



# 3 Year Plan 2023-2025

SCOTTS VALLEY BAND OF POMO INDIANS TRIBAL TANF PLAN FOR  
CONTRA COSTA, LAKE, MENDOCINO AND SONOMA COUNTIES, CALIFORNIA

## SCOTTS VALLEY BAND OF POMO INDIANS OF CALIFORNIA



### TRIBAL FAMILY ASSISTANCE PLAN RENEWAL January 1, 2023 – December 31, 2025

#### TRIBAL TANF GOALS

Scotts Valley Band of Pomo Indians (the “Tribe” or “SVBPI”) will administer a Tribal TANF Program, designated as the Scotts Valley Tribal TANF Program (“SVTT Program”), to provide TANF assistance and related support services to all eligible Native Americans and their families who are members of the service population defined in this plan and who reside in the service area(s) approved in this plan. The SVTT Program will provide TANF assistance and services to eligible Native families with children, or those expecting children, who need temporary assistance and who meet the requirements to be eligible for cash assistance and/or supportive services.

SVTT Program services will provide needy parent or caretaker clients with job preparation, work related assistance and other supportive services to enable them to, over time, transition from the SVTT Program to self-sufficiency in a culturally competent way. SVTT Program assistance shall be provided promptly, with particular concern for the preservation of Native families.

The SVTT Program may provide funds and/or services to families at risk of welfare dependency. The Scotts Valley Tribal TANF Program will comply with all financial, statutory, and regulatory purposes of TANF.

The SVTT Program will measure progress and outcomes of the program by collecting data each month that will meet the quarterly reporting requirements as outlined in 45 CFR 286.255.

The primary goals of the SVTT Program are to provide assistance and/or support services that are intended to meet the purposes of TANF and:

1. Increase the employability of needy families.
2. Increase employment opportunities for Native American families through job training and skill development.

3. To prevent and reduce unwanted and unplanned pregnancies.
4. Encourage and foster healthy and stable two parent Native American families.

Progress on program goals will be measured by using specific computerized reports generated through our eligibility system to track and analyze work participation rates, educational goals identified and/or completed, employment stability through the 24-month transitional period, data related to teen pregnancy rates, and status of existing and new two (2) parent families.

## DESIGNATED AGENCY

SVBPI shall be responsible for the overall administration of the SVTT Program and will provide Tribal TANF assistance and related services to all eligible Native Americans and their families within the approved service area.

### Big Valley Rancheria

As designated by resolution from Big Valley Tribe, SVBPI, as the lead tribe, will be responsible to serve eligible enrolled Big Valley Tribal members and their families who live on the Big Valley Rancheria or in the off-reservation areas of Lake County with SVTT Program assistance and supportive services as approved in this plan. (Refer to Exhibit B "Big Valley Business Committee Resolution".)

In Contra Costa County, the SVTT Program office is located near public transportation in the City of Concord, CA. The client service office for Lake, Mendocino and Sonoma counties is located in Lakeport CA.

In instances where applicants are unable to visit a SVTT Program office for valid reasons, home visits will be arranged on a case-by-case basis.

## VARIANCE WITHIN THE SERVICE AREA

Pursuant to 45 CFR 286.75(a)(3), the SVTT Program will provide the same services, assistance, or activities within a county, but may not provide the same services, assistance, or activities across all counties. In order to accommodate for higher costs of living in some of the counties within the SVTT Program approved service area, maximum monthly assistance grant amounts may be higher in those counties with documented higher costs of living. Maximum monthly assistance grant amounts will be regularly reviewed and evaluated to ensure reasonableness and equity, and all monthly assistance schedules will be approved by the Tribal Council. Any additional variances between counties will be submitted as an amendment to the plan or noted on future renewals.

## PROGRAM OVERSIGHT AND MANAGEMENT

Five (5) members of the SVBPI Tribal Council will serve as the Oversight Board for the SVTT Program and will be responsible for monitoring the program. The SVBPI Tribal Council accepts and undertakes fiduciary and administrative responsibility for the program.

There will also be an Advisory Committee comprised of 2 members of Scotts Valley Band of Pomo Indians and 3 members of Big Valley Rancheria Business Committee and/or a Focus Committee of a similar composition. The SVTT Program Advisory Committee will act in an advisory capacity only, advising on issues related to policy, procedures and program planning.

The Tribe's Administrator will supervise the SVTT Program's Executive Director and provide direction on matters of policy, procedures and program management. Currently the Tribal Administrator administers all the Tribal operations including: program planning and execution, annual budgeting overview and personnel monitoring and management.

The Executive Director is responsible for the day-to-day operations and program management consisting of but not limited to: budget management, human resources, policies and procedures, etc.

The Chief Financial Officer ("CFO") for SVBPI currently develops all annual budgets, monitors financial controls, and oversees the maintenance of all accounting systems. The SVTT Program Accounting Staff provides monthly management reports that track the performance of the SVTT Program fiscal operations. The CFO will oversee the financial operations and reporting of the SVTT Program. Both the CFO and Executive Director provide supervision to exclusive SVTT Program Accounting Staff.

The SVTT Program will maintain, adhere to and update (as needed) a Policy Manual, Employee Manual, Transportation Manual and Fiscal Policies & Procedures Manual. All manuals will be updated, in no less than three-year intervals, to align with the most recent approved 3-year SVTT Program Plan. The manuals may be updated with approval by the SVBPI Tribal Council at any time.

The SVBPI Tribal Council and Tribal Administrator oversee the operations of all Tribal business.

## **FISCAL ACCOUNTABILITY**

For each year in which the Tribe receives or expends TANF grant funds, the Tribe will comply with the fiscal accountability provisions of the Indian Self Determination and Education Assistance Act (25 U.S.C. §5305 (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 plan covers the continued operation of the SVTT Program for a 3-year period, beginning January 1, 2023 through December 31, 2025.

## REVIEW AND COMMENT ON THE PROGRAM PLAN

The SVTT Program conducted a 45-day public comment period from September 9, through October 24, 2022. Opportunity to review and comment on the SVTT Program Draft Plan was provided to Tribal members and community members at the SVTT Program offices in Concord and Lakeport and at the Big Valley Tribal Council offices during the 45-day public review period. In addition, the Draft Plan was made available for viewing and comment on the SVTT Program website during the 45-day public review period with the opportunity to submit comments and suggestions on the website.

## SERVICE POPULATION AND SERVICE AREA

The SVTT Program will provide TANF assistance and services to:

1. all eligible enrolled SVBPI Tribal members, eligible members of federally recognized Tribes and members of the California Judgment Roll, their descendants and their families who reside in the off-reservation areas of Contra Costa County;
2. all eligible enrolled SVBPI Tribal members and their families who reside in off-reservation areas of Lake, Mendocino, and Sonoma Counties provided that at least one member of the assistance unit is an enrolled SVBPI Tribal member; and
3. eligible enrolled members of the Big Valley Tribe and their families who reside in the off-reservation areas of Lake County or on the Big Valley Rancheria, provided that at least one member of the assistance unit is an enrolled Big Valley Tribal member.

## PROVIDING ASSISTANCE AND SUPPORT TO OUT-OF-APPROVED-SERVICE-AREA TRIBAL MEMBERS

The SVTT Program will provide TANF assistance and supportive services to:

1. all eligible enrolled SVBPI Tribal members who live within a 60-mile radius of a SVTT Program office; and
2. all eligible enrolled Big Valley Tribal members who live within Mendocino County.

These clients will receive the same assistance and support as those clients who reside within the approved service area provided that the client meets all other SVTT Program eligibility requirements. Participants will be required to comply with all applicable requirements of the SVTT Program such as Work Participation Rate, Penalties and Time Limits.

The SVBPI understands that no additional funding will be provided now or in the future for this additional service population, and that all federal rules and regulations governing Tribal TANF apply. The Tribe understands that it is not authorized to establish a Tribal TANF office outside of the SVTT Program's approved service area, and that the time limit exception associated with 50% or more not-employed does not apply to those enrolled Big Valley Tribal members who reside outside Big Valley Reservations. As per the requirements outlined in TANF-ACF-PI-2018-02, and as noted in this plan, the SVTT Program will establish memorandums of understanding with the State/County and other Tribal TANF programs providing services in these areas, to ensure non-duplication of benefits and services prior to applying this section. All services will be provided from the SVTT Program offices located in either Concord or Lakeport. SVBPI assures that the SVTT Program has the administrative capacity to provide TANF benefits and services to the extended service population, with no negative impact to overall Tribal TANF operations and/or current provision of benefits and services.

## ELIGIBILITY for TANF ASSISTANCE and SERVICES RELATED to the PURPOSES of TANF

Eligibility for TANF assistance and services is as established in the Tribe's approved TANF plan.

Only needy families, as defined in the TANF Plan, may receive: (a) any form of Federally or State Maintenance of Effort (MOE) funded "assistance" (as defined in 45 CFR 286.10); or (b) 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 the Tribe to receive the particular "assistance", benefit, or service.

The Tribe 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 eligible individuals and families who are not financially deprived but who would benefit from the kinds of services that meet TANF purposes 3 or 4. Objective eligibility criteria will be established for participation in these services and activities. Unless the State instructs otherwise, the Tribe may also use MOE funds to pay for non-assistance pro-family activities for individual or family members, regardless of financial need.

## ELIGIBLE/NEEDY FAMILIES

The SVTT Program defines needy families based on County of residence and a total family income outlined as follows:

The SVTT Program defines needy families as those families with a total family income equal to, or less than 300% of the federal poverty guidelines in all service areas in order to receive any form of assistance as defined below. Under the SVTT Program an eligible needy Native American family or program assistance unit will be comprised of dependent child(ren) and parent(s) or caretaker relative(s).

Eligible families meeting the above income and other asset limitation guidelines will be eligible to receive cash assistance and supportive services.

### **QUALIFYING NATIVE AMERICAN INDIAN FAMILY**

For both Needy and Non-Needy, a Qualifying Native American Indian Family:

1. must have at least one Native American Indian Child or be carrying a Native American Indian Child; and
2. may be comprised of the biological children, stepchildren, adopted children or relative children (whether Native American Indian or not), under the age 18 or under the age 19, if still attending high school.

The term "Native American Indian Family" is further defined as:

1. Native American Indian or non-Native single parent, regardless of age, with a Native American Indian Child(ren) or a single parent expecting a Native American Indian Child(ren) (such individuals shall become eligible for SVTT Program services in the second trimester of their pregnancy or anytime during a medically verified high risk pregnancy); or
2. Native American Indian and non-Native two parent families with a Native American Indian Child(ren); or
3. A Needy or Non-Needy Native American Indian/non-Native caretaker with a Native American Indian Child(ren) (residing full-time); must be related to the eligible child (or children) by blood, custom, tribal designation, or court designated placement. There is no limit requirement related to the degree of the relationship; or
4. A Native American Family may include a non-custodial parent of a minor child who 1) lives within the service area and 2) does not live in the same house as the minor child.

## **ELIGIBLE NATIVE AMERICAN INDIAN FAMILIES WHO HAVE MOVED into the COVERED SERVICE AREA**

Eligible Native American Indian Families who have moved into the approved service area(s) of Contra Costa, Lake, Mendocino or Sonoma Counties shall receive the same amount of cash assistance and/or the same support services as all other existing eligible families residing within the same county as long as they meet all of the SVTT Program eligibility requirements.

## **INCOME and EARNINGS ELIGIBILITY REQUIREMENT**

The SVTT Program will count 50% of each dollar over \$750 of each participant's gross earned income in determining a family's eligibility for assistance and in calculating the monthly TANF grant amount. In addition, all TANF subsidized wages (including those earned through an OJT) will be disregarded entirely in determining a family's eligibility for assistance and in calculating the monthly TANF grant amount.

The SVTT Program will disregard all earned income deriving from temporary census employment for the U.S. Census Bureau as an incentive to engage Native American's and TANF participants in assisting the US Government in completing this important task as well as income from other temporary Federal/State employment such as AmeriCorps and CalFire.

Income from Indian Judgment funds, distributions from land and mineral rights, or other disbursements excluded under Federal law, will not be counted in determining eligibility and/or in calculating a family's monthly assistance grant.

Payments made to Native American Indians for natural resources are not counted as income in determining eligibility or payment amount for applicants and recipients. Per capita payments, revenue sharing trust fund payments, and Tribal General Welfare Exclusion Act of 2014 benefits, and the benefit payments from sources other than natural resources will be excluded up to \$10,000 per recipient per year.

For parents/needy caretakers 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.

The SVTT Program will disregard all or a portion of emergency payments received by individuals impacted by disasters such as the COVID-19 Pandemic or wildfires. Examples of emergency payments that may be disregarded (in whole or in part) for those impacted by a disaster include enhanced unemployment insurance compensation benefits, emergency support payments such as those from the Tribe or charitable/philanthropic organizations; and emergency payments excluded under federal law. These payments will be excluded in whole or in part as countable income or resources when determining TANF eligibility and monthly benefits amounts.



Any further disregards will be outlined in the SVTT Program policies and procedures which will provide the full/comprehensive list of income disregards.

## RESOURCES and ASSETS

The SVTT Program will exclude from the resource/asset limit, the Family's primary residence, one vehicle per family and a second vehicle for two parent families where both parents are engaged in approved work participation, 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, retirement accounts such as 401(k), 403(b), 457 plans, Individual Retirement Accounts ("IRA"), and Roth Accounts, 529 college savings plans, and Coverdell Educational Savings Accounts ("ESA"). 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 a resource limit of \$10,000. For purposes of this section, cryptocurrencies are digitally-based currency that exist solely on the internet and are unregulated and unmanaged by third parties, such as banks or governments.

Any assets beyond these limits will be considered available resources to the needy family, including equity in other vehicles. Exceptions can be granted in special circumstances, for example burial accounts, inoperable vehicles or other assets that are held in trust or have no value. Religious articles/artifacts and cultural articles/artifacts are only exempt if the item(s) has an important religious purpose or is of important cultural significance to a client's family, village, or tribe. For any such items to be exempt, they should not be intended for sale or trade. Additionally, items that are reasonably calculated to produce employment or income such as craftsman tools and machinery or those used for subsistence activities such as hunting, fishing or gathering equipment may be excluded from being counted towards the resource limit as outlined in the SVTT Program policies and procedures.

## NON-DUPLICATION of SERVICES

All applicants will be required to sign a SVTT Program application certifying that family members are not receiving assistance from another Tribal/State TANF Program.

Information on services being provided by the SVTT Program to a client will be disclosed to other Tribal/State TANF Programs to verify non-duplication of TANF assistance or services.

A SVTT Program participant's Social Security numbers may be shared with Tribal/State TANF Programs or other appropriate partners to avoid duplication of services. Each

client is required upon application and recertification to sign a release and exchange of information to allow the SVTT Program to verify duplication of services is not occurring.

## CONFIDENTIALITY STATEMENT

The SVTT Program requires that all employees, TANF clients, service contractors and consultants sign a statement verifying they understand they are responsible for maintaining the confidentiality of all program applicants, and that all applicants have a right to complete and full confidentiality relative to any matters related to their participation in the SVTT Program. Said agreement will also state that any violations of this policy will result in immediate termination of their employment or service contract with the SVTT Program.

In addition, client files are maintained under lock and key and electronic files are password protected with only appropriate people having access.

## ASSISTANCE

The SVTT Program will provide eligible needy Native American Indian families with monthly assistance as defined at 45 CFR Part 286.10, in the form of cash, checks, vouchers or other forms of benefits designed to meet a family's ongoing basic needs such as food, clothing, shelter, utilities, household goods, personal care items and general incidental expenses. The term "assistance" includes child-care and transportation assistance for those TANF recipients who are participating in approved work activities, but not employed.

## SUPPORT SERVICES FOR INCOME ELIGIBLE FAMILIES (i.e. Purposes 1 & 2)

The SVTT Program may serve income eligible needy TANF program participant families with the following support services, as funding permits:

1. all justifiable job-related costs when in compliance with the SVTT Program work participation and case management requirements. These costs could include, but are not limited to: employment tools, clothing/shoes, grooming, equipment and supplies;
2. relocation assistance when in compliance with the SVTT Program work participation and case management requirements;
3. procurement of right to work documents when in compliance with the SVTT Program work participation and case management requirements;

4. child care when in compliance with the SVTT Program work participation and case management requirements;
5. transportation assistance when in compliance with the SVTT Program work participation and case management requirements;
6. job-training, work experience, career pathways, basic adult education and post-secondary education, vocational training and other activities intended to increase skills, job-readiness, employment capacity and knowledge development designed to lead to self-supporting employment, GED completion activities, and computer training(including income eligible non-custodial parents);
7. Job/Educational supplies as reasonably appropriate for the position/program such as books, computers/laptops, computer software, ISP access payments, paper, notebooks, calculators, etc. provided that the client attests that they have unsuccessfully attempted to obtain such services from other governmental agencies (e.g. a local education agency) or that the recipient is not otherwise eligible to receive job/educational supplies and upon the evaluation of need and verification as outlined in the SVTT Program policies and procedures (including income eligible non-custodial parents);
8. job search, job placement, resume development, etc. (including income eligible non-custodial parents);
9. non-medical mental health and non-medical substance abuse and gambling abuse/addiction services, including referral and outreach support;
10. legal, ceremonial, or culturally relevant marriage costs, premarital marriage counseling and culturally relevant counseling up to \$1500 to become a legally recognized two-parent family;
11. “Newborn-Startup Kit” to provide support for a parent(s) with a newborn upon completion of an SVTT Program parenting class, or equivalent parenting class offered in the community. This Kit will include, but is not limited to, cribs, changing tables, toiletries, diapers, sanitizers, bottles, baby blankets and nursing aids, up to a total value of \$500;
12. a one-time payment of up to \$10,000 for educational loans that are in default;
13. a one-time payment of up to \$5,000 to assist with court-imposed fees and fines, not including traffic fines, to address the removal of barriers in obtaining employment;

14. a one-time payment of up to \$3,000 for traffic fines so that the SVTT Program Client can obtain a driver's license that is needed for a job or educational reason.
15. emergency shelter, emergency housing assistance, or transitional housing services for SVTT Program Clients managing domestically violent relationships, substance abuse recovery, gambling addiction/abuse recovery, homelessness (including those at risk of becoming homeless due to eviction notices, or substandard housing as identified by local government authorities), emancipation from foster youth programs, or domestic violence living situations;
16. home safety funds may be provided for needs discovered after completion of a home visit or subsequently brought to the attention of and recommended by a Site Manager with a lifetime limit of \$1500. Non-construction minor repairs and items may include but are not limited to: smoke/carbon monoxide detectors, child safety plugs, child safety gates, bed/bedding, etc. as outlined in the SVTT Program policies and procedures, subject to availability of funds;
17. incentives for adults for successful participation in and completion of client specific educational goals as defined in the Clients Family Success Plan. Incentives, include, but are not limited to: up to \$2,500 for completion of educational degrees, up to \$500 for completion of employment/training programs and up to \$250 based on GPA per term. These incentives shall be defined in the SVTT Program Policy Manual and are subject to availability of funds;
18. Individual Development Assistance (IDA) funds, subject to availability of funds and regulatory limitations;
19. down-payment funds for first-time homebuyers, subject to availability of funds and regulatory limitations;
20. to address legal problems consistent with the purposes of TANF i.e. where legal problems are a threat to family stability or the undermining of employment where a public, pro-bono or contingency attorney is not provided by law or industry standards, subject to availability of funds;
21. economic development and job creation assistance consistent with 45 CFR Part 286.35, subject to availability of funds and as approved by ACF; and/or
22. educational achievement incentives for Youth up to a \$250 gift card per semester based on GPA achievement, up to a \$250 gift card for perfect attendance, and up to \$1000 for completion of an educational degree.

## PURPOSE 3 AND 4 SUPPORT SERVICES FOR “INCOME ELIGIBLE” AND “OTHER ELIGIBLE”

Families and individuals participating in purposes 3 and/or 4 will be identified for eligibility by the criteria below:

1. Through an assessment based on the Adverse Childhood Experiences’ (ACE) survey to determine “at risk” status; or
2. By meeting at least one of the following indicators:
  - a. Being a member of a low-income family (based on the U.S. poverty guideline)
  - b. Having limited cognitive functioning
  - c. Having parents who are not high school graduates
  - d. Having previous involvement in the juvenile justice system
  - e. Living in a High Rate Crime Area
  - f. Having an absent parent (Single Parent Children)
  - g. Living with a caretaker relative
  - h. Living on or near a Reservation or Rancheria lands
  - i. Being homeless or at risk of being homeless
  - j. Having Substance Abuse Issues
  - k. Having Gambling Abuse/Addiction issues
  - l. Being a Pregnant/Parenting Teen
  - m. Living with, or having a history of, Domestic Violence

The SVTT Program will provide services to those at-risk individuals and families identified above, regardless of financial need, which utilize culturally-based pregnancy prevention strategies (TANF Purpose 3) and strengthen families and family wellness (TANF Purpose 4).

To assist in accomplishing the above, the SVTT Program may provide the following services:

1. Referrals to domestic violence counseling and other related services;
2. Culturally relevant personal and family member healing, guidance and support services including offering traditional crafts and activities designed to promote family formation and/or maintenance, promote self-confidence and strengthen the connection to community and culture;
3. Referrals to counseling for teen pregnancy related issues, including pregnancy prevention and education;
4. Participation and attendance at wellness conferences not to exceed \$5000 per family per year;

5. Support for native youth targeted programming designed to address Purposes 3 and/or 4 including participation, attendance at and funding for leadership conferences such as Unity, Youth Big-Time Events, on-campus clubs, after school curriculum, and other programs including non-native education based activities;
6. Parenting skill classes, communication and relationships skills classes, marriage counseling;
7. Learning and life-skills development classes for both Adults and Youth that enhance self-confidence including but not limited to grooming, dressing, communicating, punctuality, attitude and behavior;
8. Individual and family and mental wellness classes including but not limited to, healthy relationships with self and others, meditation, traditional health and wellness, anger management and understanding risk factors all with an emphasis of improved self-esteem or family dynamics;
9. Executive and cognitive function maintenance and growth activities; and
10. Classes and counseling which promote healing from historical trauma and current community trauma.

## NON-RECURRING, SHORT-TERM BENEFITS (NRST)

Non-recurring emergency assistance benefit may be provided to eligible needy Native American Indian families to meet extraordinary needs that arise from an emergency, crisis 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 or episode of need; and
2. Are not intended to meet recurrent or ongoing needs; and
3. Will not extend beyond four months.

There is a limit of \$3,000 per event per household for NRST benefits provided to eligible Indian families experiencing a specific episode of need in the context of a natural disaster, government declared state of emergency, or crisis that affects the community at large.

NRST benefits provided in any context outside of a natural disaster, government declared state of emergency or crisis that affects the community at large has a lifetime limit of \$10,000

Total family income must be equal to or less than 375% of the Federal Poverty Guidelines to be eligible for receipt of NRST benefits.

## DIVERSION

The SVTT Program may provide diversion assistance to families at risk of welfare dependency (not current participants in the SVTT Program or another TANF Program), subject to a maximum life-time limit of \$10,000 (and based on availability of funding). Families must meet income eligibility of no more than 400% of the Federal Poverty Guidelines. Diversion assistance and/or services are cash payments and/or services provided to families who: (1) are not current TANF recipients; (2) are at risk of becoming dependent on welfare; and (3) who are in need of a one-time or limited benefit to help them avoid becoming dependent on welfare.

Examples of needs that might qualify for diversion include:

- A. Emergency repairs to a vehicle needed to maintain employment;
- B. Assistance with the purchase or repair of tools, equipment, clothing, etc. necessary to maintain employment; and/or
- C. Assistance with Rental deposit and moving costs due to the loss of the family's primary residence by uncontrollable circumstances such as fire, vandalism, Acts of Nature, or domestic violence, which if not addressed will impact the family's ability to maintain employment.

## TRANSITIONAL SERVICES

Transitional Services are employment related support services provided to TANF clients who have become employed and are no longer receiving TANF cash assistance. The client is eligible for employment retention incentives for up to 24 months as outlined in the SVTT Program policies and procedures or until the household income and resources exceed the prescribed definition of "needy". However, all supportive services including, but not limited to, transportation and child care will remain available to the household regardless of time incurred until the household's income and resources exceed the prescribed definition of "needy" or the household is otherwise ineligible. To be eligible to receive transitional services the client must remain employed.

## TRIBAL OPTIONS

Listed below are certain policies or restrictions that the Tribe has adopted as being central to its SVTT Program:

1. All school age children will be required to attend school full time with written verification of enrollment and current attendance status being required. For those children who are deemed by an appropriate authority to need an alternative setting, such as home-schooling, online education curriculum, alternative schools, etc., proof of compliance will meet the goal of this education requirement. 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 or demonstrate compliance.
2. Penalties will be levied in accordance with SVTT Program's Intentional Program Violation Policy for those clients that have committed or commit felony fraud to collect benefits ranging from 6 months to permanent disqualification based on the severity and recidivism.
3. Children's immunization records must be up to date and provided, unless exempted via Federal or California State Law.
4. The SVTT Program exempts parent/needly caretakers that are 55 years of age or older from the work participation requirements. The SVTT Program considers Native American Indian persons reaching 55 years of age to be Elders in the Native American Indian community, deserving deferential and preferential treatment. Native American Indians experience a much lower life expectancy than other Americans, so the adoption of deferential and preferential treatment of Elders is justified.
5. The SVTT Program cash assistance grants may be increased each year by a percentage amount equal to the Social Security Cost of Living Adjustment (COLA) annual increase or by the decision of the Tribal Council and subject to the availability of funds.
6. The SVTT Program may provide school supplies and a clothing allowance for every needy income-eligible TANF participant child from an aided family who is enrolled in and attending school full-time as clarified above. Maximum benefit not to exceed \$1000 per year.
7. The SVTT Program may provide non-assistance and supportive services to a non-custodial parent of an eligible SVTT Program family as permitted under TANF-ACF-IM-2018-01, subject to availability of funds.



## COORDINATION with OTHER PROGRAMS

The SVTT Program will coordinate with other Tribal service providers and other social service, education, and community-based/faith-based organizations under contract or through memorandum of agreement to provide necessary support services needed by Clients to become self-sufficient by engaging in educational, wellness and job-related activities and support services.

MOUs and/or MOAs with internal and external partners to provide services to SVTT Program participants on a fee for services basis will be executed, subject to availability of funds.

## CHILD CARE

The SVTT Program will provide assistance with childcare services to income-eligible TANF program clients who are participating in approved SVTT Program work activities. Childcare services may be provided by other TANF program participants, or by contracted state licensed childcare providers. Childcare assistance will be provided for children aged thirteen (13) or younger and may be provided for children who are over thirteen but under 18 years of age, who require childcare due to a medically verified disability or condition.

## EMPLOYMENT OPPORTUNITIES

The service population of Contra Costa County primarily reside in an urban setting where community services and transportation are readily available. However, unemployment rates, higher costs for housing, childcare and other basic needs, higher crime rates in low-income areas and the stress of living in a denser population create a different set of barriers to self-sufficiency than the rural areas. In 2021, the overall unemployment rate in the county was 6.4% which is double the rate of 2018 according to California's Employment Development Department.

The service populations of Lake, Mendocino and Sonoma counties primarily reside in rural areas, making public transportation inaccessible for most clients. Where transportation is available, resident Tribal members are subjected to limited bus stops that are sometimes a long distance from their homes. Additional problems include poor to no communication caused by the lack of telephone and internet services to some homes in the service area resulting in isolation. The rural location, lack of other community services, disproportionate poverty rates, high levels of unemployment, inaccessibility of services, low levels of educational attainment and cultural norms that do not necessarily embrace the ideas of mainstream society, present intractable challenges and may act as barriers to self-sufficiency.

The Big Valley Reservation, located in Lake County, historically and currently continues to have a higher than 50% unemployment rate. In addition, amongst Scotts Valley adult members of eligible working age, the unemployment rate hovers near 50%. Furthermore, in 2021 the published unemployment rate for Lake County was 7.4% which is still greater than the overall State average and is the greatest unemployment rate of all the counties serviced by the SVTT Program. This rate is most likely even higher as underemployment or part-time employment is not captured in unemployment statistics. Lake, Sonoma, and Mendocino counties have varied employment opportunities, but many tribal members lack the foundation of education, basic skills and access to funding for adequate training, notwithstanding barriers of transportation and childcare.

Country-wide, the Native American and Alaska Natives employment-population ratio – which measures the portion of the population that is employed – is 55.6% and the labor force participation rate – which measures the share of adults either working or looking for a job is – 60.3%, both the lowest for all race and ethnicity groups while representing only 1% of the labor force. At 7.8%, the Native American and Alaska Natives unemployment rate, for 2017, was almost double the national rate of 4.4%, according to the Bureau of Labor Statistics. (<https://www.bls.gov/opub/ted/2018/labor-market-trends-for-american-indians-and-alaska-natives-2000-17.htm>)

There are 10 tribal casinos located within this three-county service area, but 8 of these are small gaming facilities offering limited employment in the hospitality industry. The remote locations and distance from clients' residences, create a barrier to employment due to some extreme weather conditions, transportation issues, child care and employment criteria.

The SVTT Program will align job training and education opportunities with the local labor market of the services areas. According to the *Lake County Economic & Demographic Profile 2018*, “produced by the Center for Economic Development at California State University, Chico with funding from the County of Lake Special Districts”, the top five growing industries in Lake County between 2007 and 2016 are management of companies and enterprises, health care and social assistance, manufacturing, state government and educational services. (Page 25) Additionally, according to Data USA (<https://datausa.io/profile/geo/lake-county-ca/>), the Health Care & Social Assistance, Retail Trade and Construction remain the largest industries.

The SVTT Program will coordinate with economic development agencies and with local economic development corporations, as well as develop, foster and maintain linkages with local employment development departments, workforce investment boards, businesses for training and employment opportunities as well as the Tribal Governments located within all of these counties. The SVTT Program currently offers targeted employment and career counseling services to SVTT Program participants residing on the Big Valley Reservation.

The SVTT Program is designed to first stabilize the client's living conditions and then to remove barriers to employment by providing training opportunities, health and wellness training and support, and then job search and job interviewing training to assist the client from dependency to independence. Each client will be provided individual counseling along with a career assessment focusing on career development.

## ELIGIBLE WORK ACTIVITIES

The following is a list of approved work activities that SVTT Program clients may participate in to fulfill their Work Participation requirement. The activities listed below, which are appropriate to those available and are consistent with the purposes of TANF and the economic conditions and resources of the service areas, are not inclusive; other activities may be approved on a case-by-case basis as appropriate. A reasonable amount of travel time (not to exceed one hour each way) to and from work training sites and travel to child care providers may count as time towards meeting work activity requirements in order to develop a work routine, adequate job skills and empower clients. Travel time is determined on a case-by-case basis.

1. Subsidized employment
2. Unsubsidized employment
3. Participation in Native Employment (NEW) Program (when this service is available)
4. Work Experience Program (WEX)
5. Job sampling or work experience
6. Education and job skills training directly related to employment
7. Satisfactory attendance in secondary school or in a course of study leading to a certificate of general equivalence (GED) in the case of a Client who has not completed secondary school or received such a certificate
8. Post-Secondary or vocational education training
9. Provision of childcare services for any individual who is participating in a community services program
10. Domestic violence, substance abuse, gambling addiction/abuse and mental health counseling and education related to rehabilitation
11. Small business training, business start-up and operational activities
12. Life Skills training and education
13. 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.
14. Approved community service activities
15. Job search and job readiness activities (as per the limitations at 45 CFR 286.105 (b) and (c))

## MANDATORY WORK REQUIREMENTS

The SVTT Program agrees to satisfy the following minimum work participation rates:

Work Participation Rates (all families except non-needy caretakers)

FY 2023	28%
FY 2024	28%
FY 2025	28%

Weekly Work Hour Requirements (all families except non-needy caretakers)

Single Parent with Child(ren) 0-1 year of age  
0 hours per week

Single Parent with Child(ren) 1 year of age and older  
22 hours per week

2 Parent family with Child(ren) 0-6 months of age  
0 hours minimum

2 Parent family with Child(ren) 6 months of age and older  
32 hours minimum

The SVTT Program requires one or both parents in a two-parent family to participate in a work activity to meet the minimum requirements. The work hours of both parents will be combined to meet the minimum requirement.

## LIMITATIONS and SPECIAL RULES

An individual will be considered to be engaged in work by participating in any work activity specified in this plan, or otherwise approved in advance by an appropriate Family Advocate of the SVTT Program.

A client's job search or readiness activities may only count towards work participation requirements for a maximum of six weeks in any fiscal year, unless the unemployment rate in the SVTT Program's service area is at least 50 percent greater than the United States' total unemployment rate for that fiscal year, in which case they may count for 12 weeks. 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/job readiness.

A single parent with a newborn child under one year of age shall be exempt from any work requirements.

As deemed critical by universally accepted research, SVTT will exempt a two-parent family with a newborn child under 6 months of age from required work participation

hours in order to encourage family bonding resulting in positive child development and social engagement as adults.

In a two-parent family with one parent admitted to an inpatient rehabilitation program, the second parent will still be required to participate at the same rate as a single parent.

A teen head of household who maintains satisfactory high school or college or GED education attendance is fully meeting the work participation requirements of the SVTT Program.

Upon certification by a Family Advocate and approval by the SVTT Program Executive Director, the SVTT Program will temporarily exempt victims of domestic violence from work participation requirements for up to three months initially. Additional time can be allotted on a case by case basis upon approval by the Executive Director. Domestic violence victims, while living in a shelter without their children, will also be exempted from cash assistance overpayment, for up to three months.

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 Client provides a written, certified statement verifying that the following condition exists:

1. Unavailability of appropriate childcare within a reasonable distance from the individuals' 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: Childcare that is within eight (8) miles or within 20 minutes via public transportation one-way travel of the participant's home, work, school, or training site.

2. Unsuitability of informal childcare: Care that does not meet the health and safety expectations of formal care that can lead to negligence or harm to the child. Such care can include, but is not limited to, lack of adult supervision (must be 18 or older); unsafe surroundings (unsafe housing conditions and/or inappropriate environmental conditions due to the presence of violence, substance abuse, gambling addiction/abuse, etc.); or over-crowded conditions in residential home, etc.

3. Unavailability of appropriate and affordable formal childcare.

Affordable Childcare Arrangements: A State-Licensed Free Preschool; or a childcare provider that agrees to accept as full payment the childcare subsidy payment provided by the SVTT Program. The SVTT Program uses the Tribe's Child Care Development Fund approved subsidy

schedule to determine the appropriate payment limit based on usage or contract agreements, age and facility type.

## TIME LIMITS

The SVTT Program shall limit the time a family may receive cash assistance from the SVTT Program for a maximum of 72 months for Contra Costa, Mendocino and Sonoma service areas and a maximum of 84 months for Lake County at which time federally-funded cash assistance to the family will end. However, the family may still be eligible for Transitional Services, if employed.

### Justification for Contra Costa, Mendocino and Sonoma County's 72-Month Time Limit

The SVTT Program is justified in extending the maximum time limit for all participants to 72 months for Contra Costa, Mendocino and Sonoma because doing so would support the purposes of the TANF program and is reasonable under present economic conditions in all the counties served. The COVID-19 Pandemic has affected all areas resulting in participants effectively incurring two years of time of aid without adequate means to reach self-sufficiency within the prescribed limits due to shelter-in-place orders, businesses closing, in-person schooling being unavailable, increased unemployment and the resulting inflation. For instance, the annual unemployment rate for Contra Costa County nearly tripled between 2018 and 2020 from 3.2 to 9.1 and has only reverted to 6.4 in 2021 which is still double the 2018 statistics; Mendocino County more than doubled from 4.0 in 2018 to 9.2 in 2020 and remains significantly elevated at 6.2 in 2021; Sonoma County also nearly tripled from 2.8 in 2018 to 8.1 in 2020 and is twice its 2018 level at 5.5 in 2021. Extending the Time-on-Aid to 72 months would help alleviate this loss and the corresponding excess unemployment while responding to the current needs of the SVTT Program population. Furthermore, we have participants who had successfully transitioned off the program in the past finding themselves with the need to return due to business closures and reduction in employment opportunities. These former clients are in need of new and additional services otherwise pre-empted by being time-barred. But for the COVID-19 pandemic, these clients would have remained off the program; however, under the current economic situation, these clients are finding themselves back in poverty with limited options and are the exact clients we want to help get back on their feet with new skills and a reduction in financial stress as they have shown success in the past. In addition to the adverse economic conditions facing SVTT Program participants, our service population is substantially less likely to have graduated from high school or completed postsecondary education than their peers regardless of their current physical location making career changing a more daunting process.

## Justification for Lake County's 84 Month Time Limit

In addition to all the reasons above, the SVTT Program service population is historically severely disadvantaged with respect to education, transportation, and joblessness. Compounding these historic inequities, Lake County has insufficient employment opportunities overall, and the job sectors for which SVTT Program participants are normally qualified are shrinking. Although some TANF programs may presume that participants can travel for employment, there is virtually no access to public transit in Lake County and SVTT Program participants are substantially less likely to have access to reliable personal transportation. The proposed 84-month limit for SVTT Program participation in Lake County is a reasonable extension to give such a severely depressed and disadvantaged service population the opportunity to reach parity with their statewide peers, and to attain sustainable self-sufficiency through education and workforce development. Moreover, wildfires have burned more than 60% of Lake County over the last four years, and the COVID-19 pandemic has affected 100% of the SVTT Program service population with stay-at-home orders. These natural disasters have disrupted employment and education progress for SVTT Program participants. Furthermore, Lake County has additional barriers to self-sufficiency which justify an extension of time as outlined below:

### 1. Poverty

According to the *Lake County Economic & Demographic Profile 2018*, “produced by the Center for Economic Development at California State University, Chico with funding from the County of Lake Special Districts”, the poverty rate for Lake County has consistently been 4.2-8.1% higher than the State of California over the last ten years. As of 2016, the Lake County poverty rate is 20.7% compared to a 14.4% for the State. Of additional significance is that the difference for the State over the 10-year period is only a 2% increase whereas the increase for Lake County is 4.3%. (Page 35)

Additionally, according to Data USA (<https://datausa.io/profile/geo/lake-county-ca/>), American Indian and Alaskan Native Alone make up 3.19% of the 64,095 people who live in Lake County or 2,045 people. The report goes on to say that 818 American Indians live below the poverty line in Lake County which translates to 40% (if not higher as it is unclear whether Alaskan Natives are included in the Native American category or the Other category).

### 2. Unemployment

According to the *Lake County Economic & Demographic Profile 2018*, “produced by the Center for Economic Development at California State University, Chico with funding from the County of Lake Special Districts”, Lake County has had higher than average unemployment between 2006 and

2016. That pattern continues through today and demonstrates that Lake County still struggles with job development and opportunities. (Page 23)

3. Jobless and job surplus rate

According to the *Lake County Economic & Demographic Profile 2018*, “produced by the Center for Economic Development at California State University, Chico with funding from the County of Lake Special Districts”, there are 14,962 jobs in the County of Lake with 29,140 people in the labor force which means there is roughly 1 job for every 2 workers. Of those 14,962 jobs, 10,293 are employed from within the county and 4,669 commute from outside the county. Additionally, 8,285 people have found jobs outside the county which means almost as many Lake County residents work in the county as out. (Page 14) In addition, the annual unemployment rate for Lake County nearly doubled between 2018 and 2020 from 5.3 to 9.8 and has only reverted to 7.6 in 2021 which is still over 2 percentage points higher than 2018 statistics.

4. Education levels

According to the *Lake County Economic & Demographic Profile 2018*, “produced by the Center for Economic Development at California State University, Chico with funding from the County of Lake Special Districts”, 74% of Lake County residents have “Some College, No Degree” or less education compared to 62.5% for the State of California. Of that 74%, 26.6% have no more than a high school diploma or equivalent. On the other side, in Lake County, only 15.1% have a Bachelor’s degree or higher compared to 30.2% for the State of California. (Page 48)

Equally, the number of high school graduates in Lake County qualified to go to a UC or CSU System was 28.4% in 2015-16 compared to the 45.4% percent for the State of California. (Page 50)

The lack of educational advancement and readiness is compounded when one factors in that the top two growing fields of management and health care generally require education beyond high school to qualify for and many positions require post-secondary and advanced degrees.

5. Availability of and/or accessibility to resources (educational facilities, transportation)

According to the *Lake County Economic & Demographic Profile 2018*, “produced by the Center for Economic Development at California State University, Chico with funding from the County of Lake Special Districts”, 73% of people commute by driving alone. (Page 16) While this method of transportation is generally readily available to non-Natives, the Native American community is not afforded such a luxury and many continue to rely on relatives and the limited public transportation to travel. The issue of transportation is compounded when small children are involved.



Additionally, according to Data USA (<https://datausa.io/profile/geo/lake-county-ca/>), the average commute time for Lake County was 25.3 minutes with an inference that this travel time is by car since “drive alone” was the largest type of commute. This information reinforces that failure to have a reliable, available vehicle is an impediment to successful self-sufficiency.

Also, the remoteness of Lake County and the large footprint of Clear Lake in the center, all act as impediments to resources and accessibility. Many services, such as legal aid, an in-depth public transportation system, inpatient mental health facilities and juvenile hall facilities do not exist within Lake County. Other services, such as Lake County’s Resource and Referral Provider (North Coast Opportunities), exist only in Lakeport and Clearlake, whereas some services, like Redwood Coast Regional Center, which provides services and supports to individuals with developmental disabilities, exist only in Lakeport.

Furthermore, while Lake County officially has two junior college campuses within its borders, both colleges are satellite facilities offering limited coursework with the main campus being upwards of 45 to 90 minutes away by car.

#### 6. Equity

The last reason to authorize an 84-month TOA for Lake County is based in equity. The SVTT Program only serves Scotts Valley Members and Big Valley Members within the borders of Lake County and a vast majority of Big Valley Members live on the Big Valley Reservation which consistently has unemployment in excess of 50% per month resulting in a tolling of those same client’s TOA. As such, that same vast majority is legally permitted to be on TANF for terms far greater than the 60-month time-limit prescribed to the States and for which SVTT has agreed to in the past. This results in a serious inequity between Scotts Valley members, who, to this day, do not have trust land and therefore are subsequently effectively penalized further by having the same socio-economic challenges as explained above as Big Valley without the same remedies.

Once a family is ineligible to receive federally-funded TANF assistance due to reaching the federal time limit, the SVTT Program may continue to provide assistance to the eligible children of the timed out family using California State Maintenance of Effort (MOE) funds, if such funds are available and provided to the SVTT Program by the State of California. Any family whose assistance is extended through California State MOE funds will not be eligible for federally-funded support services or transitional services.

In accordance with Code of Federal Regulations [45 C.F.R. 286.115(d)(1)-(3)], the SVTT Program will not count towards the time limit: any month of receipt of assistance

to a family that does not include an adult head of household; or any month of receipt of assistance by an adult during which the adult lived in Indian Country or in an Alaskan Native Village, in which at least 50 percent of the adults were not employed.

The SVTT 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 application of hardship, statute or regulation, or under any experimental, pilot or demonstration project approved under Section 1115 of the TANF Act.

### **ASSISTANCE TO CHILDREN IN HOUSEHOLDS WHO HAVE REACHED THE 60-MONTH LIMIT.**

Assistance to children in households who have reached the 60-month limit will be provided with segregated California State MOE funds (based on availability) and will require a family plan to self-sufficiency. These cases shall have priority for the expenditure of California State MOE funding and will include supportive services designed to address the needs of the child(ren).

### **GOOD CAUSE**

The SVTT Program may temporarily exempt clients from fulfilling the weekly work participation requirement for good cause. "Good Cause" is a temporary condition or circumstance that significantly hinders an individual's ability to reasonably fulfill their weekly work participation requirement; examples of "good cause" include temporary lack of transportation (car breaking down); temporary lack of acceptable child care; illness (as verified in writing by a physician); "acts of God" such as extreme weather conditions, house fires, declared disasters or other major calamities.

### **HARDSHIP**

Hardship exemptions are for conditions that hamper or inhibit a participant's ability to maintain a job or enter into work activities of the SVTT Program. The SVTT Program will consider the following categories of cases for exemption from the time-on-aid limit on a case-by-case basis. The exemptions are temporary until the issue or barrier is resolved:

1. Where an individual has a medically-verified and documented physical/mental disability which limits his/her ability to perform and/or maintain work or education activities; where disability is long-term, SVTT Program will work with the client to transition them to publicly-funded programs appropriate to their circumstances;
2. Where a single parent has numerous children (3 children or more) under the age of ten years old;

3. Where an adult is culturally responsible for the full-time care of an elder (i.e. a person over 55 years old) or where an adult is responsible for the medically verified and documented full-time care of a disabled parent, child, sibling, spouse, or partner;
4. In cases where a parent or child in the assistance unit is or has recently been the victim of domestic violence, and the physical, mental, and/or the emotional well-being of the victim would be further endangered by a strict application of the applicable time-limit;
5. Where a family member is within 30 or less units of completing a credentialed or postsecondary program, the completion of which is endangered by a strict application of the applicable time limit;
6. Where a parent has achieved a certificate or degree in a new career but is unable to obtain work due to lack of work experience required by employers in the field and is actively pursuing employment with the support of SVTT including, but not limited to, subsidized employment;
7. Where the family is determined to suffer from a hardship where loss of TANF benefits would result in conditions that threaten the health and safety of the family and circumstances outside the family's control prevent the family from reaching self-sufficiency;
8. Where reliable transportation, public or private, is lacking to traverse remote rural areas thereby presenting a barrier to self-sustainability (not to exceed 180 days);
9. Where an individual is experiencing a significant short-term illness, incapacity or disability including participating in a substance abuse or gambling abuse recovery program which temporarily limits (not to exceed one-year) his/her ability to perform and/or maintain work or education activities with supporting documentation from a qualified professional or where care of another member of the family assistance unit is required for the same reason; and/or
10. Where a declared state of emergency or natural disaster impairs or displaces an individual from either work, school or home or the ability to look for work;

The SVTT Program may exempt up to 25% of the total SVTT Program caseload for hardship. This 25% rate of exemption is increased from 20% in the previous TFAP to account for current economic conditions in Lake County, and in response to recent natural disasters affecting SVTT Program participants. The economic conditions in Lake County (see description under Time Limits, above), coupled with recent natural disasters including wildfires and COVID-19, are rationally related to a 5 percent increase in hardship exemptions. Natural disasters, including the COVID-

19 pandemic, are directly related to several of the SVTT Program's hardship exemptions, so it is rational to connect them to an increase in the number of hardship exemptions sought. To respond effectively to the immediate needs of its service population, the SVTT Program should be allowed greater flexibility in granting hardship exemptions. Moreover, the heavily depressed and systemically disadvantaged state of the AI/AN population served by the SVTT Program, coupled with the barriers associated with generational trauma, provides an independent rationale for increasing the hardship exemption limit beyond the 20 percent allowed for States as a whole.

## PENALTIES against CLIENTS

If a Client in a family receiving assistance refuses to engage in work as required by the SVTT Program, in the absence of good cause, the SVTT Program may:

1. Reduce or terminate the amount of assistance otherwise payable to the assistance unit; or
2. Provide limited assistance for basic needs through a vendor pay system for those Clients that fail to participate in work requirements until such time that the Client resumes the required work requirements. (Note: the vendor pay system pays directly to the vendor for food, utilities, and shelter).

In all cases, children are always eligible for supportive services.

Any individual that refuses to participate in recommended substance abuse, gambling abuse/addiction and/or mental health counseling when referred by the Family Advocate shall be automatically placed on the vendor pay system.

## APPEAL RIGHTS and the PROCESS

The following appeal process will be facilitated and enforced for all SVTT Program clients:

1. Clients, who are at risk of losing benefits due to non-compliance, will be issued a written notice of adverse action, 12 calendar days before the action is implemented. Clients will be advised of the right to appeal an adverse decision or sanction under the SVTT Program and will be informed that the adverse action will be stayed upon timely filing of an appeal until either all appeals are exhausted or a final unappealable decision is rendered.
2. Any appeal by the Client of a written SVTT Program notification which proposes to deny, reduce or terminate assistance or services to a Client, or having a Client

placed on a voucher system, must be in writing and submitted to the Family Advocate Supervisor within 12 calendar days of the Client being notified of an adverse action under the SVTT Program.

3. After an appeal has been filed (as in 2 above), the Family Advocate Supervisor has 12 calendar days to notify the Client in writing of his/her decision relative to the appeal.
4. If the Client disagrees with the Family Advocate Supervisor's decision, the Client may appeal that decision to the Site Manager within 12 calendar days of the Client receiving an appeals decision from the Family Advocate Supervisor.
5. If the Client disagrees with the Site Manager's decision, the Client may appeal that decision to the TANF Executive Director within 12 calendar days of the Client receiving an appeals decision from the Site Manager.
6. The Executive Director will decide on the appeal and must provide a written copy of this decision within 12 calendar days of receiving the appeal from the Client.
7. If the Client disagrees with the Executive Director's decision, the Client may appeal that decision to the Tribal Administrator within 12 calendar days of the Client receiving an appeals decision from the Executive Director.
8. The Tribal Administrator will decide on the appeal and must provide a written copy of this decision within 12 calendar days of receiving the appeal from the Client.
9. If the Client disagrees with the decision of the Tribal Administrator, the Client may make a final appeal to the Tribal Council. This appeal must be made in writing within 12 calendar days of receiving an unfavorable decision from the Tribal Administrator. The decision of the Tribal Council is final.

Should any position in the above chain be currently vacant, the appeal would be filed with the next position in the chain of command as if that vacant position was not a part of the appeals process to begin with.

## DATA COLLECTION and REPORTING

The Tribe will comply with all federal statutory and regulatory requirements pertaining to SVTT Program data collection and reporting.

## RETROCESSION

If the SVBPI elects to retrocede the SVTT Program, SVBPI will comply with all statutory and regulatory requirements pertaining to retrocession as outlined at 45 CFR Part 286 and the Social Security Act.

Respectfully submitted,

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Sorhna Li, Executive Director/Designee on behalf of Shawn Davis, Chairman  
The Scotts Valley Band of Pomo Indians

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Date Signed

Attachments:

Exhibit A: Scotts Valley Tribal Council Resolution No., S.V. 18-22

Exhibit B: Big Valley Business Committee Resolution No., 11-21-2019-01

Exhibit C: Assurances