



Soboba Band of Luiseño Indians Tribal TANF Plan October 1, 2026 - September 30, 2029

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TABLE OF CONTENTS

TRIBAL TANF GOALS	4
DESIGNATED AGENCY	4
PERIOD COVERED BY THE PLAN	5
SERVICE AREA AND SERVICE POPULATION	5
ELIGIBILITY	5
NEEDY FAMILIES	5-6
NEEDY INDIAN FAMILIES MOVING INTO THE COVERED SERVICE AREA	6
STTP TRIBAL TANF ASSISTANCE	7
NON-DUPLICATION OF SERVICES	7
INCOME AND EARNINGS	7-8
RESOURCES AND ASSETS	8
DIVERSION BENEFITS	8
NRST EMERGENCY DISASTER BENEFITS	8-9
SUPPORTIVE SERVICE FOR INCOME ELIGIBLE TANF PARTICIPANTS	9-10
TRANSITIONAL BENEFITS	10
SUPPORTIVE SERVICES UNDER TANF PURPOSES 3 & 4	10-11
CHILDCARE	11
TRIBAL WORK ACTIVITIES	11-12
MANDATORY WORK REQUIREMENTS	12
WORK PARTICIPATION RATES	12-13
LIMITATIONS AND SPECIAL RULES	13
GOOD CAUSE EXEMPTIONS	13-14
HARDSHIP EXEMPTIONS	14-15
PENALTIES AGAINST INDIVIDUALS	15-16
TIME LIMITS	16
TRIBAL OPTIONS	16-19
APPEAL RIGHTS AND PROCESS	19
DISPLACEMENT COMPLAINTS	19-20
EQUITABLE PROVISION OF SERVICES	20
CONFIDENTIALITY STATEMENT	20

COORDINATION WITH OTHER PROGRAMS	20
EMPLOYMENT OPPORTUNITIES IN SERVICE AREA	20-21
REVIEW AND COMMENT ON PLAN	22
DATA COLLECTION AND REPORTING	22
ADMINISTRATIVE COST RATE	22
FISCAL ACCOUNTABILITY	22
RETROCESSION	22

TRIBAL TANF GOALS

The Soboba Band of Luiseno Indians (SBLI) is a sovereign Tribe that administers a Tribal TANF Program that is funded with a federal block grant. The authority granted to SBLI to administer this program is established in the Social Security Act. The regulations that govern Tribal TANF are located at 45 Code of Federal Regulations (CFR) §286.

The mission of the Soboba Tribal TANF Program (STTP) is to assist American Indian families and future generations to reach their fullest potential in securing economic stability while encouraging wellness in the family. The four purposes of TANF are:

1. Provide assistance to needy families so that children can be cared for in their own homes or in the homes of relatives;
2. End the dependency of needy parents on government benefits by promoting job preparation, work and marriage;
3. Prevent and reduce the incidence of out-of-wedlock pregnancies;
4. Encourage the formation and maintenance of two parent families.

In conjunction with the four purposes of TANF, STTP will establish the following goals and measures:

1. Decrease barriers for participants and families so that they can achieve self-sufficiency. Progress will be measured by successful completion of goals and strategies listed in family plans.
2. Increase the employability of needy families by providing education and computer-based trainings. This goal will be tracked by the number of participants who successfully complete classes offered through STTP, local community colleges, universities, and vocational training programs.
3. Reduce risk factors associated with unplanned pregnancies, alcohol/substance abuse and traumatic life experiences. This goal will be measured through successful attendance and completion in ongoing prevention programming.
4. To increase the number of healthy and stable two parent families by providing family mental health group therapy classes and workshops. This goal will be measured by participant attendance and successful participation in services as reflected in provider reports, case management and client self-reports.

STTP aims to provide eligible participants at risk of welfare dependency with assistance and services to empower them to transition from STTP to self-sufficiency. 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 American 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 who reside within the approved service areas: Cahuilla Reservation, Santa Rosa Reservation Soboba Reservation, the City of Riverside, and the off-reservation areas of Riverside County. Field offices will be established at service sites in Riverside County, the City of Riverside, 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, 2026** through **September 30, 2029**.

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, American Indian/Alaska Natives (AI/AN), 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

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 a household with dependent biological children, step-children, adopted children, relative children (including non-American Indians), or American Indian child(ren) who have been placed by the guardian, a Court designated placement, Tribal Social Services, State/County Social Services, Tribal Custom and/or Tradition under the age of 19 living with an eligible adult and/or eligible minor parent (at least one member of the Assistance Unit must be American Indian/Alaska Native).

STTP shall define American Indian as any enrolled members of a Federally-recognized Tribe, members of the California Judgment Rolls, their descendants and families. 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) who are living with them full time. Guardianship must be established by the parent/guardian, a Court designated placement, Tribal Social Services, State/County Social Services, Tribal Custom and/or Tradition.
- D. Eligible American Indian child(ren) living full time with a non-needy caretaker (excluding child(ren) receiving foster care) who are living with them full time. Guardianship must be established by the parent/guardian, a Court designated placement, Tribal Social Services, State/County Social Services, 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): STTP defines a "Non-Needy Caretaker" as Adults who are self-sustained and are caring full time for eligible American Indian child(ren) who have been placed in their care and whose guardianship has been established by the parent/guardian, a Court designated placement, Tribal Social Services, State/County Social Services, Tribal Custom and/or Tradition. STTP has established a separate set of criteria that applies to calculating the grant amount for NNC cases per sibling group. STTP defines eligible dependent child(ren) as a "sibling group" if they share the same birth parent(s).

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

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 (i.e., for food, clothing, shelter, utilities, household goods, personal care items, and general incidental expenses). This includes childcare and transportation assistance for income eligible TANF participants who are not employed. Note: For income eligible families who are employed or transitioning off of TANF, childcare and transportation are defined as an employment supportive service (non-assistance). STTP refers to families receiving "TANF assistance" as "cash aid families".

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

When determining a family's initial eligibility for TANF assistance (cash aid), a family's total earned income must be at or below 200% of the federal poverty guidelines (FPG).

After a family is determined eligible based on the FPG's, STTP will then determine if a family is eligible for a monthly grant. 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 net earnings when calculating monthly grants; 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 with the exception of the items noted below. Current STTP grant amounts are listed in the approved program policy.

STTP will exclude from the STTP monthly grant calculation the following types of unearned income:

- all Indian Judgement funds or other disbursements that are excluded under federal law;
- insurance settlements provided to cover the costs of medical care and/or vehicle repairs;
- income tax refunds;
- up to \$1,000 per capita payments;
- a portion of Tribal revenue sharing income monthly;
- Some forms of unearned income (not counted as income in determining a family's grant) intended to stabilize the family, address an emergency, assist families on their educational/vocational plan and to prevent families from further barriers for example:
 - loans;

- educational loans, grants, scholarships, work-study, financial aid;
- GI Bill educational assistance to service members, veterans and their dependents;
- VA education, training, vocation or rehabilitation benefits (Exclusion of VA benefits will be determined on a case-by-case basis to insure there is no conflict with federal rules or laws);
- All income received from Universal Basic Income Programs (i.e., California State Guaranteed Income Pilot);
- 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;
- retirement income drawn down early to cover the cost of bills such as medical care, or other basic necessity with proof of spend down;
- foster care payments (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);
- \$1,000 of Tribal General Welfare Assistance.

Additional details provided in STTP Policy.

RESOURCES AND ASSETS

STTP resource limit is \$10,000. Excluded from this limit are: one home if the family lives in it; land/home located on an Indian Reservation; one operating motor vehicle per adult; property that is considered cultural, traditional or for subsistence purposes; and any retirement accounts (i.e., 401k) including IRA and Roth Accounts. Additional exceptions may be granted in special circumstances where a resource/asset has no immediate value, for example, burial accounts, inoperable vehicles, and/or assets that are held in trust or have no value. On a case-by-case basis, STTP may exempt a resource if it is reasonably expected to produce employment or income for the family in the future (e.g., wood cutting equipment, farming/machinery, and tools). All other resources beyond the resource limit shall be considered available income to the needy family, including equity in other vehicles, property, mineral rights, stocks, retirement disbursements, etc.

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 \$10,000. 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.

NON-RECURRENT SHORT TERM (NRST) EMERGENCY DISASTER BENEFITS

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 identified via a government (federal, state, tribal, county, local, etc.) declared 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 \$12,000 per household with a \$3,000 limit per disaster declaration for non-recurring short-term benefits provided in the context of natural disasters. To be eligible for these funds, eligible needy American Indian families must have a total family income that is equal to or less than 300% of the Federal Poverty Guidelines (FPG). Families also must be able to demonstrate an episode of need in the context of a government declared natural disaster (federal state, tribal county, etc.) such as earthquake, wildfire, flood, landslide, pandemic and can include needs related to a government required response such as a mandatory evacuation. These benefits are available as funds permit.

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 #17 and #18).
- 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, and clothing expenses as funds permit.
- I. May provide a one-time payment toward education loans 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 emergency benefits 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. Examples of benefits that may be provided are beds, bedding, or other vital necessities to ensure the safety and well being of the aided child(ren).
- L. 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.
- M. Family maintenance and preservation: family-focused and community-based services such as counseling, social support groups, or traditional parenting activities designed to help families cope with stress or problems that interfere with their ability to nurture their child(ren).
- N. 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).

TRANSITIONAL BENEFITS

May provide transitional support services to families who are no longer eligible to receive Tribal TANF cash assistance due to a mix of earned/unearned income. Transitional benefits include services to support and secure maintaining of employment such as: childcare; transportation costs; and costs associated with education/work activities. Transitional services may not exceed 24 months or \$10,000 over a lifetime as funding permits.

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. *Reference section: Eligibility.*

- A. Child/youth activities that promote the prevention of teen pregnancy, 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. *Reference section: Tribal Options #20.*

- B. Youth employment services, job readiness activities, career counseling, resume writing and work experience activities. *Reference section: Tribal Options #20.*
- C. Culturally relevant support services and activities which foster self-initiative, strengthen community involvement and support, promote knowledge of culturally traditional family formation, building of social support networks, and increasing use of Tribal community resources. Activities can include: cultural education, language services, life skills development and prevention activities that support a healthy lifestyle.
- 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, 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). Activities including, but not limited to: parenting, anger management, suicide prevention and healthy relationship classes; marital and family counseling.

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 24 months for families that qualify. *Reference Transitional Benefits section.*

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 is a list of approved work activities:

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 (not from their own household) who is participating in STTP approved work activities.
13. Domestic violence and substance abuse treatment/rehabilitation services, (non-medical) not to exceed 1 year.
14. Career counseling, educational/vocational assessments, mental health assessments, mental health counseling (non-medical) and related educational workshops.
15. Entrepreneurship, small business training, self-employment and education related to operating a small business.
16. Life skills training/education: e.g., financial management; wellness (i.e., healthy life style choices); health and hygiene practices that will contribute to family wellness and individual readiness for the work force.
17. Cultural classes and activities that foster the development of positive self-esteem, confidence, etiquette, awareness of norms, self-initiative and improve employability skills and executive function (as approved on the family's work plan and targeted at addressing identified barriers). Classes cannot exceed 10 hours per week for single parent families, and 15 hours per week for two parent families.
18. Culturally relevant work activities that increase self-sufficiency and result in either the attainment of food, fulfillment of basic needs, or that increase skills to employment and result in the creation of goods that may be sold. Examples of traditional work activities can include: pottery making, weaving, basketry, wood carving, jewelry making, farming, hunting, fishing, and maintaining/raising cattle.

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
2026	30%	20	30%	30
2027	30%	20	30%	30
2028	30%	20	30%	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 and 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. STTP defines “Good Cause” as temporary conditions or events that reasonably prevent the participant from completing countable work activities due to circumstances beyond their control.

Good cause exemptions will be provided for participants who are able to demonstrate evidence of good cause. Good cause examples include:

- A. Temporary lack of transportation or appropriate child care (Not to exceed four (4) months in extreme cases).
- B. Temporary lack of housing (Not to exceed four (4) months in extreme cases).
- C. Temporary illness verified by a doctor's statement (not to exceed four (4) months in extreme cases).
- D. Natural Disasters (not to exceed four (4) months in extreme cases).
- E. Victims of domestic violence and/or inpatient rehabilitation with children (*Reference section: Limitations and Special Rules*).
- F. A single parent with a child under one year of age (Not to exceed one (1) year).
- G. Additional good cause circumstances may be considered with evidence that the participant is experiencing an extenuating circumstance and is unable to comply with work activity requirements. These instances will be approved on a case-by-case basis by the Executive Director.

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 as per 45 CFR 286.150.

- 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 extraordinary conditions beyond the participants control that severely 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) (Not to exceed one (1) year in extreme cases).

- 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 (Not to exceed one (1) year in extreme cases).
- D. Victims of domestic violence (Not to exceed six (6) months in extreme cases).
- E. Individuals with a severe medical condition verified by a licensed medical physician and determined on a case-by-case basis.
- F. Minor Parent who is enrolled in school full time under 18 years of age.
- G. STTP recognizes transportation difficulties in 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.
- H. By virtue of being a new blended family (i.e., a new marriage or relationship), where each adult entered the relationship with different time on aid counts, STTP recognizes a hardship when both parents have not been able to fully benefit from TANF services and assistance that can help stabilize the newly blended family, and support the parents in securing stable employment and a livable wage for the new family unit. In this situation, a hardship exemption may be provided, which would default the family timeclock to the parent with the highest remaining months.

STTP defines a "rural area" as a geographic location on the outskirts of town that are densely populated and lack public transportation. STTP provides services to three Indian Reservations located in rural areas: Soboba, Santa Rosa, and Cahuilla Indian Reservations.

STTP will continue to exempt a total of up to 25% of the caseload from the 60-month time limit based on hardship. Participants residing in the rural and/or unincorporated service areas in Riverside County and on the Reservations served under the program experience significant and unique barriers that often require additional time and resources to resolve. These barriers include limited transportation access; limited access to employment opportunities; geographic isolation; and lack of basic infrastructure supports such as running water and sewer services. 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 contributes to greater/more significant barriers and limits to employment and training opportunities. These barriers and limitations result 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. STTP 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.

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). These families do not count toward the 25% hardship exemption. 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.

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. All children aided in the cash aid assistance household will receive an annual **\$300** clothing allowance as funding permits. **This clothing allowance is intended to help families with non-school aged children and/or children who are not eligible for clothing incentives.**
3. In the best interest of stabilizing families and reducing barriers, STTP may continue to provide aid to currently active TANF cash aid families who are compliant with an active re-unification plan (with Child Protective Services (CPS) or Tribal/County Social Services) for a maximum of 6 months while the children are temporarily removed from the home and the parent/guardian is working to reunify their household as per section 408(a)(10) of the Social Security Act. The payment will be reduced to reflect the current assistance unit (not to include the children removed from the home). When the family is re-unified, the children will be added back into the assistance unit.
4. Will require all applicants at intake to complete substance abuse testing. Random testing may be conducted thereafter; 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).

5. 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. STTP will work with these families to determine activities beneficial to their abilities; assess their needs and progress; and provide outside referrals and resources as deemed necessary to eliminate harm when they timeout of Tribal TANF assistance.
6. 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.
7. 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.
8. There will be no family cap.
9. No deprivation requirement.
10. Diversion Benefits to eligible families who have income equal to or less than 300% of the Federal poverty guidelines. These benefits are available as funds permit. *See Diversion Benefits section.*
11. Non-recurrent Short Term (NRST) Emergency Disaster Benefits to eligible needy American Indian families whose total family income is equal to or less than 300% of the Federal Poverty Guidelines (FPG) and demonstrate an episode of need in the context of a government declared natural disaster as provided by 45 CFR 286.10(b)(1). These benefits are available as funds permit. *See NRST Emergency Disaster Benefits section.*
12. Will continue to provide assistance to families with children (over 18 years old) who have not attained the age of 19 and are a full-time student in a secondary school (or in the equivalent level of vocational or technical training).
13. STTP may continue to provide cash assistance while an eligible Tribal TANF parent/needy 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.
14. STTP may provide domestic violence, substance abuse, and mental health counseling, education and rehabilitation (non-medical).
15. 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.
16. 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.

17. STTP Will provide once per lifetime marriage promotion activities and support services to assistance eligible TANF participants, not to exceed \$1,000 as funding permits.
18. STTP will provide a once per lifetime (up to) \$1,000 incentive to assistance eligible TANF participants that marry as funding permits.
19. STTP may provide school aged eligible children whose families are **TANF assistance participants** (cash aid and transitional), with educational incentives, subject to availability of funds. These incentives 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 \$150 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 an annual clothing incentive of \$300 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 incentive. Receipt of this incentive 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 incentive is made at the discretion of the TANF Executive Director.
20. 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 activities 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, educational field trips, motivational speakers, camps and events; cultural activities that foster the development of positive self-esteem, support networks, connection to community, self-initiative, and promote knowledge of cultural traditional family formation and pregnancy prevention; wellness activities that provide education on essential life skills; and work experience. Objective "At risk" eligibility criteria apply. As funding permits. *Reference section: Supportive Services Under TANF Purpose 3 and 4.*
21. STTP may offer employment and training incentives for **TANF assistance participants** (cash aid and transitional) who obtain a job and/or maintain employment. Additionally, STTP may also include incentives for these

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 incentive of \$500 for families that transition off of TANF cash aid assistance for full time employment. STTP may provide an additional \$500 for job retention after 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 \$1,000 to clients who obtain an AA degree or equivalent vocational education/training accreditation.
- A one-time academic incentive of \$1,500 to clients who obtain a Bachelors of Art or Science degree from an accredited college or university in an effort to promote educational excellence and a livable wage.
- A one-time academic incentive of \$2,000 to clients who obtain a Master's Degree or higher educational degree from an accredited college or university in an effort to promote educational excellence and a livable wage.

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.

DISPLACEMENT COMPLAINTS

Pursuant to § 286.110, STTP maintains a Policy and safeguards that ensures that participants in Tribal TANF work activities do not displace other workers from 1) the same or any substantially equivalent job; or 2) the employer has terminated the employment of any regular employee or otherwise caused an involuntary reduction

in its workforce in order to fill the vacancy with the TANF participant. A notice will be posted and grievance forms available at each work site; individuals can register a complaint in writing or on a Grievance Form by submitting their complaint to STTP directly.

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, lower 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: Wind Turbine Service Technicians, Machine Feeders and Off bearers, Occupational Therapy Assistants, Physician Assistants, Information Security Analysts, Statisticians, Phlebotomists, Personal Care Aides, Diagnostic Medical Sonographers, and Occupational/Physical Therapists Assistants/Aides (per Riverside County Labor Market Information (LMI) dated July 20, 2023 with most recent data reported from the first quarter of 2022). In Riverside County, occupations with the most job openings include: Home Health and Personal Care Aides, Fast Food/Counter Workers, Laborers and Freight, Stock and Material Movers, Stockers and Order Fillers, Cashiers, Industrial Truck and Tractor Operators, Retail Salespersons, Heavy and Tractor-Trailer Truck Drivers, Waiters and Waitresses, Janitors and Cleaners (except Maids and Housekeeping Cleaners) (per Riverside County Labor Market Information dated July 20, 2023). The current LMI data appears to represent employment opportunities after 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.

ADMINISTRATIVE COST RATE

The Soboba Band of Luiseno Indians and STTP will abide by the Administrative Cost Rate to not expend more than 25% of the federal TANF grant on administrative costs per 45 CFR 286.50(c).

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.