

CALIFORNIA TRIBAL TANF PARTNERSHIP (CTTP)
TRIBAL TANF PLAN
For the period
July 1, 2021 through June 30, 2024

California Tribal TANF Partnership (CTTP) is a TANF program administered by the Robinson Rancheria Citizens Business Council (RRCBC), a grantee. CTTP provides cash assistance, welfare to work and family wellness related services to Native American families with children, or those expecting children, who are in need of temporary and appropriate cash assistance and supportive services.

GOALS

CTTP will provide culturally-rooted services to eligible parent(s) and/or caregiver Participants with job preparation, work related assistance and other supportive services (e.g., cultural tools and skills training in the use of modern technology) to empower them to eventually leave the CTTP program, become self-sufficient and provide their families with an improved quality of life. It is the intent of the CTTP program to provide prompt assistance with particular concern for the prosperity of Native American family life.

The CTTP program will measure progress and achievement of TANF program outcomes by collecting data each month that will meet the quarterly reporting requirements as outlined in 45 CFR §286.255. This is achieved by data extraction, review and analysis based on, but not limited to, active caseloads, work participation rates, support service expenditures, self-sufficiency rates and case closures. Annual audits include, not only review of fiscal compliance, but also overall CTTP program compliance with State and Federal regulations set forth by the grantors. Recommendations for improvement are presented to CTTP by which alterations are made.

DESIGNATED AGENCY

The RRCBC has designated CTTP as a department of the RRCBC. The CTTP Executive Director reports directly to the RRCBC. The RRCBC is responsible for the policy making and overall direction of the CTTP Program.

The main Administration office is located near the Robinson Rancheria in Lakeport, California. County and regional service offices are located near other Tribal partner rancherias/reservations in accessible locations so as to facilitate the provision of services to Native American population centers.

PROGRAM OVERSIGHT AND FISCAL MANAGEMENT

The Tribal Chairperson is responsible for assuring the CTTT Executive Team manages the operations of the CTTT program and that the direction of the CTTT program is on target with the policies and vision expressed by the RRCBC. The five (5) members of the RRCBC assist the Tribal Chairperson.

The CTTT Executive Director leads an Executive Team that carries out the administrative, program service, fiscal, information management and reporting functions. The RRCBC Chief Financial Officer (CFO) and CTTT Finance Director develop annual budgets, monitor financial controls and oversee the maintenance of all accounting systems. The CFO oversees the CTTT financial operations and the CTTT program's monthly management reports that track the performance of CTTT's fiscal operations.

At the present time, the above team and RRCBC jointly oversee the Tribal operations and CTTT, which during 2021 includes the administration of five (5) grants and an annual budget of approximately \$16 million, including approximately \$14.8 million Tribal TANF Family Assistance Grant (TFAG).

FISCAL ACCOUNTABILITY

For every year in which Robinson Rancheria receives or expends TANF funds, RRCBC will comply with the fiscal accountability provisions of Section 5(f) (1) of the Indian Self-Determination and Education Assistance Act, (U.S.C.) 450c (f) (1), relating to the submission of a single agency audit as required by chapter 75 of Title 31, U.S. Code.

PERIOD COVERED BY THE PLAN

This CTTT program plan covers the continued operation of the CTTT program for a three-year period, beginning July 1, 2021, through June 30, 2024.

SERVICE POPULATION

CTTT will provide TANF assistance and supportive services to eligible members of the Robinson Rancheria Band of Pomo Indians, in addition to members of the Tribes outlined in Table 1 and all Native Americans who are members of Federally recognized Tribes, enrolled Federally recognized Alaskan Native or California Judgement Roll Tribes, their families and their descendants who reside in the approved on-reservation and off-reservation service areas outlined in this plan. At least one child of the family must prove tribal membership or that they are a descendant of a Federally Recognized Native American Tribe or a descendant of a person(s) listed on the California Judgement Roll.

TABLE 1

**CTTP
Tribal Partner Members of Approved Service Population**

Approved Tribe:	County:
1. Bear River Band of Rohnerville Rancheria	Humboldt
2. Big Lagoon Rancheria	Humboldt
3. California Valley Miwok Tribe	San Joaquin
4. Kletsel Dehe Wintun Nation	Colusa
5. Elem Indian Colony	Lake
6. Elk Valley Rancheria (off-reservation)	Del Norte
7. Fort Bidwell Band of Paiute Indians	Modoc
8. Greenville Rancheria	Plumas/Shasta/Tehama
9. Grindstone Indian Rancheria	Glenn
10. Habematolel Band of Pomo Indians	Lake
11. Mechoopda Indians of Chico Rancheria	Butte
12. Middletown Rancheria	Lake
13. Robinson Rancheria of Pomo Indians	Lake
14. Susanville Indian Rancheria	Lassen
15. Cher-Ae-Heights Indian Community of the Trinidad Rancheria	Humboldt
16. Wiyot Tribe (Table Bluff Rancheria)	Humboldt

REVIEW and COMMENT on the CTTT PROGRAM PLAN

RRCBC holds regularly scheduled Tribal Partner meetings that have been attended by current and prospective Tribal Partners to allow input and comment on the CTTT program; these meetings have been held since program services began in July 2003. These meetings are open to the Tribal member delegates of the Partner tribes. Agendas for the meetings include discussions about Tribal TANF services in general and the specific services provided by CTTT.

The CTTT TFAP was made available for viewing and comment on March 15, 2021, which was 45 calendar days prior to submission.

The staff and management of CTTT consider all input and make needed changes in all areas of program services, keeping in mind the dual objectives to meet the requirements and limitations set forth by federal and state regulations and policy and to assist Native American families to achieve self-sufficiency.

SERVICE AREA

Table 2 presents CTTTP’s current and continuing service area counties, as well as a description of Native American families eligible for CTTTP services and Tribal members that will be excluded from receiving CTTTP services

Table 2 CTTTP Service Areas and Service Populations For the Period 7/1/2021 through 6/30/2024 By County and Reservation/Rancheria (With Notations of Tribal Members Excluded from CTTTP Services)	
County	Reservations & Service Populations
1. Amador	All eligible members of the Lone Band of Miwok Indians, all eligible members of Federally Recognized Tribes, enrolled Federally recognized Alaskan Native or California Judgement Roll Tribes and their families and descendants who reside in the off-reservation areas of Amador County. (<u><i>Not to be serviced by CTTTP: members of Buena Vista and Jackson Rancheria living on their reservations.</i></u>)
2. Butte	All eligible members of the Mechoopda Indian Tribe of Chico Rancheria and all eligible members of Federally Recognized Tribes, enrolled Federally recognized Alaskan Native or California Judgement Roll Tribes and their families and descendants who reside in the off-reservation areas of Butte County and on the Chico Rancheria (<u><i>Not to be serviced by CTTTP: members of the Berry Creek Rancheria, Mooretown Rancheria and any Indian families residing on the Enterprise Rancheria/Reservation.</i></u>)
3. Colusa	All eligible members of the Kletsel Dehe Wintun Nation and all eligible members of Federally Recognized Tribes, enrolled Federally recognized Alaskan Native or California Judgement Roll Tribes and their families and descendants who reside in the off-reservation areas of Colusa County and the Kletsel Dehe Wintun Nation Rancheria. (<u><i>Not to be serviced by CTTTP: members living on the Cachil Dehe Band of Wintun Indians Rancheria/Reservation.</i></u>)
4. Del Norte	All eligible members of Federally Recognized Tribes, enrolled Federally recognized Alaskan Native or California Judgement Roll Tribes and their families and descendants who reside in the off-reservation

	<p>areas of Del Norte County. <i>(Not to be serviced by CTPP: Members of the Elk Valley Tribe living on the Reservation, Members of Tolowa Dee-Ni Nation, Resighini Rancheria Members and Yurok Tribal Members living on or off of their Reservations in the county.)</i></p>
<p>5. Glenn</p>	<p>All eligible members of Grindstone Rancheria, and all eligible member of Federally Recognized Tribes, enrolled Federally recognized Alaskan Native or California Judgement Roll Tribes and their families and descendants who reside in the off-reservation areas of Glenn County and on the Grindstone Rancheria.</p>
<p>6. Humboldt</p>	<p>All eligible members of Big Lagoon Rancheria and all eligible members of Federally Recognized Tribes, enrolled Federally recognized Alaskan Native or California Judgement Roll Tribes and their descendants who reside on the Big Lagoon Rancheria, all eligible members of the Bear River Band of Rohnerville Rancheria, and all eligible members of Federally Recognized Tribes and their descendants who reside on the Bear River Band of Rohnerville Rancheria, all eligible members of the Wiyot Tribe (Table Bluff Rancheria) and their descendants and members of other Federally Recognized Tribes who reside on the Wiyot Tribe (Table Bluff Rancheria), and all eligible members of Cher-Ae-Heights Indian Community of the Trinidad Rancheria and their descendants, and all eligible members of Federally Recognized Tribes and their families and descendants who reside in the off-reservation areas of Humboldt County, Alaskan Natives, and descendants of those names on the California Judgment Roll and their families. <u>(Not to be served by CTPP: Blue Lake and Hoopa Valley members residing on their reservations within the County and any person residing within the interior of the Yurok Rancheria and Yurok tribal members residing anywhere in Humboldt County — except those residing within the interior boundaries of Big Lagoon, Bear River Band of Rohnerville Rancheria, Cher-Ae-Heights Indian Community of the Trinidad Rancheria and the Wiyot Tribe (Table Bluff Rancheria). Any Karuk tribal members residing in the northeastern part of Humboldt County from</u></p>

	State Highway 96, mile post HUM28.6, north to the Siskiyou County line. Any person residing within the interior boundaries of any non-CTTP Partner reservation or rancheria. Any member of the Cahto Tribe residing in the county. Any member of Tolowa Dee-Ni Nation living on or off their Reservations in the County.)
7. Lake	All eligible members of Robinson Rancheria of Pomo Indians, Habematolel Upper Lake Rancheria, Elem Indian Colony Band of Pomo Indians of the Sulphur Bank Rancheria, Middletown Rancheria of the Pomo Indians of California and all eligible members of Federally Recognized Tribes, enrolled Federally recognized Alaskan Native or California Judgement Roll Tribes and their families and descendants who reside in the off-reservation areas of Lake County and on the Robinson, Upper Lake, Sulphur Band and Middletown Rancherias. <i>(Not to be served by CTPP: Members of the Big Valley Rancheria, Yocha Dehe Wintun Nation and Scott's Valley Rancheria living on or off their reservation and Cahto Tribe residing in the county, Sherwood Valley Tribal members, Round Valley Tribal members and Pinoleville Tribal members).</i>
8. Lassen	All eligible members of the Susanville Indian Rancheria and all members of Federally Recognized Tribes, enrolled Federally recognized Alaskan Native or California Judgement Roll Tribes and their families and descendants who reside in the off-reservation areas of Lassen County and on the Susanville Indian Rancheria.
9. Modoc	All eligible members of the Fort Bidwell Indian Community and all eligible members of Federally Recognized Tribes, enrolled Federally recognized Alaskan Native or California Judgement Roll Tribes and their families and descendants who reside in the off-reservation areas of Modoc County and on the Fort Bidwell Indian Community Reservation. <i>(Not to be serviced by CTPP: Any Lookout and XL (Pit River) Tribal members off-reservation, Alturas Rancheria Tribal members, anyone residing on Cedarville Rancheria and Likely (Pit River) Tribal members living on their reservations).</i>
10. Plumas	All eligible members of the Greenville Rancheria and all eligible members of Federally Recognized

	Tribes, enrolled Federally recognized Alaskan Native or California Judgement Roll Tribes and their families and descendants who reside in the off-reservation areas of Plumas County and on the Greenville Rancheria.
11. San Joaquin	77.5% of all eligible members of Federally Recognized Tribes, the California Judgement Roll, and their families, enrolled Federally recognized Alaskan Native or California Judgement Roll Tribes and descendants who reside in the off-reservation areas of San Joaquin County (<i>Note: State of California has agreed to a split of the county service area – CTPP is awarded 77.5% of the Indian population. WNT is awarded 22.5% of the Indian population</i>)
12. Shasta	All eligible members of Federally Recognized Tribes, enrolled Federally recognized Alaskan Native or California Judgement Roll Tribes and members of the California Judgement Roll and their families and descendants who reside in the off-reservation areas of Shasta County. (<i>Not to be serviced by CTPP: all Native Americans residing within the boundaries of the Redding Rancheria and their tribal members residing in the county; other exclusions are tribal members residing on the Big Bend, Montgomery Creek, anyone residing on Pit River Tribe of California reservation/rancheria and the Pit River/Ajumavi Atsugewi Nation</i>)
13. Solano	All eligible members of Federally Recognized Tribes, enrolled Federally recognized Alaskan Native or California Judgement Roll Tribes and their families and descendants who reside in the off-reservation areas of Solano County.
14. Sutter	All eligible members of Federally Recognized Tribes, enrolled Federally recognized Alaskan Native or California Judgement Roll Tribes and their families and descendants who reside in the off-reservation areas of Sutter County.
15. Trinity	All eligible members of Federally Recognized Tribes, enrolled Federally recognized Alaskan Native or California Judgement Roll Tribes and their families and descendants who reside in the off-reservation areas of Trinity County (<i>Excluding Tribal members of the Redding Rancheria. and Round Valley Rancheria</i>).

16. Tehama	All eligible members of the Greenville Rancheria and all eligible members of Federally Recognized Tribes, enrolled Federally recognized Alaskan Native or California Judgement Roll Tribes and their families and descendants who reside in the off-reservation areas of Tehama County and on the Greenville Rancheria, excluding members of Paskenta Band of Nomlaki Indians residing on their reservation.
17. Yuba	All eligible members of Federally Recognized Tribes, enrolled Federally recognized Alaskan Native or California Judgement Roll Tribes and their families and descendants who reside in the off-reservation areas of Yuba County.

ELIGIBLE NATIVE AMERICAN FAMILY DEFINITION

The term Native American shall be defined as an individual that is a member of a Federally Recognized Tribe/Alaskan Native and their descendants, including the California Judgement Roll. The CTTT Program defines an eligible Native American family as one comprised of all biological children, stepchildren, adopted children or a relative child (including non-Native Americans), under the age of 18 living with an Eligible Adult (defined as an adult supervising the family). At least one child of every family must be Native American for purposes of cash assistance.

NEEDY FAMILIES

The CTTT Program defines needy families as those with total family income equal or less than 200% of the Federal Poverty Guidelines. Families meeting this income and other asset limitation guidelines will be eligible to receive cash assistance and supportive services.

NON-NEEDY CAREGIVER RELATIVE FAMILIES

All eligible Native American children living with a Non-Needy Caregiver Relative (non-foster care) must be related to the Caregiver by blood (no limit to the degree of relationship) or by tribal custom and/or tradition.

ELIGIBILITY for CTTT TANF ASSISTANCE and SERVICES as RELATED to the PURPOSES of TANF

Eligibility for CTTT TANF assistance and services is as established in RRCBC’s approved TANF Plan. Only needy families, as defined in the TANF Plan, may receive:

1. Any form of Federal or State MOE funded assistance (as defined in 45 CFR 286.10).

2. Any benefits or services pursuant to TANF Purposes 1 or 2, regardless of the purpose served.

“Needy” means financially deprived, according to income and resource (if applicable) criteria established in the TANF Plan by RRCBC to receive the particular “assistance” benefit or service.

RRCBC may use segregated Federal TANF funds to provide services (and related activities) that do not constitute ‘assistance’ (as defined in 45 CFR 286.10) to individuals and families members who are not financially deprived but who need the kind of service that meets TANF Purposes 3 and 4. Objective criteria will be established for participation in these programs.

Unless the State instructs otherwise, RRCBC may also use MOE funds to pay for non-assistance pro-family activities for individuals of family members, regardless of financial assistance.

OBJECTIVE CRITERIA FOR PURPOSES 3 & 4 ACTIVITIES

The following criteria will be utilized to determine eligibility for individuals and families who wish to participate in activities under the Culture and Wellness program, Purposes 3 & 4; at least one of these factors must be present for participation in the program activities and/or services:

- Living in High Rate Crime Area
- Single Parent with Children
- Parents are not high school graduates
- Living with a Caregiver Relative
- Living on or near a reservation or rancheria lands
- Previous involvement in Foster Care System
- Previous involvement in Juvenile Justice System
- Living in underperforming school districts
- A member of a low-income family
- Having low academic skills
- Past/Present homelessness
- Substance use/mental health experience
- A Pregnant/Parenting Teen
- Experienced Domestic Violence

CTTP works with each of the communities it serves to provide family wellness services and activities that support culturally-based pregnancy prevention, family formation and family strengthening. By supporting families who are at-risk (as described in the eligibility criteria on page 8), CTTP works to meet TANF purposes 3 & 4. Pro-family wellness program services and activities are conducted in various group arrangements and include, but are not limited to:

- Activities that promote and teach tribal culture and tradition
- Pro-family, two-generation engagement activities
- Activities that promote and support wellness, education, career, and life-skills development
- Activities that promote and support physical and mental well-being
- Activities that promote and support executive function improvement
- Activities that promote and support responsible parenting, improved relationship skills such as communication and positive life-style choices
- Activities that promote and support family reunification, two parent formation and absent parent engagement
- Activities that promote and support the prevention of out-of-wedlock pregnancies, teen pregnancy prevention, sex education and healthy family planning services
- Activities that promote and support the transition of youth successfully moving towards adult self-sufficiency

Activities that promote and support the post-exit data management and success tracking. These activities are all conducted within the context of pregnancy prevention, family formation and family strengthening as related to purposes 3 & 4.

CHILD SUPPORT ENFORCEMENT

The CTTT program does not require cooperation with child support as a condition of eligibility for TANF.

ELIGIBLE NATIVE AMERICAN FAMILIES MOVING into the APPROVED SERVICE AREA

Eligible Native American families moving into the approved service area shall receive the same level of services as all other existing eligible families, as long as they meet all of the CTTT program requirements.

NON-DUPLICATION of SERVICES

All CTTT program applicants will be required to sign the CTTT program application, certifying that family members are not receiving assistance from another Tribal, State or County TANF program. Information on services being provided by the CTTT program to a particular Participant will be disclosed to other Tribal, State or County TANF programs to verify non-duplication of services, if the CTTT program Participant has recently moved to another TANF jurisdiction. Vital information for CTTT program Applicants/Participants may be shared with other Tribal, State or County TANF programs or the county welfare staff to avoid duplication of services.

The CTTT Compliance Investigators are responsible for conducting intensive investigations surrounding allegations of intentional program violations (IPV), unintentional program violations (UPV) or fraud, including collecting and evaluating evidence, determining violations of welfare laws and/or CTTT program regulations, preparing outcome for penalties, sanctions or requests for criminal complaints, depending on findings.

Providing TANF Benefits to Tribal Members Residing on the Reservation or in the Exclusive BIA Designated Service Area of another Tribe: A tribe with an approved Tribal TANF program may provide TANF benefits to its own members regardless of where those members reside. See the section on DUAL ELIGIBILITY for clarification on the difference between providing and serving. If a tribe only wants to provide benefits to its members who reside in another tribe's BIA designated service area or on another tribe's reservation, it may do so without obtaining concurrence. However, the tribe will not receive additional funding for providing benefits to those members and is only able to provide benefits and services from within their own approved TANF service area unless they have written permission from the other tribe. Again, all Tribal TANF requirements apply, including work participation. (PI-2018-02)

CONFIDENTIALITY STATEMENT

The CTTT program requires that all RRCBC, CTTT employees, service contractors and consultants sign a statement that they understand that all current/past Participants and applicants have a right to complete and full confidentiality relative to any matters related to their participation in CTTT program. Said agreement also states that any violations of this policy will/may result in immediate termination of their employment or service contract with the CTTT program.

FINANCIAL NEED and INCOME

All needy adult earned income (except the first \$600 of earnings plus 50% percent of each additional dollar of earnings) will be counted as net countable income in determining the TANF grant amount.

All needy adult income will be counted as defined in the CTTT Policies and Procedures when determining the grant amount.

The CTTT program will exclude as income all Native American judgment funds and other disbursements that are excluded under federal law.

Temporary employment income with the Census Bureau will not be counted in eligibility.

RESOURCES and ASSETS

The CTTTP program will exclude from the resource/asset limit one operable vehicle for each adult Participant and an additional operable motor vehicle per licensed minor in the assistance unit who is attending school and/or employed. The resource limit of all other available assets is \$10,000 (excluding Cal Fresh and other State food aid programs, as distributed under the regulations for the Federal food stamp program). All other assets such as real property, mineral rights, stocks, etc., will be considered as available assets (with the exception of their primary residence land and/or a home located on a Native American reservation/rancheria).

Any assets beyond these limits shall be considered available to the needy family, including equity in other vehicles. Exceptions can be granted in special circumstances (e.g., burial accounts, inoperable vehicles or other assets that are held in trust or have no value). Cultural/Religious articles such as jewelry; prompt books or Bibles; crucifixes; decorative objects of art such as paintings, statuary, blankets, masks, carvings, etc. will also be exempt.

CASH ASSISTANCE

CTTP will provide eligible needy families with monthly cash assistance as defined in 45 CFR 286.10 in the form of a voucher, check or electronic benefit for shelter, clothing and other basic needs. This also includes childcare and transportation supportive service assistance for those recipients who are participating in work activities but are not yet employed.

NON-RECURRENT SHORT TERM BENEFITS

Non-recurring emergency assistance may be provided to eligible needy families to meet extraordinary needs that may arise from an emergency, crisis situation or an episode of need beyond those intended to be covered by regular monthly assistance and/or supportive services. As provided through 45 CFR 286.10(b) (1), non-recurring short-term benefits must meet the following criteria:

1. Designed to deal with a specific crisis situation or episode of need
2. Are not intended to meet recurrent or ongoing needs
3. Not to exceed 4 months from the start of the crisis situation

In addition, the total family income must be equal or less than 300% of the Federal Poverty Guidelines.

SUPPORTIVE SERVICES

CTTP may provide eligible needy TANF program Participant families with the following support services as funds are available:

1. CTTTP will provide Participants with justified job-related or educational costs when the Participant is in compliance and in good standing, as evidenced by participation in all required testing, training and other CTTTP program requirements. All Participants requesting these services must show evidence of need that is:
 - a. Specific and identified in the Participant's plan for self-sufficiency or is identified by CTTTP case management as a barrier to the Participant's employment.
 - b. Directly related to an approved plan or employment opportunity.
2. Adult educational services designed to increase economic self-sufficiency, assist in job training, job related search and job placement activities.
3. Work participation-related expenses to include, but not limited to: books, uniforms, tuition, educational supplies, childcare, clothing allowances and transportation expenses when there is no other source of funding.
4. Job development.
5. Work experience Program (WEX). CTTTP offers a work experience program for eligible needy TANF Participants who have completed the Career Services course provided by CTTTP.
6. Youth Employment Program (YEP). CTTTP offers a subsidized work experience program for needy TANF youth Participants whose families are current TANF Participants and income does not exceed 200% of the Federal Poverty Guidelines. Also eligible are any youth on a Non-Needy Caregiver Relative case or youth on a case who are living in the home of a parent(s) receiving SSI/SSP. Youth Participants must be: between the ages of 14 – 17, an 18 year-old still attending high school (or equivalent), or an 18 year-old high school graduate. Eligibility for 18 year-old graduates will end on the last day in the month of graduation. The YEP consists of job readiness training workshops that precede a six-week summer subsidized job placement. The subsidy rate may be stipend participation based or 100% of wages and fringe benefits.
7. Domestic violence related services.
8. Emergency shelter and emergency housing assistance.
9. Teen pregnancy prevention and education.
10. Culturally relevant support services in the context of removing barriers to employment, training, family formation and/or maintenance.

11. Childcare and transportation costs for participants who are under income and employed: and for transitional participants who are engaged in approved work activities.
12. Linkage to medical and non-medical substance use disorder services and mental health services intended to assist the Participant's barriers to employment and self-sufficiency, after all other sources of available medical funding for these purposes, such as Indian Health Services, have been depleted.
13. Provide services and/or work with Tribal or county child welfare programs to encourage child unification with the child's parent(s) or extended family members.
14. Provide payment for a marriage license and preparation services as an incentive to become a two-parent family. This will be considered a special marriage bonus and will be exempt in determining the family's available resource limit. Pre/Post marital counseling services, not to exceed 6 months. Classes, workshops, or ceremonial preparation (i.e. supply gathering, traditional education, elder-inclusive activities). \$1,000 lifetime limit for all two-parent formation services. Parenting and/or marriage counseling referrals.
15. Provide educational or training activities (non-cash assistance) to a non-custodial parent of an eligible Tribal TANF family for the purposes of promoting TANF purposes 3 and 4 in support of healthy marriage promotion and activities promoting responsible motherhood and fatherhood.
16. Vocational training referrals.
17. Support for the development of a small business, as directly related to a Participant's approved self-sufficiency plan, for training and/or loan packaging services by approved small/micro-business development assistance programs. Support does not include business finance.
18. Incentive awards for educational achievements by Tribal TANF participants, youth and adults per the following policy (funding permitting):
 - a. High School Diploma / High School Equivalency Certificate Incentive
 - i. \$500 upon successful completion of High School diploma or equivalency
 - ii. High school graduates or equivalent may be authorized for up to \$200 to purchase a graduation package. Graduation package may include: cap, gown, tassel, pictures and invitations. This incentive may also be utilized for graduation registration costs

- b. Adult Education Incentive (Limit one per category per lifetime)
 - i. Up to \$500 upon completion of Vocational Training Program
 - ii. \$1000 upon completion of an Associate degree from an accredited institution
 - iii. \$1500 upon completion of a Bachelor's degree from an accredited institution
 - iv. \$2000 upon completion of a Graduate degree from an accredited institution
- c. Children & Youth Educational Incentives (within 30 calendar days of receipt of report cards)
 - i. Grades K-5
 - 1. \$50 for a 'A' (3.4 - 4.0) grade point average or equivalent
 - 2. \$40 for a 'B' (2.70 -3.39) grade point average or equivalent
 - 3. \$30 for a 'C' (2.0 – 2.69) grade point average or equivalent
 - ii. Grades 6-12
 - 1. \$100 for a 'A' (3.4 - 4.0) grade point average
 - 2. \$75 for a 'B' (2.70 -3.39) grade point average
 - 3. \$50 for a 'C' (2.0 – 2.69) grade point average
 - iii. Youth Extra-curricular
 - 1. \$500 per child per calendar year extra-curricular allowance that includes, but is not limited to participation in:
 - a. After school or summer sport programs
 - b. Driving school
 - c. School trips
 - d. Special classes (i.e.: dance, music, etc.)
 - e. Youth organization activities (i.e.: AYSO, Pop Warner football, little league, Boy/Girl Scouts, etc.)

19. Youth Education Services: May provide educational assistance for costs such as school supplies, tutoring and test preparation.

20. Clothing Allowance: Clothing allowances for youth and adults may be provided on an annual basis.

21. Home safety funds upon completion of a home visit. Items may include, but are not limited to: smoke/carbon monoxide detectors and child safety plugs.

22. Basic home needs upon completion of a home visit may include child bed/bedding and/or other home furniture.

CHILDCARE

CTTP provides childcare assistance for working families and Participants who are employed, attending school, training or other approved activities as identified in their self-sufficiency plan. All childcare rates are in accordance with state childcare guidelines for Childcare centers, Family childcare homes and TrustLined/Relative. CTTP may use state child care guidelines as a baseline and increase the limits up to 15%.

EXTENDED CASE MANAGEMENT (Transitional Services)

CTTP may extend case management to a family that has their case closed due to employment related reasons, and their increased income excludes them from continuing to receive cash assistance. For example, a newly employed head-of-household may continue support services to retain their paid job. Transitional services may provide support for this, however, will not exceed 12 months in a lifetime. These transitional services include, but are not limited to, childcare and mileage.

COORDINATION with OTHER PROGRAMS

The CTTP program will coordinate with other Tribal service providers; other welfare related agencies such as public, private or faith-based agencies under contract; education providers; non-profits and employers to provide necessary support services to assist Participants to become self-sufficient.

It is recognized that each county has specific partners/providers. CTTP will continue to attend and/or facilitate meetings/discussions with providers to continue to meet the needs of Participants.

CTTP has partnered with Tribes, counties, community action agencies and community round tables to discuss and create solutions to meet the needs of our Participants. An example of agencies that attend these meetings are: County social services, Tribal health, K-12 schools, behavioral health, housing, law enforcement, fire protection, etc.

EMPLOYMENT OPPORTUNITIES

CTTP currently provides Tribal TANF services to counties that are concentrated in the northern and north-central part of the state. CTTP's existing service areas had an unemployment rate in December 2020 that exceeded the 8.8 unemployment rate for the State of California in 10 out of 17 counties.

Utilizing Tribal, state, regional and local labor market information, CTTTP will develop and design programs and services with appropriate private and public employers to meet the labor market needs of Participants. Recognizing the uniqueness of each county and the resources available, CTTTP will customize services and programs to meet the Participants' employment, training and education needs.

Tribal populations are dispersed widely on reservation lands, and there are great distances between the CTTTP Tribal Partners' reservation locations. Transportation to, from, between and across CTTTP's rural service areas is difficult. Many reservations rely on dirt roads; the rough terrain causes greater than average wear and tear on personal vehicles, leaving many tribal members no other option but to walk to the nearest transportation site, bus station or informal 'pick-up area' as their primary means of transport to work, appointments, etc... This physical isolation is further exacerbated by frequent bad weather and lack of telephone service, internet and data to many homes in the area.

Job opportunities are scarce in rural communities, and the CTTTP service areas' economic basis concentrated in low-wage industries such as tourism, recreation and agriculture. Many CTTTP Participants lack job skills and are either unprepared for, or unable to access training or education with which to enhance their competitive position for, scarce employment opportunities. Due to a lack of education, job skills and job experience, high rates of household poverty and exceptionally high rates of unemployment and cultural resistance, the Native American population in the CTTTP service area finds itself in the least advantageous position to compete for scarce jobs in the region.

Native American economic development projects are the primary source of jobs for Native Americans in the Northern California CTTTP service area. Indian gaming casinos exist on some of the reservations. Employment opportunities at these casinos are not guaranteed for Native Americans because of commonly shared employment barriers; lack of job experience, lack of technical skills, and the need to pass background checks prior to employment. Indian Health Clinics are also located in various rancherias throughout the CTTTP service area and provide a limited number of skilled healthcare, secretarial and administrative positions. While some TANF Participants may succeed in obtaining employment in the clinics, the vast majority of Tribal TANF Participants are not qualified for these positions.

By creating service academies with employers, CTTTP will work with the outside agencies to train Participants with the skills needed for those individual careers.

The majorities of the areas that CTTTP serves are located near small towns that offer very limited job opportunities for Native Americans. The jobs that are available are often with owner-operated small businesses, many of which are unwilling to hire native people because of historic prejudice against the Native American community.

CTTP recognizes the differences between rural and urban employment opportunities. For example, CTTP has developed the Individual Job Readiness Program to meet the unique needs of Participants in rural areas, using local providers and employers and working one-on-one with participants to prepare them for employment. Conversely, in urban counties, CTTP has found success in group focused activities relevant to the employment specific to those urban counties.

Table 3 Unemployment Rates CTTP Existing & Planned Service Areas December 2020			
County	CTTP Region	Unemployment Rate Percent %	Primary Economic Base
California		8.8	
1. Amador	III	8.4	Government; Education and Health Services; Trade, Transportation and Utilities; and Leisure and hospitality.
2. Butte	II	8.2	Trade, transportation and utilities.
3. Colusa	III	15.5	Service Providing; Trade, transportation and utilities, Agriculture; and Government.
4. Del Norte	I	9.2	Service providing; Education and health services; and Government.
5. Glenn	II	7.7	Agriculture.
6. Humboldt	I	8.8	Trade, transportation and utilities; Education and health services; and Government.
7. Lake	II	9.0	Tourism and recreation.
8. Lassen	II	7.1	Mountainous region, historical; and landmark attractions.
9. Modoc	I	8.9	Service Providing; Educational and health services; and Government.
10. Plumas	II	10.7	Mountainous region.
11. Shasta	I	8.0	Trade, transportation and utilities; Education and health services; and Government.
12. San Joaquin	III	10.6	Trade, transportation and utilities; Government; Education and health services; Professional and business services; and Manufacturing.
13. Solano	III	8.8	Education and Health Services; Trade, transportation and utilities;

			Government; Mining, logging and construction; and Leisure and hospitality.
14. Sutter	III	10.9	Government; Education and health services; Trade, transportation and utilities; Leisure and hospitality; and Mining and logging and construction.
15. Tehama	III	6.8	Service/private service providing; Government; Educational and health services; and Trade, transportation and utilities.
16. Trinity	I	8.4	Trade, transportation and utilities; Education and health services; and Government.
17. Yuba	III	10.4	Government; Education and health services; Trade, transportation and utilities; Leisure and hospitality; and Mining, logging and construction.
18. ALL CTTT COUNTIES		9.26 average	
Reference: 1. CA-EDD; Labor Market Information Division; 11-20 and 12-20 – County Profile-Unemployment and Labor Force (not seasonally adjusted)			

WORK ACTIVITIES

The following is a list of approved work activities in which TANF Participants may participate to fulfill CTTT's work participation requirements. This list is not exhaustive, and other acceptable work activities may be approved on a case-by-case basis.

Many TANF participants live in remote areas with limited transportation and/or difficult road conditions. Therefore, all activities may include reasonable travel time, as defined by program policy, (not to exceed 60 minutes one way) to and from authorized Tribal TANF training and/or work sites.

- A. Unsubsidized employment
- B. Subsidized private/public sector employment
- C. Job sampling/work experience (paid or volunteer)
- D. On the job training
- E. Job search/job readiness training and basic skill development per 45 CFR 286.105.
- F. Community Services: i.e.: structured community service projects including, but not limited to useful community purposes in fields of health, social services, environmental protection, education, community development and recreation. Specifically, examples

of projects are: parents volunteering at school and/or childcare facility, preparing meals for the needy or the community and community clean-up activities.

- G. Satisfactory attendance in secondary school or in a course of study leading to a high school equivalency certification in the case of a Participant who has not completed secondary school or received such a certificate.
- H. Post-secondary or vocational education training
- I. Job skills directly related to employment
- J. Education directly related to employment
- K. Provision of childcare service to any individual who is participating in a community services program
- L. Domestic violence, substance use and mental health counseling and education related to rehabilitation (non-medical)
- M. Life skills training and education (i.e.: parenting skills, health and safety skills, financial skills, etc.)
- N. Culturally relevant work activities that result in the attainment of skills and/or knowledge that support self-sufficiency or that result in the fulfillment of basic needs, such as attainment of food, shelter, etc.
- O. Vocational Rehabilitation (assessment for academic competency; mental and physical health)
- P. Work experience

MANDATORY WORK REQUIREMENTS

The following Tribal Work Requirements have been informed by the impact of the persistent and severe worldwide economic recession on the labor market Participants in the seventeen (17) CTTTP service area counties. By referring to Table 3, which provides the December 2020 unemployment rates experienced by the California and CTTTP service areas, it is clearly evident CTTTP's existing service areas had an unemployment rate that exceeded the 8.8 unemployment rate for the State of California in 10 out of 17 counties.

What is not shown in Table 3 is the rate of unemployment suffered by Native Americans. CA-EDD does not report unemployment rates for the Native American segment of the labor market. The California Department of Social Services provides Native American specific unemployment rates for rancherias/reservations that experience unemployment rates in excess of 50% for the purpose of exempting Tribal TANF participants in accordance with 45 CFR 286-115 (d) (3). Table 4 presents selected county data extracted from the most recent CDSS publication that lists the Tribal reservations and rancherias that qualify for the TANF Time Limit Monthly Exemption in 2021 due to their unemployment rate.

Table 4
Tribal Reservations and Rancherias that qualify for TANF and CalWORKs Time Limit
Monthly Exemption in 2021
Due to the Unemployment Rate
(Reporting Tribes only)

Source: CA-CDSS email of 02-26-21 updating Tribal responses.

Reservation / Rancheria	County
Cachil Dehe Band of Wintun Indians (Colusa Indian Community Council)	Colusa
Fort Bidwell Indian Reservation	Modoc
California Valley Miwok Tribe	San Joaquin
Bear River Band of the Rohnerville Rancheria	Humboldt
Table Bluff Rancheria – Wiyot Tribe	Humboldt
Trinidad Rancheria – Cher Ae Heights Indian Community	Humboldt
Habematolel Pomo of Upper Lake	Lake
Robinson Rancheria of Pomo Indians	Lake
Middletown Rancheria	Lake
Mechoopda Indians of Chico Rancheria	Butte
Grindstone Indian Rancheria	Glenn

Recognizing the significant impact of the current economic recovery on the Native American labor market, the Robinson Rancheria Citizens Business Council agrees to satisfy the following minimum work participation rates.

TRIBAL WORK REQUIREMENTS

A. Fiscal Year Minimum Participation (all work-eligible families)

- | | |
|-----------------|-----|
| a. FY 2021/2022 | 30% |
| b. FY 2023 | 30% |
| c. FY 2024 | 30% |

B. Weekly Work Requirements (all families except Non-Needy Caregiver Relatives or other defined exceptions)

	Single-Parent Families	Two-Parent Families
1. FY 2021-2022	16 hours/week	24 hours/week
2. FY 2023	16 hours/week	24 hours/week
3. FY 2024	16 hours/week	24 hours/week

At least one adult in a two-parent family will be required to participate in a work activity for the minimum number of hours per week as listed above. The CTPP Program allows either adult to

participate in a work activity to meet the minimum requirements or the work hours of both adults can be combined to meet the minimum requirement.

LIMITATIONS AND SPECIAL RULES

- A. An individual who is meeting the work participation monthly hours in any activity specified in this plan or otherwise approved in advance by an appropriate Caseworker of the CTTT program is considered in compliance.
- B. A Participant's job search or readiness activities may only count towards work participation requirements for a maximum of six weeks in any fiscal year unless the Tribe's unemployment rate in the Tribal TANF service area is at least 50 percent greater than the United States' total unemployment rate for that fiscal year, then an individual's participation in job search or job readiness assistance counts for up to 12 weeks in that fiscal year. If job search or job readiness is an ancillary part of another activity, then there is no limitation on counting the time spent in job search or job readiness.
- C. A single or two-parent family from third trimester of pregnancy (with doctor's note) up to 12 months after birth of a child will be exempt. After 12 months, the Participants will be required to engage in the full WPH requirement.
- D. A teen head-of-household that maintains satisfactory high school, college or High School Equivalency (HSE) education attendance is considered to be fully meeting the work participation requirements of the CTTT Program.
- E. Upon certification of a Caseworker and approval of the CTTT Executive Director or designee, the CTTT Program will temporarily exempt victims of domestic violence and Participants with children who are admitted to in-patient rehabilitation, from work participation requirements for up to a maximum of three months at a time.
- F. Domestic violence victims will also be exempted from cash assistance overpayment collection, penalties and sanctions, for up to three months at a time.
- G. Upon the recommendation of the Caseworker, all domestic violence victims' work requirement agreements and cash assistance overpayment exemptions may be extended.
- H. Cash assistance will not be terminated or reduced if a single parent caring for a child under the age of six refuses to work or is unable to complete work activities for the following reasons, and the said Participant provides a written statement, verifying that the following condition exists:
 - 1. Unavailability of appropriate child care within a reasonable distance from the Individual's home, work, school, or training site.
Appropriate childcare: The provider meets appropriate state standards of care, or an informal arrangement in which the environment is representative of the quality of care provided to others in the community.
Reasonable distance: If the family is without transportation and there is no public transportation, then its home or work site must be no more than five miles from the childcare provider; or if the family has transportation, its home or work site is within one-hour distance, one way, from the childcare provider

2. Unsuitability of informal childcare: Care that does not meet the health and safety expectations of formal care than can lead to negligence or harm to the child.
3. Unavailability of appropriate affordable formal childcare.
Affordable child care arrangements: monthly childcare cost or copayments that do not exceed 20% of the Participant's gross monthly income.

TIME LIMITS

CTTP shall limit the time a family may receive cash assistance from the CTTP Program to a maximum of sixty (60) months, at which time cash assistance to the family will end. However, the family may still be eligible for non-cash assistance services.

The CTTP Program will not count benefits received from another Tribal/State TANF Program if the Participant lived on an Indian reservation at the time the Participant received benefits from said other Tribal/State TANF Program which had at least 50% of its members unemployed during the time the Participant was eligible for this other assistance.

The CTTP Program will count all previous months of TANF assistance funded with TANF block grant funds provided by any tribe or state, except for any month that was exempt or disregarded by statute or regulations, or under any experimental, pilot or demonstration project approved under Section 1115 of the TANF Act.

CTTP may continue non-monetary support services/benefits to child-only cases in the event the head-of-household is no longer eligible for cash assistance. Examples of non-monetary support services include workshops, educational guidance, etc.

HARDSHIP CASES

Hardship exemptions are for conditions that inhibit a Participant's ability to maintain a job or enter into work activities of the CTTP Program. CTTP will consider the following categories of cases for exemption from the sixty (60) month time limit on a case-by-case basis. These exemptions are temporary until the issue or barrier is resolved:

- A. Individuals with disabilities which limit their educational and job skills attainment and/or their ability to secure and retain employment due to a disability (documentation of disability is required).
- B. Single parents with four (4) or more children under twelve (12) years old. Criteria for this exemption focuses on the adult's ability to care for the specific needs of the children.
- C. Adult is responsible for the full-time care of an elderly person (a person over 55 years old) or a disabled parent or relative (documentation of family members disability is required).

- D. Family member is, or recently has been, the victim of domestic violence; and the physical, mental or emotional well-being of the victim would be endangered by a strict application of the 60-month limit (documentation that a domestic violence situation exists is required). The timeframe established is until the barrier is resolved, not to exceed 12 months. Under extenuating circumstances, this timeline could be extended by direction of the Executive Director.
- E. CTTP recognizes that rural area transportation barriers may impact its Participants' abilities to meet the CTTP Program's minimum requirements. As such, CTTP will consider hardship exemptions, on a case-by-case basis, to the 60-month limit for Participants residing in remote rural areas experiencing transportation barriers. The timeframe established is until barrier is resolved, not to exceed three months at a time.
- F. Family member is, or recently has been, the victim of abuse (to include but not limited to) the following: sexual abuse; being forced to engage in non-consensual acts, threats of, or attempts at, physical or sexual abuse; sexual activity involving a dependent child; mental abuse; neglect; or deprivation of medical care.
- G. To document a Participant's request for an exemption from the 60-month time limit due to the effects of abuse, the program will accept, without further investigation, a written statement from the following: a medical or mental health professional, a Sexual Assault/Rape crisis counselor/agency, a representative of a child protection or social services agency, or a representative of the court or of a law enforcement agency.
- H. Extenuating Circumstances: The family is determined to suffer from a hardship where loss of CTTP benefits would result in conditions that threaten the health or safety of the family; and circumstances outside the family's control prevent the family from reaching self-sufficiency. Cases in this category shall be approved on a case-by-case basis.
- I. A maximum of 25% of the CTTP TANF caseload, with one or more adults in the assistance unit, may be exempted and continue to receive CTTP TANF. Approximately 50% of our partner Tribes are exempted under the CA-CDSS email 2/26/21 for rancherias/reservations that experience unemployment rates in excess of 50% for the purpose of qualifying Tribal TANF participants for the time limit exemption (Table 4). Over 50% of our participant tribes reside in rural counties with the highest unemployment rates in the state.

PENALTIES AGAINST PARTICIPANTS

If a CTTP Participant in a family receiving TANF assistance refuses to engage in work as required by the CTTP Program, in the absence of good cause, the CTTP Program may reduce or terminate the amount of assistance otherwise payable to the family for that parent or needy caregiver. Policies and procedures related to those penalties are described in the CTTP Program Policy and Procedures Manual, as approved by the Robinson Rancheria Citizens Business Council.

APPEAL RIGHTS and the PROCESS

The following appeals process, as per 45 CFR 286.75(a)(7), shall apply to all CTTTP Program TANF Participants. The CTTTP Program will apply the following dispute resolution process for all individuals and/or families who wish to appeal a CTTTP Program decision to deny, reduce, suspend, sanction or terminate assistance and/or supportive services.

During the application/recertification process and/or prior to implementation of an adverse action, individuals shall be advised of their right to appeal decisions to deny, reduce, or terminate assistance/services. CTTTP employees shall provide individuals at risk of losing/changing benefits a Notice of Adverse Action ten (10) business days before or immediately after an adverse action begins, depending on the action taken (fraud/Intentional Program Violation). Participants/applicants will have ten (10) business days from the notification of an adverse action to appeal. A written form shall be made available to any applicant or Participant who wishes to file an appeal regarding an adverse action.

The appeal shall be reviewed and appealed through the following steps and positions:

- A. 1st Level: Site Manager: The Site Manager will review the appeal request within five (5) business days of the action being appealed.
- B. 2nd Level: Regional Manager: If no resolution or decision has been made at the previous level, the Regional Manager will have five (5) business days to review the appeal.
- C. 3rd Level: Compliance Director/Manager: If no resolution or decision has been made at the previous level, the Compliance Director/Manager will have five (5) business days to review the appeal and make a decision.
- D. 4th Level: Executive Director: If the participant disagrees with the decision of the Compliance Director/Manager, he/she may appeal the decision to the Executive Director; the Executive Director will reach a decision within five (5) business days of receiving the appealed decision of the Compliance Director/Manager. The decision made by the Executive Director is final.

GOOD CAUSE

The CTTTP Program has provisions to exempt certain Participants for an inability to meet certain CTTTP Program requirements for good cause. Examples of good cause exemptions are:

1. Unavailable childcare: the parent or Needy Caregiver Relative in a single-parent family cannot find appropriate and available childcare for a child living in their home under 10 years of age (for a period not to exceed three (3) months at a time).
2. Domestic Violence: meeting the requirement interferes with the Participant's attempt, or an attempt by a member of the Participant's immediate family, to escape domestic violence or its escalation. The timeframe established is until barrier is resolved, not to

exceed 12 months. Under extenuating circumstances, this timeline could be extended by direction of the Executive Director.

3. Crisis: a sudden and temporary situation beyond the family's control occurs, and it affects the health of a family member or their ability to comply. This reason includes family illness or serious injury, fire, death, communicable disease, pandemic or a tragedy of nature. The illness or serious injury must be verified by a doctor's statement.
4. Court: the Participant must appear in court or serve on a jury.
5. Transportation: necessary transportation breaks down or becomes unavailable, and the Participant lacks a reasonable alternative (for a period not to exceed three (3) months at a time).
6. Severe weather: weather conditions prohibit travel, such as a flood or earthquake (not to exceed 30 calendar days).
7. A woman with a high-risk pregnancy that prevents travel. The high-risk condition must be verified by a doctor's statement.
8. New baby's birth to a single parent with a child under one year old.
9. Other circumstances severely affecting the individual's ability to meet work requirements, participation rates or reporting requirements, as deemed appropriate and approved by the Executive Director (until resolved; not to exceed 12 months, unless under extreme circumstances).

TRIBAL OPTIONS

Listed below are certain policies or restrictions that the RRCBC has adopted as being central to the CTPP Program. These policies are subject to amendment.

- A. At intake and recertification, all Needy adult Participants must complete substance use disorder testing. Thereafter, reasonable suspicion drug testing of Participants will take place. A Participant with a positive test for unauthorized drugs will be required to participate in a substance use disorder assessment and attend counseling or enroll in a substantive rehabilitation program(s). The CTPP program will deny, reduce or terminate benefits until the Participant complies with these requirements.
- B. There will be no limit on the number of children per individual family.
- C. All school age children will be required to attend school full-time; written verification of enrollment and current attendance status will be required. If the children do not meet this educational requirement, cash benefits will be reduced until the non-compliant children return to school and attend regularly.
- D. All children must be current in all of their immunization requirements, unless religious or cultural concerns are documented.
- E. 'Non-Needy' Caregiver Relatives' income is not counted, and they are not required to participate in work activities. Other than these exceptions, Non-Needy Caregiver Relatives must meet all other CTPP program compliance rules as 'Needy' parents or Needy Caregiver Relatives when caring for Tribal TANF children.

- F. CTTTP will provide childcare to Non-Needy Caregiver Relatives, depending on the availability of funding.
- G. Participants that have committed fraud will be assessed a penalty ranging from an overpayment to permanent case closure.
- H. The CTTTP program exempts parent/Needy Caregivers that are 55 years of age or older from the work participation requirement. RRCBC considers a Tribal member 55 years or older as an “elder” and, therefore, is exempt.
- I. CTTTP will continue to provide cash assistance to a participant while an eligible Tribal TANF parent or Needy Caregiver is in a family residential in-patient substance use disorder treatment program, and the patient’s children or wards reside with him/her in the residential treatment program.
- J. A child attending in-patient treatment may be considered “in the home” for up to three (3) months. Exceptions can be made as determined by Executive Director.
- K. CTTTP will provide marriage promotion activities and incentives to eligible TANF program Participants.
- L. CTTTP will provide support services to eligible Native Americans who meet all the CTTTP Tribal TANF requirements, in an equitable and fair manner, according to customs and traditions.

DATA COLLECTION AND REPORTING

RRCBC will adhere to all statutory and regulatory data collection and reporting requirements pertaining to the Tribal TANF program.

RETROCESSION

If the RRCBC elects to retrocede this TANF program, or any portion thereof, RRCBC will comply with all statutory and regulatory requirements pertaining to retrocession as outlined at 45 CFR 286.30 and the Social Security Act.

Respectfully submitted by:

Beniakem Cromwell, Tribal Chairperson
Robinson Rancheria Citizens Business Council