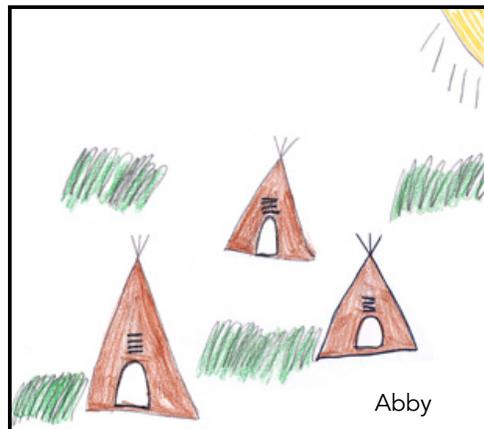
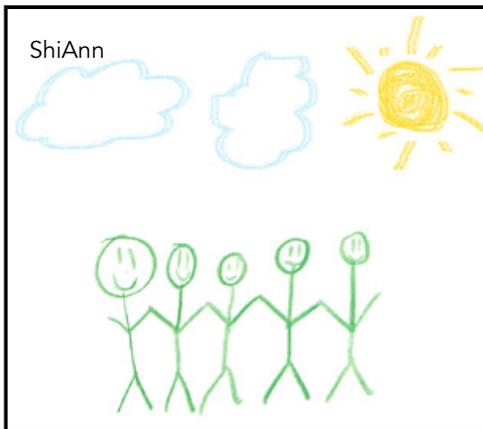




Assets that Matter to Us and Hopes for Our Native
Communities Amid the COVID-19 Pandemic



DISTRIBUTING EMERGENCY CASH ASSISTANCE TO NATIVE FAMILIES DURING A PANDEMIC

Oklahoma Native Assets Coalition, Inc. (ONAC)

Authored by

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ABOUT THE OKLAHOMA NATIVE ASSETS COALITION, INC.

The Oklahoma Native Assets Coalition, Inc. (ONAC) is an American Indian-led nonprofit network of Native people who are dedicated to increasing self-sufficiency and prosperity in their communities. The coalition, headquartered in Oklahoma City, Oklahoma, has existed since 2001, and was classified by the Internal Revenue Service as a 501(c)(3) nonprofit in 2014. ONAC focuses on promoting culturally responsive asset-building strategies and serves Native communities on a national level. For more information about ONAC, including its programs, please access ONAC's website at: <http://www.oknativeassets.org>.

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On the cover: Native youth drawings of assets that matter to them and hopes for their tribal communities. Artwork by Abby, ShiAnn, and Tanian.

FOR FURTHER INFORMATION

For any questions related to, or additional information about, the findings of this report please contact Christy Finsel, ONAC Executive Director, at cfinsel@oknativeassets.org.

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ABSTRACT

During the COVID-19 pandemic, the Oklahoma Native Assets Coalition, Inc. (ONAC), a Native-led nonprofit serving Native communities across the U.S., has provided emergency cash assistance payments (\$500 per applicant) to American Indian and Alaska Native families. In total, ONAC raised funds to support 1,070 families. ONAC approached 23 tribes and Native-led nonprofit partners to request their assistance to provide the outreach and referrals for the payments that were distributed to tribal citizens residing in 28 states.¹ This referral process has worked well, as ONAC has limited funding and could not have reasonably distributed a publicly-available application link given the need for assistance among Native families (ONAC would have been swamped with requests). ONAC has equitably dispersed emergency cash assistance funds by region of the country.

Through this program, ONAC distributed the funds by check made payable to the applicant or ACH transfer to the applicant's bank account. As part of the application, ONAC provided Bank On information for those who were not banked and may have wanted to become so as part of the emergency cash assistance program.² Also, a link to register for ONAC-provided financial coaching was made available for those interested in the service. In the applications, ONAC collected information about how the family planned to use the funds. Applicants reported that the assistance would be used for rental and mortgage payments, groceries, utilities, Internet service, burial expenses, student loan payments, and health care expenses. For harder-to-reach Native families who sometimes had no Internet service, devices for online applications, or bank accounts, ONAC assisted them with the application by phone or worked with the community partner to receive lists of mailing addresses for check disbursement. Some of the community partners assisted with outreach and application completion by visiting with families through the family's screen door or providing assistance with the application over the phone.

BACKGROUND

The Oklahoma Native Assets Coalition Inc. (ONAC), first organized in 2001 and established as a nonprofit since 2014,

¹ See the acknowledgement section, on page 2, for a list of the referring partners. Some partners wished to remain anonymous due to the sensitive nature of making referrals in their communities for limited funding. Several of the partners provided referrals for their tribal citizens who resided in multiple states throughout the country.

² Native Bank On ONAC advocates for the use of low-fee, secure, and attractive financial accounts, such as [Bank On certified accounts](#), offered by the banks and credit unions that serve Native communities. See <https://bit.ly/ONACGetBanked> for more information.

is a Native-led asset building coalition that works with tribes and partners interested in establishing asset-building initiatives and programs in Native communities, for the purpose of creating greater opportunities for economic self-sufficiency of tribal citizens. The mission of ONAC is to build and support a network of Native people who are dedicated to increasing self-sufficiency and prosperity in their communities through the establishment of integrated, culturally-relevant financial education and financial coaching initiatives, as well as seed-funded account programs, down payment assistance, free tax preparation, expanded banking access, and other asset-building strategies. While ONAC has maintained its original name, the organization has operated nationally since 2018.

ONAC provides various asset-building services that are linked, or integrated, and serve whole Native families. As a nonprofit, ONAC provides the following asset-building resources:

- 1) Delivers direct services that include seed-funded Children's Savings Account (CSA) and emergency savings accounts, financial coaching, Bank On incentives, and down payment assistance programs;
- 2) Conducts national Native asset-building research and generates resource guides for Native financial education providers, Native women entrepreneurs, Native Voluntary Income Tax Assistance providers, and parents managing 529 college savings plans for their children through the ONAC CSA program;
- 3) Acts as an intermediary and grant funder to tribes and other Native-led nonprofits so they may have resources to administer their own asset-building programs; and
- 4) Provides free trainings and technical assistance to tribal and other Native-led nonprofit partners and coordinates the national Native EITC/VITA Network and Native Bank On ONAC initiative.

EMERGENCY CASH ASSISTANCE PROGRAM

In May 2020, ONAC was awarded \$400,000 by the Wells Fargo Foundation to hire a program manager and initiate national emergency cash assistance and financial coaching programs serving tribal citizens. After receiving that grant award and launching the program, ONAC spoke with the nonprofit, Native Americans in Philanthropy. Their Chief Executive Officer, Erik Stegman, put ONAC in touch with Edgar Villanueva, Principal of the Decolonizing Wealth Project (DWP), as DWP had funds they wanted to distribute for emergency cash assistance, but were looking for an

organizational partner to manage the funds distribution process. During 2020, DWP awarded \$322,500 to ONAC for emergency cash assistance and related staff support. ONAC also received funds from private donors. Later in 2020, the Wells Fargo Foundation awarded another \$37,500 to support this program, and an additional \$19,500 in grant funding was reallocated to emergency cash assistance payments from a separate earlier grant awarded to ONAC by the Foundation. Thus far, ONAC has raised funds to support 1,070 families. The program will continue through October 2021, or later, if additional funds are secured.

Through the program, ONAC provides emergency cash assistance (\$500 per applicant) to Native families who have been negatively financially impacted by the pandemic. ONAC has been the only Native-led nonprofit administering cash payments directly to Native families at a national level, equitably by region of the country, during the pandemic.³

THE VALUE OF AN INTERMEDIARY IN THE CASH DISTRIBUTION PROCESS

In this time of crisis, when tribes and Native-led nonprofits are under-resourced and with limited staffing capacity, ONAC determined the most efficient way to deliver funds to families in need was for ONAC to directly administer the program and work with Native partners on referrals for the assistance.

Through this program model, ONAC fundraised for the emergency cash assistance and created the program infrastructure that included the generating of an online application. ONAC selected the Native partners who identified referrals in their respective communities and worked with the partners on draft language to use to notify tribal citizens that they were eligible for emergency cash assistance. Once ONAC received a list of referrals from the Native partners, ONAC's program staff distributed the application links, assisted applicants who had no Internet or devices to complete the online application (through a manual entry option on ONAC's application backend), processed the applications, and directly sent payments to the referred applicants by ACH transfer or check. On the administrative side of the program, ONAC staff managed the program database, followed up with those who had uncleared checks until they cleared, connected applicants to available ONAC wrap-around asset-building services, and managed the program evaluation process.

In this funds distribution model, 23 tribes and Native-led

³ In 2020, ONAC also worked with several tribal partners to direct 205 additional tribal citizens to emergency cash assistance through the Family Independence Initiative.

nonprofits identified families in need. Examples of these partnerships include: Native VITA programs, tribal housing authorities, Native CDFIs, tribal social service programs, tribal administrators, and more. ONAC partners were best positioned to identify those most in need of assistance in their communities. When making the referrals, some partners worked from lists of clients or tribal citizens that had been calling for assistance. Others knew of situations where clients were having difficulties with declines in their business and keeping current with their business loan payments. Native VITA practitioners were aware of financial hardship from their interactions with those they were preparing returns for in their communities. Some outreach partners contemplated drawing names from a hat, and others asked tribal program directors for a short list of those most in need. A number of partners struggled with how to decide on whom to add to the referral list, given the immense need for assistance in their communities.

Due to the need of assistance among Native families across the U.S., and the limited funding ONAC raised, a referral process, rather than announcing a publicly available application, was deemed necessary to manage community expectations and distribute the funds as efficiently as possible. At one point during the implementation of the program, word spread about the application link within one tribal community, and ONAC staff were receiving 20 calls an hour for support. If the volume of calls had continued at that level, ONAC staff would not have been able to distribute funds within 24 hours of receiving the applications, as they would have been constantly fielding calls from additional community members in need. ONAC let the community members know there was limited funding and no publicly available application link (only referrals from that tribe). Once this message was shared, communications from individuals who had not been referred to the program stopped.

To their credit, a number of applicants were wary about frauds and scams. For this reason, the ability to work with trusted community partners was essential. To build trust into the process, Native community partners were the first point of contact with individuals who were referred for assistance. The partners communicated with those they were referring by phone, email, or letter in the mail prior to any communication from ONAC to let them know about the emergency cash program and the fact that they had been referred. This pre-award communication expedited the distribution of funds in two ways: 1) it increased the likelihood that individuals would complete the online application, and 2) when individuals received a check in the mail, they did not dispose of it thinking it was a fake check.

FUNDS DISTRIBUTION PROCESS

Individuals who were referred by an ONAC community partner received a link to an online application generated by ONAC. While the individuals who completed the application form were already approved through their referring organization, the form provided a mechanism to collect a brief amount of information regarding family financial need and a way for them to indicate whether they would like to receive the funds in a check made payable to the applicant or via an ACH transfer to their bank account. For individuals who did not have access to the Internet or a smart phone to complete the online application form, program staff provided support over the phone. In some cases, community partners assisted with outreach and application completion by visiting with families at a safe distance (e.g. outside a screen door).

APPLICANT DEMOGRAPHICS

The primary criteria for participation in this program was that recipients were American Indian and Alaska Native, and that they were experiencing a financial hardship due to the pandemic. Community partners assisted with the identification of individuals and families who met these criteria and provided a list of referrals to ONAC. Among the emergency cash recipients, the age of recipients represented a broad range from ages 18–72, with the majority falling between 25 and 64 years of age (71%). More women (58%) applied for funds than men (34%). Approximately 14% of recipients reported that they were previously unbanked, but opened a bank account in order to receive funds. The numbers of unbanked participants may have been higher. Based upon calls that ONAC received from several payday lenders/check cashers to verify that a check was legitimate, ONAC is aware that some participants requested a check and had no bank account.

PANDEMIC-RELATED FINANCIAL NEEDS

Applicants experienced a wide range of financial impacts as a result of the pandemic. To learn more about the origin of financial need, applicants were asked what was driving them to apply for emergency assistance, and how they intended to use the funds. Responses to these questions did not determine eligibility for funds, but were asked to better understand the effects of the pandemic on Native families.

Applicants who responded to these questions reported that they were in need of assistance due to:

- Job loss (20%)
- Reduction of hours at place of employment (20%)

- Furlough (2%)
- Care for an ill family member (8%)
- Need for Internet service for children to complete school lessons (7.5%)

Some of the other reasons include:

- Some individuals got COVID-19 and had to take unpaid time off of work.
- Other individuals are essential workers, but due to having family members who were at high risk of illness related to COVID-19, the workers had to find another place to live, which doubled expenses.
- Daycares closed, so some parents had to either take off work or quit their jobs entirely.
- Some families were hosting other families in their home due to job loss or illness, so their household expenses increased.
- In some cases, the income earner in the family passed away, so the remaining family members no longer had a source of income.
- Having kids home from school increased grocery expenses.

Many of the Native communities served were in remote rural areas where merchant options were limited. When tribal curfews were enacted to slow the spread of the virus, it became more difficult for some to access goods and services. Other respondents noted difficulty in affording basic needs (such as groceries and fuel) due to increased prices on those goods since the beginning of the pandemic. For some small business owners, they expressed their difficulty in accessing supplies (due to supply chain limitations) to try to build back their businesses.

Recipients shared intentions to use the funds for a variety of expenses:⁴

- Groceries (60%)
- Rental and mortgage payments (51%)
- Utilities (64%)
- Health care expenses (8%)
- Student loan payments (.9%)
- Burial expenses (2%)
- Internet service for children to participate in and complete school work (22%)

Some other reasons include:

⁴ The percentage of responses does not add up to 100 because recipients could select more than one option. Also, this data only includes responses from 509 individuals.

- Gasoline
- Medicine
- Child care
- Masks, gloves, extra cleaning supplies (COVID related)
- Home repairs (furnace, plumbing, etc.)
- Vehicle costs (payments, insurance, and repairs)
- Home office equipment to be able to work remotely

MEETING COMMUNITY NEED DURING A TIME OF CRISIS

While funds associated with this effort were limited to 1,060 Native families across the country, it is clear that the need extended to the wider Native community. Throughout the last fifteen months, recipients have inquired about ONAC's ability to serve more families in the community, as they knew they, too, were suffering. Because of the kinship ties among Native families and community members, and the extensive need for assistance, the people served did not use the funds only for their personal expenses – some were also taking care of other extended family members (e.g., having them move in with them due to job losses).

In the application for assistance, ONAC asked about personal, family, and community needs. Recipients of the funds expressed gratitude for the assistance. They also relayed a wide range of concerns for their community that included concerns about the high rate of job loss and subsequent financial impact on families, rising costs of basic needs, cultural concerns about not being able to support community members in traditional ways for those losing loved ones to COVID-19, wanting to keep their family and community members safe from the virus, desires to preserve their ways of life, and sadness about the tragic loss of elders and other community members who died from complications due to COVID-19.

As examples, recipients shared the following:

The main concern with my community is that families are experiencing the inability to provide needs for their families due to having lack of income from the COVID crisis. My hope is that this virus will be controlled so that my community is able to heal and allow families to go back to work to support their families.

Staying as healthy as possible with help of my tribal family; maintaining some semblance of normality in this time of pandemic. Keeping my small business alive with hope of prosperous return in the near future. Lack of contact personally with family is extremely devastating, especially for young members.

That my tribe will be healthy and we preserve our way of life and our language starting with our elders. To keep our elders and sickly safe from this pandemic. And to keep my family afloat during these times that we are facing, I hope to get back to normal hours at work and support my family that are grieving at this time. That is my hopes and concerns for my Tribe and family.

First and foremost, safety from illness and/or healthy recovery after illness. Getting financially stable to get into a home again and ability to pay rent. I hope the community can practice traditional events again at the longhouse for ceremony such as memorials, naming, burials, as these are vital to our Native Community and our spirituality. Be able to bring first foods out again and share the teachings and gatherings. Kids to return to school safely as parents return to full time work. Social events and activities for all to be enjoyed safely again.

I hope all our relations everywhere are faring well through these most difficult times. Especially since most of us have been personally touched by loss of loved ones. My concern is isolation during funerals, not being able to gather to support our families during funeral services. Our culture is important to carry on and is threatened by family groups not being allowed to gather at our cultural events.

My hope is that in the end we will all have a better understanding of needs in our tribal community and will be able to work together to accomplish goals and needs. My concern is for every person who has been personally touched by this pandemic, may it be physical health, mental health, or financially.

VALUE OF ASSISTANCE WITHOUT CONDITIONS

Recipients repeatedly asked about the expectations of the funding, including when and how much needed to be repaid, what they were allowed to use the funds for, and if they had to provide any documentation to prove their need. When they were assured that none of this information was required, that the funds were being provided with no conditions or follow-up, the response was pure surprise and gratitude. What a refreshing change – especially in a time of crisis – to be able to offer and receive assistance in a way that trusts in the fact that people know what they need and do not need to be monitored. From a programmatic standpoint, simplifying the eligibility process by not requiring documentation of need, allowed funds to be distributed more quickly. Also, by not tracking spending, or giving permission for custodial-

controlled expenses, ONAC was able to avoid administrative costs that would have reduced the number of families it could serve with the funds raised for this program.

INTEGRATION OF EMERGENCY FUNDS AND OTHER FINANCIAL SUPPORTS

Emergency cash assistance was just one way that ONAC supported Native families who were financially impacted by the pandemic. Since the economic shocks were so significant for many families, ONAC also offered a set of pre-existing and new wrap-around services, in collaboration with community partners, to further support them during this time. This set of optional services included:

1. **Connection to bank accounts.** As part of the application for emergency cash assistance, ONAC provided Bank On information for those who were not banked and may want to access a bank account as part of this program. Several of the community partners also provided support to open bank accounts for people they referred for cash assistance.
2. **Free financial coaching.** Optional financial coaching was offered to emergency cash recipients and included one-on-one credit counseling, homebuyer education, and basic money management. Individuals were notified of this option in their funding confirmation letters and provided with a link to an online registration form where they could register for and indicate they type of financial coaching they would like to receive. Services were provided by appointment, via phone, and teleconference. ONAC is the only Native-led entity providing financial coaching to Native families across the U.S., regardless of where they reside.⁵
3. **Emergency savings accounts.** In addition to the families who received emergency cash assistance, others participated in the ONAC emergency savings account program where they received a nest egg deposit of \$300 to start the account. These emergency savings accounts are flexible savings accounts to buffer tribal citizens in times of emergency, income fluctuation, or irregular expenses. ONAC has been funding such accounts since 2015.
4. **Access to tax preparation services and EITC.** Five of ONAC's community partners/VITA grant awardees provided either virtual and/or 'drive-

through' tax preparation or socially distanced services to ensure Native families were able to file their taxes in a safe manner and be able to claim their EITC and other refunds.

5. **Funding of Children's Savings Accounts (CSAs).** ONAC made available 70 of the CSAs it funded in 2021 to families who received emergency cash assistance. The CSA application link was sent by email, and families were offered first-come, first-served seed funding of \$100 per account into newly-opened 529 college savings plan accounts.

EMERGENCY CASH DISTRIBUTION: THOUGHTS AND LESSONS LEARNED

ONAC overcame a variety of challenges in its efforts to distribute emergency cash assistance. During the implementation of this program, ONAC program staff consulted with several tribal partners about the distribution processes they used with their own programs, as well as with a non-Native entity that also distributed emergency cash assistance and provided outreach for funds allocated for tribal citizens. Based on these conversations and experiences regarding delivery of cash payments, ONAC offers reflections and suggestions about distribution of such funds. For others considering cash distribution programs, including reparations or stewarded funds disbursements, these lessons learned may be useful:

- **Send out information about the program from a trusted source prior to funds distribution.** Many individuals who were referred for assistance were concerned about fraud and contacted ONAC to verify the legitimacy of the program. However, this concern was notably reduced when community partners notified individuals about their referral prior to ONAC sending out applications.
- **Provide funds in a variety of forms.** While ACH transfer is the fastest and safest way to distribute funds to individuals who need them, not all families in need have bank accounts or were willing to open one as a participant of this program. For this program, ONAC was able to provide funds via ACH transfer and check by mail. ONAC also explored a prepaid card option that could be utilized in the future in Native communities with no nearby financial institution.
- **Check cashing can be a challenge.** Some communities do not have readily available check cashing options if tribal citizens are not banked, able to access online banking check cashing services, or travel to an ATM or bank branch. In

⁵ See <https://bit.ly/ONACCoaching> for a flyer about the coaching.

some rural tribal communities, residents may have a food market that cashes checks. However, if payments were sent to a number of community members around the same time, those businesses would not be able to cash a large number of checks in high amounts (e.g. \$500) during a period of only a few days. In such situations, a prepaid card option could be utilized.

- **Application processes need to be provided online and by phone.** While a substantial number of applicants were able to navigate online application processes, there were also a significant number who did not have Internet access or smart devices to do so. In these cases, we offered application processes by phone, where an ONAC staff member took information from applicants and manually entered it into the application system. In some cases, ONAC partners helped by providing socially distanced assistance with the application. ONAC also offered an option for a referring partner to provide a list of names and addresses of those referred so that ONAC could mail checks to recipients without requiring them to complete an online application. This process worked well for those with no Internet, older devices, or less experience completing online applications.
- **Provide an option to speak with a program staff member if questions arise while completing an online application or inquiring about the payment.** If referred applicants had questions about the application or payments, they needed to be able to reach an ONAC staff member by phone. Chat features that inform applicants that they will be back in touch electronically in 24 to 48 hours do not work well for individuals impacted by the digital divide. These types of customer service models rely on the customer having regular access to the Internet, which was often not the case in rural communities.
- **Follow-up letters should be provided with payment.** Notification of award should be provided to recipients either by email or in hard copy with a check to confirm that they have been approved to receive funds, the timeline they can expect to receive it, and any additional information about the program that is needed.
- **Managing community expectations when there is limited funding.** Given the great need for assistance, if press releases are sent noting funding go to some, but not all families in a community, the tribe referring individuals and the entity administering the program can be inundated

with calls for more assistance, as well as frustrated community members wondering why they did not receive assistance. When there is limited funding, some discretion within communications can help small nonprofits carry out their programmatic tasks, without raising expectations from the community that cannot be met. There were instances when referring partners did not want to be named, as they did not want to receive calls from community members. In those cases, ONAC noted only general information about referring partners in the notification of award letters.

- **Protecting community members receiving assistance.** By not publicizing that financial assistance was going out in a particular tribal community and to whom, those receiving the assistance were less likely to be targeted by those interested in accessing funds that were not meant for them. In the online application, ONAC asked the recipient for the address where they wanted their checks mailed so that they could be on the lookout for the payments in the mail (especially if they share a P.O. Box with others). Discretion also helped protect recipients from predatory behaviors by those outside of the tribal community.
- **Providing cash assistance without conditions.** During times of crisis, including international pandemics, providing cash assistance without requiring participants to provide documentation of need or approvals for expenditures, reduces bureaucratic processes that are expensive to administer, and allows recipients to use the funds where most needed and in a timely manner. ONAC heard from tribal programs that offered earlier assistance during the pandemic that they would do things differently in the future to reduce barriers to individuals receiving assistance, especially when tribal citizens may have limited access to Internet service and difficulty sending and receiving documents verifying needs and expenditures.
- **Trust from community partners.** ONAC relied on community partners to provide referrals for this program. During this crisis situation, when personal financial information was shared for payment, and reputations were on the line that the assistance be legitimate and not predatory, ONAC's relationships with community partners was crucial. The referring partners leveraged their relationships with those they served by telling them that it was safe to trust ONAC to get them the funds. Mutual trust between ONAC and the community partners made this process work.

CONCLUSION

Despite the progress that ONAC has made in distributing assistance to Native families, emergency cash assistance in Native communities is still needed. ONAC is aware of the need for additional emergency cash assistance based on feedback from a number of ONAC's tribal partners, as well as from the Native families ONAC directly serves via its asset building programs. Prices on products and services have risen, yet household income continues to decline in many Native households due to unemployment and underemployment related to the ongoing pandemic.

It is our understanding that additional cash assistance is also needed due to the high COVID-related death rates in Native communities and how these deaths are impacting family balance sheets and care for Native children. COVID-19 has hit Native families hard. According to a National Institutes of Health study, "1 of every 168 American Indian/Alaska Native children . . . experienced orphanhood or death of caregivers. Compared to white children, American Indian/Alaska Native children were 4.5 times more likely to lose a parent or grandparent caregiver."⁶ A number of Native families, especially those caring for children, are struggling during this

⁶ On October 7, 2021, the National Institutes of Health published a news release entitled, "More than 140,000 U.S. children lost a primary or secondary caregiver due to the COVID-19 pandemic." <https://www.nih.gov/news-events/news-releases/more-140000-us-children-lost-primary-or-secondary-caregiver-due-covid-19-pandemic>. This news release referenced a study published in Pediatrics. <https://pediatrics.aappublications.org/content/early/2021/10/06/peds.2021-053760>.

ongoing pandemic and are in need of financial assistance.

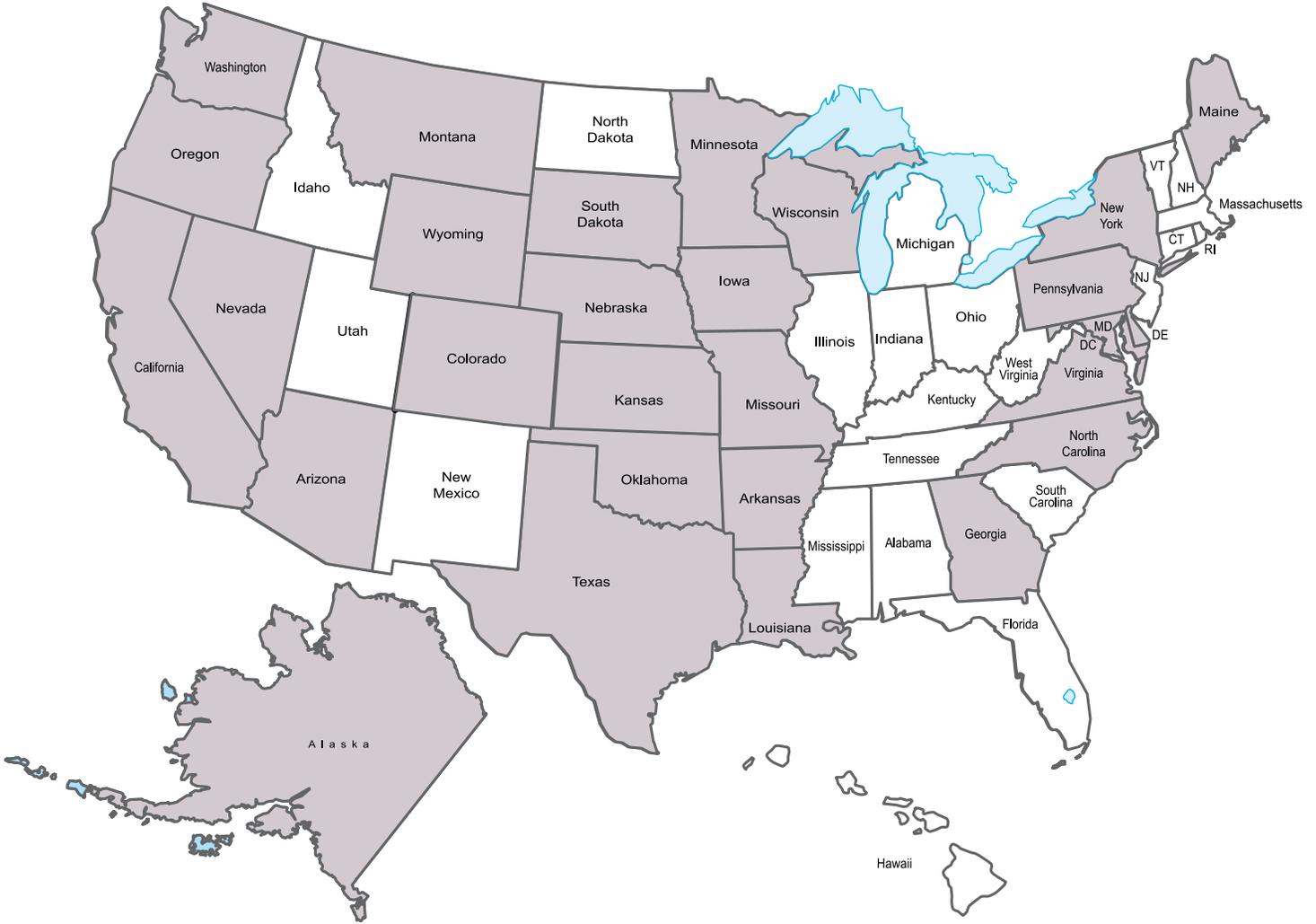
Related to needing financial support, Native individuals and families have demonstrated a growing need for financial coaching services. Requests for financial coaching have tripled in the past two months with some individuals noting that their savings are depleted and they need to have a plan to stretch their funds. A number of registrants are expressing interest in basic budgeting and credit counseling to support their personal efforts to manage household finances through the pandemic.

This case example of creating and implementing a direct cash distribution process highlights the importance of funding Native-led nonprofits that are most closely connected with their community members, as well as being aware of the areas where community need is greatest. ONAC was able to distribute cash assistance awards quickly due to the good lines of communication already established between community partners and program referrals. Another helpful factor was the program design, which allowed for online applications, one-on-one phone assistance with filling out the application, and the option to receive funds via an ACH transfer to a bank account or by a check by mail.

The level of flexibility built into this program allowed people who most needed the funds to receive them regardless of their banked or unbanked status. It is estimated that the economic impacts of the pandemic are going to affect Native families for, at least, the next several years. Therefore, it is more important than ever that there are easy-to-access systems of support to continue to meet their needs.



To help ONAC serve more Native families, please consider making a donation at <https://give.classy.org/COVIDONAC>.



**SHADED STATES INDICATE WHERE ONAC
EMERGENCY CASH ASSISTANCE PAYMENTS WERE DISTRIBUTED**

