

**CALIFORNIA TRIBAL TANF PARTNERSHIP (CTTP)
TRIBAL TANF PLAN**

For the period

July 1, ~~2021-2024~~ through June 30, ~~2024~~2027

~~Amendment #3: June 1, 2023~~

California Tribal TANF Partnership (CTTP) is a TANF program administered by Robinson Rancheria, the grantee, and is overseen by the Robinson Rancheria Tribal Council, referred to herein as the Robinson Rancheria Citizens Business Council (RRCBC). CTTP provides cash assistance, welfare to work and family formation 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.

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 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.

GOALS

The goals of the CTTP Program are:

1. Maintain and increase the number of eligible CTTP participants who are able to obtain and maintain employment through higher education, vocational training and job skills training.
2. Maintain or increase high school graduation rates for CTTP youth participants.
3. Maintain or increase the number of CTTP participants who engage in or complete a higher education and vocational training through education supports, employment development and trainings and skill development.
4. Maintain or increase satisfactory school attendance and GPA's for CTTP participants.
5. Maintain or increase the number of CTTP participants who engage in or complete a High school diploma and/or high school equivalency program.
6. Maintain or increase the number of families who are able to resolve or decrease family stability risk factors via participation in family formation and maintenance activities.
7. Maintain or increase engagement and connection to culture through workshops/events, educational opportunities and employment development.
8. Maintain or increase successful completion of Substance Use Disorder services.

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, employment numbers, support service expenditures, self-sufficiency rates, intake data, workshop/event data including attendance and outcomes, program expenditures and case closures.

Other forms of measuring the achievement of CTTTP goals includes: comparison of previous CTTTP program data, Career Services outcomes, educational outcomes, participant surveys, surveys and follow up from program leavers, needs assessments, workshop/event participation and outcomes, demographic data and completion of goals outlined in family self-sufficiency plans.

Annual audits include, not only review of fiscal compliance, but also overall CTTTP program compliance with State and Federal regulations set forth by the grantors. Recommendations for improvement are presented to CTTTP by which alterations are made.

DESIGNATED AGENCY

Robinson Rancheria, the grantee, is overseen by the [RRCBC](#) ~~Robinson Rancheria Tribal Council (RRCBC)~~. The CTTTP is a program of the Tribe. The CTTTP Executive Director reports directly to the RRCBC. The RRCBC is responsible for the policy making and overall direction of the CTTTP 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 CTTTP Executive Team manages the operations of the CTTTP program and that the direction of the CTTTP 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 CTTTP 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 CTTTP Finance Director develop annual budgets, monitor financial controls and oversee the maintenance of all accounting systems. The CFO oversees the CTTTP financial operations and the CTTTP program's monthly management reports that track the performance of CTTTP's fiscal operations.

~~At the present time, the RRCBC oversees the Tribal operations, which during 2021 includes the administration of five (5) grants and CTTTP with 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, 25 U.S.C. 5305 (f)(1), relating ~~to the~~ to the submission ~~of a~~ of a single agency audit as required by chapter 75 of Title 31, U.S. Code.

PERIOD COVERED BY THE PLAN

This CTTTP program plan covers the continued operation of the CTTTP program for a three-year period, beginning ~~July 1, 2021~~ July 1, 2024, through ~~June 30, 2024~~ June 30, 2027.

ADMINISTRATIVE COSTS

CTTP will not spend more than 25% of its annual federal TANF grant on administrative costs, as per the regulation.

SERVICE POPULATION

CTTP 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 eligible members of Federally recognized Tribes, Alaska Natives or members of the California Judgment Roll, their descendants and families 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, Alaskan Native, or member of the California Judgement Roll.

TABLE 1	
CTTP	
Tribal Partner Members of Approved Service Population	
Approved Service Population- Reservations, Rancherias and BIA Designated Service Areas	County
1. Bear River Band of Rohnerville Rancheria	Humboldt/Del Norte
2. Big Lagoon Rancheria	Humboldt
3. Kletsel Dehe Wintun Nation/Cortina Rancheria Band of Wintun Indians	Colusa/Glenn
4. Elem Indian Colony	Lake
5. Fort Bidwell Band of Paiute Indians	Modoc
6. Greenville Rancheria/Greenville Rancheria of Maidu Indians	Butte/Lassen/Plumas/Shasta/Sutter/Tehama/Yuba
7. Grindstone Indian Rancheria	Glenn
8. Habematolel Band of Pomo Indians of Upper Lake/Upper Lake Rancheria	Lake
9. Mechoopda Indians of Chico Rancheria	Butte

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TABLE 1 CTTP Tribal Partner Members of Approved Service Population	
Approved Service Population- Reservations, Rancherias and BIA Designated Service Areas	County
10. Middletown Rancheria	Lake
11. Redwood Valley Rancheria	Mendocino
12. Robinson Rancheria of Pomo Indians	Lake
13. Susanville Indian Rancheria	Lassen
14. Cher-Ae -Heights Indian Community of the Trinidad Rancheria	Humboldt
15. Wiyot Tribe/Table Bluff Rancheria	Humboldt

REVIEW and COMMENT on the CTTP PROGRAM PLAN

The RRCBC holds regularly scheduled community meetings to allow public input and comment on the CTTP Program; these meetings have been held since program services began in July 2003. In addition, CTTP has held numerous Tribal Partner meetings that have been attended by current and prospective Tribal Partners. These meetings are open to the public and to the Tribal members of the Partner tribes; agendas for the meetings include discussions about Tribal TANF services in general and the specific services provided by CTTP. The CTTP Partners also attend an bi-annual meeting of the CTTP Program.

This renewal plan was posted on the CTTP website and made available at all site offices and to partner Tribes for public review and comment beginning March 15, ~~2021~~ 2024 and ending April 30, ~~2021~~ 2024, which was 45 calendar days prior to submission.

The staff and management of CTTP 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 (AND RELATED SERVICE POPULATION)

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

Table 2
CTTP Service Areas and Service Populations
For the Period of: July 1, ~~2021~~2024 through June 30, ~~2024~~2027

Approved Service Area by County (includes reservations and BIA service area designations served)	Approved Service Population	Excluded Tribes with Reservations in Approved Service Area	Tribes with BIA Service Area Designation
<p><u>Amador</u> CTTP provides Tribal TANF assistance and services in all off-reservation areas of Amador County.</p>	<p>CTTP provides Tribal TANF assistance and services to all members of federally recognized Tribes, Alaska Natives, members of the California Judgment Roll, their families and descendants who reside in the off-reservation areas of Amador County.</p>	<p>Buena Vista Rancheria of Me Wuk Indians (reservation excluded); Jackson Rancheria (reservation excluded)</p>	<p>N/A</p>
<p><u>Butte</u> CTTP provides TANF assistance and services in the off-reservation areas of Butte County and on the Mechoopda Indian Tribe of Chico Rancheria.</p>	<p>CTTP provides Tribal TANF assistance and services to all members of the Mechoopda Indian Tribe; Greenville Rancheria/Greenville Rancheria of Maidu Indians, and members of federally recognized Tribes, Alaska Natives, members of the California Judgment Roll, their families and descendants who reside in the off-reservation areas of Butte County, and on the Mechoopda</p>	<p>Berry Creek Rancheria (reservation excluded; withdrew from participation) ÷Mooretown Rancheria (reservation excluded); Enterprise Rancheria (reservation excluded)</p>	<p>Greenville Rancheria/Greenville Rancheria of Maidu Indians (included);→ ÷ Mechoopda Indian Tribe (included) Mooretown Rancheria (excluded on and off reservation)</p>

Table 2
CTTP Service Areas and Service Populations
For the Period of: July 1, ~~2021~~2024 through June 30, ~~2024~~2027

Approved Service Area by County (includes reservations and BIA service area designations served)	Approved Service Population	Excluded Tribes with Reservations in Approved Service Area	Tribes with BIA Service Area Designation
	Indian Tribe of Chico Rancheria.		
<p><u>Colusa</u> CTTP provides TANF assistance and services in the off-reservation areas of Colusa County and on the Kletsel Dehe Wintun Nation/Cortina Rancheria Band of Wintun Indians Rancheria.</p>	CTTP provides Tribal TANF assistance and services to all members of the Kletsel Dehe Wintun Nation/Cortina Rancheria Band of Wintun Indians, and members of federally recognized Tribes, members of the California Judgment Roll, Alaska Natives, their families and descendants who reside in the off-reservation areas of Colusa County, and on the Kletsel Dehe Wintun Nation/Cortina Rancheria Band of Wintun Indians Rancheria.	Cachil Dehe Band of Wintun Indians/Colusa Indian Community (reservation excluded)	Kletsel Dehe Wintun Nation/Cortina Rancheria Band of Wintun Indians (included)
<p><u>Del Norte</u> CTTP provides TANF assistance and services in the off-reservation areas of Del Norte County.</p>	CTTP provides Tribal TANF assistance and services to all members of Bear River Band of Rohnerville Rancheria, and	Elk Valley (reservation excluded, withdrew from participation); Resighini Rancheria (reservation excluded) 235	Bear River Band of Rohnerville Rancheria (included) Resighini Rancheria (excluded off-reservation, withdrew) 235

<p align="center">Table 2</p> <p align="center">CTTP Service Areas and Service Populations</p> <p align="center">For the Period of: July 1, 2021<u>2024</u> through June 30, 2024<u>2027</u></p>			
<p>Approved Service Area by County (includes reservations and BIA service area designations served)</p>	<p>Approved Service Population</p>	<p>Excluded Tribes with Reservations in Approved Service Area</p>	<p>Tribes with BIA Service Area Designation</p>
	<p>members of federally recognized Tribes, Alaska Natives, members of the California Judgment Roll, their families and descendants who reside in the off-reservation areas of Del Norte County.</p>	<p>Tolowa Dee-Ni Nation/Smith River (reservation excluded)</p> <p>÷Yurok (reservation excluded)</p>	<p>-Tolowa Dee-Ni Nation/Smith River (excluded off-reservation, withdrew)÷</p> <p>Yurok (excluded off-reservation, withdrew)</p>
<p><u>Glenn</u> CTTP provides TANF assistance and services in the off-reservation areas of Glenn County and on the Grindstone Indian Rancheria.</p>	<p>CTTP provides Tribal TANF assistance and services to all members of the Grindstone Indian Rancheria; Kletsel Dehe Wintun Nation/Cortina Rancheria Band of Wintun Indians, and members of federally recognized Tribes, Alaska Natives, members of the California Judgment Roll, their families and descendants who reside in the off-reservation areas of Glenn County and on the Grindstone Indian Rancheria.</p>	<p>N/A</p>	<p>Kletsel Dehe Wintun Nation/Cortina Rancheria Band of Wintun Indians (included)</p>

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For the Period of: July 1, ~~2021~~2024 through June 30, ~~2024~~2027

Approved Service Area by County (includes reservations and BIA service area designations served)	Approved Service Population	Excluded Tribes with Reservations in Approved Service Area	Tribes with BIA Service Area Designation
<p><u>Humboldt</u> CTTP provides TANF assistance and services in the off-reservation areas of Humboldt County and on the Big Lagoon Rancheria, Bear River Band of Rohnerville Rancheria, Cher-Ae-Heights Indian Community of the Trinidad Rancheria, and the Wiyot Tribe/Table Bluff Rancheria.</p>	<p>CTTP provides Tribal TANF assistance and services to all members of the Big Lagoon Rancheria; Bear River Band of Rohnerville Rancheria; Cher-Ae-Heights Indian Community of the Trinidad Rancheria; and Wiyot/Table Bluff Rancheria, and members of federally recognized Tribes, Alaska Natives, members of the California Judgment Roll, their families and descendants who reside in the off-reservation areas of Humboldt County and on the Big Lagoon Rancheria; Bear River Band of Rohnerville Rancheria; Cher-Ae-Heights Indian Community of the Trinidad Rancheria; and Wiyot/Table Bluff Rancheria.</p>	<p>Blue Lake Rancheria (reservation excluded); Hoopa (reservation excluded); Yurok (reservation excluded)</p>	<p>Bear River Band of Rohnerville Rancheria (included) Karuk (excluded in the Northeastern part of Humboldt County from State Highway 96, Mile post HUM28.6, to the north of Siskiyou County line); Cahto Tribe/Laytonville Rancheria (excluded off-reservation) † Tolowa Dee-Ni-Nation/Smith River (excluded off-reservation, withdrew from participation) † Yurok (excluded off reservation, withdrew from participation)</p>

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CTTP Service Areas and Service Populations
For the Period of: July 1, ~~2021~~ 2024 through June 30, ~~2024~~ 2027

Approved Service Area by County (includes reservations and BIA service area designations served)	Approved Service Population	Excluded Tribes with Reservations in Approved Service Area	Tribes with BIA Service Area Designation
<p><u>Lake</u> CTTP provides TANF assistance and services in the off-reservation areas of Lake County and on the Robinson Rancheria of Pomo Indians, Habematolel Pomo of Upper Lake/Upper Lake Rancheria, Elem Indian Colony, and Middletown Rancheria.</p>	<p>CTTP provides Tribal TANF assistance and services to all members of Robinson Rancheria of Pomo Indians; Habematolel Pomo of Upper Lake; Elem Indian Colony; Middletown Rancheria, and members of federally recognized Tribes, Alaska Natives, members of the California Judgment Roll, their families and descendants who reside in the off-reservation areas of Lake County and on the Robinson Rancheria of Pomo Indians, Habematolel Pomo of Upper Lake/Upper Lake Rancheria, Elem Indian Colony and Middletown Rancheria.</p>	<p>Big Valley Rancheria (reservation excluded)</p> <p>– Yocha Dehe Wintun Nation (reservation excluded)</p> <p>– Cahto Tribe/Laytonville (reservation excluded)</p> <p>– Pinoleville (reservation excluded)</p> <p>– Round Valley (reservation excluded)</p> <p>– Scotts Valley (reservation excluded)</p> <p>– Sherwood Valley (reservation excluded)</p>	<p>Big Valley (excluded off-reservation, withdrew)</p> <p>– Cahto Tribe/Laytonville (excluded off-reservation)</p> <p>– Pinoleville (excluded off-reservation)</p> <p>– Round Valley (excluded off-reservation)</p> <p>– Scotts Valley (excluded off-reservation)</p> <p>– Sherwood Valley (excluded off-reservation)</p>
<p><u>Lassen</u> CTTP provides TANF assistance and</p>	<p>CTTP provides Tribal TANF assistance and</p>	<p>N/A</p>	<p>Greenville Rancheria/Greenville</p>

Table 2

**CTTP Service Areas and Service Populations
For the Period of: July 1, ~~2021~~2024 through June 30, ~~2024~~2027**

Approved Service Area by County (includes reservations and BIA service area designations served)	Approved Service Population	Excluded Tribes with Reservations in Approved Service Area	Tribes with BIA Service Area Designation
services in the off-reservation areas of Lassen County and on the Susanville Rancheria.	services to all members of the Susanville Rancheria; Greenville Rancheria/Greenville Rancheria of Maidu Indians, and members of federally recognized Tribes, Alaska Natives, members of the California Judgment Roll, their families and descendants who reside in the off-reservation areas of Lassen County and on the Susanville Rancheria.		Rancheria of Maidu Indians (included) ; Susanville Rancheria (included)
<u>Mendocino</u> CTTP provides TANF assistance and Services on the Redwood Valley Rancheria and in the off-reservations areas of Mendocino County (<i>Mendocino County is Redwood Valley Rancheria’s shared BIA Designation Area*</i> ; services provided off-reservation are	All members of the Redwood Valley Rancheria, residing on Redwood Rancheria and the off-reservation areas of Mendocino County, and members of federally recognized Tribes, Alaska Natives, members of the California Judgment Roll, their families and descendants who	Excluded <u>off-reservation:</u> <u>Members of federally recognized Tribes (excluding Redwood Valley members), Alaska Natives, members of the California Judgment Roll, their families and descendants.</u>	Redwood Valley Rancheria* (Included) Cahto Tribe of Laytonville Rancheria (excluded) ; Hopland Band of Pomo Indians (excluded) ; Pinoleville Pomo Nation (excluded) ; Round Valley Indian Tribes (excluded)

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<p>Approved Service Area by County (includes reservations and BIA service area designations served)</p>	<p>Approved Service Population</p>	<p>Excluded Tribes with Reservations in Approved Service Area</p>	<p>Tribes with BIA Service Area Designation</p>
<p><i>to Members of the Redwood Valley Rancheria only)</i></p>	<p>reside on the Redwood Valley Rancheria.</p>	<p><u>Excluded both on and off-reservation:</u> Coyote Valley Band of Pomo Indians, Sherwood Valley Band of Pomo Indians, Pinoleville Pomo Nation, Round Valley Indian Tribes, Guidiville Rancheria of California, Manchester Point Arena Band of Pomo Indians, Hopland Band of Pomo Indians, Potter Valley Band of Pomo Indians, Cahto Tribe of Laytonville Rancheria.</p>	<p>; Scotts Valley Band of Pomo Indians (excluded) and Sherwood Valley Band of Pomo Indians (excluded)-</p>
<p>Modoc CTTP provides TANF assistance and services in the off-reservation areas of Modoc County and on the Fort Bidwell Indian Community Reservation.</p>	<p>CTTP provides Tribal TANF assistance and services to all members of the Fort Bidwell Indian Community, and members of federally recognized Tribes, Alaska Natives, members of the California Judgment Roll, their families and descendants who reside in the off-</p>	<p>Pit River (excluded-both Lookout and XL Reservations); Pit River-Likely (excluded); Alturas Rancheria (excluded)</p>	<p>Fort Bidwell (included) Cedarville (excluded)</p>

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<p>Approved Service Area by County (includes reservations and BIA service area designations served)</p>	<p>Approved Service Population</p>	<p>Excluded Tribes with Reservations in Approved Service Area</p>	<p>Tribes with BIA Service Area Designation</p>
	<p>reservation areas of Modoc County and on the Fort Bidwell Indian Community Reservation.</p>		
<p><u>Plumas</u> CTTP provides TANF assistance and services in the off-reservation areas of Plumas County and on the Greenville Rancheria/Greenville Rancheria of Maidu Indians.</p>	<p>CTTP provides Tribal TANF assistance and services to all members of Greenville Rancheria/Greenville Rancheria of Maidu Indians, and members of federally recognized Tribes, Alaska Natives, members of the California Judgment Roll, their families and descendants who reside in the off-reservation areas of Plumas County and on the Greenville Rancheria/Greenville Rancheria of Maidu Indians</p>	<p>N/A</p>	<p>Greenville Rancheria/Greenville Rancheria of Maidu Indians (included)</p>
<p><u>San Joaquin</u> CTTP provides TANF assistance and services in the off-reservation areas of San Joaquin County to 77.5% of eligible</p>	<p>CTTP provides Tribal TANF assistance and services to 77.5% of all members of federally recognized Tribes, Alaska</p>	<p>N/A</p>	<p>N/A</p>

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<p>Approved Service Area by County (includes reservations and BIA service area designations served)</p>	<p>Approved Service Population</p>	<p>Excluded Tribes with Reservations in Approved Service Area</p>	<p>Tribes with BIA Service Area Designation</p>
<p>population (this area is split with Washoe Native TANF who serves 22.5% of population).</p>	<p>Natives, members of the California Judgment Roll, their families and descendants who reside in the off-reservation areas of San Joaquin County.</p>		
<p><u>Shasta</u> CTTP provides TANF assistance and services in the off-reservation areas of Shasta County.</p>	<p>CTTP provides Tribal TANF assistance and services to all members of Greenville Rancheria/Greenville Rancheria of Maidu Indians, and members of federally recognized Tribes, Alaska Natives, members of the California Judgment Roll, their families and descendants who reside in the off-reservation areas of Shasta County.</p>	<p>Redding Rancheria (reservation excluded)</p> <p>÷ Big Bend Rancheria (reservation excluded)</p> <p>÷ Montgomery Creek (reservation excluded)</p> <p>÷ Pit River of California and Ajumavi Atsugewi Nation (reservations excluded)</p>	<p>Greenville Rancheria/Greenville Rancheria of Maidu Indians (included)</p> <p>Redding Rancheria (excluded off reservation)</p>
<p><u>Solano</u> CTTP provides TANF assistance and services in the off-</p>	<p>CTTP provides Tribal TANF assistance and services to all members of federally</p>	<p>N/A</p>	<p>N/A</p>

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<p>Approved Service Area by County (includes reservations and BIA service area designations served)</p>	<p>Approved Service Population</p>	<p>Excluded Tribes with Reservations in Approved Service Area</p>	<p>Tribes with BIA Service Area Designation</p>
<p>reservation areas of Solano County.</p>	<p>recognized Tribes, Alaska Natives, members of the California Judgment Roll, their families and descendants who reside in the off-reservation areas of Solano County.</p>		
<p><u>Sutter</u> CTTP provides TANF assistance and services in the off-reservation areas of Sutter County.</p>	<p>CTTP provides Tribal TANF assistance and services to all members of Greenville Rancheria/Greenville Rancheria of Maidu Indians, and members of federally recognized Tribes, Alaska Natives, members of the California Judgment Roll, their families and descendants who reside in the off-reservation areas of Sutter County.</p>	<p>N/A</p>	<p>Greenville Rancheria/Greenville Rancheria of Maidu Indians (included-)</p>
<p><u>Tehama</u> CTTP provides TANF assistance and services in the off-reservation areas of Tehama County and on the Greenville</p>	<p>CTTP provides Tribal TANF assistance and services to all members of Greenville Rancheria/Greenville</p>	<p>Paskenta Band of Nomlaki Indians (reservation excluded)</p>	<p>Greenville Rancheria/Greenville Rancheria of Maidu Indians (included)</p>

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<p>Approved Service Area by County (includes reservations and BIA service area designations served)</p>	<p>Approved Service Population</p>	<p>Excluded Tribes with Reservations in Approved Service Area</p>	<p>Tribes with BIA Service Area Designation</p>
<p>Rancheria/Greenville Rancheria of Maidu Indians.</p>	<p>Rancheria of Maidu Indians, and members of federally recognized Tribes, Alaska Natives, members of the California Judgment Roll, their families and descendants who reside in the off-reservation areas of Tehama County and on the Greenville Rancheria/Greenville Rancheria of Maidu Indians.</p>		
<p><u>Trinity</u> CTTP provides TANF assistance and services in the off-reservation areas of Trinity County.</p>	<p>CTTP provides Tribal TANF assistance and services to all members of federally recognized Tribes, Alaska Natives, members of the California Judgment Roll, their families and descendants who reside in the off-reservation areas of Trinity County.</p>		<p>Redding Rancheria (excluded off reservation); Round Valley (excluded off reservation)</p>
<p><u>Yuba</u> CTTP provides TANF assistance and services in the off-</p>	<p>CTTP provides Tribal TANF assistance and services to all members of</p>		<p>Greenville Rancheria/Greenville Rancheria of Maidu Indians (included)</p>

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<p>Approved Service Area by County (includes reservations and BIA service area designations served)</p>	<p>Approved Service Population</p>	<p>Excluded Tribes with Reservations in Approved Service Area</p>	<p>Tribes with BIA Service Area Designation</p>
<p>reservation areas of Yuba County.</p>	<p>Greenville Rancheria/Greenville Rancheria of Maidu Indians, and members of federally recognized Tribes, Alaska Natives, members of the California Judgment Roll, their families and descendants who reside in the off-reservation areas of Yuba County.</p>		

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 or members of the California Judgment Roll, their descendants and families who reside in the approved service area. The CTTP Program defines an eligible Native American family as one comprised of all biological children, stepchildren (including non-Native Americans), adopted children (including non-Native Americans), or a relative child (see Non-Needy Caregiver Relative Families section for definition of “relative child”) under the age of 18 living with an Eligible Adult (defined as an adult supervising the family). At least one child in each family unit must be Native American for the family unit to be deemed eligible for receipt of TANF assistance and services.

NEEDY FAMILIES

The CTTP Program defines needy families as those with total net countable family income, after disregards are applied, that is equal to or less than 200% of the Federal Poverty Guidelines. Families meeting this income and other asset limitation guidelines and definition of eligible Native American family 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 CTP TANF ASSISTANCE and SERVICES as RELATED to the PURPOSES of TANF

Eligibility for 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 Federally or State MOE funded assistance (as defined in 45 CFR 286.10); or
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 state ~~funds~~ MOE funding to pay for non-assistance pro-family activities for individuals or family members, regardless of financial need.

OBJECTIVE CRITERIA FOR PURPOSES 3 & 4 ACTIVITIES

The following criteria will be utilized in determining an individual's or family's eligibility for receipt of support services offered under TANF Purposes 3 and 4. Individuals and families must meet two or more of the following eligibility factors to be eligible to receive support services or activities under TANF Purposes 3 and 4:

- Resides in documented high-crime rate area
- Single Parent with Children
- Parents are not high school graduates
- Native child residing with a Caregiver Relative
- Living on or near a reservation or rancheria lands
- Previous or current involvement in Foster Care System
- Previous or current involvement in Juvenile Justice System
- Residing in documented underperforming school districts

- A member of a low-income family
- Previous or current low academic performance
- Homelessness
- Substance use/mental health challenges
- Pregnant or parenting teen
- Previous or current domestic violence impact

CHILD SUPPORT ENFORCEMENT

The CTTTP 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 CTTTP program requirements.

NON-DUPLICATION of SERVICES

All CTTTP program applicants will be required to sign the CTTTP 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 CTTTP program to a particular participant will be shared with other Tribal, State or County TANF programs to verify non-duplication of services at intake and annually at recertification. Vital information for CTTTP program applicants/participants will be shared with other Tribal, State or County TANF programs or the county welfare staff (as appropriate) to avoid duplication of services.

The CTTTP 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 CTTTP program regulations, preparing outcome for penalties, sanctions or requests for criminal complaints, depending on findings.

Following the guidance set forth in PI-2018-02, CTTTP recognizes that tribal members may be serviced by their own Tribe's TANF program if they reside in a CTTTP service area. In the event a participant may be eligible to receive services from their own Tribe, CTTTP will also ensure non-duplication of TANF services with the applicant's Tribe.

CONFIDENTIALITY STATEMENT

The CTTTP program requires that all RRCBC, CTTTP employees, service contractors and consultants are provided training and must sign an agreement certifying 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 CTTP program. The signed agreement states that any violations of this policy will/may result in immediate termination of their employment or service contract with the CTTP program.

FINANCIAL NEED and INCOME

The following section identifies how earned and unearned income is handled in establishing income eligibility and calculating the monthly grant amount for both applicants and on-going cases.-

All Net Countable Income (earned and unearned), after all disregards are applied, received by adult members, minor head-of-households and/or children, shall not exceed the CTTP payment standard for the applicable family size.

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

To incentivize continued participation in work experience programs, CTTP may disregard all, or part of, earned income derived from: Work Experience (WEX) and Federal work study. Specifics regarding income and timelines are outlined in CTTP policies and procedures.

Temporary employment income with the Census Bureau will not be counted in establishing eligibility or in calculating the monthly grant amount.

CTTP may, disregard all, or part of, earned income from temporary or seasonal employment. Participant(s) must not ~~to~~ have income that exceeds 200% of the current Federal Poverty Level and this disregard will not exceed (6) six weeks per recertification year.

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

CTTP may disregard all or part of other unearned income that is intended to support continued engagement an-in educational programs, assist a disabled or unemployed adult or child, provide a benefit to a child on behalf of an absent parent, or loans to assist with a short-term financial shortfall. Specifics are addressed in CTTP policies and procedures.

Examples of unearned income that may be disregarded include:

- Scholarships, grants etc.
- Tribal General Welfare Benefits
- Child support
- Social Security Death Benefits (SSDB) for minor children
- Temporary disability payments (SDI, Paid-Family Leave)
- SSDI (Social Security Disability Insurance)
- Unemployment payments
- Loans (Bona-fide financial loan, personal loans)

- SSI/SSP: Adults or children who receive SSI or SSP payments, will be excluded from the TANF household and related SSI/SSP payments received on behalf of these excluded individuals will not be counted toward the family income.

Additionally, CTTTP may disregard all, or a portion of, the following unearned income types. Specifics are addressed in CTTTP policies and procedures:

- Up to \$3000 annual disregard, per family, in tribal per capita payments.
- Up to \$2500 annual disregard, per family, for non-recurring ~~or~~ “lump sum” income. Examples of non-recurring lump sum income include: lottery winnings, insurance settlements and ~~back~~ child support ~~and tax refunds~~.
- For parents/Needy Caregivers age 55 years or older, any unearned income in the form of Elders Assistance will be exempt and not counted against the assistance unit in the month of receipt in determining initial eligibility and/or in calculating a family’s monthly assistance grant.
- Emergency payments received by individuals impacted by disasters such as the COVID-19 Pandemic. Examples of emergency payments that may be disregarded (in part or in total) for those impacted by a disaster include emergency support payments such as those from the Tribe or charitable/philanthropic organizations, and emergency payments excluded under federal law.
- All payments received under Universal Basic Income programs.
- Following the guidance set forth in PI-2011-01, all tax refunds (or advance payment with respect to a refundable credit) is completely excluded from income in the month received and from the family’s resource limit for a period of twelve (12) months from receipt. To minimize administrative burden, CTTTP has elected to include both State and Federal tax returns in this exclusion.

All other needy adult income will be counted as income, specifics are outlined in CTTTP policies and procedures when determining income eligibility and in calculating the monthly grant amount.

RESOURCES and ASSETS

The CTTTP program will exclude from the resource/asset limit any asset required to be excluded under federal law, a family’s primary ~~or~~ residence, 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, Individual Development Accounts (IDA), land and/or a home which is held in trust by the federal government for the benefit of an Indian or an Indian tribe even if not the family’s primary residence, tribal burial funds, savings accounts held on behalf of the minor, retirement accounts such as 125 Cafeteria Plan, 401(k), 403(b), 457 plans, Individual Retirement Accounts (IRA), Roth Accounts (ESA).

Additionally, in accordance with PI-2011-01, CTTTP will exclude any tax refund (or advance payment with respect to a refundable credit) from counting towards the family's resource limit for a period of 12 months from receipt when determining initial or on-going eligibility. To minimize administrative burden, CTTTP has elected to include both State and Federal tax returns in this resource exclusion.

All other assets such as real property and financial assets (cash, stocks, bonds, mutual funds, and cryptocurrencies, etc.) will be considered as available assets and may not exceed the resource limit of \$10,000 for the assistance unit. The resource limit of all other available assets is \$10,000. 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~~ 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 four (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 the following support services to assistance eligible, needy TANF program participant families, as funds are available. In accordance with 45 CFR 286.10, all supportive services will be counted as assistance when required. as funds are available:

1. CTTP will provide participants with justified job-related or educational costs when the participant ~~is in compliance~~ is complying and in good standing, as evidenced by participation in all required testing, training and other CTTP 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 CTTP 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 experience Program (WEX) supportive services.
4. Youth Employment Program (YEP). CTTP 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~~ 18-year-old still attending high school (or equivalent), or an ~~18-year-old~~ 18-year-old high school graduate. Eligibility for ~~18-year-old~~ 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.
5. Domestic violence related services intended to support the safety and security of families experiencing, or at risk of, domestic violence. Services may include: emergency shelter and domestic violence referrals.
6. Emergency shelter and emergency housing assistance for those experiencing, or at risk of, homelessness. Services may include: short-term emergency housing and deposit assistance.
7. Culturally relevant supportive services and activities designed to decrease the dependency of government benefits for needy families, reduce barriers to self-sufficiency by allowing adults and youth to engage in job preparation and which foster success by strengthening community involvement and support, promoting knowledge of culturally traditional family formation, building of social support networks or potential employment networks, removing barriers to employment and training and increasing utilization of native community resources.
8. Childcare and transportation costs for participants who are under income and employed or engaged in an approved work activity, and for transitional participants who are engaged in approved employment work activities.

9. Referrals to substance use disorder services and mental health services intended to assist the participant's barriers to employment and self-sufficiency.
10. Provide educational or training activities (non-cash assistance) to a non-custodial parent of an eligible Tribal TANF family for the purposes increasing the non-custodial parent's ability to support their family.
11. 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. In addition to the marriage bonus, CTTTP may provide parenting and/or marriage counseling referrals.
12. Vocational training referrals.
13. Training and education related to the development of a small business, as directly related to a participant's approved self-sufficiency plan. Services may include: workshops, collaborations with other agencies and referrals related to entrepreneurship, business development, awareness of small business programs and guidance in how to apply for SBA loans/funding opportunities. CTTTP does not provide loans or business financing.
14. Youth Extra-Curricular Allowance

Youth extra-curricular funding allowance is designed to provide CTTTP assistance eligible youth the ability to participate in structured activities that promote positive self-esteem, healthy decision making, avoidance of risky behaviors, positive peer interactions, engagement of the needy youth with their community, educational achievement, attainment of soft-skills needed to obtain and maintain employment, and the reduction of incidences of teen pregnancies. All extra-curricular funding is tied to a specific need of the youth, identified during the family assessment, and will be incorporated into the family service plan.

Each child will be eligible for up to \$500, per calendar year, for extracurricular activities such as: after school or summer sport programs/specialty classes (i.e. music or dance) which can build self-esteem and teach self-discipline; driving school to enable a youth to attain a license necessary to enter the workforce; and funding for school trips that promotes increased engagement of the needy youth with class peers.

15. Youth Education Services: May provide educational assistance for costs such as school supplies, tutoring and test preparation, provided these services are not supplied by another source such as the local education agency.
16. Clothing Allowance: Clothing allowances for assistance eligible youth and adults, may be provided on an annual basis.

17. 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.
18. Basic home needs upon completion of a home visit may include child bed/bedding, kitchenware, 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 of California reimbursement ceilings for subsidized childcare guidelines for childcare centers, family childcare homes and TrustLined/relative. CTTP may use these state child care rate guidelines as a baseline and increase the limits up to 15% of that baseline.

EXTENDED CASE MANAGEMENT (Transitional Services)

EXTENDED CASE MANAGEMENT for EMPLOYED FAMILIES (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 to receive support services such as extended case management, childcare and mileage to assist the individual in retaining their employment. Transitional services will not exceed ~~twelve (12)~~twenty-four (24) months in a lifetime.

EXTENDED CASE MANAGEMENT for CTTP YOUTH AGING off of TANF ASSISTANCE

CTTP may provide educational or training activities for Native youth between the ages of 18-24, who have transitioned off their parent or caregiver's CTTP case due to age. The goal of these services is to support former CTTP youth in reaching their educational and employment goals to reduce the risk of out of wedlock pregnancies and future dependency on government assistance. To receive purpose 1 and 2 services, the Youth must meet standard of "needy" for the CTTP program by having countable income and assets below the standard for CTTP program. Other specifics are outlined in CTTP Policy and Procedure manual.

INCENTIVES

Incentive awards for educational achievements by needy (assistance-eligible) Tribal TANF participants, youth and adults per the following policy (funding permitting):

- a. High School Diploma / High School Equivalency Certificate Incentive
 - i. \$500~~\$1000~~ upon successful completion of High School diploma or equivalency for CTTP Adult Participants.

~~ii.~~ \$750 upon successful completion of High School diploma or equivalency for CTP Youth Participants.

iii. High school graduates or equivalent may be authorized for up to \$200 to purchase a graduation package. Graduation package may include: cap, gown and tassel. If the only available package includes additional items, it may be approved up to the maximum of \$200. This incentive may also be utilized for graduation registration costs

~~ii.~~

b. Adult Education Incentive (Limit one per category per lifetime)

i. Up to ~~\$500~~\$2000 upon completion of Vocational Training Program

ii. ~~\$1000~~\$2500 upon completion of an Associate degree from an accredited institution

iii. ~~\$1500~~\$4000 upon completion of a Bachelor's degree from an accredited institution

iv. ~~\$2000~~\$5000 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~~\$70 for a 'A' (3.4 - 4.0) grade point average or equivalent

2. ~~\$40~~\$60 for a 'B' (2.70 -3.39) grade point average or equivalent

3. ~~\$30~~\$50 for a 'C' (2.0 – 2.69) grade point average or equivalent

ii. Grades 6-12

1. ~~\$100~~\$200 for a 'A' (3.4 - 4.0) grade point average

2. ~~\$75~~\$150 for a 'B' (2.70 -3.39) grade point average

3. ~~\$50~~\$100 for a 'C' (2.0 – 2.69) grade point average

PURPOSES 3 & 4 ACTIVITIES

~~CTTP may~~CTTP may provide families who are established “at-risk” (as per the eligibility criteria on page 12) with TANF Purpose 3 and 4 services focusing on culturally-relevant activities that advance the prevention of out-of-wedlock pregnancy, encourage and foster two-parent family formation, and support family strengthening and preservation. CTP fulfills these objectives through the provision of workshops, classes, trainings and activities that strengthen the participant’s connection to their culture, fosters responsibility to community and family, and which support the development of life skills, self-awareness, and executive function to increase the participant’s capacity for self-sufficiency. Through engagement in these activities, participants attain skills, perspective, and understanding that lead to: responsible decision making; improved understanding of consequences; decreased likelihood of participation in risky behaviors such as out-of-wedlock intercourse; improved mental well-being; cultural connection and respect for community, family, and self; and skills that contribute to increased success in marriage and partnership.

Examples of Purpose 3 and 4 workshops, classes, trainings and activities include:

- Tribal cultural and traditional activities that foster connection to family and community, teach responsibility, and strengthen social support networks
(Language activities, storytelling, cultural workshops/classes, Regalia making, Traditional foods gathering/preparation, talking circles, traditional protocols)
- Two-generation engagement activities that foster family strengthening and encourage family formation and preservation
(Parenting classes, Family literacy, Family night workshops, talking circles)
- Workshops and activities that foster wellness, teach personal responsibility and life skills, and build capacity for healthy relationships and improved executive function
(Alcohol and drug prevention classes/groups, DV awareness curriculum, Healthy Relationships, Education awareness workshops, Health awareness workshops)
- Activities that promote and support physical and mental well-being
(Curriculum in healthy lifestyle choices, workshops promoting physical/spiritual health and well-being)
- Activities that promote and support responsible parenting, improved relationship skills such as communication and positive life-style choices
(Culturally relevant relationship and parenting classes)
- Activities that promote and support family reunification, two parent formation and absent parent engagement.
(Culturally relevant relationship and parenting classes)
- Workshops and trainings that foster prevention, discourage out-of-wedlock pregnancy, and encourage healthy family formation.
(Out-of-wedlock pregnancy prevention workshops, healthy relationship workshops, workshops and trainings on responsible decision making and consequences)
- Activities that promote and support the transition of youth successfully moving towards adult self-sufficiency.
(Culturally relevant youth leadership workshops, tutoring, prevention education)
- Teen pregnancy prevention and education
(Teen Pregnancy prevention workshops)
- Educational or training activities (non-cash assistance) to a non-custodial parent of an eligible Tribal TANF family for the purposes increasing the non-custodial parent's ability to support their family (life skills workshops, culturally relevant parenting classes).

COORDINATION with OTHER PROGRAMS

The CTPP 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. CTPP 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.

CTTP will collaborate with Tribal or county child welfare programs to encourage family formation/preservation services to reunite Native American children that have been involuntarily removed from the household with their immediate or extended Native American families are determined by each family's Service Plan. When collaborating, CTTP will ensure that services provided are not available through another funding source administered by the Tribe and that TANF funds are not used to support child welfare-related programs or activities. TANF funds will not be used for child welfare purposes or joint spending will be cost allocated appropriately. (CWS/Tribal/TANF collaboration meetings, ICWA meetings).

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 annual unemployment rate for ~~2020-2022~~ that met or exceeded the ~~10.1% 2020~~ 4.2% 2022 annual unemployment rate for the State of California in ~~5~~ sixteen (16) out of ~~17~~ eighteen (18) counties.

Utilizing Tribal, state, regional and local labor market information, CTTP 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, CTTP 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 CTTP Tribal Partners' reservation locations. Transportation to, from, between and across CTTP'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 CTTP service areas' economic base is concentrated in low-wage industries such as tourism, recreation and agriculture. Many CTTP 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 CTTP 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 CTTP 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 majority 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.

CTTTP recognizes the differences between rural and urban employment opportunities. For example, CTTTP has developed the Individual Job Readiness Program (IJRP) to meet the unique needs of participants in rural areas through job development, employer engagement and education, community specific training opportunities and collaboration with Partner tribes on employment needs. CTTTP also engages with local providers and employers while working one-on-one with participants to prepare them for employment. Conversely, in urban counties, CTTTP has found success in group focused activities relevant to the employment specific to those urban counties. In both rural and urban areas, CTTTP collaborates with local workforce organizations and employment agencies to increase employment and relevant training opportunities for CTTTP participants.

County	CTTTP Region	Unemployment Rate Percent %	Primary Economic Base
California		4.2 -10.1	
1. Amador	III	4.4 9.1	Government; Education and Health Services; Trade, Transportation and Utilities; and Leisure and hospitality.
2. Butte	II	4.5 9.2	Government ; Trade, transportation and utilities.
3. Colusa	III	11.6 16.0	Service Providing; Trade, transportation and utilities, Agriculture; and Government.
4. Del Norte	I	5.1 9.5	Service providing; Education and health services; and Government.
5. Glenn	II	5.3 8.9	Service providing ; Government ; and Agriculture.

Table 3 Unemployment Rates CTTP Existing & Planned Service Areas Annual Average 20202022			
County	CTTP Region	Unemployment Rate Percent %	Primary Economic Base
6. Humboldt	I	<u>48.4</u>	Trade, transportation and utilities; Education and health services; <u>Leisure and hospitality</u> ; and Government.
7. Lake	II	<u>5-9.6</u>	<u>Service providing; Government</u> ; Tourism and recreation.
8. Lassen	II	<u>4.40%7.1</u>	<u>Government; and Service providing. Mountainous region, historical; and landmark attractions.</u>
9. Mendocino	III	<u>4.1%9.2</u>	Service providing, trade, transportation and utilities, Education and health services.
10. Modoc	I	<u>5.5%8.5</u>	Service Providing; Educational and health services; and Government.
11. Plumas	II	<u>6.510.7</u>	<u>Mountainous region.Service providing; and Government.</u>
12. Shasta	I	8.7	Trade, transportation and utilities; Education and health services; and Government.
13.12. San Joaquin	III	5.211.3	Trade, transportation and utilities; Government; Education and health services; Professional and business services; and Manufacturing.
<u>13. Shasta</u>	<u>I</u>	<u>4.6</u>	<u>Trade, transportation and utilities; Education and health services; and Government.</u>
14. Solano	III	<u>4.29.5</u>	Education and Health Services; Trade, transportation and utilities; <u>GovernmentRetailers; Government</u> ; Mining, logging and construction <u>Service providing</u> ; and Leisure and hospitality.
15. Sutter	III	<u>6.611.0</u>	Government; Education and health services; Trade, transportation and utilities; <u>Service providing; and Leisure and hospitality.</u> ; and Mining and logging and construction.
16. Tehama	III	<u>4.88.8</u>	Service/private service providing;

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Table 3 Unemployment Rates CTTP Existing & Planned Service Areas Annual Average 20202022			
County	CTTP Region	Unemployment Rate Percent %	Primary Economic Base
			Government; Educational and health services; and Trade, transportation and utilities.
17. Trinity	I	4.68 .0	Trade, transportation and utilities; Education and health services; and Government.
18. Yuba	III	5.51 0.5	Government; Education and health services; Trade, transportation and utilities; Leisure and hospitality; and Mining, logging and construction.
19. ALL CTTP COUNTIES		9.66 4.3% average	
Reference: 1. CA-EDD; Labor Market Information Division; 2020-2022 Annual Average – County Unemployment Rates Profile Unemployment and Labor Force (not seasonally adjusted)			

WORK ACTIVITIES

For those participants who are receiving cash assistance services, all allowable activities are intended to promote and support economic self-sufficiency and contribute towards meeting the four purposes of TANF. Allowable activities are also intended to increase and enhance useful skills necessary for job search, job acquisition and job retention. Other activities are intended to facilitate educational achievement and skill development within the context of mitigating self-sufficiency barriers and increasing employment.

These work activities reflect the economic resources of CTTP Partner tribes and the needs of CTTP communities. Below is a list of approved work activities in which TANF participants may participate to fulfill CTTP’s work participation requirements.

CTTP acknowledges the unique challenges of participants living in remote areas and who may have transportation challenges, lack public transportation and/or experience 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. Travel time will be determined during the family assessment and included in the family self-sufficiency plan. The intent of providing reasonable travel time is to increase participant skill development and awareness in the areas of time management, work related routines, childcare strategies and transportation access.

Approved Work Activities:

- 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: (i.e.: assessment for academic competency; additional assessments through medical specialty exams, psychological and vocational testing, as needed; mental and physical health; job development and placement; Pre and post-employment services)
- P. Work experience (CTTP WEX program; WIOA/Tribal work experience preparation or programs)
- Q. Business development activities (i.e.: self-employment, development of business plan, entrepreneurship, application for SBA loans/funding opportunities)

MANDATORY WORK REQUIREMENTS

The following Tribal Work Requirements have been informed by the impact of the persistent and severe local economic recession on the labor market in the seventeen (17) CTTP service area counties. By referring to Table 3, which provides the ~~2020-2022~~ Annual Average unemployment rates experienced by the California and CTTP service areas, it is clearly evident CTTP's existing service areas had an unemployment rate that ~~met or~~ exceeded the ~~10.1%~~ ~~4.2%~~ ~~2020-2022~~ annual unemployment rate for the State of California in ~~5-sixteen (16)~~ out of ~~eighteen (18)~~ ~~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, ACL ~~21-3523-38~~, that lists the Tribal reservations and rancherias that qualify for the TANF Time Limit Monthly Exemption in ~~2021-2022~~ due to their unemployment rate.

Table 4 Tribal Reservations and Rancherias that qualify for TANF and CalWORKs Time Limit Monthly Exemption in 20202022 Due to the Unemployment Rate (Reporting Tribes only)	
Source: CA-DSS All County Letter (ACL) 21-3523-38 (March 25, 2021)April 27, 2023	
Reservation / Rancheria	County
Bear River Band of the Rohnerville Rancheria	Humboldt
Cachil Dehe Band of Wintun Indians/Colusa Indian Community Council	Colusa
Cher-Ae Heights Indian Community of the Trinidad Rancheria	Humboldt
Fort Bidwell Indian Reservation	Modoc
Grindstone Indian Rancheria	Glenn
Habematolel Band of Pomo Indians of Upper Lake/Upper Lake Rancheria	Lake
Mechoopda Indians of Chico Rancheria	Butte
Middletown Rancheria	Lake
Robinson Rancheria of Pomo Indians	Lake
Susanville Indian Rancheria	Lassen
Table Bluff Rancheria – Wiyot Tribe	Humboldt

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 ~~2022~~2024 38%
- b. FY ~~2023~~2025 38%
- c. FY ~~2024~~2026 38%

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

Single-Parent

Two-Parent

	Families	Families
1. FY 20222024	22 hours/week	34 hours/week
2. FY 20232025	22 hours/week	34 hours/week
3. FY 20242026	22 hours/week	34 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 CTTP 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 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 (6) 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 twelve (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 twelve (12) months after birth of a child will be exempt (from work requirements). 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 CTTP Program.
- E. Upon certification of a Caseworker, and approval of the CTTP Executive Director or designee, the CTTP 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 (3)~~ [six \(6\)](#) months at a time.
- F. Domestic violence victims will also be exempted from cash assistance overpayment collection, penalties and sanctions, for up to three (3) months at a time.
- G. Upon the recommendation of the Caseworker, all domestic violence victims’ work requirement agreements may be excluded from penalties and sanctions related to not meeting minimum work participation requirements.
- H. Cash assistance will not be terminated or reduced if a single parent caring for a child under the age of six (6) 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 the participant's home or work site must be no more than five miles from the childcare provider; or if the family has transportation, the participant's home or work site must be within a 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 align with and do not exceed the established CTTT childcare rates.

TIME LIMITS

CTTP shall limit the time a family may receive federally funded cash assistance from the CTTT Program to a maximum of ~~sixty (60)~~**seventy-two (72)** months, at which time cash assistance to the family will end. However, the family may still be eligible for Purpose 3 and 4 activities or support services.

As per 286.115(d) The CTTT Program will not count any month of assistance to a family that does not include an adult head of household, a family that does not include a pregnant minor head-of-household, minor parent head-of-household, or spouse of such a head-of-household or - CTTT will not count any month of receipt of assistance for an adult who resided in Indian country or in an Alaskan Native Village in which at least 50% of the adults were not employed during the time the participant received the assistance.

The CTTT 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.

Justification to support CTTT's 72-Month Time Limit

CTTP's program service population is historically disadvantaged with respect to education, transportation and employment. Compounding these historic inequities, according to Rural County Representatives of California (2024), seventeen out of eighteen counties served by CTTT are considered rural (RCRC, 2024). These rural counties have increased transportation challenges and less access to local employment and training/education opportunities that increase employability in a competitive job market. It cannot be assumed that participants can easily travel for employment or education opportunities as there is virtually no access to public transit in rural communities or near reservation areas and CTTT Program participants are substantially less likely to have access to reliable personal transportation.

In addition to rural challenges, wildfires have contributed to economic uncertainty for CTTT participants. Since 2018, all eighteen CTTT service areas have been impacted by wildfires. The largest wildfires in California history (August Complex, Mendocino Complex, SCU Lightning, LNU Lightning and North Complex) have occurred in eleven CTTT counties within the last

three years: Butte, Colusa, Glenn, Lake, Mendocino, Plumas, San Joaquin, Solano, Tehama, Trinity and Yuba counties (Cal FIRE, 2021). Furthermore, the related Public Safety Power Shutoffs (PSPS) impacted twelve out of eighteen counties in 2020: Amador, Butte, Humboldt, Lake, Lassen, Mendocino, Plumas, Shasta, Solano, Tehama, Trinity and Yuba. Some of these areas experienced power outages of 48 hours or longer.

These fires and PSPS shutoffs have caused widespread devastation and impacts upon our communities including, supply chain disruptions, increased food and energy costs, displacement, long-term health concerns, school closures, loss of homes, infrastructure damage and direct economic impacts and job losses related to business closures and reduction in tourism revenue.

Poverty

According to Public Policy Institute of California (PPIC, 2023), the poverty rate went up to 13.2% in the first quarter of 2023. This is consistent with recent data showing Native American families continue to experience poverty at a greater rate than other racial/ethnic groups. According to The Condition of Education (2023) annual congressional report, between 2010 to 2021, “a reduction in the poverty rate was observed for children across all racial/ethnic groups, except for American Indian/Alaska Native and Pacific Islander children.” American Indian/Alaskan Native children living in poverty was 32 percent, nearly double the national average of 17 percent.

The average poverty rate for the 18 counties CTTTP Program participants reside is ~~10.14~~10.146%. This is over the state poverty rate by 2.8%. Native American’s living in California have a higher rate than at of 18.36%. (U.S. Census, 2024) This would indicate that Native Americans would benefit from the time on aid changing from 60-months to 72-months. By allowing Native American’s to receive 72-months of aid, would allow CTTTP Program participants to work on their long-term goals to achieve self-sufficiency without the need for TANF support.

Unemployment

The information under the heading “Employment Opportunities” in this document demonstrates the need for the 72-month time on aid extension. The CTTTP Program administers Tribal TANF funds in high unemployment areas. California’s unemployment rate was 5.1% as of December 2023, up almost 1% from the 2022 California annual average of 4.2%, which demonstrates the California job market is still highly unstable. In addition to this, sixteen out of eighteen counties where CTTTP Program participants reside have unemployment rates exceeding the state average. The higher unemployment rate in these counties further impact job development and opportunities for Native American families and CTTTP Program participants.

Substance Use Disorder

Substance use disorder is a widespread concern with significant implications for the communities CTTTP serves. Recent Center for Disease Control and Prevention (2022) data shows a 39% increase in overdose deaths for Native Americans between 2019 and 2020. In 2020 Native Americans had the highest overdose deaths compared to other racial/ethnic groups (CDC, 2022). Substance use is a continued threat to family stability as child welfare involvement, foster care rates and permanent termination of parental rights have risen parallel to the opioid misuse trends in the United States and is comorbid with other issues including child poverty and child neglect

(Mihalec-Adkins et al., 2020). CTTTP is acutely aware that Substance Use is a barrier to not only employment, but to family wellness. Increasing the time on aid will allow CTTTP additional time to identify and address substance use disorder through Substance Use assessments, referrals, culturally appropriate prevention services and case management.

As demonstrated above, increasing the time limits will support TANF purposes 1 & 2. Increasing the time limit will allow Native children to remain in their homes receiving the support from CTTTP services. When a participating parent times out, the case is closed and the children lose the support from CTTTP. Providing additional 12 months will support families in their educational and employment needs.

Providing an additional twelve (12) months of support will allow the family to work on their education and employment goals with the assistance of TANF funds. They will be able to pay rent, receive supportive services, participate in substance use counseling and obtain support from our various departments with a greater likelihood of long-term self-sufficiency.

This proposed timeline is consistent with the purposes of TANF and with the economic conditions and resources of the Tribe as per 45 CFR 286.115(b).

HARDSHIP CASES

Hardship exemptions are conditions that inhibit a participant's ability to maintain a job or enter into work activities of the CTTTP Program. CTTTP will consider the following categories of cases for exemption from the ~~sixty (60)~~seventy-two (72) month time limit on a case-by-case basis. These exemptions are temporary until the issue or barrier is resolved:

- A. Individuals with disabilities as verified and documented by a medical professional 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).
~~A.~~
- B. Single parents with four (4) or more children under six (6) years old. Criteria for this exemption focuses on the adult's ability to care for the specific needs of the children.
~~B.~~
- 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. Verification and documentation by a medical professional of need for full-time care of family member is required.
~~C.~~
- 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~~72-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.
~~D.~~
- E. CTTTP recognizes that rural area transportation barriers may impact its participants' abilities to meet the CTTTP Program's minimum requirements. As such, CTTTP will

consider hardship exemptions, on a case-by-case basis, to the ~~60~~⁷²-month limit for participants residing in remote rural areas experiencing transportation barriers. The timeframe established is until barrier is resolved, not to exceed three (3) months at a time.

- ~~E.~~
- 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.

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.

G. Minor Head-of-Households: CTTT recognizes the primary goal for minor head-of-households is to maintain school attendance in order to obtain their high school diploma/high school equivalency. This educational attainment is crucial for long term self-sufficiency, family stability and future employment opportunities. To assist in promoting this goal, CTTT will provide a hardship exemption for minor head of households, through the month of their 18th birthday or month of graduation (whichever comes first), from the 72-month time limit while the minor parent(s) is satisfactory attending school, high school or GED/equivalent training program.

- ~~G.~~ H. _____ Extenuating Circumstances: The family is determined to suffer from a hardship where loss of CTTT 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. Examples of extenuating circumstances include: family illness or serious injury, loss of housing, fire, death, communicable disease, pandemic or a tragedy of nature. The illness or serious injury must be verified by a doctor's statement. Cases in this category shall be approved on a case-by-case basis, for a period not to exceed three (3) months at a time, up to twelve (12) months, unless under extreme circumstances as approved by the Executive Director.

A maximum of 20% of the CTTT TANF caseload, with one or more adults in the assistance unit, may be exempted under the above hardships and continue to receive CTTT TANF.

PENALTIES AGAINST PARTICIPANTS

If a CTTT participant in a family receiving TANF assistance refuses to engage in work as required by the CTTT Program, in the absence of good cause, the CTTT 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 CTTT Program Policy and Procedures Manual, as approved by the RRCBC. 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 ~~after~~ an adverse action begins. Exceptions to the ten (10) business day notification of adverse action may include instances where fraud or an Intentional Program Violation has occurred as verified by an investigation.

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 participants from penalties and sanctions due to good cause. Good cause is defined by CTTTP as: a sudden and temporary situation beyond the family's control that affects the health of a family member or their ability to fully engage in work activities, meet participation rates or to meet other CTTTP program requirements such as reporting responsibilities. Good cause exemptions are provided for:

1. Unavailable appropriate 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 six (6) 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 twelve (12) months. Under extenuating circumstances, this timeline could be extended by direction of the Executive Director.
3. Crisis: includes family illness or serious injury, fire, death, loss of housing, communicable disease, pandemic or a tragedy of nature. The illness or serious injury must be verified by a doctor's statement. (Not to exceed three (3) months at a time).
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.

TRIBAL OPTIONS

Listed below are certain policies or restrictions that the RRCBC has adopted as being central to the CTTP Program.

- A. At intake and recertification, all needy adult participants must complete drug-screening. 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 substance-abuse rehabilitation program(s). The CTTP 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 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 in the TANF unit must be current in all of their immunization requirements, unless religious, [health](#) 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 the same CTTP program compliance rules as "needy" parents or needy caregiver relatives when caring for children receiving Tribal TANF.
- F. CTTP will provide childcare to the needy child on the case of non-needy caregiver relatives for purposes of work, school or respite, depending on the availability of funding.
- G. Participants that have committed welfare fraud as confirmed by a completed investigation will be assessed a penalty ranging from an overpayment to permanent case closure.
- H. The CTTP 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 mental health or substance abuse treatment may be considered "in the home" for up to three (3) months to support the child's recovery and assist in maintaining home for the child to return to. Exceptions to this time limit can be made as deemed appropriate by treatment plan and as determined by Executive Director, not to exceed nine (9) months. This exemption does not apply to children who are residing in a long-term boarding program.
- K. CTTTP will provide marriage promotion activities and incentives as outlined in this plan to income 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 and in compliance with federal guidelines and regulations.

DATA COLLECTION AND REPORTING

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

DISPLACEMENT

CTTTP conforms to Section 261.70 of the 45 CFR which requires that a job provided to a TANF participant cannot be as a result of (i) an employer layoff from the same or a substantially equivalent job; or (ii) the employer has terminated the employment of any regular employee or caused involuntary reduction in its workforce.

In addition, CTTTP ensures that no participant, including but not limited to those placed in either a WEX, OJT placement or a community work experience program, will displace regular paid employees of any of the organizations providing either the placement or the community work experience. This assurance also complies with Section 286.110 of Tribal TANF, which requires safeguards to ensure that Tribal TANF Participants will not displace other workers.

In addition, CTTTP has established a grievance procedure for resolving complaints for any alleged violation of non-displacement requirements. Employees or their representatives who believe that their jobs are being displaced or infringed upon shall present their complaint to the employment contractor with authority over the placement. If the contractor is unable to resolve the problem within 15 days, the employee or representative may file a formal grievance in writing to the CTTTP Executive Director's Office, who will hear a formal grievance.

Grievance hearings will be scheduled within 30 calendar days of receipt of the formal grievance, and a written decision will be issued within 30 days of the hearing. If either party is dissatisfied with CTTTP's written decision, they may appeal the decision to the U.S. Department of Labor within 20 days of receipt of the written decision. The procedures for appeal, which must be sent

to the Office of Administrative Law Judges, in the U.S. Department of Labor, will be provided in writing with the decision.

This notification is on the CTPP website for public viewing.

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