

CALIFORNIA TRIBAL TANF PARTNERSHIP (CTTP)
TRIBAL TANF PLAN
Renewal
For the period
July 1, 2018 through June 30, 2021

TRIBAL TANF GOALS

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

GOALS

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

The CTTP Program will measure progress and achievement of TANF Program outcomes by collecting data each month that will meet the quarterly reporting requirements as outlined in 45 CFR §286.255. This is achieved by data extraction, review and analysis based on, but not limited to, active caseloads, work participation rates, support service expenditures, self-sufficiency rates and case closures. The extracted self-sufficiency data will be shared annually with the Partners.

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

DESIGNATED AGENCY

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

The main Administration office is located near the Robinson Rancheria in Lakeport, California. County and regional service offices are located near other Tribal partner

rancherias/reservations in accessible locations so as to facilitate the provision of services to Native American population centers.

KEY OVERSIGHT TEAM MEMBERS and FISCAL COMPETENCY

The Tribal Chairperson is responsible for assuring the CTPP Administrative team manages the operations of the CTPP Program and that the direction of the CTPP 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 CTPP Executive Director leads an Administrative and Program team that carries out the administrative, program service, fiscal and information management and reporting functions. The RRCBC Chief Financial Officer (CFO) develops annual budgets, monitors financial controls, and oversees the maintenance of all accounting systems. The CFO oversees the CTPP financial operations and the CTPP Program's monthly management reports that track the performance of CTPP's fiscal operations.

At the present time, the above team, and the RRCBC, jointly oversee the Tribal operations and CTPP, which during 2014 included the administration of 5 grants and an annual budget of approximately \$16 million, including the approximated \$14.6 million Tribal TANF Family Assistance Grant (TFAG).

FISCAL ACCOUNTABILITY

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

PERIOD COVERED BY THE PLAN

This CTPP Program plan covers the continued operation of the CTPP Program for a three-year period, beginning July 1, 2018 through June 30, 2021.

SERVICE POPULATION

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

person(s) listed on the California Judgment Roll.

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

REVIEW and COMMENT on the CTTT PROGRAM PLAN

The RRCBC holds regularly scheduled community meetings to allow public input and comment on the CTTT Program; these meetings have been held since program services

began in July 2003. In addition, CTTT has held numerous Tribal Partner meetings that have been attended by current and prospective Tribal partners. These meetings were open to the public and to the Tribal members of the Partner tribes; agendas for the meetings included discussions about Tribal TANF services, in general, and the specific services provided by CTTT. The CTTT Partners also attend an annual meeting of the CTTT Program.

The CTTT TFAP was made available for public viewing and comment on January 1, 2018 which was 45 days prior to submission.

The staff and management of CTTT employ useful and critical 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 move to self-sufficiency.

SERVICE AREA

SERVICE AREA FOR THE PERIOD 07-01-18 THROUGH 06/30/21

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

TABLE 2 CTTT Service Areas and Service Populations For the Period 7/1/2018 through 6/30/2021 by County and Reservation/Rancheria (With Notations of Tribal Members Excluded from CTTT Services)	
COUNTY	RESERVATIONS & SERVICE POPULATIONS
1. Amador	All eligible members of Federally Recognized Tribes and their families and descendants who reside in the off-reservation areas of Amador County. <i>[Not to be serviced by CTTT: members of the Lone Band of Miwok Tribe and members of the Buena Vista and Jackson Rancherias living on their reservations.]</i>
2. Butte	All eligible members of the Mechoopda Indian Tribe of Chico Rancheria, and all eligible members of Federally Recognized Tribes and their families and descendants who reside in the off-reservation areas of Butte County and on the Chico Rancheria. <i>[Not to</i>

	<i>be serviced by CTTT: members of the Berry Creek Rancheria, Mooretown Rancheria, and any Indian families residing on the Enterprise Rancheria/Reservation.]</i>
3. Colusa	All eligible members of the Cortina Indian Rancheria of Wintun Indians of California, and all eligible members of Federally Recognized Tribes and their families and descendants who reside in the off-reservation areas of Colusa County and the Cortina Indian Rancheria. <i>[Not to be served by CTTT: members living on the Colusa Rancheria/Reservation.]</i>
4. Del Norte	All eligible members of the Resighini Rancheria, and all eligible members of Federally Recognized Tribes and their descendants who reside on the Resighini Rancheria, and all eligible members of Federally Recognized Tribes and their families and descendants who reside in the off-reservation areas of Del Norte County. <i>[Not to be serviced by CTTT: Members of the Elk Valley Tribe living on the Reservation. Members of Smith River Tribes and Yurok Tribal Members living on or off of their Reservations in the county.]</i>
5. Glenn	All eligible members of Grindstone Rancheria, and all eligible members of Federally Recognized Tribes and their families and descendants who reside in the off-reservation areas of Glenn County and on the Grindstone Rancheria.

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<p>6. Humboldt</p>	<p>All eligible members of Big Lagoon Rancheria, and all eligible members of Federally Recognized Tribes and their descendants who reside on the Big Lagoon Rancheria; all eligible members of the Bear River Band of Rohnerville Rancheria, and all eligible members of Federally Recognized Tribes and their descendants who reside on the Rohnerville Rancheria; all eligible members of the Wiyot Tribe, members of other Federally Recognized Tribes, Alaskan Natives, and descendants of those named on the California Judgment Roll and their families who reside on the Table Bluff Rancheria; and all eligible members of the Cher-Ae Heights Indian Community of the Trinidad Rancheria; and all eligible members of Federally Recognized Tribes and their families and descendants who reside in the off-reservation areas of Humboldt County. <i>[Not to be served by CTTT: Blue Lake and Hoopa Valley members residing on their reservations within the County and any person residing within the interior of the Yurok Rancheria and Yurok tribal members residing anywhere in Humboldt County – except those residing within the interior boundaries of Big Lagoon and Bear River Band of Rohnerville Rancherias. Any Karuk tribal members residing in the northeastern part of Humboldt County from State Highway 96, mile post HUM28.61, north to the Siskiyou County line. Any person residing within the interior boundaries of any non-CTTP Partner reservation or rancheria. Any member of the Cahto Tribe residing in the county. Any member of Smith River Tribes living on or off their Reservations in the County.]</i></p>
<p>7. Lake</p>	<p>All eligible members of Robinson Rancheria Band of Pomo Indians, Habematolel Upper Lake Rancheria, Elem Indian Colony Band of Pomo Indians of the Sulphur Bank Rancheria, Middletown Rancheria of Pomo Indians of California, and all eligible members of Federally Recognized Tribes and their families and descendants who reside in the off-reservation areas of Lake County and on the Robinson, Upper Lake, Sulphur Bank and Middletown Rancherias. <i>[Not to be served by CTTT: Members of the Big Valley Rancheria, Rumsey Tribe and Scott’s Valley</i></p>

	<i>Rancheria living on or off their reservation and any members of the Pinoleville Tribe and Cahto Tribe residing in the county.]</i>
8. Lassen	All eligible members of the Susanville Rancheria and all eligible members of Federally Recognized Tribes and their families and descendants who reside in the off-reservation areas of Lassen County and on the Susanville Rancheria.
9. Modoc	All eligible members of the Fort Bidwell Indian Community and all eligible members of Federally Recognized Tribes and their families and descendants who reside in the off-reservation areas of Modoc County and on the Fort Bidwell Indian Community Reservation. <i>[Not to be serviced by CTTT: Any Lookout and XL (Pit River) Tribal members, Alturas Rancheria Tribal members, and Likley (Pit River) Tribal members living on their reservations.]</i>
10. Plumas	All eligible members of the Greenville Rancheria of Maidu Indians of California, and all eligible members of Federally Recognized Tribes and their families and descendants who reside in the off-reservation areas of Plumas County and on the Greenville Rancheria.
11. San Joaquin	77.5% of all eligible members of Federally Recognized Tribes, the California Judgment Roll, and their families and descendants who reside in the off-reservation areas of San Joaquin County. <i>[Note: State of California has agreed to a split of the county service area – CTTT is awarded 77.5% of the Indian population; WNT is awarded 22.5% of the Indian population.]</i>
12. Shasta	All eligible members of Federally Recognized Tribes and members of the California Judgment Roll and their families and descendants who reside in the off-reservation areas of Shasta County. <i>[Not to be serviced by CTTT: all Native Americans residing within the boundaries of the Redding Rancheria and their tribal members residing in the county; other exclusions are tribal members residing on the Big Bend, Montgomery Creek, Pit River Tribe of California and the Pit River/Ajumavi Atsugewi Nation.]</i>

13. Solano	All eligible members of Federally Recognized Tribes and their families and descendants who reside in the off-reservation areas of Solano County.
14. Sutter	All eligible members of Federally Recognized Tribes and their families and descendants who reside in the off-reservation areas of Sutter County.
15. Trinity	All eligible members of Federally Recognized Tribes and their families and descendants who reside in the off-reservation areas of Trinity County. <i>[Excluding Tribal members of the Redding and Round Valley Rancherias].</i>
16. Yuba	All eligible members of Federally Recognized Tribes and their families and descendants who reside in the off-reservation areas of Yuba County.

ELIGIBLE NATIVE AMERICAN FAMILY DEFINITION

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

NEEDY FAMILIES

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

NON-NEEDY FAMILIES

An eligible Native American child living with a non-needy caretaker (non-foster care) must be related 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 CTP 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).
2. Any benefits or services pursuant to TANF purposes 1 or 2, regardless of the purposes served.
3. 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 family 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 established and titled the Wellness program. Unless the State instructs otherwise, RRCBC may also use MOE funds to pay for non-assistance pro-family activities for individuals or family members, regardless of financial assistance.

Objective Criteria for Purposes 3 & 4 Activities -Wellness program services

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

- Living in High Rate Crime Area
- Absent Parent (Single Parent Children)
- Parents are not High School Graduates
- Living with a caretaker relative
- Living on or near a Reservation or Rancheria lands
- Previous involvement in Foster Care System
- Previous involvement in Juvenile Justice System
- Living in underperforming school districts
- Being a member of a family with income at or below poverty level
- Having low academic skills
- Previous involvement in homelessness/Housing issues
- Previous involvement in substance use/mental health issues
- A Pregnant/Parenting Teen

- Experienced in Domestic Violence issues

There will be no income or resource limit for members or descendants of any of the seventeen (17) tribal partner tribes. For members or descendants of non-tribal partner tribes, the income limit is 300% of the Federal Poverty Guidelines and the resource limit is \$2000.

CHILD SUPPORT ENFORCEMENT

The CTPP 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 amount of cash assistance as all other existing eligible families, as long as they meet all of the CTPP Program requirements.

NON-DUPLICATION of SERVICES

All CTPP Program applicants will be required to sign the CTPP 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 CTPP Program to a particular Participant will be disclosed to other Tribal, State or County TANF Programs to verify non-duplication of TANF assistance or services, if the CTPP Program Participant has recently moved to another TANF jurisdiction. Social security numbers for CTPP Program Participants may be shared with other Tribal, State or County TANF Programs or the county welfare staff to avoid duplication of services.

The CTPP Compliance Director is 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 CTPP Program regulations, preparing outcome for penalties, sanctions or requests for criminal complaints, depending on findings. The Compliance Director reports directly to the CTPP Executive Director.

CONFIDENTIALITY STATEMENT

The CTPP Program requires that all RRCBC, CTPP Program employees, service contractors and consultants sign a statement that they understand that all welfare

applicants have a right to complete and full confidentiality relative to any matters related to their participation in the CTTT Program. Said agreement also states that any violations of this policy will/may result in immediate termination of their employment or service contract with the CTTT Program.

RESOURCES and ASSETS

The CTTT Program will exclude from the resource/asset limit one operable vehicle for each adult participant. A second operable vehicle cannot exceed an equity value of \$4,650, as determined by fair market value, and \$2,000 of all other available assets (excluding food stamps, and other State food aid programs, as distributed under the regulations for the Federal food stamp program). All other assets such as real property, mineral rights, stocks, etc. will be considered as available assets with the exception of their primary residence land and/or a home located on a Native American reservation/rancheria).

Any assets beyond these limits shall be considered available to the needy family, including equity in other vehicles. Exceptions can be granted in special circumstances (e.g., burial accounts, inoperable vehicles, or other assets that are held in trust or have no value). Religious articles such as religious jewelry; prompt books or Bibles; crucifixes; decorative objects of art such as paintings, statuary, blankets, masks, carvings, etc. are only exempt if they were made by a person whose relationship to the Participant would qualify as a CTTT Program caretaker relative or the item(s) has an important cultural significance to a client's clan, village, ethnic, or racial community such that the client is in effect standing as caretaker or agent of the community and is not free to dispose of the item without suffering personal or social consequences for violating established written or unwritten laws or rules.

CASH ASSISTANCE

CTTT will provide eligible needy families with monthly cash assistance as defined at 45 CFR 296.10 in the form of a voucher or check for shelter, clothing and other basic needs. This also includes child care and transportation supportive services assistance for those recipients who are participating in work activities but are not yet employed.

SUPPORT SERVICES

CTTT may provide eligible needy TANF Program Participant families and "other eligible" families (as defined by the eligibility guidelines for activities under TANF Purposes 3 and 4 in the CTTT Program Policies and Procedures) with the following support services:

1. CTTT will provide Participants with justified job related or educational

costs when the Participant is in compliance and in good standing, as evidenced by participation in all required testing, training and other CTTTP Program requirements. All Participants requesting these services must show evidence of need that is:

- a. Specific and identified in the Participant's plan for self-sufficiency or is identified by CTTTP case management as a barrier to the Participant's employment.
 - b. Directly related to an approved plan activity or employment opportunity.
2. Educational activities designed to increase economic self-sufficiency, assist in job training, job related search and job placement activities (excluding any costs associated with expenditures for public education).
 3. Work participation-related expenses to include, but not limited to: books, uniforms, tuition, educational supplies, childcare, clothing allowances and transportation expenses when there is no other source of funding.
 4. Job development.
 5. Work Experience Program (WEX). CTTTP offers a work experience program for eligible needy TANF Participants who have completed the Career Development course provided by CTTTP.
 6. Youth Employment Program (YEP). CTTTP offers a subsidized work experience program for needy TANF youth participants whose families are current TANF Participants and income does not exceed 200% of the Federal Poverty Guidelines. Also, eligible are any child only cases; the eligible child must live with a caretaker/relative(s) or be living in the home of a parent(s) receiving SSI/SSP. The YEP will be an up to six-week program that begins in June and ends in August. This employment opportunity will provide job skills and experience for the youth. The subsidy rate will be 100% of wages and fringe benefits. The youth participant must also meet the following eligibility criteria.
 6. Domestic violence related services.
 7. Housing and emergency assistance.
 8. Teen pregnancy prevention and education.
 9. Culturally relevant support services provided in the context of removing barriers to employment, training, family formation and/or maintenance not for general religious or cultural purposes.

10. Childcare and transportation costs for participants who are under income and employed; and for transitional participants who are engaged in approved work activities.
11. Linkage to medical and non-medical substance abuse services and mental health services intended to assist the Participant's barriers to employment and self-sufficiency, after all other sources of available medical funding for these purposes, such as Indian Health Services , have been depleted.
12. Work with tribal or county child welfare programs to encourage child unification with the child's parent(s) or extended family members.
13. Provide a one-time, lifetime payment for a marriage license 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.
14. Parenting and/or marriage counseling referrals.
15. Provide educational or training activities (non-cash assistance to a non-custodial parent of an eligible Tribal TANF family for the purposes of promoting TANF purposes 3 and 4 in support of: healthy marriage promotion, activities promoting responsible fatherhood per the policies set forth in TANF Program instruction number TANF-ACF-PI-2008-10 (10/23/08).
16. Vocational training referrals.
17. Support for the development of a small business, as directly related to a Participant's approved development plan, for training, and/or loan packaging services by approved small/micro-business development assistance programs. Support does not include business finance or start-up costs.
18. Incentive awards for educational achievements by Tribal TANF participants, youth and children per the following policy (funding permitting):
 - A. High School Equivalency Certification Incentive
 - i. \$250 upon successful completion of High School Equivalency exam
 - B. Adult Educational Incentive
 - i. \$500 upon completion of an Associate degree from an

- accredited institution
- C. Children & Youth Educational Incentives – (within 30-days of receipt of report cards).
- i. Grades K – 5 for children excelling academically and/or socially will be provided non-monetary incentives deemed appropriate by site staff.
 - ii. Grades 6 – 12
 - a. \$100 for a ‘A’ (4.0) grade point average
 - b. \$75 for a ‘B’ (3.0) grade point average
 - c. \$50 for a ‘C’ (2.0) grade point average
 - iii. All Grades:
 - a. \$300 per child per calendar year “extra-curricular activities” allowance that includes, but is not limited to participation in:
 - After school or summer sports program
 - Driving school
 - School trips
 - Special classes (i.e., dance, music, etc.)
 - Youth organization activities (i.e., AYSO, Pop Warner football, little league, Boy/Girl Scouts, etc.)
- D. Youth Clothing Allowance
- i. \$200 per academic school year for school age children (Early Head Start thru high school)
 - ii. \$200 for youth working 20 hours or more per week
- E. Seasonal Clothing Allowance
- i. \$100 per child provided in December as funds permit

19. Home safety funds, up to \$1,000, for needs recommended by the CTPP Program Compliance Investigator or Case Management staff, upon completion of a Home Safety Visit. Items may include, but are not limited to smoke/carbon monoxide detectors, child safety plugs, bed/bedding, etc. This supportive service may be provided as funds are available.

CHILDCARE

CTPP provides childcare for working families and Participants attending school to meet their self-sufficiency plan. All childcare rates are in accordance with state child care guidelines for daycare centers and individual providers.

EXTENDED CASE MANAGEMENT (Transitional Services)

A CTPP Caseworker 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 need support services to retain their paid job. Transitional services will provide support for this; however, will not exceed 12 months in a lifetime. These transitional services include but are not limited to childcare (not to exceed 12 months in a lifetime) and mileage (not to exceed 6 months in a lifetime).

COORDINATION with OTHER PROGRAMS

The CTPP Program will coordinate with other tribal service providers and other welfare related agencies such as public, private or faith-based agencies under contract or through Memorandum of Understanding to provide necessary support services required by Participants to become self-sufficient.

EMPLOYMENT OPPORTUNITIES

CTTP currently provides Tribal TANF services to counties that are concentrated in the northern and north-central part of the state. With the exception of Humboldt and Solano Counties, all of the CTPP existing service areas had an unemployment rate in December 2014 that exceeded the 6.7 unemployment rate for the State of California. See Table 3.

County	CTTP Phase & Region	Unemployment Rate¹ Percent %	Primary Economic Base
CALIFORNIA			
1. Amador	II – south	4.8	tourism, wine region
2. Butte	II – east	5.6	agriculture
3. Colusa	II – south	18.5	agriculture
4. Del Norte	II – north	6.4	tourism
5. Glenn	I – east	7.4	agriculture
6. Humboldt	II – north	4.0	agriculture, recreation, industry
7. Lake	II – central	6.0	tourism & recreation; wine & agriculture
8. Lassen	I - east	6.5	mountainous region, historical &

			landmark attractions
9. Modoc	II – north	9.0	transportation
10. Plumas	I – east	10.0	mountainous region
11. Shasta	III -- north	5.6	
11. San Joaquin	III – south	7.0	business, industry, transportation,
12. Solano	I – south	4.4	business-to-business and local service industries
13. Sutter	I – south	9.4	agriculture
14. Trinity	II – north	6.2	tourism & recreation
15. Yuba	I – south	7.4	agriculture
ALL CTTT COUNTIES		7.88 average	
Reference: 1. CA-EDD; Labor Market Information Division;01-18 –County Profile-Unemployment and Labor Force not seasonally adjusted)			

Tribal populations are dispersed widely on reservation lands, and there are great distances between the CTTT Tribal Partners’ reservation locations. Transportation to, from, between and across CTTT’s rural service areas is difficult and predominantly dependent on private vehicles. Public transportation is normally not available except in a few off-reservation areas or in urbanized enclaves, towns and places. 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 to many homes in the area.

Job opportunities are scarce in rural communities, and the CTTT service areas’ economic base is concentrated in low-wage industries such as tourism, recreation, and agriculture. Many CTTT 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 CTTT 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 CTTT service area. Indian gaming casinos exist on some 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 CTPP 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.

The majority of the areas that CTPP 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 prejudice against the Native American community.

WORK ACTIVITIES

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

- A. Subsidized Tribal/non-Tribal employment
- B. 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 Service
- G. Satisfactory attendance in secondary school or in a course of study leading to a high school equivalency certificate 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 training 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 abuse and mental health counseling and education related to rehabilitation (non-medical)
- M. Small business training, business start-up and operational activities
- N. Life skills training and education (i.e., parenting skills, health and safety skills, financial skills, etc.)
- O. 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 the attainment of food, shelter, etc.
- P. Assessment (academic competency; mental and physical health)
- Q. Work experience

MANDATORY WORK REQUIREMENTS

The following Tribal Work Requirements have been informed by the impact of the persistent and severe worldwide economic recession on the labor market Participants in the sixteen (16) CTPP service area counties. By referring to Table 3, which provides the January 2018 unemployment rates experienced by the California and CTPP service area counties, it is clearly evident that with the exception of Humboldt and Solano Counties, the entire CTPP service area unemployment rates are higher than the California rate.

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 qualifying Tribal TANF participants for the 60-month time limit exemption. Table 4 presents selected county data extracted from the most recent CDSS publication that lists the Tribal reservations and rancherias that qualify for the TANF and CalWORKs 60-Month Time Limit Exemption in 2018 due to their unemployment rate.

TABLE 4

**Tribal Reservations and Rancherias that Qualify for
TANF and CalWORKs 60 Month Time Limit Exemption in 2018
Due to the Unemployment Rate
(Reporting Tribes Only)**

Source: CA-DSS All County Letter 17.63 and CDSS email of 02-28-18 updating Tribal responses.

RESERVATION / RANCHERIA	COUNTY
Fort Bidwell Indian Reservation	Modoc
Resighini Rancheria	Del Norte
California Valley Miwok Tribe	San Joaquin
Table Bluff Rancheria – Wiyot Tribe	Humboldt
Trinidad Rancheria – Cher Ae Heights Indian Community	Humboldt
Elk Valley Rancheria	Del Norte
Habematolel Pomo of Upper Lake	Lake
Robinson Rancheria	Lake
Elem Indian Colony of Pomo Indians of Sulpher Bank Rancheria	Lake
Susanville Indian Rancheria	Lassen
Yurok Tribe of the Yurok Reservation	Humboldt

Recognizing the significant impact of the 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 families except non-needy caretakers)

1 – FY 2019	36%
2 – FY2020	37%
3 – FY 2021	38%

B – Weekly Work Requirements (all families except non-needy caretakers or other defined exceptions)

	Single Parent Families:	2 Parent Families:
1 – FY 2019	22 hours/week	34 hours/week

2 – FY2020	22 hours/week	34 hours/week
3 – FY2021	22 hours/week	34 hours/week

At least one spouse 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 CTTT Program allows either parent to participate in a work activity to meet the minimum requirements or the work hours of both parents can be combined to meet the minimum requirement.

LIMITATIONS and SPECIAL RULES

1. An individual is considered engaged in work by virtue of their participation in any work activity specified in this plan, or otherwise approved in advance by an appropriate caseworker of the CTTT Program.
2. A Participant's job search, or readiness activities, may only count towards work participation requirements for a maximum of six weeks in any fiscal year. 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.
3. A single parent with a child less than six years of age and over one year of age shall be required to participate in a minimum of sixteen hours of work per week.
4. A single parent with a child under one year of age shall be exempt from any work requirements.
5. A teen head-of-household that maintains satisfactory high school, college or HSE education attendance is considered to be fully meeting the work participation requirements of the CTTT Program.
6. Upon certification by a caseworker and approval of the CTTT Program Director, the CTTT Program will temporarily exempt victims of domestic violence, and Participants with children who are admitted to in-patient rehabilitation, from work participation requirements for up to a maximum of three months.
7. 7 -- Domestic violence victims will also be exempted from cash assistance overpayment, while living in a shelter with their children, for up to three months.
8. 8 -- Upon the recommendation of the caseworker, all domestic violence victims' work requirement agreements and cash assistance overpayment exemptions may be extended.

9. 9 -- Cash assistance will not be terminated or reduced if a single parent caring for a child under the age of six refuses to work or is unable to complete work activities for the following reasons, and the said Participant provides a written, certified statement verifying that one or more of these conditions exists:
 - A. Appropriate childcare (a provider who passed the CTTTP background check as defined in the CTTTP Program Policies and Procedures) is unavailable within a reasonable distance, which is determined on a case by case basis depending on transportation limitations, from the Participant's home or work site, or
 - B. Informal childcare provided by a relative or under other arrangements is unavailable or unsafe, or
 - C. Appropriate and affordable formal childcare that falls within CTTTP's reimbursement schedule as outlined in CTTTP Program Policies and Procedures, which follow county guidelines, is unavailable.

TIME LIMITS

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

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

The CTTTP 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 regulation, or under any experimental, pilot or demonstration project approved under Section 1115 of the TANF Act.

CTTP may continue non-monetary support services benefits to child-only cases in the event that the head-of-household is no longer eligible for cash assistance.

HARDSHIP CASES

Hardship exemptions are for conditions that hamper or 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) month time limit on a case-by-case basis. These exemptions are temporary until the issue or barrier is resolved:

- A. Individuals with learning or other disabilities which limit their educational and job skills attainment and/or their ability to secure and retain employment due to a disability (documentation of disability is required);
- B. Single parents with numerous children (4+ children at the time of enrollment in the CTTTP Program) under the age of twelve years old;
- C. Adult is responsible for the full-time care of an elderly person (a person over 55 years old) or a disabled parent or relative (documentation of family member's disability is required).
- D. Family member is, or recently has been, the victim of domestic violence and the physical, mental, or emotional well-being of the victim would be endangered by a strict application of the 60-month limit (documentation that a domestic violence situation exists is required.) The timeframe established is until barrier is resolved not to exceed 12 months. Under extenuating circumstances, this timeline could be extended by direction of the Executive Director.
- 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-month limit for Participants residing in remote rural areas experiencing transportation barriers. The timeframe established is until barrier is resolved not to exceed 90 days.
- F. A maximum of 20% of the CTTTP TANF caseload, with one or more adults in the assistance unit, may be exempted from the 60-month limit and continue to receive CTTTP TANF. Approximately 50% of our partner Tribes are exempted under the CA-DSS All-County Letter 14-108 for Rancherias/reservations that experience unemployment rates in excess of 50% for the purpose of qualifying Tribal TANF participants for the 60-month time limit exemption (Table 4). Over 50% of our participant Tribes reside in rural counties with the highest unemployment rates in the state.

PENALTIES AGAINST PARTICIPANTS

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

APPEAL RIGHTS and the PROCESS

The following appeals process shall apply to all CTTTP Program TANF Participants, as per 45 CFR 286.75(a)(7), 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.

CTTTP Program employees shall provide individuals at risk of losing/changing benefits a Notice of Adverse Action ten (10) business days before an adverse action begins. During the application process and/or prior to implementation of an adverse action, individuals shall be advised of their right to appeal an adverse decision or sanction by the CTTTP Program and/or decisions to deny, reduce, or terminate assistance/services. A written form shall be made available to any applicant or participant who wishes to file an appeal about any denials of services.

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

1st Level: Site Manager: The Site Manager will review the appeal request within three (3) business days of the action being appealed.

2nd Level: Regional Manager: if no resolution or decision has been made at the previous level, the Regional Manager will have three (3) business days to review the appeal.

3rd Level: Compliance Director: if no resolution or decision has been made at the previous level, the Integrity Director/Compliance Officer will have three (3) business days to review the appeal and make a decision.

4th Level: Executive Director: if the participant disagrees with the decision of the Compliance Director he/she may appeal the decision to the Executive Director; the Executive Director will reach a decision within three (3) business days of receiving the appealed decision of the Compliance Director. The decision made by the Executive Director is final.

GOOD CAUSE

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

1. Lack of transportation (for a period not to exceed 90 days).
2. Unavailable appropriate childcare (for a period not to exceed 90 days).
3. Domestic violence in the home when meeting the CTTT Program 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 (for a period not to exceed 12 months or until barrier is resolved as determined by a Caseworker).
4. Illness verified by a written doctor's statement (until resolved).
5. Court date (participant must appear in court or serve on a jury).
6. New baby's birth to a single parent with a child under one year old.
7. Woman with a high-risk pregnancy that prevents travel (the high-risk condition must be verified by a doctor's statement).
8. Extreme weather conditions making transportation unsafe or impossible (not to exceed 30 days).
9. Other circumstances severely affecting an individual's ability to meet work requirements, participation rates or reporting requirements, as deemed appropriate and approved by the Executive Director (until resolved; not to exceed 12 months, unless under extreme circumstances).

TRIBAL OPTIONS

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

1. At intake all Participants must complete substance abuse testing. Thereafter, reasonable suspicion drug testing of Participants will take place. A Participant with a positive test for drugs will be required to participate in substance abuse assessments and attend counseling sessions or enroll in a substantive rehabilitation program(s). The CTTT Program will deny, reduce or terminate benefits until the Participant complies with these requirements.
2. There will be no limit on the number of children per individual family.
3. 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.

4. All children must be current in all of their immunization requirements, unless religious or cultural concerns are documented.
5. 'Non-Needy' caretaker relatives' income is not counted, and they are not required to participate in work activities. Other than these exceptions, non-needy caretaker relatives must meet all other CTTT Program compliance rules as 'Needy' parents or needy caretakers when caring for Tribal TANF children.
6. CTTT will provide childcare to non-needy caretakers, depending on the availability of funding.
7. There will be a maximum one-year disqualification of benefits for those Participants that have committed major fraud to collect benefits.
8. The CTTT Program exempts parent/needy caretakers that are 55 years of age or older from the work participation requirements. RRCBC considers a Tribal member 55 years or older as an "elder" and, therefore, is exempt.
9. CTTT will continue to provide cash assistance to a participant while an eligible Tribal TANF parent or needy caretaker is in a family residential in-patient substance abuse treatment program and the patient's children or wards reside with her (him) in the residential treatment program.
10. CTTT will provide marriage promotion activities and incentives to eligible TANF program participants.
11. CTTT will provide support services to eligible Native Americans who meet all the CTTT Tribal TANF requirements, in an equitable and fair manner, according to customs and traditions.

DATA COLLECTION AND REPORTING

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

RETROCESSION

If the RRCBC elects to retrocede this TANF program, RRCBC will comply with all statutory and regulatory requirements pertaining to retrocession as outlined at 45 CFR 286 and the Social Security Act.

Respectfully submitted on by

E. J. Crandell, Sr.
Tribal Chairperson
Robinson Rancheria Citizens Business Council

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