eliminating barriers rather than
staff intervening directly to eliminate barriers for the client. As the client’s needs and situation
changes, the client’s ISP may be modified, services added or deleted, as changes may be made at
any time. Clients who do not fulfill their responsibilities will be carefully re-assessed prior to
approval of additional services and assistance. These clients will have only secondary priorities
for services. Clients who meet or exceed written ISP goals may receive an incentive bonus or
award, usually in the form of a gift card or cash.

Services to Individuals

The PLPT 477 Program administers services intended to help clients achieve self-
sufficiency, which is the first priority of the Program, develop careers, and advance careers.
Services are provided for clients residing in the PLPT service area. Services are integrated at all
stages for the clients through their Individual Services Plan (ISP). Services are structured to meet
the needs of individual clients and clients and their families. The Program collaborates with
internal and external employer partners, which creates employment opportunities for PLPT 477
clients.

Under the PLPT 477 Program, clients experiencing similar situations received the same
access to the same services, as funding is available. Services provided to a client will be based on
the client’s needs and, if applicable, the needs of their family, and adjusted accordingly. As
resources permit, opportunities for employment, education, and training will be at the forefront
for clients to access. Priority for services will be provided to Native American Veterans and
eligible spouses with all services.

The 477 Case Manager is the primary contact for PLPT 477 Program and Services,
processes applications for eligibility and determining services, guides the overall 477 Program,
and coordinates with program staff.

Clients will be encouraged to attend a formal 477 Orientation on the PLPT 477 Program
and Services. Orientations will be held so multiple clients can attend. Informational materials
will always be made available and provided to clients. In many cases, the 477 Case Manager will
conduct an orientation on an individual basis, also, to ensure all clients receive an orientation.

Brochures containing information about the PLPT 477 services will be used as an
outreach tool that provides information on the 477 Program and to orient clients. Outreach
activities and events are held at least quarterly to ensure the Program reaches individuals who are eligible for the Program and Services.

Although each type of service is described separately below, sequential or concurrent enrollment in a variety of services may be allowed as a part of the client’s ISP.

Education and Training

A variety of educational and training services will be made available to clients who require training or education. All requests for services will be processed in accordance with the PLPT Higher Education, Adult Vocational Training, and Enrichment Policies and Procedures. In addition to the normal 477 application and request for services, clients must provide additional information specific to educational or training services. Enrolled PLPT members who are eligible for 477 educational or training services may be funded with either Tribal Higher Education funds or 477 Educational Assistance funds.

Education and training services will include, but will not be limited to, remedial education (basic literacy, GED preparation, post-secondary education pre-requisites), instructional workshops, tutoring, skill enhancement, life-skills, occupational training or certification, vocational training programs, and higher education programs. Specialized training may be offered to facilitate job opportunities for new hires and incumbent workers. Higher Education is postsecondary and career enhancement, development, or advancement education resulting in a degree or certification from an accredited postsecondary institution. Funding is provided for both short and long-term programs of study, as well as accredited online programs. Support under this service may include, but not be limited to, tuition, books fees, special materials, and educational/training related expenses.

Vocational training is designed to assist eligible clients acquire the job skills necessary to obtain full-time employment. This training is for clients who wish to obtain a certificate or license in a short period of time in order to enter the workforce, develop a career, or advance a career. Support in this area may include, but not be limited to, tuition, books, fees and related educational/training expenses. The program will fund full-time training in any vocational or trade school, apprenticeship, accredited online programs, or on-the-job training program. An accredited, certified, or licensed program must provide the training program. Clients will be discouraged from enrolling in for-profit vocational training programs. For-profit programs must be accredited through a widely accepted vocational training accrediting institution.

Employment Services

A variety of employment services will be made available to clients, including but not limited to, career counseling, job readiness training, job referral, supported work services, and job retention services. Clients may participate in employment services, either by referral through the Welfare Assistance, Human Services, Education Department, Tribal Court; or by an
individual requesting services. The client may be identified as low income, unemployed, underemployed, economically disadvantaged, in need of job enhancement or development skills, or youth-at-risk.

Clients are considered to be entering, transitioning, or dislocated within the workforce. Some clients require a minimum of assistance with short-term and basic job assistance. Simple resources, such as current job postings and workshop information relating to job skills development or enhancement, will be made available. Job listings include local, Tribal, and Statewide jobs. In addition, employment and employer websites, temporary agency listings, and job readiness information are made accessible.

Many clients may have little work experience or a poor or intermittent work history. Clients may be mandated by courts to seek or return to work or be required to do job search activities when requesting 477 Welfare Assistance services. These individuals may be reluctant or uncooperative when employment assistance is offered. The 477 Program works to transition these clients on an individual basis so that the client can benefit from a consistent and step-by-step approach towards individualized employment goals and objectives. The ISP can provide the structure to facilitate this process. Referrals can be made for those individuals who are ineligible for the 477 Program or when additional resources are needed.

The Nevada Department of Employment, Training and Rehabilitation (DETR) can offer supplemental services for clients who have a physical or mental disability. A DETR Caseworker is able to work with Native Americans from the PLPT service area who suffer from mental disabilities, have been in prison, or are in the process of substance-abuse recovery. According to DETR, those clients must be motivated and willing to work toward stable employment.

Clients have access to several employment development programs in the region. The 477 Program uses career centers such as Job Opportunities in Nevada (JOIN) and the Reentry Program at Truckee Meadows Community College (TMCC) to supplement employment support for those who are unsure of their career path. Clients are referred to these programs for intensive job-readiness skills and specialized career training. Until PLPT is equipped with an assessment site, these centers provide occupational testing for PLPT 477 clients.

The client’s Individual Services Plan can provide a structured approach for securing employment. The ISP can set specific employment goals and objectives for the client with intensive needs or those in need of multiple services. Counseling or assessments may be a prerequisite or concurrent requirement with employment services. The ISP may and is frequently revised to meet the needs of the client. The 477 Program works closely with other departments such as Human Resources, Social Services, Tribal Health Center and the Tribal Court. This ongoing interdepartmental communication provides intensive- needs clients with more resources and support as they work towards self-sufficiency.
Career Counseling

Using the scores from all assessments, the 477 Program staff will work to guide clients toward successful employment, career development, or career enhancement. Job listings and classes for work-readiness and enhancement will be provided by the 477 Program.

Job-Readiness Training

The 477 Program staff can provide assistance or host a training for a group of clients for résumé-writing, Internet job search, completing an application, interview preparation and skill building, guidelines for appropriate dress and decision-making in the workplace. The computer lab can provide access to job-search needs, such as the letter of introduction, cover letters, and résumés. The client may also be placed on a Supported Work assignment in the area for Work Experience.

Job-Retention Services

When a client secures a job or returns to the workplace, it may be advisable to develop an ISP based on job retention. Objectives may include getting to work on time, and appropriate professional dress and demeanor.

Supported Work Services

The PLPT 477 Program offers a Supported Work Services for clients. The service facilitates temporary job placements. The three components of the service are On-the-Job Training, Work Experience, and Internships. On-the-Job Training (OJT) allows for training in the client’s career area preference. Work Experience provides a job experience in basic skills such as reporting to work on time, work attire, professional etiquette, etc. in a supportive work environment. Internships provide students with hands-on experience while they attend postsecondary, vocational training, or other education. The Supported Work Services is a partnership between the 477 Program and an employer. Employers may be PLPT Departments, local businesses, or local organizations.

The 477 Program staff are responsible for the Supported Work Services. A designated staff will be responsible to coordinate job placements with employers and clients. The 477 Program will identify businesses, organizations, or PLPT Departments inclined to accept or request a placement. A designated staff will coordinate with the employer to become a 477 Program Supported Work Services site and establish employment services, develop or utilize an existing job description, determine the wage, and process required forms and partnership agreements. The 477 Program staff and job hosts will develop guidelines for client behavior, work conduct, discipline, and resolution of disputes. The employer will be responsible for evaluating client work performance. Evaluations will be completed on a monthly basis. The
employer will initiate the job placement by requesting a placement and submitting an application request.

The Supported Work Services is a paid work for the client. Clients are paid a wage determined by the employer or default to the 477 Program’s budgeted wage. The 477 Program may pay as much as 100% of the wage for the client, depending on the agreed wage; however, the ideal situation would be a shared cost with the host agency.

Placement of 477 clients will be considered temporary and the client will not be eligible for benefits other than those required by law. Time missed from the job site will be time without pay. The 477 Program will not pay students who are doing an internship for school credit unless approval by the 477 Program Administrator. Internship students may qualify for an incentive award.

As a general rule, Supported Work Services placements will be for an eight-week period, if the client works 40 hours per week. Clients can be scheduled to work up to 20 hours per week or full-time, but have a maximum of 320 hours per Supportive Work Program. Total hours may be extended, depending on requests by the employer and designated staff, but the maximum allowed per client and depending on funding available is 640 hours per year.

Intensive Case Management

The 477 Case Management is the planning, development and management of services for a client. These services include those available through the PLPT 477 Program, other PLPT programs, and other public and private agencies in the region. The 477 Case Management Team will determine if a client needs intensive case management and will be the Designated Staff Member for that client. Clients identified as needing intensive case management may require assistance for a longer period of time. There is no time limit for these clients as long as the client is making satisfactory progress toward the completion of the goals and objectives listed in the ISP. The Case Management Team will seek to identify the barriers that might prevent the client from successfully completing the program of service and becoming productively employed. The Case Management Team will coordinate available resources to assist the client in overcoming those barriers.

Each client will have a detailed list of the tasks they will be required to complete as part of the ISP. The approach will be one of self-help, guiding the client through the process of removing or overcoming the barriers, leading to self-sufficiency.

Due to the higher rate of unemployment and extra barriers experienced by residents, intensive case management is necessary to provide to clients. This period has seen extra caseloads as a result of the economic recession, loss of jobs, layoffs, more competition because of lack of jobs and most importantly, a longer period of time before clients are able to obtain jobs.
In order to increase job readiness, basic employment skills and the potential for hiring by PLPT or external employers, the PLPT 477 Department will focus on job training/placement. A concentrated program will be established to focus on enrolling unemployed PLPT members in pre-employment classes and to match completers with open, designated positions with the service area. Additionally, the two departments will work with Federal, State, and County resources to qualify PLPT members for employment opportunities in the local area.

Transitional Services

Some clients may face multiple barriers to succeeding with their ISPs and require specialized services to help them move from their current status determined as a crisis to self-sufficiency, to employable or employed status. Clients may also be encouraged or required to enroll in “life skills” training that provide clients assistance developing skills such as money management, personal appearance, attendance, etc. Professional counseling or other type of transitional services may be a prerequisite or concurrent requirement with employment and educational services. The 477 Case Management Team will determine if Transitional Services are necessary for a client. Payments and reimbursements must follow PLPT Financial Policies.

Transitional Services will be made available for up to $300 per client per calendar year. Transitional services may include, but may not be limited to the following:

- Special classes;
- Educational classes;
- Utility bill to prevent utilities from being shut off;
- Substance-abuse counseling;
- Professional counseling;
- Marriage and family therapy;
- Job-readiness training;
- Job-retention services;
- Expenses associated with daily or weekly program contacts;
- Additional assessments and testing not covered under another service; or
- Other similar services necessary to identify and remove barriers to self-sufficiency.

Supportive Services

Supportive Services address barriers that prevent clients from returning to work or establishing a stable employment record. The purpose of supportive services is to assist the client in overcoming barriers as identified in the ISP. The designated staff member may utilize Supportive Services to assist a client in overcoming barriers to employment or education. When possible, costs of the request for Supportive Services will be shared with the client. These
services will be provided when it is determined by the designated staff member that they are essential in achieving the ISP objectives.

All Supportive Services require documentation of need and cost of the required service. All services must be related to achieving employment, education, and training. Supportive Services will be made available up to $300 per calendar year per client. If a client can show just cause for Supportive Services in excess of the maximum $300 per client per calendar year, the 477 Program Director can approve. The maximum allowed under this circumstance will be $600. Just causes are limited to loss of employment not as a result of the client’s actions, emergencies associated with a medical issue or disasters, or a situation associated with a PLPT Human Services or Tribal Court case. Supportive Services may include, but will not be limited to the following and based on available funding. Payments and reimbursements must follow PLPT Financial Policies.

- Transportation assistance (bus passes, limited minor car repairs);
- Gas cards may be provided, if a client is working and attending an education program;
- Union fees (funds will not be used to assist, promote, or deter union organizing);
- Assistance with driver’s or commercial license;
- Professional and school related fees;
- Insurance that is job-related or needed to support employment;
- Work clothing, tools, and special equipment; or
- Other assessments and evaluations as necessary to identify and remove barriers to employment and/or education.

In order to receive such Supportive Services, the client must sign a Client Supportive Services Agreement Form pledging to return the items or reimburse the 477 Program for the expense if the client does not meet objectives in the ISP applicable to the Supportive Services request. All requests for Supportive Services must include necessary documentation on the need for the service and must follow the PLPT Financial Policy and Procedures. Supportive Services may be provided through vouchers, purchases, or reimbursement directly to the client.

Welfare Assistance Services

The PLPT 477 Program provides Welfare Assistance for eligible clients. The purpose of the Welfare Assistance Program is to provide for services to allow for the promotion of personal well-being, family unity, and economic and social stability while working toward self-sufficiency. The PLPT administers general assistance in accordance with the provision of 25 CFR Part 20 Financial Assistance and Social Services Programs. This Plan establishes revised general eligibility requirements to receive 477 Program services.

Clients requesting Welfare Assistance must also meet the following guidelines:
Lack sufficient resources to meet the essential-need items defined by the Bureau standard of assistance;

Meet the additional eligibility criteria for each of the specific programs of financial assistance; and

Apply concurrently for financial assistance from state, Tribal, county, local, or other federal agency programs, if they are eligible.

The client will meet with a 477 Program staff member to review and sign an Individual Self-Sufficiency Plan (ISP) that will serve as the client’s Individual Services Plan. The 477 Case Management Team member will determine financial eligibility by reviewing all income, earned or unearned in the month it is received and as a resource thereafter if converted into cash in accordance with (25 CFR §20.307 through §20.313). The goal will be accomplished by providing the client with financial assistance while outlining specific steps the client will take in order to gain self-sufficiency. All applicants with dependent children are required to apply for Temporary Assistance for Needy Families (TANF). Eligibility and payment standard rates for Welfare Assistance are based on the state TANF guidelines (25CFR §20.306).

Welfare Assistance clients considered able to work will be required to engage in work activities. Work activities will be defined in the ISP and may be defined as, but not limited to, remedial education, occupational training, and supported-work services, as well as unsubsidized employment. Job search or job-readiness training may also be considered as ‘engaged in work activities. A client’s failure to seek, to accept, or maintain employment (without good cause), will result in the client’s ineligibility to receive assistance for a minimum of 60 days to a maximum of 90 days. Clients participating in an education, training, or job-readiness activity will be able to complete the program prior to job search or accepting employment.

Welfare Assistance clients not covered by this work requirement will be required to follow a self-improvement program described in their ISP. Those clients exempt from the work requirement should be under a physician’s care. Appropriate medical documentation will be required. The “medical waiver” clients will be required to apply concurrently to Social Security Disability. For clients on medical waiver, the 477 Case Management Team member will monitor the case by periodically requesting reports of case status from either the client’s physician or the Social Security office, or their Social Security advocate.

In some instances, clients who are on a medical waiver and whose condition is not severe enough to prevent them from working full-time are referred to the State of Nevada Department of Employment, Training and Rehabilitation (DETR). Individuals will complete an application and attend an orientation process. Should they meet the program qualifications, the client is then assigned a counselor who will set a date for testing evaluation of the individual’s physical and mental capacity to work. Clients are counseled and an Individual Services Plan is developed for training, job placement, or vocational training.
DETR staff have worked specifically with Native American ex-felons or individuals with certain special needs. The 477 Program staff works closely with this program so eligible individuals who apply for Welfare Assistance have more support to get back to work.

A client’s need for continued financial assistance will be subject to review each month, unless otherwise needed. This review will include the following:

- Biweekly visits with the client;
- Review of income, school attendance (when appropriate), living circumstances, and household composition for the month’s financial assistance is provided; and
- Appropriate revisions to the ISP.

**Child Care Services**

The PLPT administers the Child Care Development Fund program integrated with the PLPT 477 Plan. The PLPT 477 Department will provide Child Care services to eligible clients through the PLPT Child Care program. All applicants for PLPT Child Care services must apply through the 477 Program. The child receiving child care services must be an Indian Child 13 years or younger and enrolled in a Federally Recognized Indian Tribe or an eligible direct descendent of an enrolled PLPT Tribal Member. The family requesting child care services must reside on PLPT 477 Program service area to receive Child Care services. By statute, all eligible children are under the age of 13 and reside with a family whose parent(s)/guardian(s) are working or attending a job training or educational program, or a child who receives or is in need of child protective services.

Applicants who request and qualify for Child Care Assistance services must meet 477 Program and income eligibility requirements. The only exception to the income eligibility requirements are foster parents and guardians with court ordered temporary custody of child and reside on PLPT Tribal Lands. Child care fees are waived 100% for foster children and children in the care of court ordered temporary guardian(s) living on Tribal Lands. The 477 Program Child Care Services supports families who step up to assist children in need of a home.

The following are the procedures that will be followed when processing a request for Child Care services:

The 477 Case Manager and Child Care Supervisors will provide all necessary forms and information packets to the parents to begin the process of requesting child care. The forms are as follows:

- 477 Intake Form
- 477 Request for Assistance Form
- 477 Child Care Program Application
The 477 Case Manager will review the completed application, certify eligibility, and notify the applicant on eligibility for services within five (5) days after application has been processed.

The 477 Case Manager notifies the Center’s Child Care Supervisor of a new client and forwards necessary documents. Within three (3) business days from receipt of new client information, Child Care Supervisor contacts the client to schedule Orientation or notify client of the estimated date for an opening.

All parents will be required to pay for Child Care services each week, with the exception of foster children and temporary court ordered temporary guardians.

The Child Care Supervisor will provide the 477 Case Manager with a copy of any correspondence or notification sent to parents relevant to child care payments and child care assistance services, i.e., late-payment notice and leave forms. This information will also be added to the client’s case file both at the Center and in the 477 client file.

Child Care Centers

PLPT operates a Child Care Center in Nixon, Nevada. The center has a maximum capacity based square footage and child/adult ratios and are regulated by Indian Health Services. Parents/guardians who are employed with no adult living in the home to care for the child(ren) while parents/guardians are at work are eligible for services. Parents/guardians who are engaged in educational, training, employment and related activities are eligible for these services. The Center provides supervised child care for children age three (3) months up to thirteen (13) years of age. The Center provides child care services for tribal members and community residents. The center offers full time care, part time care, and after school care. The center operates Monday through Friday and is closed on tribal, state and federal holidays, and for staff training days. To assure child care staff are provided necessary Early Childhood Education and caregiving training, five days are allotted for closure for training needs each year.

Tribal Child Care Priority for Services

Priorities for an opening at the Child Care Center are for families who are:

- Low-income and working to achieve education, training, and/or employment.
- Caring for children with special needs, including children involved in the Child Protective Services/Indian Child Welfare cases of a competent court.
- Low-income and working.
- Above income working families with no care available in the home (i.e., single parent households, two parent household working similar shifts).
- Above income families with parent/guardian working to advance a career.
- Validated for a justified medical/health reason, see Section 5.1.7.
Children having special needs will be evaluated on an individual basis. The purpose is to ensure that children with disabilities receive all the services to which they are entitled pursuant to Developmentally Appropriate Practice. The Child Care Centers coordinate with Nevada Early Intervention Services for services, as well as PLPT Tribal Health Clinic.

Parent/Guardian Rights

The Child Care Program ensures parents/guardians their rights as parents/guardians while their children are participants in the program, as the program aims to provide caregiving through a partnership with parents/guardians.

The Child Care Program Parents/Guardians have the following rights:

- To have access to their child(ren) whenever the child(ren) are receiving care at a Center.
- To receive information pertaining to parent/guardian options, policies and procedures, practices, child records, and concerns relating to the child care services.
- To receive appropriate care giving in a safe environment for child(ren) that is attune to accommodates early childhood education and development.
- To appeal decisions related to denial or termination of the Program.
- To request access to verify staff health and training requirements.

Youth Services

The PLPT 477 Program provides Youth Services for students age 3 up to age 22. Some services are provided to specific ages, as per regulations. For youth to receive Youth Services, they must meet the general 477 Program eligibility requirements. Specific requirements may vary depending on the type of services requested. The following categories are established for Youth Services:

Youth Services include supplementary financial assistance for students age 3 through grade 12 and their families to meet the specialized and unique educational needs of Native American students. This is accomplished by providing educational-support services for all Native American students attending schools serving the PLPT service area. PLPT will continue to meet the statutory requirement of the Johnson O’Malley Program by maintaining an Education Advisory Committee, which is the umbrella advisory committee for all Education Department programs. Youth Services will support activities to include but not limited to educational, career development, youth leadership, behavioral health, etc. Parents/guardians are required to apply for 477 Program Youth Services as established in the 477 Plan and guided by approved internal policies and procedures. The students must agree to complete a program to earn a high school diploma or GED as part of the students’ ISP.

Comprehensive Youth Assistance
PLPT youth meeting the requirements for PLPT 477 Program Youth Services will be provided Comprehensive Youth Assistance which may include but may not be limited to the following services to help youth overcome identified barriers to achieving educational goals, preparing them to become employable upon completion of a high school diploma or GED:

- Specialized tutoring and study skills training
- Assistance with special education services
- Drop-out prevention and credit recovery
- Leadership development, community service, and civic responsibility opportunities
- Life skills training (self-esteem, self-control, financial literacy, etc.)
- Bullying prevention and support
- Post-secondary and vocational training preparation
- Referrals for comprehensive guidance and counseling
- Truancy and other status offenses intervention
- Assistance enrolling in alternative secondary school services (e.g., GED, etc.)
- Pregnancy prevention and teen parenting classes
- Assistance enrolling in a recognized mentoring program
- Supportive services (linkages to community services, educational testing, reasonable accommodations for youth with disabilities, legal aid services, referrals to health care, employment and training related applications and/or testing, basic clothing needs for homeless and indigent youth, alternative behavioral health services)

Supplemental Youth Services

Supplemental Youth Services will provide youth who need additional or special service with assistance to overcome barriers to education and/or employment. These youths may be experiencing special circumstances or in special school settings where they need assistance to overcome identified barriers to their education or to employment.

Per 20 CFR 668.430, individuals eligible to receive Supplemental Youth Services under this Plan are youth who are PLPT Tribal members, a direct descendent of a PLPT Tribal member, or a Tribal member of a Federally-recognized tribe or Alaska Native and reside within PLPT service area low-income, and between the ages of 14 and 21 with one or more of the following characteristics:

- Basic skills deficient*,
- A school dropout,
- Homeless or runaway,
- Pregnant or parenting,
- Has educational attainment that is one or more grade levels below the grade level appropriate to their age group,
● Has disabilities, including learning disabilities,
● Is an offender, or
● Requiring additional education-or employment-related assistance that help overcome barriers (e.g., child protective services, emotional/behavioral or substance abuse issues).

* Basic skills deficient is defined as a youth who have English reading, writing, or computing skills at or below the eighth grade level on a generally accepted standardized test; or is unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the individual's family, or in society.

Youth Supported-Work Services

One of the purposes of the PLPT 477 Program is to encourage employment with a goal of self-sufficiency. One way to achieve this is through various work experiences for eligible youth ages 14-21. Supported work experiences for youth may include but may not be limited to, vocational exploration opportunities, entrepreneurial skills training, occupational skill training, workforce preparation activities, and part-time employment developed or funded by the 477 Program. Such employment may be offered on a full-time basis during school vacations or for youth not required to be in school during a normal academic school year.

All youth applicants for Youth Supported-Work Services must apply through the 477 Program and meet 477 criteria. In addition to the normal 477 Application and Request for Services, clients must provide additional information specific to Youth Supported-Work Services.

Summer Youth Employment Program

The PLPT 477 Program coordinates the PLPT Summer Youth Employment Program (SYEP). All students who apply to participate in the PLPT SYEP must complete the 477 Program Intake process. The youth who meet the 477 Program Supplemental Youth Services eligibility criteria will be supported by the 477 Program. The 477 Summer Youth clients will be subject to general rules of the PLPT Summer Youth Employment Program, but will also be required to participate in life-skills building and basic skills tutoring as part of their SYEP experience.

Supplemental Youth Employment

The PLPT 477 Program will fund supplemental youth employment opportunities year-round. This employment is for youth who demonstrate a need for job-readiness skills and basic employability skills. Generally, youth who have completed high school or received their GED, and are waiting for further training or education, will be eligible to participate in this program, as
long as they have not reached the age of 22. The purpose is to provide the youth clients with work experience, vocational exploration, and occupational skill training opportunities.

Coordination of Services

The PLPT 477 Program has established partnerships with various PLPT Tribal Departments and services to provide opportunities, additional services, and to cast a web of support for 477 clients or 477 clients and their families. Some partnerships address the individual needs of the family unit and others address the needs of the individual. Clients receiving services through the 477 Program and/or Coordinated Programs are supported by the programs provided by other PLPT Departments to clients meet their goals outlined in their ISP. The 477 Program staff recognize the importance of coordinating with several entities during the 477 client’s goal planning and efforts toward success. The following are resources the RSIC 477 Program coordinates with to assist clients achieve success.

- The PLPT Recreation Department’s Summer Food Program provides nutritious and well-balanced meals and snacks year round for children.
- PLPT’s Library Program that offers a place where individuals can conduct weekly job searches online and develop other employment documents such as resumes for their career development needs. The Library staff also host weekly story time and other literacy activities with the children.
- Sumunumu Tutoring Programs assists with students with remedial and progressive educational endeavors, either through specialized tutoring services or through out-of-school time tutoring and educational programming.
- PLPT Housing provides temporary assistance to participants with housing needs, as well as supports families with housing needs.
- PLPT Tribal Court assists with families who are having court issues by coordinating with Juvenile Probation or Truancy issues to help families keep students engaged in school and graduate from high school.
- PLPT Tribal Police help families involved with the Tribal Court system.
- PLPT Social Services help families during times of distress keep families together or find alternative solutions.
- PLPT Public Works Transit System provides transportation for employment, services, and other client needs.
- PLPT Tribal Health Center provides medical, dental, optical, hearing, behavioral health, and substance abuse services. The Clinic also offers health education and preventative services through Community Health programs, as well as food distribution services for families in need of food.
- Indian Health Services provides monitoring for health and food programs.
Services to Employers

PLPT recognizes that job availability for Native American Indians within the service area is scattered and, in some cases, limited. Therefore, the PLPT 477 plan will support economic development. To the extent that opportunities permit, all of the services to customer/participants may be utilized to facilitate economic development. In addition to services focused on qualified individuals, services to employers will focus on qualifying the employer. Qualifying an employer may include but may not be limited to, verifying the business is Native American owned or will have a workforce that is primarily Native American, reviewing the owner or manager’s resume or work history for likelihood of success, requiring a five-year business plan, identifying the anticipated number of employees to be hired, anticipated rates of pay, and what type of jobs employees will do; specifying these are new or retained employment positions.

Special services to stimulate such growth may be offered, as well as other community-building activities in support of strategic tribal planning and development. It is expected that program staff will handle these activities through the usual services offered to individuals.

Although community-building activities are geared toward the participants as a group, a separate budget line item is not required. Such activities are still within the scope of existing components such as Employment, Education, and Supportive Services. Most of this assistance is expected to be in support of micro-enterprises or entrepreneurship opportunities.

Services to support economic development may include, but are not limited to the following:

- Special labor force surveys to inform employers considering an investment about the workforce available (e.g. skills present in the available workforce).
- Customized training to meet the employer’s individual needs.
- Pre-employment screening, skill enhancement training, on-the-job-training, and wage subsidies as an additional inducement to employ.
- Managerial support training, which will include training of eligible participants for potential managerial positions as well as the training of current managers in enterprises located within the service area in how to more effectively utilize the available Native American workforce.
- Equipment to prepare participants for positions within eligible enterprises (title to be held by the Tribe).
- Micro-enterprises initiated by economically disadvantaged participants. For example, because availability of quality child-care is limited, participants who chose to become licensed child-care providers would be assessed for potential of success as a micro-enterprise. To meet tribal certification requirements, these home providers must meet certain childcare standards and requirements. It is anticipated that funding for these efforts will mainly fall within Supportive Services or Quality Care.
H. JOB CREATION AND ECONOMIC DEVELOPMENT

Project Subsidies

It is the intent of the Pyramid Lake Paiute Tribe to break the cycle of dependency. The intent of Project Subsidies is to partially support a viable project that promotes Job Creation or Economic Development. By supporting projects that foster employment and entrepreneurship, the PLPT will prevent its workforce from becoming dependent on federal assistance. It is the Tribe’s belief that a significant number of Native Americans will gain jobs through this effort. Project Subsidies may be awarded through grants.

Project Subsidies: Grants

It is anticipated projects will include jobs created through funding for employers who demonstrate the necessary competence and commitment (through business plans, financing, etc.). Job Creation / Economic Development Projects will be formalized through a tribal Memorandum of Understanding as applicable. Project recipients will be required to annually report their project obligations, which are to create jobs and attempt to hire qualified Native Americans. The funding allocated for this purpose will be leveraged with other dollars (tribal or otherwise) specifically for Job Creation and Economic Development for both new projects and expanded program projects. Employers will be asked to utilize PLPT’s 477 Program as a first source employment referral agency for potential employees.

Determination of Percentage / Fund Limitation

The Tribe has chosen to use up to ten percent (10%) of the limitation as allowable in the P.L. 102-477 amendments as provided in Title XI of the Omnibus Indian Advancement Act signed into law by the President on December 27, 2000, as Public Law 106-568.

LAW – P.L. 106-568 (Excerpt)

IN GENERAL – Notwithstanding any other provisions of law, including any requirement of a program that is integrated under a plan under this Act, a tribal government may use a percentage of the funds made available under this Act [as determined under paragraph (2)] for the creation of employment opportunities, including private sector training placement under section 10.
Project(s) EXAMPLE

As authorized by resolution of the Pyramid Lake Paiute Tribe:
Project: Insert Name
Insert Dollar Amount
Describe the Project, allowable uses and limits of the funds; detail required reporting.
Address the possibility of applying a lien to the business pending receipt of the required report. Include Signatures agreeing to these terms by Project Director and by 477 Director.

Job Creation / Economic Development Pending Project(s)
Pending authorization by resolution of the Pyramid Lake Paiute Tribe:

At the time of this Plan submittal, pending Job Creation / Economic Development Projects have not been identified. We will include information on pending projects with our annual report.

I. GENERAL REQUIREMENTS FOR CLIENTS

In general, P.L. 102-477 applicants who meet residency criteria will be qualified for services if they can provide proof of membership of federally recognized tribe – or in some cases – certificate degree of Indian blood descendence, and demonstrate a need for employment, training, social, or related services. Additional qualifications may be required based on services available. Eligibility or qualification for services includes one or more of the following criteria:

Service Eligibility/Qualification for Services

Adult & Youth
● Low Income*
● Working less than full time / under employed
● Unemployed 7 consecutive days or more
● Employed – Require skill enhancement to maintain or advance
● High school drop out
● Individual with a disability
● Social services
● Emergency
● Disaster
● Homeless

Youth Only
• Leadership development
• Lacks employability skills
• Enrolled in eligible Johnson O’Malley school system
• At-risk youth
• Member of an at-risk peer group
• Foster child

Income

For purposes of this plan, “low-income” means 150% of poverty or no more than 60% of the published Nevada State median income. Non-taxable income is excluded from income. A chart is included in the appendix which details income based on household size. When federal poverty limits are updated, this chart will be modified accordingly. For Child Care Development activities, the PLPT chooses to use the flexibility allowed by law. Any Indian child in the Tribe’s service area will be eligible to receive CCDF funds, regardless of the family’s income, work, or training status, as long as the household income is no more than 85% of the published Nevada State median income. For the purposes of childcare eligibility, only taxable income is submitted for verification. A chart that details income eligibility for childcare is included as an attachment. All payments due to providers will be made to providers directly each month. PLPT issues payments to providers on a regular and prescribed schedule. Once a payment relationship is established, PLPT accounting will encode, print, and mail checks every other week at the agreed upon rate, until the child’s care status is terminated or changed through the recertification process. Provider payments are processed independent of occasional child absences. Occasional absences are defined as five or fewer days per month. Childcare assistance is not counted as income when making eligibility determination for other forms of assistance included in this plan.

Selective Service Registration

Adult males between the ages of 18 to 26 years of age or born after 1959 will be required to show proof of selective service registration. If not registered and no longer allowed to register, application will be asked to provided convincing evidence that failure to register was not knowing and willful. The Director will review each case and make the decision if the selective service registration requirement is waived.

Veterans

Priority of service will be given to Native American Veterans and eligible spouses for all services provided.
J. GRIEVANCE AND APPEALS PROCEDURE

The Tribe has established a uniform grievance and appeals procedure applicable to all 477 participants and tribal staff employed within this 477 Program. It contains provisions that will apply to all program participants engaged in any type of activity under this Plan.

The procedure ensures due process and establishes a series of levels, starting with informal resolution at the staff level. The final level of appeal is to a committee including the Department manager and two other senior level tribal administrative staff.

Appeal to final level must be in writing and submitted within ten business days of the action being appealed.

The grievance and appeals procedures are posted in the 477 tribal offices and a copy is provided to every applicant for services.

K. BUDGET

This is a brief overview of the budget portion of PLPT’s 477 Plan. Included is a description of the assumptions involving revenues, a description of the cost categories used, the
definition of administrative costs for purposes of this plan, and a discussion of several administrative and indirect cost issues.

Anticipated Revenues

The table of anticipated revenues is included below. All figures for anticipated revenues represent full year amounts for the programs indicated. The PLPT’s 477 Program budget will be modified if anticipated revenue differs from actual revenue.

<table>
<thead>
<tr>
<th>Potential Programs</th>
<th>Potential Revenues</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Department of Health &amp; Human Services</strong></td>
<td></td>
</tr>
<tr>
<td>SAMHSA Native Connections</td>
<td>250,000.00</td>
</tr>
<tr>
<td>Child Care Development Fund (CCDF)</td>
<td>531,052.00</td>
</tr>
<tr>
<td>Substance Abuse and Suicide Prevention (formerly MSPI)</td>
<td>175,000.00</td>
</tr>
<tr>
<td>Substance Abuse and Suicide Prevention (formerly MSPI)</td>
<td>150,000.00</td>
</tr>
<tr>
<td>Subtotal</td>
<td>1,106,052.00</td>
</tr>
<tr>
<td><strong>Department of the Interior</strong></td>
<td></td>
</tr>
<tr>
<td>Human Services</td>
<td>261,594.00</td>
</tr>
<tr>
<td>Johnson O’Malley</td>
<td>54,235.00</td>
</tr>
<tr>
<td>Higher Education</td>
<td>157,557.00</td>
</tr>
<tr>
<td>Subtotal</td>
<td>473,386.00</td>
</tr>
<tr>
<td><strong>Department of Justice</strong></td>
<td></td>
</tr>
<tr>
<td>Office of Violence Against Women (OVW) Tribal Sexual Assault Services Program (TSASP)</td>
<td>349,501.00</td>
</tr>
<tr>
<td>Subtotal</td>
<td>349,501.00</td>
</tr>
<tr>
<td><strong>Total Potential Revenues</strong></td>
<td>1,928,939.00</td>
</tr>
</tbody>
</table>
Anticipated Expenditures

A table of anticipated expenditures is detailed on the following page. Anticipated expenditures are shown for a 12-month period.

The expenditures are grouped into the categories identified in the Tribe’s 477 Plan of services. The Tribe will maintain cost control at the category level. Subcategory costs are shown only to establish the basis for indirect costs and to distinguish anticipated expenditures for certain selected types of services.

Additionally, direct administrative expenses and the portion of indirect costs attributable to the programs are noted.

Within this 477 Plan, the Tribe has indicated that all of the services to participants may be utilized to facilitate job creation which include but not limited to labor force surveys to identify job opportunities for eligible participants, customized training, managerial training and the purchase of training equipment.

The funds described in Section V of the 477 Plan “Services to Employers” are indicated in the budget line item “Job Creation / Economic Development”. The Tribe has chosen to use the 10% limitation as allowable in the P.L. 102-477 amendment as provided in Title XI of the Omnibus Indian Advancement Act signed into law by the President on December 27, 2000, as Public Law 106-568.

<table>
<thead>
<tr>
<th>Cost Category</th>
<th>Anticipated Expenses</th>
</tr>
</thead>
<tbody>
<tr>
<td>Personnel - Salaries</td>
<td></td>
</tr>
<tr>
<td>477 Director</td>
<td>$</td>
</tr>
<tr>
<td>Case Manager</td>
<td>$</td>
</tr>
<tr>
<td>Child Care Director</td>
<td>$</td>
</tr>
<tr>
<td>Child Care Aide</td>
<td>$</td>
</tr>
<tr>
<td>Service</td>
<td>Cost</td>
</tr>
<tr>
<td>----------------------------------------------</td>
<td>------</td>
</tr>
<tr>
<td>Total Personnel</td>
<td>$</td>
</tr>
<tr>
<td>Personnel - Benefits</td>
<td>$</td>
</tr>
<tr>
<td>Benefits</td>
<td>$</td>
</tr>
<tr>
<td>Total Benefits</td>
<td>$</td>
</tr>
<tr>
<td>Education and Training</td>
<td>$</td>
</tr>
<tr>
<td>Career Counseling</td>
<td>$</td>
</tr>
<tr>
<td>Job-Readiness Training</td>
<td>$</td>
</tr>
<tr>
<td>Job-Retention Services</td>
<td>$</td>
</tr>
<tr>
<td>Supported Work Services</td>
<td>$</td>
</tr>
<tr>
<td>Intensive Case Management</td>
<td>$</td>
</tr>
<tr>
<td>Transitional Services</td>
<td>$</td>
</tr>
<tr>
<td>Supportive Services</td>
<td>$</td>
</tr>
<tr>
<td>Service</td>
<td>Amount</td>
</tr>
<tr>
<td>----------------------------------------</td>
<td>--------</td>
</tr>
<tr>
<td>Welfare Assistance Services</td>
<td>$</td>
</tr>
<tr>
<td>Child Care Services</td>
<td>$</td>
</tr>
<tr>
<td>Child Care Centers</td>
<td>$</td>
</tr>
<tr>
<td>Comprehensive Youth Assistance</td>
<td>$</td>
</tr>
<tr>
<td>Supplemental Youth Services</td>
<td>$</td>
</tr>
<tr>
<td>Youth Supported-Work Services</td>
<td>$</td>
</tr>
<tr>
<td>Summer Youth Employment Program</td>
<td>$</td>
</tr>
<tr>
<td>Project Subsidies: Grants</td>
<td>$</td>
</tr>
<tr>
<td>Indirect</td>
<td>$</td>
</tr>
<tr>
<td><strong>Total Expenses</strong></td>
<td>$</td>
</tr>
</tbody>
</table>

*Administrative Expenses*
For purposes of the Tribe’s 477 Plan, administrative expenses are defined by the Tribe’s negotiated Indirect Cost Agreement. The administrative expense category includes direct administrative costs and all indirect costs attributable to the programs, which are costs incurred for a common or joint purpose and benefit more than one cost objective. PLPT’s approved rate is 23.06%.

Appendix A - Survey Results

**Community Feedback Survey**

We are interested in understanding how the local community feels about the proposed Pyramid Lake Paiute Tribe 477 Plan.

A 477 is federal legislation which allows tribes to combine formula-funded federal grants that are employment and training-related into a single plan with a single budget and a single reporting system.

This can include programs under the Department of Agriculture, Commerce, Education, Energy, Health and Human Services, Homeland Security, Housing and Urban Development, Interior, Justice, Labor, Transportation, and Veterans Affairs.

We greatly appreciate you taking the time to share your thoughts.
The more services and programs that are brought into one department, the more resources and better opportunity to meet my needs.

Answered: 28   Skipped: 0

<table>
<thead>
<tr>
<th>ANSWER CHOICES</th>
<th>RESPONSES</th>
</tr>
</thead>
<tbody>
<tr>
<td>Strongly agree</td>
<td>25.00%</td>
</tr>
<tr>
<td>Agree</td>
<td>35.71%</td>
</tr>
<tr>
<td>Neither agree nor disagree</td>
<td>21.43%</td>
</tr>
<tr>
<td>Disagree</td>
<td>17.86%</td>
</tr>
<tr>
<td>Strongly disagree</td>
<td>0.00%</td>
</tr>
<tr>
<td>TOTAL</td>
<td>100.00%</td>
</tr>
</tbody>
</table>

TOTAL RESPONSES: 28
The more services and departments that are brought into one department, the more challenge (and friction) that will be experienced in creating that department.

Answered: 28   Skipped: 0

<table>
<thead>
<tr>
<th>ANSWER CHOICES</th>
<th>RESPONSES</th>
</tr>
</thead>
<tbody>
<tr>
<td>Strongly agree</td>
<td>14.29%</td>
</tr>
<tr>
<td>Agree</td>
<td>46.43%</td>
</tr>
<tr>
<td>Neither agree nor disagree</td>
<td>21.43%</td>
</tr>
<tr>
<td>Disagree</td>
<td>17.86%</td>
</tr>
<tr>
<td>Strongly disagree</td>
<td>0.00%</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>28</strong></td>
</tr>
</tbody>
</table>
Is the opportunity for greater resources to provide services worth the friction of creating a new department?

Answered: 28  Skipped: 0

<table>
<thead>
<tr>
<th>ANSWER CHOICES</th>
<th>RESPONSES</th>
</tr>
</thead>
<tbody>
<tr>
<td>Always</td>
<td>14.29%</td>
</tr>
<tr>
<td>Usually</td>
<td>30.29%</td>
</tr>
<tr>
<td>Sometimes</td>
<td>35.71%</td>
</tr>
<tr>
<td>Rarely</td>
<td>10.71%</td>
</tr>
<tr>
<td>Never</td>
<td>0.00%</td>
</tr>
<tr>
<td>TOTAL</td>
<td></td>
</tr>
</tbody>
</table>
If you could combine programs in order to receive services more efficiently, which programs would you include?

Answered: 28  Skipped: 0

<table>
<thead>
<tr>
<th>ANSWER CHOICES</th>
<th>RESPONSES</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sumunumu</td>
<td>42.86%</td>
</tr>
<tr>
<td>Child Care</td>
<td>67.86%</td>
</tr>
<tr>
<td>Social Services</td>
<td>64.29%</td>
</tr>
<tr>
<td>Johnson O’Malley</td>
<td>53.57%</td>
</tr>
<tr>
<td>Higher Education</td>
<td>53.57%</td>
</tr>
<tr>
<td>TERO</td>
<td>42.86%</td>
</tr>
<tr>
<td>Victims Services</td>
<td>64.29%</td>
</tr>
</tbody>
</table>

Total Respondents: 98
How much do you support or oppose the 477 Plan concept?

Answered: 28  Skipped: 0

<table>
<thead>
<tr>
<th>ANSWER CHOICES</th>
<th>RESPONSES</th>
</tr>
</thead>
<tbody>
<tr>
<td>Strongly support</td>
<td>25.00%</td>
</tr>
<tr>
<td>Somewhat support</td>
<td>32.14%</td>
</tr>
<tr>
<td>Neither support nor oppose</td>
<td>25.00%</td>
</tr>
<tr>
<td>Somewhat oppose</td>
<td>7.14%</td>
</tr>
<tr>
<td>Strongly oppose</td>
<td>10.71%</td>
</tr>
<tr>
<td>TOTAL</td>
<td></td>
</tr>
</tbody>
</table>
### What is your age?

<table>
<thead>
<tr>
<th>ANSWER CHOICES</th>
<th>RESPONSES</th>
</tr>
</thead>
<tbody>
<tr>
<td>17 or younger</td>
<td>0.00%</td>
</tr>
<tr>
<td>18-20</td>
<td>0.00%</td>
</tr>
<tr>
<td>21-29</td>
<td>0.00%</td>
</tr>
<tr>
<td>30-39</td>
<td>14.29%</td>
</tr>
<tr>
<td>40-49</td>
<td>17.86%</td>
</tr>
<tr>
<td>50-59</td>
<td>35.71%</td>
</tr>
<tr>
<td>60 or older</td>
<td>32.14%</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>28</strong></td>
</tr>
</tbody>
</table>

Answered: 28, Skipped: 0
What community are you a resident of?

Answered: 28  Skipped: 0

<table>
<thead>
<tr>
<th>ANSWER CHOICES</th>
<th>RESPONSES</th>
</tr>
</thead>
<tbody>
<tr>
<td>Nixon</td>
<td>42.86%</td>
</tr>
<tr>
<td>Sutcliffe</td>
<td>7.14%</td>
</tr>
<tr>
<td>Wadsworth</td>
<td>35.71%</td>
</tr>
<tr>
<td>Other</td>
<td>14.29%</td>
</tr>
<tr>
<td>TOTAL</td>
<td></td>
</tr>
</tbody>
</table>