



Soboba Band of Luiseño Indians Tribal TANF Plan October 1, 2023 - September 30, 2026

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TRIBAL TANF GOALS

The goals of the Soboba Tribal TANF Program (STTP) are to provide eligible American Indians and their families who reside in the approved service area assistance and 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, skills development and partnerships with local employers.
3. Prevent and reduce unwanted and unplanned pregnancies.
4. Encourage healthy and stable two parent Native American families.

STTP will measure progress and the achievement of outcomes of these goals by reviewing and analyzing program data, including, but not limited to: the achievement of educational milestones, completed job training, attainment of gainful employment, marriages and participation in youth prevention activities. Additionally, data will be collected and analyzed to reflect the average number of all required families work participation hours per month with the intent of meeting and exceeding the negotiated Work Participation Rate.

STTP aims to provide eligible participants at risk of welfare dependency with assistance and services to empower them to leave the program and become self-sufficient. STTP will comply with all financial, statutory and regulatory purposes of TANF. It is the intent of the STTP that assistance shall be provided promptly with due regard for the preservation of Indian family life.

DESIGNATED AGENCY

The Soboba Band of Luiseño Indians will be responsible for the administration of the Soboba Tribal TANF program and will provide Tribal TANF assistance and services to all eligible members of the approved service population and who reside within the approved service areas, i.e. the Cahuilla Reservation, Soboba Reservation, the City of Riverside, the Santa Rosa Reservation, and the off reservation areas of Riverside County. Field offices will be established at service sites in Riverside County, the Cahuilla, Soboba and Santa Rosa Reservation(s).

PERIOD COVERED BY THE PLAN

This plan covers the continued operation of the Soboba Tribal TANF program for a three (3) year period beginning October 1, 2023 through September 30, 2026.

SERVICE AREA AND SERVICE POPULATION

The STTP will provide TANF assistance and/or related support services to all eligible Soboba Tribal members, Santa Rosa Tribal members, Cahuilla Tribal members, eligible members of a federally recognized Tribe, members of the California Judgment Rolls, their descendants and families, who reside on the Cahuilla, Soboba and Santa Rosa reservation(s) and in the City of Riverside; and to all eligible Soboba and Santa Rosa Tribal members, their descendants and families who reside in the off reservation areas of Riverside County, excluding the Morongo, Torres Martinez and Pechanga reservation lands.

ELIGIBILITY

Eligibility for TANF assistance and services is as established in the Tribe's approved Tribal TANF Plan. Only needy families, as defined in the TANF plan, may receive (a) any form of Federally-funded or State Maintenance of Effort (MOE) - funded "assistance" (as defined at 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 services.

The Tribe may use segregated Federal TANF funds to provide services and related activities that do not constitute "assistance" (as defined at 45 CFR 286.10) to individuals and family members who are not financially deprived but who need the kind(s) of services that meet TANF purposes 3 or 4. Objective eligibility criteria (as outlined in the Soboba Tribal TANF Program Policy) will be established and applied for participation in these services and activities.

Eligibility for these services and related activities under TANF Purposes 3 and 4 will be restricted to individuals and family members who meet "at risk criteria" for the kind of services identified. "At Risk" means engaging in or exposure to behaviors not limited to: out of wedlock pregnancy, alcohol and substance abuse, domestic violence, delinquency, and behavioral problems. Unless the State instructs otherwise, STTP may also use MOE funds to pay for non-assistance pro-family activities for individuals or family members regardless of financial need.

NEEDY FAMILIES

The STTP defines eligible needy American Indian families as families with a total family income equal to or less than (200%) of the Federal poverty guideline. STTP defines an eligible American Indian family as all biological children, step-children, adopted children, relative children (including non-American Indians), or American Indian child(ren) who have been placed by court/tribal family social services under the age of 19 living with an eligible adult and/or eligible minor parent (at least one member of every family must be American Indian).

STTP shall define American Indian as any enrolled members of a Federally-recognized Tribe, members of a California Tribe identified on the California Judgment Roll and their descendants. In addition, all eligible families must meet one of the following guidelines:

- A. American Indian/Non-American Indian single parent with eligible child(ren) or expecting (individuals will become eligible for Tribal TANF services in their third trimester of pregnancy).
- B. American Indian/Non-American Indian two-parent families with eligible child(ren) or expecting (individuals will become eligible for Tribal TANF services in their third trimester of pregnancy).
- C. American Indian/Non-American Indian needy caretaker with eligible child(ren) (non-foster care); caretaker must be related by blood, no limit to the degree of relationship.
- D. Eligible American Indian child(ren) living full time with a non-needy caretaker (excluding child(ren) receiving foster care); caretaker must be related by blood (no limit to the degree of relationship), or eligible child(ren) placed

with a caregiver by Court designated placement, Tribal Custom, and/or Tradition.

E. American Indian/Non-American Indian minor parent with eligible child(ren).

STTP defines "minor parent(s)" as an individual with one or more of the following characteristics:

- Married
- Emancipated
- Deceased Parents
- Whereabouts of parents (of minor parent) are unknown
- Minor parent has lived on his/her own for 1 year
- Tribal Family Services or CPS determines that the minor parent cannot live with their parent(s)

Non-Needy Caretaker (NNC): Adults who are caring for blood relative American Indian child(ren) who have been placed in their care either voluntarily by the legal parent completing a Designation of Indian Custodian, or by either Court, County or Tribal Social Service agencies, may apply for assistance on behalf of the eligible minor child(ren). STTP has established a separate set of criteria that applies to calculating the grant amount for NNC cases per sibling group. STTP's definition of a "care-taker relative" includes: Siblings, Nephews, Aunts, Grandparents, Cousins, Nieces and Uncles. STTP defines eligible dependent child(ren) as a "sibling group" if they share the same birth parent(s). STTP also recognizes non-relative caregivers who have established custody and/or guardianship of eligible American Indian child(ren) per the processes identified in this paragraph and NEEDED FAMILIES section (D) regarding Non-Needy Caretakers above.

NEEDY INDIAN FAMILIES MOVING INTO THE COVERED SERVICE AREA

Eligible needy American Indian families moving into the service area will receive the same amount of cash assistance and/or support services as any other eligible needy TANF family.

STTP TRIBAL TANF ASSISTANCE

The STTP will provide eligible needy participant families monthly TANF assistance as defined in 45 CFR 286.10 in the form of cash, checks, vouchers, or other forms of benefits designed to meet the family's ongoing basic needs including, but not limited to: shelter, clothing, utilities, heating/cooling costs, household goods, personal care items, and general incidental expenses. This includes childcare and transportation assistance for income eligible TANF participants who fulfill their work participation requirements, and eligible participants who are transitioning off of TANF.

NON-DUPLICATION OF SERVICES

All applicants will be required to sign the Tribal TANF application certifying that they are not receiving TANF assistance from another Tribal, State, or County TANF program. Information will be disclosed to other Tribal, State, and County TANF programs to verify non-duplication of TANF assistance or services. Names and

social security numbers of all Tribal TANF applicants will be shared to ensure non-duplication of services.

INCOME AND EARNINGS

All needy families earned net income will be counted toward the STTP Tribal TANF grant amount. STTP may exempt up to the first \$1,000 dollars plus 50% of each additional dollar of earnings (current amount is listed in the program policy as approved by the Tribal Council); subsidized earnings are not counted as income in determining a family's grant. Income that is considered short term and/or infrequent (non-reoccurring) will be averaged when determining cash assistance (i.e. per capita, revenue sharing, extra pay period or bonuses). All unearned income will be counted dollar for dollar towards the potential grant. STTP will exclude all Indian Judgement funds or other disbursements that are excluded under federal law. STTP may exclude some forms of unearned income (not counted as income in determining a family's grant) for example: loans; educational loans/grants; scholarships; income tax refunds; a portion of child support payments; a portion of Unemployment Insurance Benefit (UIB) payments and/or any special stimulus UIB payments (such as benefits under the CARES Act); any earnings from temporary employment with the US Census Bureau as related to the US Census; insurance settlements provided to cover the costs of medical care and/or vehicle repairs; foster care payments (i.e. applicable to needy families only – the foster child and foster care income will be excluded from the Assistance Unit (AU)); SSI or SSP payments (individuals receiving this income will be excluded from the AU); and \$1,000 of unearned income in the form of revenue sharing or per capita payments monthly. A full list of exclusions is provided in program policies.

RESOURCES AND ASSETS

STTP will omit from the resource limit, the following: one home if the family lives in it; one motor vehicle per adult; and up to \$10,000 in all resources and all other assets. On a cases by case basis, STTP may waive the resource limit if the resource is reasonably expected to produce employment or income for the family in the future (e.g., wood cutting equipment, farm machinery, and tools). All other resources beyond this limit shall be considered available income to the needy family, including equity in other vehicles, property, mineral rights, stocks, etc. (exception: Land/Home located on an Indian Reservation). Exceptions may be granted in special circumstances; for example, burial accounts or inoperable vehicles and/or other assets that are held in trust or have no value. Additional exemptions will include: property that is considered cultural, traditional or for subsistence purposes.

TRIBAL OPTIONS

STTP has established the following policies and options for STTP (as funding permits):

1. Will require all school aged children to attend school full time, with regular attendance, verification of enrollment and current status is required. Cash benefits will be reduced until child(ren) return to school and/or maintain regular attendance.
2. Will require proof that all children not in school and under the age of 6 have received appropriate immunizations within 30 days from the date of eligibility. A

financial penalty will be imposed on the parent/caretaker relative for failure to comply with the immunization requirement. In the following situations, the family may be exempt from the immunization requirements: 1) Immunizations are contrary to religious beliefs, and/or 2) immunizations are medically inappropriate.

3. Will require all applicants at intake to complete substance abuse testing. Random testing may be conducted; failure to comply with this requirement may result in an adverse action of benefits or case closure. Participants who test positive will be required to participate in a substance abuse assessment, attend counseling sessions and/or enroll in a rehabilitation program; unless deemed unnecessary by the substance abuse center/counselor in writing. STTP will continue Tribal TANF assistance to the family through a voucher system or deny, reduce or terminate benefits until participant compliance is met (non-needy caretaker exempt).
4. Will exempt parent/needy caretakers who are 55 years of age or older from the work participation requirement. STTP considers American Indian individuals reaching age 55 to be an elder in the Indian community and deserving of deferential treatment.
5. Will deny cash aid for applicants/participants who commit fraud to collect benefits and are found guilty in a court of law, for a maximum of three years. Participants may be fully eligible for cash aid after the three-year suspension of benefits, without future violations.
6. Will deny benefits to individuals for a maximum of three years for conviction of felony drug related crimes. Participants may be fully eligible for cash aid after the three-year suspension of benefits, without future violations.
7. There will be no family cap.
8. No deprivation requirement.
9. Diversion Benefits - May provide diversion (non-reoccurring short term) benefits or services to eligible families at risk of welfare dependency for a maximum of 4 consecutive months in a 12-month period. Diversion benefits are cash payments and/or services provided to families who: 1) are not currently STTP TANF cash aid recipients; 2) are at risk of becoming dependent on TANF; and 3) are in need of a one time or limited benefits to help them avoid dependency on TANF, with a lifetime limit of \$5,000. Families eligible for diversion benefits or services will have income equal to or less than (300%) of the Federal poverty guidelines. These benefits are available as funds permit.
10. Non-recurrent Short Term (NRST) Emergency Disaster Benefits - May provide non-reoccurring short term emergency disaster benefits or services to: eligible needy Indian families whose total family income is equal to or less than 300% of the Federal Poverty Guidelines (FPG) and demonstrates an episode of need in the context of a government declared natural disaster. Disaster assistance is available to those who have been directly impacted by a natural disaster such as earthquake, wildfire, flood, landslide, and as identified via a government (federal, state, tribal, county, etc.) declared disaster, mandatory evacuation, pandemic, etc. These funds are intended to assist families in meeting extraordinary needs that arise out of an emergency, crisis situation, or an episode of need resulting from a recent natural disaster. As provided by 45 CFR

286.10(b)(1), non-reoccurring short term benefits must meet the following criteria: 1) Designed to deal with a specific crisis situation or a necessary episode of need; 2) Are not intended to meet recurrent or ongoing needs; and 3) Will not exceed four (4) months from the start of the crisis situation. There is a maximum lifetime limit of \$5,000 per household for non-recurring short term benefits provided in the context of natural disasters. These benefits are available as funds permit.

11. Will continue to provide assistance to families for children (over 18 years old) who have not attained the age of 19 so long as the child(ren) has not graduated from high school, and is a full-time student in a secondary school (or in an equivalent level of vocational or technical training); and/or if a child has been diagnosed with an educational learning disability with documented proof from a school or licensed therapist, and is enrolled in High School or equivalent.
12. STTP may continue to provide cash assistance while an eligible Tribal TANF parent/needful caretaker is in an inpatient substance abuse treatment program with their child(ren) for a maximum of 90 days. This timeline can be extended on a case by case basis with the approval of the STTP Executive Director.
13. STTP may provide domestic violence, substance abuse, and mental health counseling, education and rehabilitation (non-medical).
14. Will allow participants to accumulate assets through a program of individual or family group development accounts (IDA) as funds permit and as outlined in program policies and/or procedures.
15. Will facilitate participants' receipt of training in money management from a local bank or other nonprofit organization that offers STTP their services free of charge.
16. STTP Will provide once per lifetime marriage promotion activities and support services to assistance eligible TANF participants, not to exceed \$500 as funding permits.
17. STTP will provide a once per lifetime (up to) \$1,000 incentive to assistance eligible TANF participants that marry as funding permits.
18. STTP may provide school aged eligible children whose families are TANF assistance eligible participants (cash aid and transitional), with educational incentives and/or allowances, subject to availability of funds. These incentives and/or allowances include:
 - Report Card incentive-cash awards may be provided to school-age eligible TANF children (K-12) that maintain a "C" average or higher, as funding permits. Eligible children shall receive \$50 for a "C" average, \$75 for a "B" average and \$100 for an "A" average per reporting period for books, school supplies, clothing or personal items.
 - STTP may provide assistance eligible TANF youth that complete high school or obtain a GED, a \$500 incentive. TANF youth may also be eligible to receive cash incentive awards for higher educational degrees and/or certificates.
 - STTP may provide a bi-annual clothing allowance of \$200 for every assistance eligible TANF participant child that attends school (Transitional Kindergarten – 12th grade or equivalent) and is maintaining a "C" grade point

average, subject to availability of funds. Students in their first year of school will be exempt from the grade requirement. Child(ren) who may not have a "C" grade point average, but display special needs and/or an unusual circumstance may still qualify for the clothing allowance. Receipt of this allowance will be verified with school reports and/or verification of participation in special education or school intervention programs (such as a referral to special education, an Individualized Education Plan (IEP), 504 Plan, Student Support Team (SST) report, etc.) or with a letter signed by a medical or mental health professional. Approval of this allowance is made at the discretion of the TANF Executive Director.

19. Will provide prevention and educational activities through the "Leadership thru Education Acquirement and Desire" (L.E.A.D); the goal of L.E.A.D is to encourage students to achieve academic excellence, increase high school graduation and college enrollment, and reduce intergenerational welfare dependency by providing a coordinated and collaborative network of outreach programs and services to young American Indian men and women who engage in behaviors that put them at risk for out of wedlock pregnancy, substance abuse and addiction. L.E.A.D activities may include tutoring groups, college application training/sessions, cultural activities, educational field trips, educational motivational speakers, educational camps, wellness activities, work experience and participation in educational events and activities. Objective "At risk" eligibility criteria applies.
20. STTP may offer employment and training incentives for TANF assistance eligible clients (cash aid and transitional) who obtain a job and/or maintain employment. Additionally, STTP may also include incentives for these assistance eligible participants who meet training or credentialing benchmarks such as a GED or other forms of vocational education or training accreditation. These incentives include (as funding permits):
 - A one-time work allowance of \$500 for families that transition off of TANF cash aid assistance for full time employment. STTP may provide an additional \$200 for retaining the job for 90 days.
 - A once per life-time incentive benefit of \$1,000.00 to families who have received cash assistance for six months or less, and the parent finds full time employment and chooses the payment in lieu of receiving additional cash aid or transitional assistance.
 - A one-time academic incentive of \$500 to clients who obtain a GED.
 - A one-time academic incentive of \$500 to clients who obtain an AA degree or equivalent vocational education/training accreditation.
 - A one-time academic incentive of \$1,000 to clients who obtain a Bachelors of Art or Science degree from an accredited college or university in an effort to promote educational excellence, to reduce out-of-wedlock pregnancies and to strengthen family formation.

SUPPORTIVE SERVICES FOR INCOME ELIGIBLE TANF PARTICIPANTS
(PURPOSE 1 AND 2)

The STTP may provide assistance eligible TANF program participants with the following supportive services:

- A. Skills assessment, job development, placement and education activities designed to support self sufficiency.
- B. Work Experience support services, education, life and employment skills development.
- C. Domestic violence services including, but not limited to: counseling, non-medical domestic violence treatment and relocation (as funding permits).
- D. Childcare and transportation costs for participants who are successfully fulfilling work activity requirements.
- E. May provide referral(s) and outreach for non-medical substance abuse and mental health services related to the removal of barriers to employment, training, and job-related education services.
- F. May provide assistance with dental or vision services as a barrier removal when all other resources have been exhausted.
- G. Family Formation activities including, but not limited to: parenting classes, pre-marital counseling, and expenses related to the marriage of a TANF recipient as an incentive to become a two-parent family (See Tribal Options #16 and #17).
- H. Educational activities and services designed to increase self-sufficiency, job training, and work experience (excluding tuition for public education). May provide justified job related or educational costs to eligible participants cooperating with TANF work participation requirements including, but not limited to the following: books, uniforms, tuition, education, vocational training to obtain employment skills, employment supplies, childcare, clothing allowances and transportation expenses as funds permit.
- I. May provide a one-time payment of up to \$1,000 toward education loans (non-federal loan programs only) that are in default, or towards traffic fines, insurance, vehicle registration and other expenses to obtain or retain a driver's license in the context of removing barriers to employment, education and/or employment related training as funds permit.
- J. Emergency/Crisis Benefits – STTP may provide non-reoccurring short term emergency benefits to current TANF participant families who are experiencing a crisis or emergency (excluding natural disasters). STTP may provide non-recurring, short term services that are: 1) designed to address a specific crisis, or episode of need; and 2) are not intended to extend beyond 4 months as per 45 CFR 286.10 (b) (1) (i-iii), emergency assistance benefits will be limited annually as funding permits.
- K. May provide transitional support services such as: childcare; transportation costs; and costs associated with education/work activities to families who are no longer eligible to receive Tribal TANF assistance due to a mix of earned/unearned income. Transitional services may not exceed 12 months or \$5,000.00 over a lifetime as funding permits.

- L. May provide non-assistance support and emergency services to a Non-Needy Caretaker for the purpose of improving the Caretaker's capacity to care for an eligible dependent child(ren) as funds permit.
- M. May provide childcare assistance to a Non-Needy Caretaker who is employed or attending school and/or training. Childcare will be provided for hours worked or in educational/training activities and travel time to the childcare center. Childcare will only be provided to the eligible TANF child(ren) aided in the TANF assistance unit as funds permit.
- N. Family maintenance and preservation: family-focused and community based services designed to help families cope with stress or problems that interfere with their ability to nurture their child(ren).
- O. As funding permits, may provide non-cash assistance educational training activities to the non-custodial parent of an eligible Tribal TANF family, for the purposes of enhancing the ability of the non-custodial parent to provide child support and other assistance to the child(ren).

SUPPORTIVE SERVICES UNDER TANF PURPOSE 3 AND 4

In addition to assistance eligible families, STTP may also provide "At Risk" and "Other Eligible" families with the following support services that promote TANF Purposes 3 and 4. STTP will apply objective criteria to establish eligibility for participation in these support services.

- A. Activities that promote teen pregnancy prevention, support success in school (i.e. tutoring services), health and wellness, leadership, education and literacy, high school graduation rates, promotion of post-secondary education and other youth prevention activities.
- B. Youth employment services, job readiness activities, career counseling, resume writing and work experience activities.
- C. Culturally relevant support services and activities, including, but not limited to: cultural education, language services, health and wellness, life skills development and prevention activities.
- D. Domestic violence resource and referral services.
- E. May provide alcohol and drug prevention activities including referral(s) and outreach for non-medical substance abuse and mental health services.
- F. Family formation activities including, but not limited to: parenting, anger management, suicide prevention and healthy relationships classes; marital and family counseling.
- G. Family maintenance and preservation: family focused and community based services designed to help families cope with stress or problems that interfere with their ability to nurture their child(ren).

CHILDCARE

STTP may provide childcare funding or services to assistance eligible families participating in approved STTP TANF work and educational activities. Childcare needs are a major barrier to employability and may be provided by contracted state licensed childcare providers, family members or other providers identified by the family and who are approved to provide childcare per program policies.

STTP childcare assistance may be offered as part of transitional services for up to 12 months for families that qualify.

TRIBAL WORK ACTIVITIES

The following work activities relate to and are justified by the Tribe's needs and economic conditions, and are consistent with the purposes of TANF per 45 CFR 286.80(b)(5)(i). Reasonable travel time to and from assigned work/training sites and travel time to and from the childcare provider may be included as time counted toward meeting a participant's work activities requirement to further support the family in attaining the skills needed to enter the workforce. "Reasonable travel-time" is defined as one hour each way, for a total of two hours of travel time per day. STTP's service areas are either rural, isolated areas or areas of high population concentration; in the rural areas there is a significant distance between the area and the work sites and in the highly populated areas there is significant traffic congestion. Both of these circumstances result in long commuting and driving times. The following list of approved work activities is not exclusive:

1. Subsidized Tribal, Public, and private employment.
2. Unsubsidized employment.
3. Participation in "NEW" Native Employment Work activities.
4. On the job training or job shadowing.
5. Work experience (e.g. on the job training program, training intended for a specific industry, apprenticeship and/or internship).
6. Job search/job readiness and basic skill development as per the provisions of 45 CFR 286.105 (b) and (c).
7. Community service programs and volunteer work relative to employment or education.
8. Post-secondary/vocational education training.
9. Job skills training directly related to employment.
10. Education directly related to employment.
11. Satisfactory participation in secondary school or in a course of study leading to a certificate of general equivalence in the case of a recipient who has not completed secondary school or received such a certificate.
12. The provision of childcare services to the children of an individual who is participating in STTP approved work activities.
13. Domestic violence, substance abuse treatment, mental health counseling, education and (non-medical) rehabilitation programs not to exceed 1 year.
14. Entrepreneurship, small business training, self-employment and education related to operating a small business.
15. Life skills training/education: e.g. financial management, health and hygiene practices that will contribute to family wellness and individual readiness for the work force.
16. Culturally relevant work activities that increase self-sufficiency and result in either the attainment of food, the fulfillment of basic needs, or that increase

skills to employment and result in the creation of goods that may be sold. Traditional work activities may include: pottery making, weaving, basketry, wood carving, jewelry making, farming, etc.

MANDATORY WORK REQUIREMENTS

STTP agrees to satisfy the following minimum work participation rates as indicated below and in accordance with 45 CFR Part 286.80(b)(2).

WORK PARTICIPATION RATES

All families (except non-needy caretaker and child only).

Minimum Work Participation Rates: All families (except non-needy caretaker/child only)				
	Single Parent Families		Two-Parent Families	
Fiscal Year	Participation Rate	Weekly Hours of Work	Participation Rate	Weekly Hours of Work
2020	37%	20	37%	30
2021	37%	20	37%	30
2022	37%	20	37%	30

STTP will allow either one parent or both parents in a two-parent family to participate in work activities to meet the minimum work participation requirement. The work hours of both parents can be combined.

LIMITATIONS AND SPECIAL RULES

An individual shall be considered to be engaged in work/training by virtue of participation in any work activity specified in this plan or as approved by STTP in advance. STTP shall consider participation of an individual in a job search and/or job readiness activity for a minimum of 3 days per week to be considered as a full week of participation by that individual. Per 45 CFR 286.105(b)(1)(c), an individual’s job search and job readiness assistance may count toward work requirements for a total of 6 weeks in any fiscal year unless such activity is an ancillary part of other work activities, then there is no time limitation on counting the time spent in job search/job readiness. Additional weeks of job search and job readiness activities (up to an additional 6 weeks for a total of 12 weeks in a fiscal year) may be allowed if the unemployment rate in the STTP service area is at least 50% greater than the United States total unemployment for that fiscal year and/or is authorized by federal regulation (45 CFR Part 286.105(b)(2)).

A single parent, with a child over one year of age shall be required to participate in work activities at a minimum of 20 hours a week. ***A single parent with a child under one year of age*** may be exempt from fulfilling the work requirement until the child reaches 1 year of age. A teen head of household who maintains satisfactory school (high school, GED or college) participation and is working

towards obtaining a High School diploma or GED is considered to be meeting the work participation requirements.

Upon certification by a Case Worker and approval of the STTP Executive Director, STTP will temporarily exempt **victims of domestic violence and inpatient rehabilitation** with children from work participation requirements up to a maximum of 1 year. Domestic violence victims will be exempted from cash assistance overpayment while living in a shelter.

GOOD CAUSE EXEMPTIONS

STTP may temporarily excuse individuals from fulfilling the work participation requirements without penalty for good cause. Good cause issues include, but are not limited to:

- A. Temporary lack of transportation or appropriate child care (Not to exceed one (1) year in extreme cases).
- B. Temporary illness verified by a doctor's statement (Not to exceed one (1) year in extreme cases).
- C. Natural Disasters including, but not limited to: fires, flood, severe winds and /or earthquakes (Not to exceed one (1) year in extreme cases).
- D. A single parent with a child under one year of age (Not to exceed one (1) year).
- E. Victims of domestic violence and/or inpatient rehabilitation with children for up to one (1) year in extreme cases.

Assistance will not be terminated or reduced if a single parent caring for a child under the age of 6 years refuses or stops work activities for one of the following good cause reasons with a certified written statement by STTP staff.

- 1. Unavailability of appropriate child care: "appropriate child care" is defined as affordable, safe, child care provided by an individual in a setting that is acceptable to the parent.
- 2. Unavailable childcare within a reasonable distance from the individual's home or work site: "reasonable distance" is defined as a distance that can be traveled in one hour (round trip) by car or public transportation.
- 3. Unsuitability of informal child care by a relative or under other arrangements: "unsuitability of informal child care" is defined as unacceptable informal child care environment and/or provider due to issues of safety, physical/mental capabilities of provider, etc.
- 4. Unavailability of affordable formal child care arrangements: "affordable child care" is defined as child care costs that are equal to the market-rate charged for comparable services and that comprise less than 10% of a parent's monthly income.

HARDSHIP EXEMPTIONS

Hardships are conditions that hamper or inhibit an individual's ability to maintain work or enter into work activities. STTP will consider the following cases for exemption from the 60-month time limit based upon hardship as determined on a case-by-case basis.

- A. Individuals with significant learning disabilities, as verified by medical and/or professional assessments.
- B. Single parents with numerous children under 12 years of age (4+ children).
- C. Individuals responsible for the full time care of a disabled relative, child or adult as approved on a case-by-case basis, depending upon severity, with proof from a licensed medical authority or professional.
- D. Victims of domestic violence for a period of 6 months as identified in this Tribal Plan.
- E. Individuals with a severe medical condition verified by a licensed medical physician.
- F. Minor Parent who is enrolled in school full time under 18 years of age.
- G. STTP recognizes transportation difficulties in the rural areas as a barrier to work requirements and will make exemptions on a case-by-case basis. This exemption is similar to the State of California Cal Works program allowing Counties to make hardship exemptions for remoteness in rural areas due to transportation difficulties.

STTP may exempt a total of up to 25% of the caseload from the 60-month time limit based on hardship caused by the extensive rural and/or unincorporated service area where participants reside. This exemption is greater than the 20% allowed by the regulation (45 CFR 286.120(1)(c)) due to the proportion of our service area that is rural and isolated, which creates limited employment opportunities and multiple barriers to employment (such as the absence of public transportation, dirt roads, and lack of infrastructure) that results in difficulty obtaining and keeping employment for large numbers of our participants.

PENALTIES AGAINST INDIVIDUALS

If an individual in a family receiving assistance refuses to engage in work or follow policies as required by STTP in the absence of good cause, STTP may reduce or terminate the amount of assistance otherwise payable to the family for that parent/needier caretaker. STTP may reduce or provide limited assistance for basic needs through a voucher system for those individuals that fail to participate in work participation requirements, until such time that the individual(s) resume work requirements. The voucher system will pay for basic needs. Any individual that refuses to participate in substance abuse/mental health counseling when referred by STTP shall be placed on the voucher system. Soboba Tribal TANF will use a dispute resolution process, as noted in this plan, when individuals or families want to challenge the Tribes decision to deny, reduce, suspend, sanction, or terminate assistance, as per 45 CFR 286.75(a)(7). All participants at risk of losing assistance, or receiving sanctions, shall be issued a notice of adverse action 5 business days before said action will begin.

TIME LIMITS

Consistent with the purposes of TANF and the economic conditions and resources of the Tribe as per 45 CFR Part 286.115(b)(1), STTP shall limit the time an eligible adult head of household may receive TANF assistance to a maximum of 60 months. In the case of a two (2) parent family, where one parent has timed-out while in a previous marriage or relationship and has entered into a new marriage or

relationship with a new spouse, the timed out adult will be removed from the assisted unit and STTP may continue to aid the remaining eligible family members in the household.

STTP 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 an Alaskan Native Village in which at least 50% of the adults were not employed and the participant was receiving TANF assistance as indicated in 45 CFR Part 286.115(d). STTP will count all prior months of federal TANF assistance funded with TANF block grant funds except for any month that was exempt or disregarded by statute, regulation, or under any experimental, pilot or demonstration project approved under section 1115 of the ACT.

APPEAL RIGHTS AND PROCESS

As per 45 CFR 286.75(a)(7), the STTP has established the following dispute/appeals process and will apply this process for all individuals and/or families who wish to appeal an STTP decision to deny, reduce, suspend, sanction or terminate assistance and/or supportive services.

- A. The participant may appeal in writing and submit his/her objection of the adverse action to the Site Manager within ten (10) business days of receipt of notification.
- B. The Site Manager will respond with a decision in writing within ten (10) business days. This decision may be appealed in writing to the STTP Executive Director within another ten (10) business days of receiving notice.
- C. The STTP Executive Director will review the documentation and provide a decision and notify the individual in writing within ten (10) business days.
- D. The participant can further appeal the decision to the STTP Board within ten (10) business days of receiving the Executive Director's decision. The STTP Board's decision shall be considered final. The Soboba Tribal Council or a Committee appointed by the Soboba Tribal Council shall constitute the STTP Board.

EQUITABLE PROVISION OF SERVICES

STTP will provide TANF related services to eligible Tribal members and descendants who meet all STTP requirements in an equitable and fair method according to custom and tradition.

CONFIDENTIALITY STATEMENT

All STTP staff are trained on their responsibility to maintain TANF program participant confidentiality; staff receive a copy of the program's policy and are required to sign a statement acknowledging that they understand their responsibility and that any violation of the policy may result in immediate termination.

COORDINATION WITH OTHER PROGRAMS

The STTP will coordinate with other Tribal, Federal, State, County, local service providers and other welfare related agencies to assist applicants and program participants in obtaining additional appropriate support services. STTP will

coordinate with the State, County, local high schools, and community colleges for educational services and to enhance job opportunities.

STTP will coordinate with Tribal, Federal, State, County, and local agencies to assist program participants and other eligible families in obtaining services if a natural disaster were to occur within our service area.

EMPLOYMENT OPPORTUNITIES IN THE SERVICE AREA

The approved service area includes rural, suburban and urban areas.

The Indian reservations served under the STTP are located in rural Riverside County. There are great distances between the reservations and surrounding cities, and the community members are dispersed widely on the reservations themselves. For the Cahuilla, Soboba and Santa Rosa Reservations, ground transportation is dominated by rugged terrain, rough dirt roads and public transportation is not available to community members. At times, severe weather conditions may prevent access to and from the reservations. Further problems in communication and contact are caused by lack of telephone service to many homes in the area. The geographic isolation, rural environment and limited public transportation create barriers to accessing jobs and employment sites.

The Soboba Band of Luiseño Indians provides some employment opportunities at the gaming casino and at local tribal enterprises. The Cahuilla and Santa Rosa Tribes offer limited tribal employment opportunities. Riverside-San Bernardino County Indian Health Inc. offers some opportunities for employment, but most positions require a high level of education, skills and specialization. Such employment opportunities require reliable transportation and specialized skills. Although some employment opportunities exist in the area, many TANF program participants lack adequate training, transportation, and experience numerous barriers that need to be resolved prior to being able to seek training or employment.

Riverside County is vast and includes many isolated/rural communities, urban and suburban areas. Employment opportunities, public transportation and access to resources are limited. The urban areas offer additional employment opportunities, but there is a higher rate of violence, increased isolation from residing outside the home community and the cost of living is extremely high. Although Riverside County's urban areas have more job opportunities and access to public transportation, many TANF participants lack the resources for adequate training. Families with low wage jobs are not able to become economically stable or access the education and training necessary to obtain higher paying jobs.

In addition to the challenges presented by issues with transportation and isolation, STTP clients experience personal challenges that serve as barriers to obtaining and maintaining successful employment and self-sufficiency, such as: cultural resistance, poverty, higher than average rates of unemployment, mental health and substance abuse issues, low levels of education and training.

STTP will work in collaboration with local employers to develop employment opportunities for eligible TANF participants. STTP will establish, develop and maintain relationships with nearby businesses and industries to provide work experience, training opportunities, and subsidized/unsubsidized employment prospects. Riverside County has shifting employment opportunities due to the high cost of living in the area, STTP will work with TANF participants to prepare them for

positions available within the industries specific to the area and address barriers to employment by providing: skills development, educational training, employment assessments, on the job training, referrals, subsidized employment opportunities, and job placements in an effort to promote self-sufficiency and support traditional Native customs. The fastest growing occupations in Riverside County currently include: Home Health Aides, Laborers, Machine Feeders, Material Movers, Brick Masons/Block Masons, Personal Care Aides, Physical Therapist Aids, Physician Assistants, Roofers, Solar Installers, Stonemasons, Software/Applications Developers, and Tile and Marble Setters (per Riverside County Labor Market Information (LMI) dated July 20, 2020 with most recent data reported from the first quarter of 2018). In Riverside County, occupations with the most job openings include: Customer Service Representatives, Cashiers, Food preparation and serving workers, Heavy Tractor/Trailer Truck Drivers, Janitors/Cleaners, Laborers and Freight/Stock/Material Movers, Office Clerks, Order Fillers, Personal Care Aides, Retail Salespersons, Stock Clerks and Waiters/Waitresses (per Riverside County Labor Market Information dated July 20, 2020). The current LMI data appears to represent employment opportunities prior to the onset of the COVID-19 pandemic. To address the unique challenges faced in the remote and mountainous reservation areas, STTP ensures that general education classes and job preparation training are provided on each reservation; computers and phones are accessible to clients in the TANF office; client transportation is provided for job fairs and interviews; commuter/ride share programs are coordinated with TANF clients; and reimbursement for mileage, assistance with tickets and vehicle repairs is available, as permitted for TANF participants complying with TANF required work activities.

REVIEW AND COMMENT ON STTP PLAN

Per CFR 286.75 (a)(6), the Soboba Band of Luiseño Indians provided a 45-day public comment period on the Tribal TANF Plan that concluded prior to submission of the Tribal Family Assistance Plan (TFAP).

DATA COLLECTION AND REPORTING

The Soboba Band of Luiseno Indians and STTP will comply with all federal statutory and regulatory TANF data collection and reporting requirements.

FISCAL ACCOUNTABILITY

For each year that the Soboba Band of Luiseno Indians receives or expends TANF funds, STTP will comply with the fiscal accountability provision of section 5 (f) (1) of the Indian Self-Determination and Education Assistance Act, 25 U.S.C. §5305 (f)(1), relating to the submission of a single audit agency report required by chapter 75 of Title 31, U.S. Code.

RETROCESSION

If the Soboba Band of Luiseño Indians chooses to retrocede the TANF program, it will comply with all the statutory and regulatory requirements pertinent to retrocession.