



# **Mille Lacs Band of Ojibwe**

## **477 Master Plan**

**October 1, 2022 through September 30, 2025**

**FY23-FY25**

**43408 Oodena Drive, Onamia, MN 56359**

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**43408 Oodena Drive, Onamia, MN 56359**

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**Name of Tribe: Mille Lacs Band of Ojibwe**

**Band Authorized Signatory: Melanie Benjamin**

**Commissioner's Telephone: 320-532-7487**

### **Certification and Signature**

The attached and signed joint resolution [The Band Assembly resolution number goes here] certifies the Mille Lacs Band of Ojibwe support for the submission and continued operation of this P.L. 102 – 477 Plan, which incorporates Native Employment Works (NEW), Temporary Assistance for Needy Families (TANF), Workforce Innovation and Opportunity Act (WIOA) funds for both adult and youth, Job Training Partnership Act (JTPA), and Child Care and Development Funds (CCDF) as described herein effective for the period October 1, 2022 through September 30, 2025.

## **The Mille Lacs Band of Ojibwe 477 Program (hereinafter Program) Funding:**

### **477 Program Description**

The Mille Lacs Band 477 Program provides services to Tribal members seeking to establish self-sufficiency for themselves and their families pursuant to this Plan and in accordance with P.L. 102-477, as amended. The following funding streams from the sources listed are incorporated into this Plan and will be utilized to achieve Band objectives pursuant to this Plan and in accordance with P.L. 102-477, as amended:

#### ***Department of Health and Human Services***

- Native Employment Works (NEW) - \$61,723
- Temporary Assistance for Needy Families (TANF) - \$4,550,816
- Child Care Development Fund (CCDF)-FY 2016 - \$191,580

#### ***Department of Labor***

- Workforce Innovation and Opportunity Act (WIOA) Adult Services - \$52,249
- Workforce Innovation and Opportunity Act (WIOA) Youth Services - \$23,295

#### ***Department of the Interior***

- Job Placement and Training (JPT) - \$64,031
- Welfare Assistance - \$155,003

The estimated annual allocation of the combined grant funds total is \$5,147,597. The Mille Lacs Band of Ojibwe (MLBO) will authorize up to 10% of the total program funds to be utilized for economic development initiatives within the program which will be used to enhance entrepreneurial opportunities for tribal membership. This limits the maximum total allocation for these initiatives to be \$514,760 per year. Funds that are not earmarked for economic development and which are not utilized during the grant year may be used for 477 program supportive services to eligible clients. The Program will work in cooperation with our P.L. 102-477 federal program partners for review prior to the expenditure of carryover funds for this initiative.

In accordance with the Administration of Children and Families guidance, the MLBO stipulates TANF funds shall be administered through this program in such a manner as to allow for a determination that funds from specific programs, or an amount equal to the amount attracted from each program are consistent with statutory requirements, regulations, policies and procedures unless a specific waiver is granted by the appropriate secretary of the awarding agency.

# Approaches to Services, Program Goals and Eligibility

## Services

The Program has adopted a culturally appropriate name, Aanjibimaadizing, which translates as, *changing lives*. Aanjibimaadizing is operated as a division of the MLBO Department of Administration. The goals of the Program are centered on our mission statement which is:

*To assist our fellow Anishinaabe with education, training, work experiences, cultural participation, and support services to be prosperous and change their life.*

The Program's goals concentrate on empowering its participants to end dependency on government assistance with an acquired purpose, or an occupation that will contribute to the well-being of their community and family. All program services are offered to support obtaining and retaining employment, improving or creating a position of job readiness, and addressing barriers that prevent our clients from simply filling their employability development plan. The program anticipates at least 10% of program participants to obtain unsubsidized employment.

## Recruitment

Aanjibimaadizing has offices in the District 1, District 2, District 3 and the Urban area. Youth Services are provided in District 1, District 2, District 2a, District 3 and the Urban Area. The offices are open to walk in clients. Clients can also call or email. Aanjibimaadizing also has information on the MLBO website, at their aanji.org website, and an informational Facebook account. Other MLBO departments make referrals to the programs on a weekly basis.

## Mille Lacs Band of Ojibwe P.L. Law 477 Goals 2022-2025

- Create youth mentorship/internship and training opportunities in all Mille Lacs Band districts that will synchronize with *Anishinaabe values*, for example, servant leadership to look at the well-being of people and community. This will ensure youth have a positive ongoing relationship with tribal government and promote healthy relationships with adults in the community. These opportunities will be measured by the number of youth placed in mentorships/internships and the number of youth who have completed these opportunities. The program anticipates that 50% of all youth placed will complete the internship successfully.
- Develop Ojibwe language resources, materials, and training to be used long term with Aanjibimaadizing clients and all Mille Lacs Band members to increase the use of language, number of speakers, and improve the health and education of the community holistically. Measured by the number of books, resources, and materials available at the end of this three-year plan in comparison to current resources. Currently there is one level of Rosetta Stone. We anticipate the launch of at least one more level of Rosetta Stone in the three-year plan period.

- Build and strengthen our training program in the following areas: outreach to potential clients, emphasis on the importance of gaining new knowledge including digital literacy, which will help in job advancement. In addition, this will help clients see the importance in self-growth, by growing their skills. This will be measured by the number of clients attending trainings or the number of clients gaining employment, thus advancing their careers.
- Increase indigenous business development of individuals and companies by promoting skills to build human capital, business plans/development and problem solving. Measured by the number people attending small business classes and number of people obtaining a small business development grant.

### **Mille Lacs Band of Ojibwe Goals**

The Band's Chief Executive issued a directive at the State of the Band in January 2022 to first stream-line policies and procedures and secondly to improve relationships with Band members with a focus on enhancing customer service skills. The Commissioner of Administration also directed the Aanjibimaadizing program to create "youth mentorship and training opportunities" to develop workforce skills in the Mille Lacs Band youth.

The Chief Executive, as well as community surveys, have identified that Ojibwe language revitalization efforts are integral to sustaining our way of life and our inherent rights as a sovereign nation. Culturally relevant practices, teachings and trainings will be provided to clients. The Tribe is confident in their ability to self-determine needs. The elders have determined that language revitalization is the key to self-sufficiency and our well-being.

### **Client Goals**

Participant goals will be tracked in the electronic data system. Outcomes will be demonstrated and reviewed on a quarterly basis. The 477 Statistical report and anecdotal data will be used to demonstrate program effectiveness. The program would like 75% of clients to have some measure of demonstrated success at completing outcomes.

### **Eligibility**

To be eligible for 477 services, an applicant must meet at minimum these 5 eligibility criteria:

- A signed and dated application
- Proof of residency in the service area
- Tribal Membership
- Selective Service Registration for males over the age of 18
- Employability Development Plan (EDP) that is signed and dated

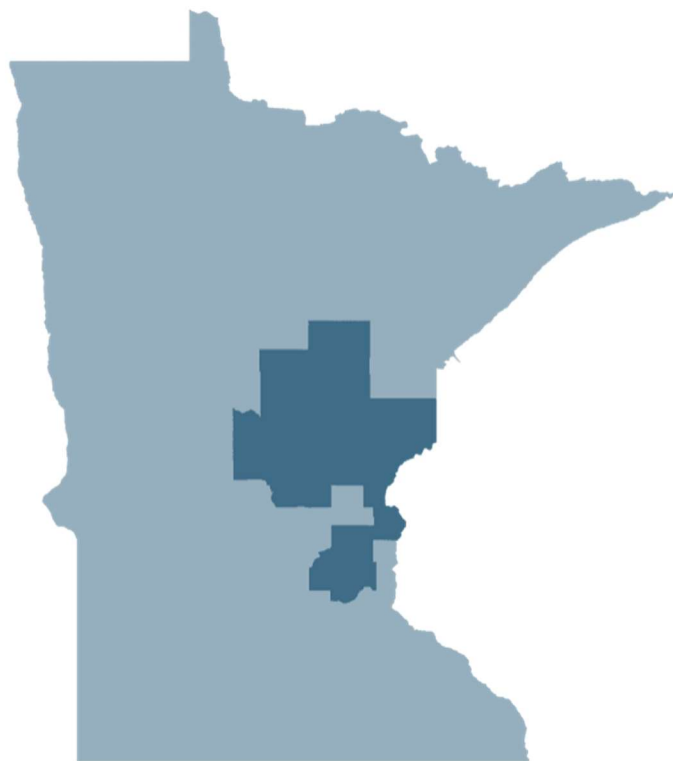
Other components of the program may need additional documentation, including income. Those requirements will be spelled out in the policies and procedures. Aanjibimaadizing will serve a majority of low-income participants.

When determining eligibility, the following guidelines also apply:

- A percentage of earned income is disregarded for work expense. This percentage is established by the MLBO APB (Administrative Policy Board) and is currently set at 42%.
- All child support payments made for the support of children not living in the assistance units' households shall be deducted from the gross earned income calculation.
- Other income exclusions will be defined in the program policies and procedures.
- Employment income earned from working with the Census Bureau will be disregarded.
- Per Capita payments will be considered disregarded income.
- Stimulus payments from the federal, state, or tribal government will be disregarded.

The Mille Lacs Band of Ojibwe is one of the largest employers in Minnesota, employing 2,450 people in tribal government and its business enterprises. In Minnesota, there were 205,714 job vacancies the 4th quarter of 2021, with more than half being located in the Metro area according to Minnesota Employment and Economic Development. For employment opportunities internally and with employers working on MLBO projects, TERO (Tribal Employment Rights Office) provides hiring preference for tribal members. Being registered with our program provides our clients an avenue to being job-ready. The program will work closely with TERO, MLBO government departments, MLBO gaming and non-gaming businesses, private and public partnerships to recruit partners to assist clients in obtaining and retaining employment.

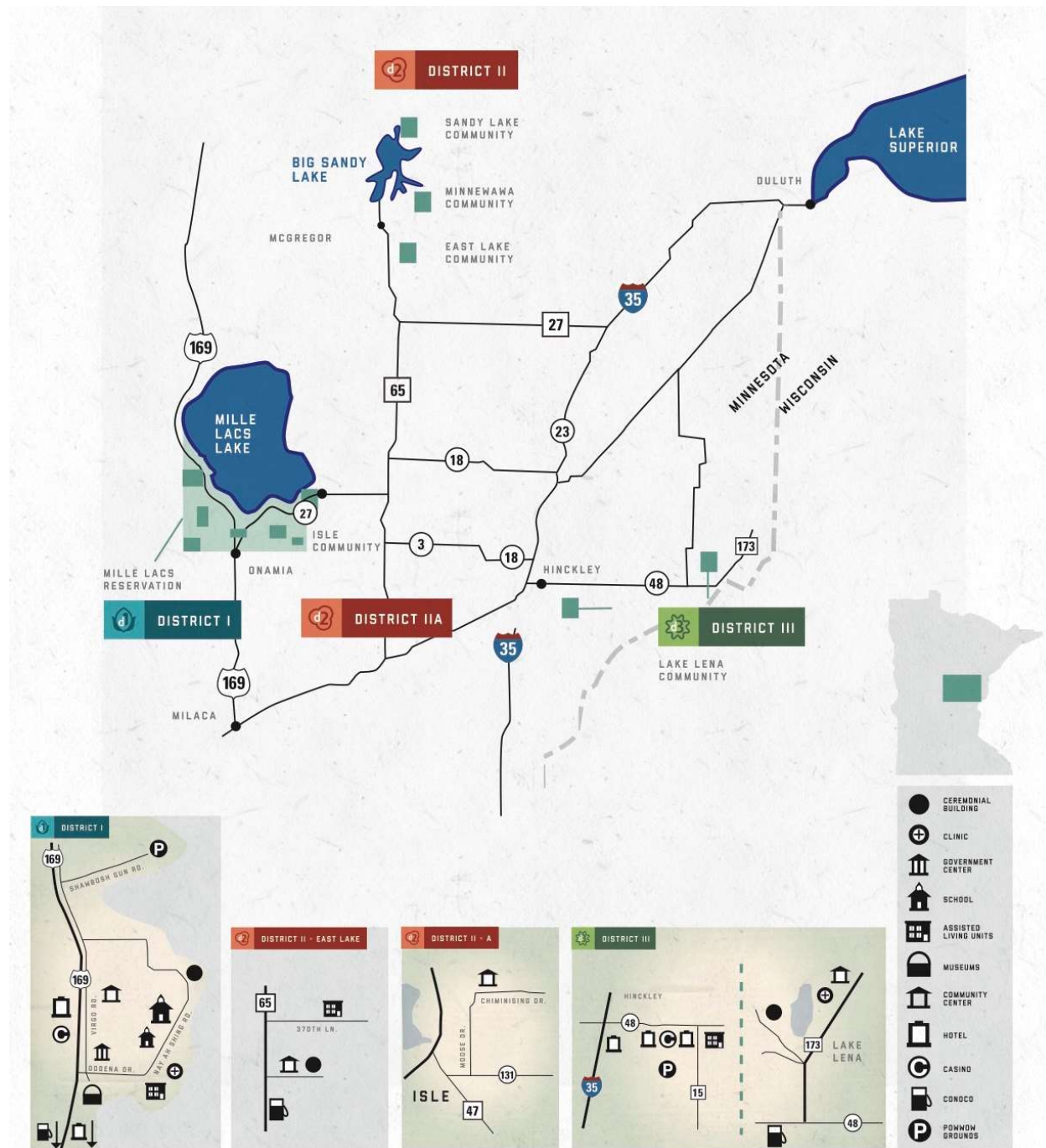
#### **Service Area for the Mille Lacs Band of Ojibwe 477 Plan**



#### **Includes the counties of:**

- **Aitkin**
- **Anoka**
- **Benton**
- **Chisago**
- **Crow Wing**
- **Hennepin**
- **Kanabec**
- **Mille Lacs**
- **Morrison**
- **Pine**
- **Ramsey**

## Mille Lacs Band of Ojibwe Reservation



As of March 2022, the Mille Lacs Band of Ojibwe has 4,897 Band members, including 2,758 living on Reservation lands (Districts: 1, 2, 2a & 3), 905 living in Urban and 1,234 living off the reservation or out of state. The Mille Lacs Band of Ojibwe Reservation is comprised of four small communities in central Minnesota: District 1—Mille Lacs (Mille Lacs County), which is located 12 miles North of Onamia. District 2—East Lake (Aitkin County), which is located 3 miles South of McGregor. District 2a (Mille Lacs County), which is located just outside of Isle.

### Mille Lacs Band of Ojibwe 477 Plan for 2023-2025

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Written: 3/22/2022 Revised: 6/28/22, 9/1/22, 9/9/22 Amended: Band Assembly Approval: 6/29/22 Federal approval: 9/27/22



District 3—Lake Lena (Pine County), which is located 30 miles East of Hinckley. There are significant members of the MLBO living in Hinckley and the Minneapolis/St. Paul area. The Mille Lacs Band is one of six members of the Minnesota Chippewa Tribe, which was formed in 1934, during the Indian Reorganization Act. The other Bands that make up the Minnesota Chippewa Tribe are: Mille Lacs, White Earth, Leech Lake, Bois Forte, Fond du Lac and Grand Portage.

The 2015 Amherst H. Wilder Foundation’s Minnesota Early Childhood Risk and Reach Report examined economic risks, health risks, and family stability risks in all Minnesota counties. Then each county was assigned an overall risk status. The MLBO has land in three counties: Mille Lacs, Aitkin, and Pine. Mille Lacs and Pine counties are considered high risk. Aitkin County is considered moderate to high risk.

### ***Mille Lacs Band of Ojibwe and Governing Structure***

The Mille Lacs Band of Ojibwe Government is separated into three branches. These branches consist of:

- A. The Legislative Branch, known as the Band Assembly, enacts laws to regulate internal and external affairs of the Mille Lacs Band. The Secretary/Treasurer and District Representatives from each district serve as the body of the branch (Mille Lacs Band of Ojibwe, 2009).
- B. The Executive Branch implements the Band’s laws and administers the Band’s programs and services. The Executive Branch is headed by the Chief Executive with a cabinet consisting of the Commissioners of which the Chief appoints (Mille Lacs Band of Ojibwe, 2009).
- C. The Judicial Branch upholds the Band’s laws and ensures justice is served equally to all band members. The Judicial Branch includes the Chief Justice and the Court of Central Jurisdiction. The Court of Jurisdiction consists of three appellate justices and one district judge (Mille Lacs Band of Ojibwe, 2009).

The Mille Lacs Band businesses use a significant portion of revenue earned to provide valuable programs and services to Mille Lacs Band Members. Some of these programs and services include: Tribal Police Department, Preschool programs, K-12 schools, youth services, a Scholarship Program, community centers, clinics in each reservation district, Tribal health insurance program, Elder services and assisted living units in each reservation district and Ceremonial Buildings. The Mille Lacs Band also invests in community roads, water and wastewater treatment facilities, community facilities, housing and other infrastructure improvements.

The Program will provide services in our Reservation Service Area, which includes the Minnesota counties of Aitkin, Benton, Crow Wing, Mille Lacs, Morrison, Pine, Chisago, and Kanabec counties. Our Urban service area includes the counties of Hennepin, Anoka, and Ramsey counties. The service area will include the use of technology for participants and staff. A more detailed description of major service areas follows. Our service population includes

members of the Mille Lacs Band of Ojibwe, enrolled members of other Federally Recognized Tribes, and first-generation descendants of the Mille Lacs Band of Ojibwe.

### ***Service Area***

The service area is defined as all on/off-reservation areas in the following counties: Aitkin, Anoka, Benton, Chisago, Crow Wing, Hennepin, Kanabec, Mille Lacs, Morrison, Pine and Ramsey.

This Urban area is limited to members and descendants of the Mille Band of Ojibwe, and members of federally recognized Tribes for 477 services. It is limited to members of the Minnesota Chippewa Tribes who are eligible for cash assistance. The 60-month time limit will apply for cash assistance in all counties, listed above. Aanjibimaadizing will limit service to Mille Lacs Band of Ojibwe and descendants for child care assistance in the Urban area.

### ***District 1 and District 2a***

Aanjibimaadizing's main office is located on the reservation, north of Onamia in Mille Lacs county. The recruitment area is a 60-mile radius from the District 1 reservation including the counties of Mille Lacs, Benton, Crow Wing, Morrison, and Benton counties. This area includes District 2a (Isle).

According to the 2020 U.S. Census data, Mille Lacs County has a total population of 26,459. Out of the total population, 6.3% is under the age of five, 6.4% are American Indian and 9.2% of the total population is living in poverty. The median income is \$56,135. The high school graduation rate is 89.8%. According to the Minnesota Unemployment Statistic LAUS (Local Area Unemployment Statistics) Data as of December 2021, the Mille Lacs county unemployment rate was 5.2%. According to the Minnesota Employment and Economic Development—State and National Employment and Unemployment Rates, the unemployment rate for the U.S. is 3.9% and the Minnesota unemployment rate as 3.1%. The Mille Lacs Reservation unemployment rate is 11.0% based in U.S. Census data. This data includes all Reservation land areas.

### ***District 2***

Aanjibimaadizing has another location the town of McGregor in Aitkin County, in what Band members call—Minisinaakwaang. The recruitment area is a 30-mile radius, including most of Aitkin County.

According to 2020 U.S. Census data, Aitkin County has a total population of 15,697. Out of the total population, 3.7% is under the age of five, 2.7% are American Indian and 11.1% of the total population is living in poverty. The median income is \$49,351. The high school graduation rate is 91.2%. According to the Minnesota Unemployment Statistic LAUS (Local Area Unemployment Statistics) Data as of December 2021, the Aitkin County unemployment rate was 4.9%.

### *District 3*

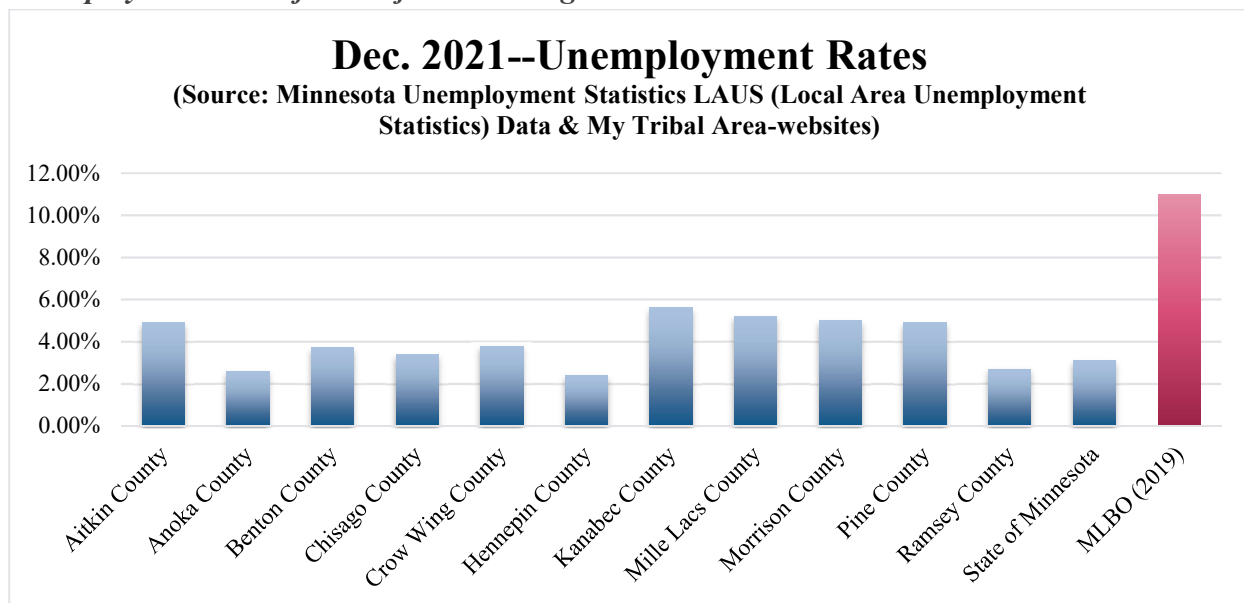
Aanjibimaadizing also operates out of the Aazhoomog area, east of Hinckley in Pine County. The recruitment area is a 30-mile radius from the reservation and includes Pine County. Services for youth are provided in Hinckley at the Meshakwad Community Center. Services are not provided for Wisconsin residents.

According to 2020 U.S. Census data, Pine County has a total population of 28,876. Out of the total population, 4.6% is under the age of five, 3.4% are American Indian and 10.2% of the total population is living in poverty. The median income is \$53,422. The high school graduation rate is 90.4%. According to the Minnesota Unemployment Statistics LAUS (Local Area Unemployment Statistics) Data as of December 2021, the Pine County unemployment rate was 4.9%.

### *Urban Office*

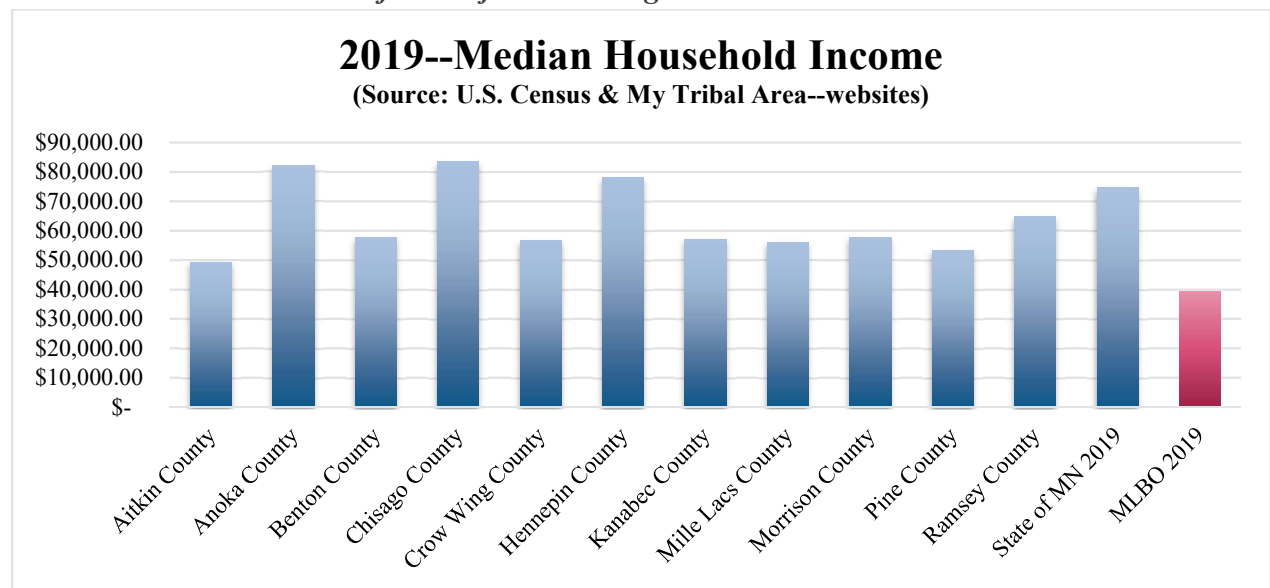
Aanjibimaadizing has a site office in downtown Minneapolis to service the Mille Lacs Band members and American Indian population in the Minneapolis/St. Paul, or Urban area. This includes the counties of Hennepin, Ramsey, and Anoka. The office is located on Franklin Avenue in Minneapolis in the neighborhood that focuses on American Indian services. This service area has limited youth programming due to the large number of current youth programs in the Urban area. Child care assistance is also limited to members and descendants of the Mille Lacs Band of Ojibwe.

### *Unemployment Rates for Aanjibimaadizing's Service Areas*



Much of the Mille Lacs Band Reservation lies within Mille Lacs County, and the foregoing chart indicates the huge disparity in employment opportunities that exists between the Reservation economy and the surrounding regional economy. As soon as one crosses the boundary on to the Reservation, unemployment rates more than double, to 11%.

### *Median Household Income for Aanjibimaadizing's Service Areas*



There is continued economic disparity seen in the median incomes of the counties we service and on the MLBO reservation. The median household income for MBLO tribal members is \$39,363, which is between \$10,000 to \$40,000 lower than any county served by the program.

### **Economic Activities**

The Mille Lacs Band of Ojibwe and its businesses are a major employer in Mille Lacs and Pine counties. There are several small businesses, educational jobs, medical field positions, county jobs, and seasonal tourist positions in all northern service counties. The Urban office has small businesses, large corporations, educational jobs, medical field positions, county jobs and several service companies focused on the American Indian community.

For employment opportunities internally and with employers working on MLB projects, our TERO (Tribal Employment Rights Office) laws provide hiring preference to our membership. Being registered with our Program provides clients with an avenue to be job ready and registered with our TERO Job Skills Bank. This registration will give our clients preference in hiring throughout our TERO jurisdiction. In addition, our 477 program will work closely with TERO to help determine projected needs of area employers and develop trainings that will improve our client's job prospects in specific areas. The Program is also partnering with Wewinabi Inc., which oversees non-gaming employment in Mille Lacs Band businesses.

Aanjibimaadizing is encouraging business development and entrepreneurial skills in multiple ways including, but not limited to:

- Endazhi-maawanji'idiing (Business/Entrepreneurship Group)
- Small business grants

- Partnership with Mille Lacs Corporate Ventures (MLCV) Enterprise Academy Development of Programming to support skills and training
- Rosetta Stone
- Ojibwe book development
- Aanjibimaadizing training garage

## **Potential Employment**

There are multiple places to assist clients in finding employment including:

- Grand Casino Mille Lacs and Grand Casino Hinckley
- Mille Lacs Band of Ojibwe Government
- Mille Lacs Band of Ojibwe Non-Gaming Business under Wewinabi Inc.
- Local businesses including restaurants, resorts, child care, small businesses, non-profits.

## **Service Delivery**

All services are offered in all sites. The majority of clients served will be low income, at or below 200% poverty level, after approved income exclusions, which are allowed due to the decreased median income seen on reservation lands. Services may be provided by the Tribe, or through partnerships within and outside of the service area. Services may be provided for the length of time to complete goals, but may be closed after 90 days if there has been no contact from participants.

## **Employment Services**

Employment services will be offered to participants. These services will include clients who are entering, transitioning, dislocated, underemployed, or looking to retain employment. The 477 employment services will include, but will not be limited to: career counseling, job readiness training, resume building, job referral, supported or subsidized work placements, internships, and job retention services. Employment assistance will be made available to all participants requiring the service as long as funding is available. Individuals seeking employment will be offered child care assistance to address their barriers, if eligible.

In addition, as detailed previously under job-creation/economic development, special services to stimulate job creation may be offered as well as other community building activities in support of strategic tribal planning and development.

Expedited services for resume writing, job search, printing paystubs, or using the computers for educational course work may be provided with a simplified application process.

Placements may be made in the public, nonprofit, private, tribal government, or tribal enterprise sectors as deemed appropriate. The duration of the services will vary based on the participant needs and work history.

## **Specialized Intensive Services**

In the Employment Development Plan (EDP) process, participants who possess multiple barriers, are participating or eligible to participate in the TANF program, exhibit substance abuse tendencies, have mental health issues, or who have exhibited a long-term dependency on public assistance may be determined to need specialized intensive services. These individuals may include custodial and non-custodial parents receiving TANF assistance for 30 months or more, and who have significant barriers to employment. Those barriers to employment may include a lack of a high-school diploma or GED, poor reading or math skills, a need for substance abuse treatment, mental health treatment, homelessness or inadequate housing, felonies, and a lack of significant work history.

Participants identified as needing specialized intensive services due to the nature of their barriers tend to require assistance for a longer period of time. Professional counseling and/or assessments may be a prerequisite, or a concurrent requirement with employment and educational services.

## **Education and Training**

A variety of educational and training services will be made available to participants. These services will include, but will not be limited to, remedial education, instructional workshops, tutoring, skill enhancement, occupational training and/or certification, and higher education.

Education and training services may be provided directly by the Tribe or by educational partners inside or outside of the Tribe's 477 service area. Child Care and Development Fund (CCDF) funding will support wrap-around child care for Head Start providing 10 to 10.5 hours of care per day for children. 477 will provide training that providers are required to take, but not limited to: CPR/First Aid and other safety trainings. All requests for 477 funding support must be completed by written application to Aanjibimaadizing.

In an effort to assist participants to achieve self-sufficiency, the Tribe's 477 program will make information available regarding occupations reported to be in high demand within the state and service area.

Educational service participants will be guided to make applications for any available resources such as Pell grants, Tribal scholarships, and TERO funding when applicable.

Training will be focused on client needs identified in their EDP and individualized for each client. A community survey in January 2019 identified CDL licenses, small business development, automotive services, construction, and office training as the most requested trainings. The program has a goal to create a training center to support clients in meeting their needs. This goal is in progress.

## TANF

Temporary Assistance for Needy Families (TANF) will be offered as a cash assistance program for those who qualify. Families will be defined as needy (*see definitions*). Tribal TANF Cash Assistance makes monthly cash payments to families with minor children based on family size and composition. The benefits will include a case plan to move a family to self-sufficiency. Cash Assistance has a 60-month lifetime limit. Exceptions for the time limit for families living on Reservation lands may be granted if the unemployment rate on those Reservation lands is over 50%. Additional eligibility requirements, including documentation, are required for TANF and will be defined in the policies and procedures. Applicants must be Mille Lacs Band Members, or first-generation descendants of the Mille Lacs Band, or members of a federally recognized Tribe and meet the definition of “Needy Family” as defined in this Plan. Applicants in Anoka, Hennepin, or Ramsey counties must meet all eligibility requirements and be a member of a Minnesota Chippewa Tribe. TANF clients in need of childcare will receive services seamlessly and be qualified for child care assistance based on their status as 477 clients. CCDF will continue to support TANF clients after they transition off of the program.

Real property will not be considered an asset or resource unless such property is generating income for the client. Simply owning property does not create a situation where the client can use the property for payments to access goods and services, but must be encumbered for that purpose which creates its own barrier when a client does not have the means to repay the debt. Lump sums and resources, such as readily available cash, savings accounts, or checking accounts, will be considered an asset or resource if the total lump sum or liquid assets available exceed \$5,000 and can be accessed without penalty to the client. Checking or savings accounts, if any, shall be verified by bank statements.

When determining eligibility, the following guidelines also apply:

- A percentage of earned income is disregarded for work expense. This percentage is established by the MLBO APB and is currently set at 42%.
  - All child support payments made for the support of children not living in the assistance units’ households shall be deducted from the gross earned income calculation.
  - Other income exclusions will be defined in the program policies and procedures.
  - Employment income earned from working with the Census Bureau will be disregarded.
  - Per Capita payments will be considered disregarded income.
  - Stimulus payments from the federal, state, or tribal government will be disregarded.
- The Work Participation rate for all participants seeking TANF assistance shall be established at 35%. Work participation rates for individuals will be a minimum of 20 hours per week and a maximum of 40 hours a week as defined in policies and procedures. Work activities may include, but are not limited to the following: work at a job, internship, subsidized work, education, training, Anishinaabe [Ojibwe] language, cultural activities, or employment search. Work participation hours may be counted for activities

that will lead to self-sufficiency, reduce dependence, and encourage healthy life choices. To be most effective in our Anishinaabe culture, work activities are best viewed with an Anishinaabe approach to activities that encourage families to be successful. Due to the remote and rural location of the Mille Lacs Reservation, pursuing language and cultural work may be some of the only employment available to members. And it can in many instances enhance the employability of members being trained in language and culture for jobs that prefer bilingual and bicultural skills. Work participation exemptions may be granted for extreme family hardship, family experiencing domestic violence, caring for a child with a disability, having a disability, imminent danger to themselves or their family, or for severe illness as defined in the policies and procedures. *The percentage of caseloads to be exempted is to be 25% or less of total TANF cases for the year.*

The Mille Lacs Band 477 Program sees and values the importance of generating meaningful opportunities for our Tribal members to find gainful employment. A primary purpose of our language revitalization effort has been to provide multiple avenues for both immediate and long-term job creation. We are developing work for speakers, teachers, trainers, mentors, and writers developing storyboards, text, and stories. Additionally, we expect our participants may be trained to work as transcribers and assist our elders in the content sessions as personal aides and in the support of project development. There are immediate financial opportunities generated by the creation of Ojibwe language books. In developing Ojibwe language modules for the Rosetta Stone language-learning platform, we anticipate employing multiple Mille Lacs Band members to work as actors, language speakers, text developers, advisors, and technical assistants. There is a high employment demand for people with marketable Ojibwe language skills and experience. Many Ojibwe tribes operate Ojibwe language immersion schools and programs where 100% of the staff has to speak in and operate in the Ojibwe language.

We have an early childhood program like this already operating at Mille Lacs. Red Lake in Minnesota, Lac Courte Oreilles in Wisconsin and many other Ojibwe communities have even larger and more well-established immersion schools. Anyone with strong language skills has special employment opportunities and is rarely unemployed or underemployed. When we get tribal members to that level of language aptitude, their job prospects are outstanding. Ojibwe is the most widely taught tribal language at colleges and universities. Learning Ojibwe today can be a powerful resume builder that can bring on a series of cascading positive impacts in the lives of Band members. All of the tribes, even if they are not in the immersion game, have Ojibwe language enrichment and teaching jobs available.

Tribes also hire historical preservation experts and seek people with language skills, not just academic credentials. Often tribal historic preservation officers work on oral history projects and handle archival manuscripts and materials where Ojibwe skills are especially useful, and tribal employers usually stipulate a preference for applicants with Ojibwe language skills. One additional set of skills that Band members are attaining under this part of our 477 Plan is the



opportunity to learn how to make books and work with recording technology for audio and video production, develop specialized tech skills, and further enhance their skill sets, resumes, and employability.

Diversity of approach has long been the hallmark of 477 Programs, and at Mille Lacs Band we have adapted our 477 Plan to create a diverse range of job opportunities that fit our culture, our employment market, and the aspirations of our Band members in line with our culture and tribal priorities for the multi-generation transmission of Anishinaabe knowledge and traditions, and the preservation of relations between youth and elders.

Although there are immediate employment opportunities being created through the projects outlined above, and the work also develops job skills that translate into higher employability for our members, those immediate and tangible benefits are really just the beginning of the benefits generated for our citizens through TANF. Since it is in the Band's interest to support its members, and the long-term viability of the Band community requires that its members pursue healthy lifestyles, our 477 Plan seeks at all levels to build healthy humans. The sustainable gainful employment of our members has often been interrupted or placed at risk by unhealthy lifestyle choices including substance abuse and family disruption. When people learn their language and culture, they are better equipped to be grounded in healthy social and work circles, better grounded in our culture and its values of hard work, respect, and communal responsibility, which relates to all TANF purposes. Native languages are more than just words, as cultural values, tribal customs, and ceremony are embedded in them (Mmari, Blum, Teufel-Shone, 2010). Additionally, Indigenous languages serve as protective factors for Indigenous communities. Studies demonstrate that "people who speak their Native language(s) have enhanced mental health and happiness." (Hallett, Chandler, & Lalonde, 2007; Ball & Moselle, 2013; Dockery, 2011). At Mille Lacs, we know that gaining knowledge of our Ojibwe language and culture as well as participation in cultural activities has played a significant role in contributing to the healing of our people.

The opposite of addiction is not simply sobriety. It is connection. The opportunities we seek to develop with TANF in the Ojibwe revitalization arena will translate to real and positive connection points for our people. They will encourage healthy living, healthy peer networks, the intergenerational transmission of cultural knowledge, and gainful employment and workforce skill set development that lead to long term self-sufficiency. The alternative to poverty is not just a job, but full-fledged financial independence which includes employment but also financial literacy, workplace relationship building, stable housing and the company of other people who are living good lives—ones that are financially fit and culturally relevant. Language is never a standalone activity, but fits into a broader perspective of children being cared for in homes, reducing dependency, prevention of out-of-wedlock pregnancy, and formation of two-parent families.

Language projects typically involve work done in teams. Our Band members benefit from the sustained company of academics, elders, and professionals who are, in addition to doing good language revitalization work, living lives that are financially and culturally healthy and serve as important role models for others more at risk. We want to reconnect our younger members to their elders and the elders to our youth. We become who we hang out with; therefore intersecting our lives with people living healthy successful lives is in direct service of the TANF mission. This is how we will disrupt and destroy the cycles of poverty and substance abuse. In this way, the mission of the Mille Lacs Band and the TANF program are one and the same.

The Mille Lacs Band 477 Program currently uses the State of Minnesota MAXIS data system to enter and administer benefits. Use of the MAXIS system ensures non-duplication of services. A goal for TANF will be to work towards using our own data and issuing cash assistance cards from our office. Another goal is to become MERIT certified to administer SNAP benefits.

TANF funding will be used to support families needing child care. TANF is meant to assist families in meeting financial obligations as they move towards self-sufficiency with work participation or educational requirements. Child care is needed by families to work or participate in education.

Since the program has a limited number of TANF families, TANF funding will be used to support the four purposes of TANF.

- Provide aid to needy families so that children can be cared for in their own homes.
- Reduce the dependency of needy parents by promoting job preparation, work, and marriage.
- Prevent and reduce the incidence of out-of-wedlock pregnancies.
- Encourage the formation and maintenance of two-parent families.

The Mille Lacs Band 477 Plan reinforces the four purposes by supporting healthy partnerships in culturally responsive ways. Historically, Ojibwe families lived in multi-generational households, where marriages and parental commitments are often defined through ceremony or cultural acknowledgement.

The Tribe's 477 Plan supports all of the foregoing purposes in multiple activities including, but not limited to; families transitioning off TANF, Ojibwe language instruction and materials, technological needs, Ojibwe cultural activities, additional funding for childcare, youth activities, supportive housing, supportive services for employment and training, and support for life choices to improve physical, emotional, mental and spiritual health.

Non-recurring short-term benefits may be issued to clients in times of emergency as defined and determined by the Federal, State, or Tribal government. This will be used to assist families who have lost income due to loss of work hours or work opportunities. This benefit may be available to all 477 clients who have qualified for the program and are living below 200% of the federal

poverty guidelines. The funding will support rent, utilities, and family support services to deal with stressful events. The funding will follow regulation 45 CFR 286.10.

## **Treatment of TANF Program Income**

If the Program generates income utilizing TANF funds, that income will be used for the purposes of the TANF program and for allowable TANF services, activities, and assistance. The MLBO is not required to report on the amount of program income earned but they will keep financial records on program income earned and the purposes for which it was used in the event of an audit or review.

## **Youth Services**

Under the Mille Lacs Band 477 Plan, youth are supported by two separate programs: Healthy Circles and Career Exploration.

Youth participate in “Healthy Circles” to learn about financial literacy, healthy life choices, community, language and culture activities, support education and high school graduation, and build self-sufficiency. The program is targeted for youth ages Kindergarten to age 20 to reduce dependency by promoting job preparation, work, wiidigendiwin [*traditional Anishinaabe marriage*], and the prevention of teen pregnancy by providing healthy supportive programming for youth. In our Anishinaabe culture and its traditional marriage practices, the role of the family in support of our children is of the topmost priority. The youth use a curriculum that focuses on four pillars: community, culture, career and educational resources to promote job preparation and the other purposes of TANF. In our culture, we encourage youth to support elders, participate in community-based projects, finish high school, and be work-ready. These activities encourage healthy life choices such as to stay in school, become employed, and live life independently.

Youth are also offered “Career Exploration” or Emerging Workforce which is available under our 477 Plan for youth ages 16-24 exploring employment. These services include youth who are entering, transitioning, or looking to obtain employment. The Tribe’s 477 employment services include, but are not be limited to: career counseling job readiness training, Ojibwe language, Ojibwe cultural activities, resume building, job referral, supported and subsidized work placements, internships, and job retention services. Employment assistance is made available to all participants who meet the eligibility criteria for needy families who require the service as long as federal funding is available. Any remaining unmet needs may be covered with tribal funds, as available. Youth may be trained and receive a subsidized incentive for this training opportunity. They are able to use this training as a resume building experience. Internships may be subsidized with Mille Lacs Band Departments and other businesses which also help youth prepare for work.

In order to maximize services to youth, Aanjibimaadizing will partner with the local education agencies and community groups to provide services, transportation, and support youth

programming across the Reservation Districts. Youth programming will promote healthy behavior and life choices which align with the purposes in TANF.

The Tribe is requesting a waiver for youth family income eligibility. Youth may be enrolled regardless of the income of families. Income will not be collected from families. The program will accept all American Indian youth in the service area, as we serve a high-risk population facing health, education, employment, and mental health disparities.

## **Supportive Services**

The Tribe's 477 plan will offer supportive services that include, but are not limited to: support for clients obtaining a new job, licenses, transportation, child care, education, technology and support to assist adult and youth clients in retaining a job.

Youth Support Services are available for youth ages kindergarten to 20-years-old and who live in households that are at or below 300% of the federal poverty guideline. Adult Support Services are for adults age 18 years and older whose income is at or below 200% of the federal poverty guideline.

## **Welfare Assistance**

Applicants may apply for welfare assistance if they meet 477 and General Assistance eligibility requirements. Welfare Assistance benefits are for single people, or people who have exceeded their lifetime TANF limit. Clients may not receive Welfare Assistance and TANF at the same time. Welfare Assistance funds must be used for essential needs of food, clothing, shelter, and utilities for clients who are deemed eligible. Welfare assistance will benefit people who have reached their 60-month time limit on TANF. Welfare Assistance is consistent with the Tribe's 477 goal to increase self-sufficiency and provide a home situation that is conducive to education, job training, skill development, and related activities for the whole household.

## **Welfare Assistance Criteria**

1. Must be American Indian or Alaska Native tribally enrolled in a federally recognized tribe and reside in the service area, or a Mille Lacs Band of Ojibwe (MLBO) first generation descendent.
2. Must not receive any comparable public assistance.
3. Must have insufficient resources to meet essential needs.
4. Must apply concurrently for assistance from other state, tribal, county, local or other federal agency for which he/she may be able. The assistance must be denied.
5. Income must not exceed 100% of the poverty guidelines. Per Capita payments would be included income for the purpose of Welfare Assistance.
6. Welfare Assistance Payments are calculated on State TANF Guidelines using TANF Utility Standards for the State of Minnesota. Refer to, 25 CFR [Title 25--Indians, Code of Federal Regulations; Bureau of Indian Affairs] §20.306--all income earned or unearned will be used in calculating eligibility as it is received and used as a resource if converted to cash in accordance to 25 CFR §20.307 through §20.313
7. Eligibility will be reviewed every 3 months for individuals not exempt from seeking employment in accordance with 25 CFR Part §20.315 and every 6 months for all recipients, or

whenever a change in status that can affect eligibility occurs (25 CFR Part §20.304. Redetermination of benefits will include a home or in person visit, estimate of income, living circumstances and household composition, completing an interview and require a revision of client case plan. Interviews may be conducted telephonically.

8. Develop and sign an Employment Development Plan (EDP) or an Individual Self-Sufficiency Plan (ISP).

Per 25 CFR §20.314

- a) An applicant must:
  1. Actively seek employment while receiving WA [welfare assistance] benefits, including the use of available state, tribal, county, local or Bureau funded employment services. If unsubsidized work is not available, the client must perform 20 hours of community work per week.
  2. Make satisfactory progress in the ISP [individual self-sufficiency plan], or EDP.
  3. Accept local and season employment when it is available.
- b) A head of household who does not comply with this section will not be eligible for General Assistance for a period of at least 60-days but not more than 90-days. Case documentation must occur.
- c) The policy in this section does not apply to any persons meeting the criteria in §20.315.
- d) A person may apply on behalf of another person by completing an application such as relatives, interested individuals, social service agencies, law enforcement agencies, or other persons or agencies who believe the applicant may qualify for assistance.

Per 25CFR §20.315 the employment policy does not apply to persons shown in the following table.

<b>The employment policy in 20.314 does not apply to...</b>	<b>If ...</b>	<b>And ...</b>
(a) Anyone younger than 16		
(b) A full-time student under the age of 19.	He/she is attending an elementary or secondary school or a vocational technical school equivalent to a secondary school.	He/she is making satisfactory progress.
(c) A person enrolled at least half-time in a program of study under Section 5404 of Pub. L. 100-297.	He/she is making satisfactory progress.	He/she was an active General Assistance recipient for a minimum of 3 months before determination/redetermination of eligibility.
(d) A person suffering from a temporary medical injury or illness.	It is documented in the case plan that the illness or injury is serious enough to temporarily prevent employment.	He/she must be referred to SSI if the disability status exceeds 3 months.

(e) An incapacitated person who has not yet received SSI or disability payments.	A physician, psychologist or credentialed licensed social service worker certifies that a physical or mental impairment (either by itself, or in conjunction with age) prevents the individual from being employed.	The assessment is documented in the case plan.
(f) A caretaker who is responsible for a person in the home who has a physical or mental impairment.	A physical or certified psychologist verifies the condition.	The case plan documents that the condition requires the caretaker to be home on a virtually continuous basis; and there is no other appropriate household member available to provide this care.
(g) A parent or other individual who does not have access to child care.	He/she personally provides full-time care to a child under the age of 6.	
(h) A person for whom employment is not accessible.	There is a minimum commuting time of one hour each way.	
<p><i>From Code of Federal Regulations. Title 25 Indians Parts 1 to 299 Revised as of April 1, 2011.</i>  <a href="https://www.bia.gov/sites/bia.gov/files/assets/bia/ots/pdf/idc-018737.pdf">https://www.bia.gov/sites/bia.gov/files/assets/bia/ots/pdf/idc-018737.pdf</a></p>		

## Ojibwe Language and Culture

It is the purpose of Aanjibimaadizing to prepare the members of the MLBO community to contribute to the Mille Lacs Band. While a primary part of this contribution is in the form of employment that helps enrolled members thrive financially, it is of equal importance that MLBO membership reflects the unique history and culture of its people. As such, the Aanjibimaadizing program also recognizes the vital role of education in traditional cultural and language practice which allows those who receive services to contribute across the whole spectrum of membership in the Mille Lacs Band community. In pursuit of this balance, the Program will provide Ojibwe cultural and language training which encourages fluency in the Ojibwe language, at the heart of which lie the values and lived experience of MLBO culture as a whole.

Having a language and culture focus serves as the nucleus of greater cohesion within family units, as both financial stability and a sense of cultural belonging are essential to the ongoing stability and health of MLBO families. A sense of respect for family is deeply embedded within the Mille Lacs Band tradition and culture. One form this respect takes is a belief that children inherit what their parents create. Because of this, they are deserving of the greatest respect and support in their movement toward adulthood. It is the position of the MLBO that education and training specifically oriented toward the preservation and dissemination of MLBO culture, particularly as it is encoded in the Ojibwe language, are of vital importance in furthering the aims of the MLBO in creating families that are financially, spiritually, and socially stable. Traditional cultural practices support healthy families. Families would work together to support those who had greater needs. Families would provide multi-generational care to children so that

work could be done. A stable family unit of 2-parents with a supportive extended family was the historical norm. Supporting Ojibwe cultural practices will increase 2-parent families, reduce teen pregnancy, end financial dependence, provide job skills, work experience, and lead to self-sufficiency. These forms of stability are mutually supportive.

As components of this goal, services include, but are not limited to, the creation of Ojibwe language resources and activities, internships for MLBO members with elders and other Ojibwe language experts, as well as other resources and activities that support Ojibwe language and cultural awareness. MLBO has planned to collaborate in the creation of a Mille Lacs Band Ojibwe Rosetta Stone software module, which will assist in the wider objective of preserving MLBO culture through language

Aanjibimaadizing will use 477 Plan funding to support multi-purpose services that include the advancement and retention of Ojibwe language and culture. These services will include, but are not limited to, the creation of Ojibwe language resources and activities, internships with elders or other Ojibwe experts, and resources and activities that promote Ojibwe culture including but not limited to; respect for elders, sacred tobacco use, wild rice harvest, maple syrup harvest, dance and drum events, and traditional medicine and healing. These activities will be available to all 477 participants in a manner that would benefit them the most and as a client choice to maximize their opportunities for growth and stability. The purpose is to assist individuals in developing a stronger sense of identity. These activities build strength, endurance, and planning.

## **Small Business Development**

A limited amount of funding will be available for small business development on the Reservation. Applicants for this program must complete a small business plan prior to receiving funds. Any individual or company receiving small business funds must report their number of employees at the end of the fiscal year. Small business training will be available to qualifying clients.

## **Child Care**

Child care is a barrier for many participants obtaining and retaining work. The Tribe is committed to increasing child care support for families using child care assistance and by developing childcare that can be used by families in the 477 program. TANF families who are working or in school will have priority for child care assistance and child care openings. To support this, the Tribe will be including CCDF funding in the P.L. 102-477 program. By including CCDF in this plan, families will be able to access multiple services in a one-stop shop approach. Families will be able to access child care assistance, training, employment, transportation, cultural activities, TANF, and job training through one program leading to seamless integration and ease of access.

Agencies involved in the delivery of CCDF services include: Aanjibimaadizing, Mille Lacs Early Education, Mille Lacs Band Public Health, Nei Ia Shing Clinic, Indian Health Service, and any other agencies deemed relevant to services.

### **CCDF Funding**

The Tribe will be including Child Care Development Fund (CCDF) funding in this 477 plan to increase funding support and decrease administrative burden for families and the Tribe. CCDF will be administered with joint interagency cooperation between Aanjibimaadizing and Mille Lacs Early Education.

The budget will provide services that include, but are not limited to, staff to provide wraparound childcare services in District 1, District 2 and the District 3 Aazhoomog area. Supplies and training for staff will be provided. Renovation of current spaces will be provided if needed. A budget and notification of those services will be provided before renovations begin. Wraparound child care is child care that is be provided before and after Head Start/Early Head Start, in all districts. Planning will begin to provide childcare in the Hinckley area due to the MLBO housing expansion in this area. As a small allocation Tribe, the program may offer direct services in center-based care and support for relative care. Respite care is not included in CCDF funding.

All funding will be administered by the MLBO Aanjibimaadizing program. Direct services and staff supervision will be provided by Mille Lacs Early Education which includes Head Start, Early Head Start, and Childcare. All childcare will be licensed by the MLBO Title 8 Statutes with the Nay Ah Shing School Board as the governing body. License copies will be kept by Mille Lacs Early Education. All safety requirements of Head Start Program Performance Standards, CCDF regulations and MLBO Title 8 will be followed. Both program's requirements will be spelled out in a service agreement that is approved by the MLBO Commissioners on the Administrative Policy Board (APB), or by written application. The services and how they will be provided will be further detailed in both program's policies and procedures. This is an evolving process with referrals made for students and families to access services. Parents will be able to apply for 477 services at MLBO Head Start and Child Care centers leading to a reduction in paperwork and time for clients accessing multiple services.

Based on the FY2016 funding allocation, the Mille Lacs Band of Ojibwe receives a small allocation.

Administrators for CCDF will be: Aanjibimaadizing

### **Integration and Delivery**

The following rules will be set and established by the Tribe: eligibility rules and policies, the sliding fee scale, and payment rates. These items will be agreed upon by both Aanjibimaadizing and Mille Lacs Early Education (MLEE). MLEE will establish program policies and procedures that align with the most stringent standards from Head Start, Early Head Start, CCDF regulations



and Mille Lacs Band Statute Title 8. MLEE has a policy regarding the protection of Personally Identifiable Information (PII) that will be followed by both programs. Mille Lacs Early Education does participate in the State of Minnesota Quality Rating System (QRIS) and has the highest level of rating-4 stars.

Child care referrals may be made by either lead agency, or by the State of Minnesota Child Care Aware system. Child care assistance will be administered by Aanjibimaadizing and can be applied for at the same time as the application for child care services. The application will allow clients to coordinate child care services, child care assistance and other services available under the MLBO P.L. 102-477 program. Priority for child care will be given to parents who are on TANF, working, or enrolled in schooling or training programming. To achieve seamless integration between child care and P.L. 102-477 services, some staff will be dually trained by each program to allow a one-stop enrollment procedure for families. This integration will promote the goals of both programs and the four purposes of TANF.

MLEE staff and families will have training funds provided by Aanjibimaadizing. Families may have one set of goals with their 477 plan and may use those goals on their Head Start Family Partnership agreements. This will allow both programs to assist parents in meeting their goals more easily. Information will be exchanged, with parent consent, to allow ease of access to Aanjibimaadizing services. Regular staff meetings will be held to assist children, families, and staff access services to improve lives and increase self-sufficiency.

Families may also apply for child care assistance through the county and the state of Minnesota, but not receive both county and Tribal child care assistance.

Aanjibimaadizing will coordinate with all community partners to optimize direct services and ensure non-duplication of services.

The function of the CCDF integration is to allow clients to obtain, retain or advance in employment, education, training or cultural activities. The expected results are increased participation and improving self-sufficiency of families. Coordination with families receiving Tribal TANF will allow seamless transition for families moving off of cash assistance, this again improves self-sufficiency.

### *Coordination of Services*

MLEE also oversees Head Start and Early Head Start. The program provides breakfast, lunch, and snack under the CACFP (Child and Adult Care Food Program). Mille Lacs Early Education (MLEE) coordinates its calendar and transition services with Nay Ah Shing Tribal Schools. Public Law 102-477 funding will provide child care assistance training opportunities, supportive services, education, and cash assistance for families in need. 477 services are available to child care assistance clients. MLEE provides Early Childhood Special Education (ECSE) with the local school districts in all Mille Lacs, Aitkin, and Pine counties.

The Ne Ia Shing clinic is run by the MLBO and provides physicals, immunizations, and dental exams for children as needed. Indian Health Service (IHS) provides health and safety training, and inspections of all classrooms and kitchens. IHS is operated under the Bureau of Indian Affairs (BIA). Staff are trained for building inspections and use a detailed checklist. The BIA defines the qualifications for the Inspectors. The BIA also determines the inspection tool. There is one IHS inspector for the 11 Tribes within the State of Minnesota. The inspections are done at minimum once per year. The IHS Inspector issues a report of any findings and all corrective actions must be submitted when applying for a tribal license. The Tribe uses IHS monitoring information to determine if programs are eligible for a child care license. Any child care licensed by the state is inspected by the State. State inspector qualifications and ratios can be found online at the MN Department of Human Services. The monitoring enforcement at state licensed facilities can be in the attached grid. Relative care is exempt from monitoring.

MLEE works with MLBO Public Health to coordinate trainings, referrals for families, and other services including tests for hemoglobin levels. Health services are provided onsite several times per year. Referrals are also made for families needing additional services related to health. All children are required to have current immunizations to attend licensed child care in Minnesota. Immunization status will be monitored throughout the year. Children attending MLBO licensed child care must also have a current physical. Additional coordination of services is done with Family Services, the Wraparound Program and other MLBO programs when needed.

All Tribal departments and tribally owned businesses actively support early education programming. Local grants and regular meetings connect the departments with state, local, and private partners including, but not limited to: the Initiative Foundation, Minnesota Head Start Association, MN Timberwolves and others. MLEE will participate in regional child care resource and referral surveys and systems. Child care is only available on the reservation for MLBO members and members of other federally recognized tribes.

The results of the coordination with these agencies improves the overall health and wellness of children.

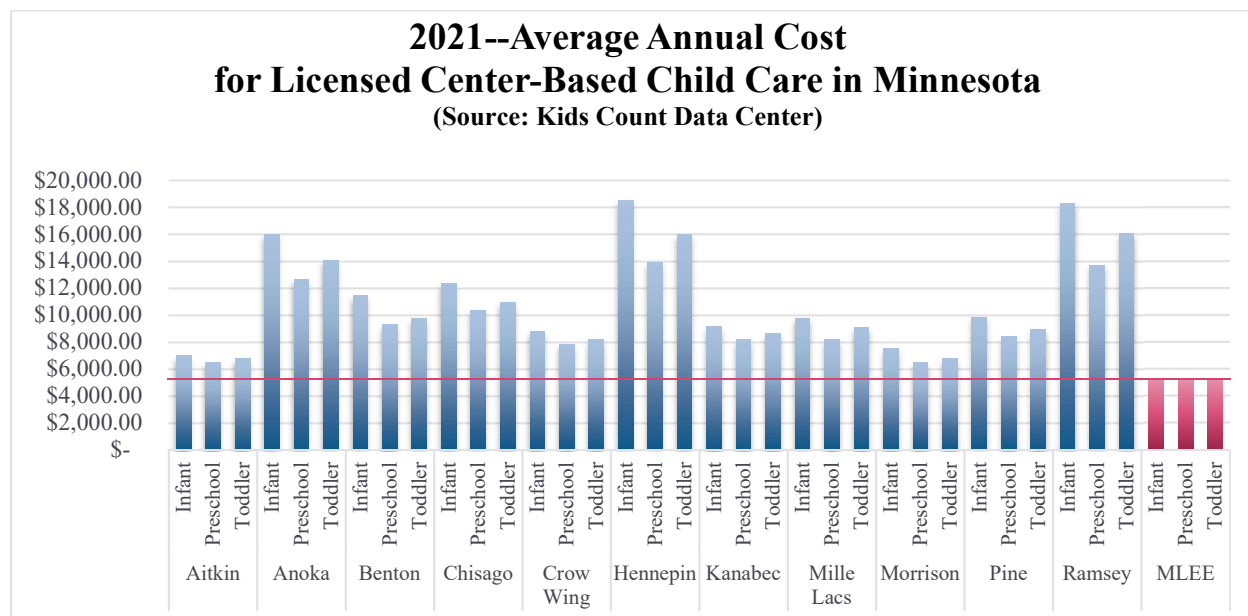
### ***Public Hearing for CCDF***

A Public Hearing Notice was posted on the MLBO and Aanjibimaadizing Facebook pages in March 2022. This notice was also sent out to all staff with an MLBO email account. Flyers were posted at Aanjibimaadizing (see attached). The meeting was held on April 7, 2022, after 20 days of notice. A meal was offered to all who attended the meeting at the District 1 Aanjibimaadizing building. Public comments and questions were kept as a record by the program and will take into consideration all public comments received. (see attached)

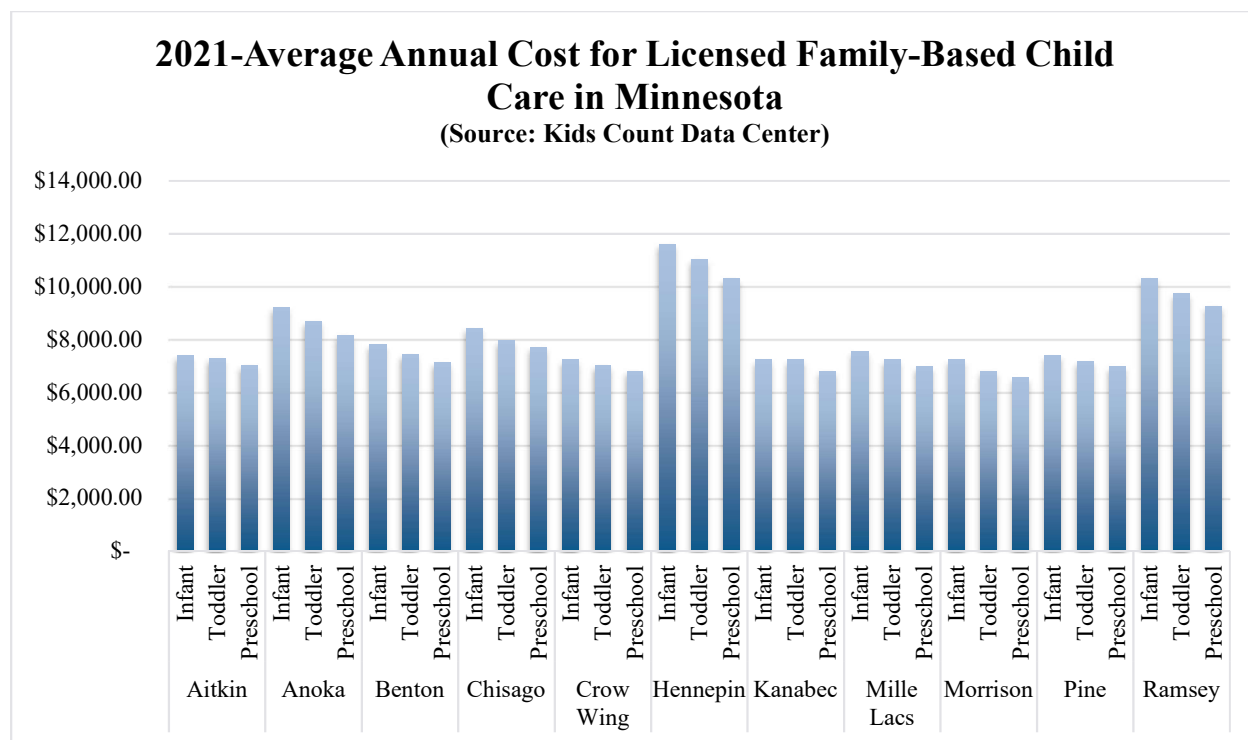
### ***Child Care Payment Rates***

Minnesota has some of the highest child care rates in the country. The majority of child care providers are in the Twin Cities/Metro area. The rates for both center-based and FCC care are higher in the Metro area. However, wages are also higher in the metro area. The chart below is

taken from the website Kids Count: The Annie E. Casey Foundation, in March 2022, regarding data from licensed center-based care for infants, preschool and toddler aged children in 2021; in addition, data from licensed family-based child care is also shown.



This chart shows that MLEE provides the cheapest child care available. The MLEE rate is calculated at full-time child care at 50 hours per week. Most families only pay for 22 hours a week due to Head Start and Early Head Start time being free of charge. MLEE is significantly cheaper than other child care in the counties. These rates allow equal access for all participants regardless of eligibility for child care assistance. These rates make it easier for 477 plan participants to afford child care. The closest child care center to Onamia, MN charges \$7 an hour for drop off child care and \$3.15 per hour for regularly enrolled children. MLBO may pay or reimburse child care based on enrollment. A quality measure may also be paid to providers to support emergency situations as determined and defined by Federal, State, or Tribal government.



This plan will use State of Minnesota Eligibility Annual Income Levels to determine co-payments. The Plan's 477 income disregards will apply for MLBO members and members of federally recognized Tribes.

Families at or below the Annual Income Entrance Level determined by the state of Minnesota will not pay a co-payment. Families with income between the Annual Income Entrance Level and an Annual Income Level at 67% will pay a 3% co-payment of the child care bill, or \$15, whichever is less. Families with income between the Annual Income Level at 67% and the Annual Income Level at 85% will pay a 10% co-payment of the child care bill. Families will be asked to pay a co-payment of no more than 10% of their income. Families must pay their co-pay in order to maintain eligibility for child care assistance. Families whose income is less than 100% of the poverty level, or on TANF, will not be required to pay a co-pay. Foster children may not be required to pay a co-pay.

#### ***Co-payment Annual Income Levels***

<b>Family Size</b>	<b>Annual Income Entrance Level</b>	<b>Annual Income Level at 67% SMI</b>	<b>Annual Income 85% SMI Exit Level (during eligibility or redetermination period)</b>
2	\$36,096	\$51,457	\$65,281
3	\$44,589	\$63,564	\$80,640
4	\$53,083	\$75,671	\$96,001
5	\$61,576	\$87,779	\$111,361
6	\$70,069	\$99,886	\$126,721

No family with assets over \$1,000,000 may receive funds from CCDF. No family income over 85% of the State Median Income will qualify for child care assistance. MLBO may elect to waive co-payments in a time of emergency.

For purposes of this plan, we will base our market rate survey on state data.

Households receiving child care assistance must:

- Participate in authorized activities including work, looking for work or attending school.
- Cooperate with child support requirements for any children who have a parent living outside of the home.
- Choose and eligible child care provider.

The number of hours your child care benefit covers is determined by your:

- Work, training or school schedule
- Child's school schedule
- Other factors including travel time

Most families have to pay a portion of the child care cost, called a copayment. The copay amount is based on your family's size and income.

### *Eligibility*

Parents will be informed about how to apply for services at the MLBO child care center sites, community meetings, and at the 477 offices. Eligibility is based on 477 requirements, provider requirements, and income eligibility. The co-pay is determined by using the sliding fee scale, which will be reviewed and updated annually using federal poverty guidelines. A copy of the sliding fee scale is attached. Parents will be eligible for services for 12 months and then must reapply. Families whose income is less than 100% of the poverty level, or defined as at-risk, will not be required to pay a co-pay for child care.

### *Indian Child/Indian Reservation Service Area*

"Indian child" shall be defined as a child who is enrolled, or can show enrollment, or are eligible for enrollment, as far back as maternal or paternal grandparent, in a federally recognized tribe, and who is residing on or near the Mille Lacs reservation and/or our service area. These children could be a descendent of an enrolled MLBO member.

For the purposes of this grant, the agency shall follow the service area of the 102-477 plan which includes: Aitkin, Pine, Mille Lacs, Crow Wing, Benton, Morrison, Kanabec and Chisago county. See "Service Area for the Mille Lacs Band of Ojibwe 477 Plan" map. Families living in these counties may be Mille Lacs Band Members, Mille Lacs Descendants or members of other federally recognized tribes. Child care assistance may be provided for participants in: Anoka, Hennepin, and Ramsey counties who are Mille Lacs Band Members or Descendants only.

Center-based child care services will be provided in: Mille Lacs, Aitkin, and Pine counties by Mille Lacs Early Education (MLEE), the tribally operated center.

### ***Child Count***

A comprehensive child count was completed in May 2022 and included Tribal enrollment data, local school data and census data. The child count for all Alaska Native and American Indian children under the age of 13 is included as Attachment 1.

### ***Parental Complaint Process***

MLEE has a Parent Grievance Procedure included in the Parent Handbook. All parents/guardians will be given the Parent Handbook upon enrollment of their child in the program. The public may request a Parent Handbook. Complaints or grievances are to be given to the Early Education Director or District Coordinator. A meeting will be held to discuss the situation and possible resolution. If the problem is not resolved to the satisfaction of the parent, they may take the complaint to the Commissioner of Education, and/or the Nay Ah Shing School Board. The grievance policy is available upon request. Complaints are recorded and kept with the Early Education Director. It may be discussed with outside parties' subject to confidentiality policies regarding employees and enrolled children with a substantiated written request. Parents may also use the Aanjibimaadizing Grievance Procedure for issues related to child care assistance and eligibility.

### ***Quality Activities***

The Plan will require a minimum of 9% of each year's fiscal allotment for quality activities. Quality activities may include, but are not limited to: staff training, parent training and/or education, activities to increase parental choice, and activities designed to improve the quality and availability of child care. MLEE does an annual program self-assessment to learn about the quality of care currently offered. Parent surveys and community surveys are also completed on an annual basis. MLEE requires all staff hired to obtain a Child Development Associate credential (CDA) relative to the age group they work with. Aanjibimaadizing will support this process with additional funding. In addition, all MLEE staff receive the following training: prevention of infectious diseases, medication administration, shaken baby syndrome/abusive head trauma, transporting children safely, family engagement, nutrition, language/literacy, curriculum development and instruction, safe sleeping/prevention of sudden infant death, prevention and response to emergencies due to food and allergic reactions, handling and storage of hazardous materials and bio-contaminants, CPR/First Aid, access to physical activity, child development, and caring for children with special health or developmental needs annually. Aanjibimaadizing may pay a quality measure to child care providers during a time of emergency to ensure quality and continuation of care.

The Tribe may provide mini-grants to child care providers to improve the quality of care.

The Tribe is not required to provide a consumer statement for parents.

### *Health and Safety*

MLEE has an approved Emergency Preparedness plan that includes procedures for evacuation, relocation, shelter-in-place, lockdown, reunification with families, continuity of operations, accommodations of infants and toddlers, children with disabilities, and children with chronic medical conditions. MLEE provides a yearly orientation to meet all health and safety requirements in August. New Staff are trained upon hire.

All staff are required to be certified in CPR and First Aid. The program will meet the 11 health and safety requirements for Providers in the following ways (please note that FFN or relative care are exempt, but may be offered these services):

1. Prevention: Immunizations are required at enrollment and monitored throughout the year. Classroom cleaning schedules are in place at the centers. Training opportunities are offered for providers regarding handwashing and other prevention techniques.
2. Prevention of sudden infant death and safe sleep practices: These trainings are held at the centers at a minimum of once per year. 477 may also offer these trainings once per year. All infants are placed on their backs to sleep and other safe sleep practices are done at Mille Lacs Band of Ojibwe licensed child care. FFN may be exempt from these requirements.
3. Administration of medication and parental consent: Centers have policies in place that align with Caring for Our children and the local clinics. 477 may also offer this training once per year. FFN may be exempt from these requirements.
4. Prevention and response to emergencies and allergic reactions: Centers have policies in place that align with 'Caring for Our Children' and the local clinics. 477 may also offer this training once per year. Emergency planning may be offered by the 102-477 program annually to family child care and FFN providers. FFN may be exempt from these requirements.
5. Building and physical premises safety: MLEE has procedures in place to ensure the health and safety of both children and staff, including hand washing, diapering, exclusion, and cleaning procedures. Child play areas are checked/cleaned daily in order to search for any broken/hazardous play objects or areas which have become dirty through use. If any problems are documented, then notice is given to Maintenance staff or MLEE management. Classrooms are also cleaned daily and as needed. A cleaning checklist is completed daily for the classroom and turned in at the end of the month. Other health and safety components include trainings in multiple areas for staff, families, and children, including: First Aid/CPR, Shaken Baby, Sudden Infant Death, Nutrition, Healthy Foods, and Movement, as well as other trainings identified by surveys or data. There is an eye wash station located in the laundry room in case of eye-contamination accidents. Monthly fire drills, bi-annual tornado drills, tri-annual bus safety evacuations, and bi-annual lock-down drills are completed in the program, and MLEE also has an Emergency Preparedness plan. The MLBO as a whole also has an emergency services plan. Centers are inspected by Indian Health Service under the

Bureau of Indian Affairs at minimum annually. Centers are defined as any indoor or outdoor space associated with the care of children licensed by the Mille Lacs Band of Ojibwe. State licensed providers are inspected by the state at least once per year. FFN providers would be exempt.

6. Prevention of shaken baby, abusive head trauma, and child maltreatment: Centers have policies in place that align with ‘Caring for Our Children’ and the local clinics. 477 may also offer this training once per year. FFN may be exempt from these requirements.
7. Emergency Preparedness and response: Centers have policies in place that align with ‘Caring for Our Children’ and the local clinics. MLBO has a Tribal Emergency Plan to offer services offsite in a limited capacity, if required. FFN would be exempt. Both Emergency Plans are available upon request.
8. Health and Safety trainings are provided annually, typically in August. FFN providers are exempt, but may be included in the August trainings. New staff at the MLBO center-based child care centers are provided this training within 90 days of start time. FFN may be exempt from these requirements.
9. Handling and Storage of hazardous materials and appropriate disposal of bio-contaminants is done in the center. Hazardous materials are stored in locked cabinets. Bio-contaminants are disposed of in bio containment bags and labeled. All staff wear gloves and follow disinfectant procedures. FFN may be exempt from these requirements.
10. Child care does not transport children except for possible field trips. Then transportation follows the State of Minnesota laws and Head Start Performance Standards. Children under age 5 wear a harness and a bus monitor would ride the bus. FFN may be exempt from these requirements.
11. All providers who work and are licensed in the State of Minnesota Licensed, tribally licensed, or Family, Friend and Neighbor must maintain First Aid and CPR certification.
12. Annual training is provided for all providers on the recognition and reporting of child abuse and neglect in cooperation with Mille Lacs Band Family Services. Staff report all suspected child abuse and neglect to Mille Lacs Band Family Services. FFN may be exempt from these requirements.
13. There are policies and procedures in place for MLBO center-based care that address Head Start Performance Standards, Caring for Our Children, and MLBO Title 8 health and safety standards. FFN may be exempt from these requirements.
14. Health and Safety requirements are monitored at MLBO on a quarterly basis by the Early Education Department and at a minimum, annually by Indian Health Service. There are two inspectors for all Tribal centers in the State of Minnesota. MLBO relies on Indian Health Service to monitor the qualifications and inspector ratios for tribally licensed centers. Family



Child Care and State Licensed Child Care is monitored by the State annually. Put in website for state inspector qualifications. FFN may be monitored by the program annually. FFN may be exempt from these requirements.

(See attached grid for health and safety details.)

### ***Child and Adult Ratio***

The ratio for infants under the age of 15 months is one adult to 4 babies, the maximum group size is 9. The ratio of toddlers age 15 months to 33 months is one adult to 7 toddlers, then maximum group size is 14. The ratio of preschool children ages 33 months to 5 years is one adult to 10 children, the maximum group size is 20. The ratio for school age children is one adult to 12 children, the maximum group size is 30. The ratios are defined in MLBO Title 8. The maximum group size for FFN care is 8 children under the age of 11. During Early Head Start time, the ratio for children under the age of 3 is one adult to 4 children. The state licensed centers follow similar ratios that are defined in Rule 2 and Rule 3 for Minnesota child care.

### ***Background Checks***

The Tribe is doing an alternative approach to background checks because the Tribe does not access the State-based child abuse and neglect registry and Federal systems. FFN providers are exempt from background checks, but may complete the Minnesota Bureau of Criminal Apprehension background check if the family requests. Staff at the tribally licensed centers must complete a background check that includes fingerprints sent to the FBI and state authorities, a national sex offender registry check, and criminal history check. Staff working at state licensed centers follow state background check requirements. The MLBO only licenses centers on Reservation land. The State of Minnesota licenses family child care centers on the reservation and center-based child care centers off the reservation, and these providers follow Minnesota licensing guidelines for background checks.

### ***Teacher qualifications***

For the tribal centers we follow Head Start teaching requirements. For children ages 3-5 teachers must have a 2 year or 4-year degree with an emphasis in early childhood education, or a CDA in addition to the degree, assistant teachers must have a CDA, teacher aides must have a GED or high school diploma. For children ages birth to 3 teachers must have at minimum and infant toddler CDA and teacher aides must have a GED or high school diploma. State of MN teacher qualifications are found on the attached grid.

### ***Pre-Service***

Tribal centers hold an annual preservice in August of every year. The pre-service is four days and staff receive an average of 32 hours of training. Training is provided on an ongoing basis for 4 hours each month. State licensed providers follow the State of Minnesota guidelines. FFN providers may offered to attend trainings at the Tribal center, but are exempt from pre-service. All staff receive all required health and safety trainings within 90 days of employment.

State provider data is reviewed online at MN Department of Human Services (DHS) bi-annually.

### *Applications*

To receive child care assistance funds, families must apply to become an Aanjibimaadizing client. They may do this at any Aanjibimaadizing Office, MLEE, or online at <https://aanji.org/>.

To receive quality improvement funding, child care providers serving Mille Lacs Band children may contact the Executive Director or the Operation and Compliance Manager for an application.

### *Early Childhood Goals*

The Plan will support MLEE's goals which are listed below.

- Increase Family Engagement and collaboration in the area of school readiness and completion of family goals, documenting family engagement in usable and relatable ways.
- To have all MLEE children be current with all health requirements.
- Improve Staff recruitment and retention as well as on-boarding processes and trainings to ensure quality services for children and parents enrolled in Mille Lacs Early Education.
- Improve the aggregation and analysis of data and monitoring systems to better inform staff, families, and community, as well as facilitate program management.
- Improve CLASS scores through observation, training, curriculum fidelity and Practice Based Coaching.

Child Care options include: licensed center-based care, licensed family child care and friends & family care. These options may all be available for child care assistance, if they are licensed and/or meet safety standards.

### **CCDF Waivers**

The Tribe will not be included in a consortium at this time.

### **Issues and Barriers**

#### *Transportation*

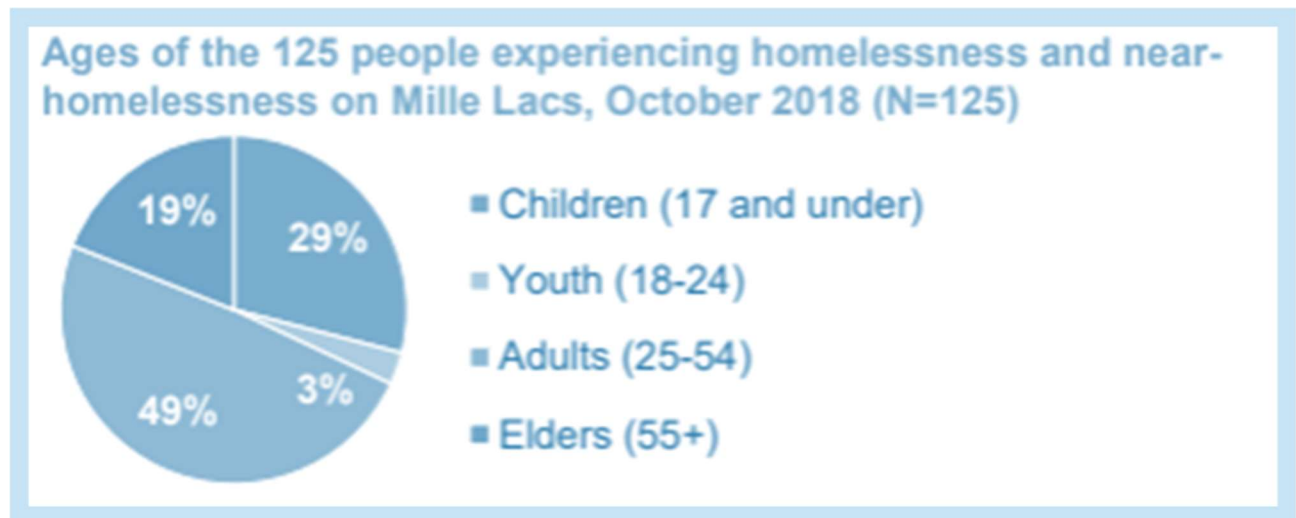
In a January 2019 survey, at least 25% of the respondents did not have a valid driver's license. Due to the rural location of the reservation land, driving to a job is basically a requirement. The lack of a reliable vehicle is also a barrier for participants. There is also a group of clients that have a driver's license, but it is not valid due to owing back child support and/or traffic fines. The Urban office location has some public transportation options.

#### *Housing*

The numbers of homeless families and children have been increasing, even with the MLBO building new single-family housing. The majority of families live on Mille Lacs Band Reservation or Trust lands.

Homeless data is from the 2018 report “Homelessness on Minnesota American Indian Reservations”. The 2021 Reservation study was postponed due to COVID-19 pandemic.

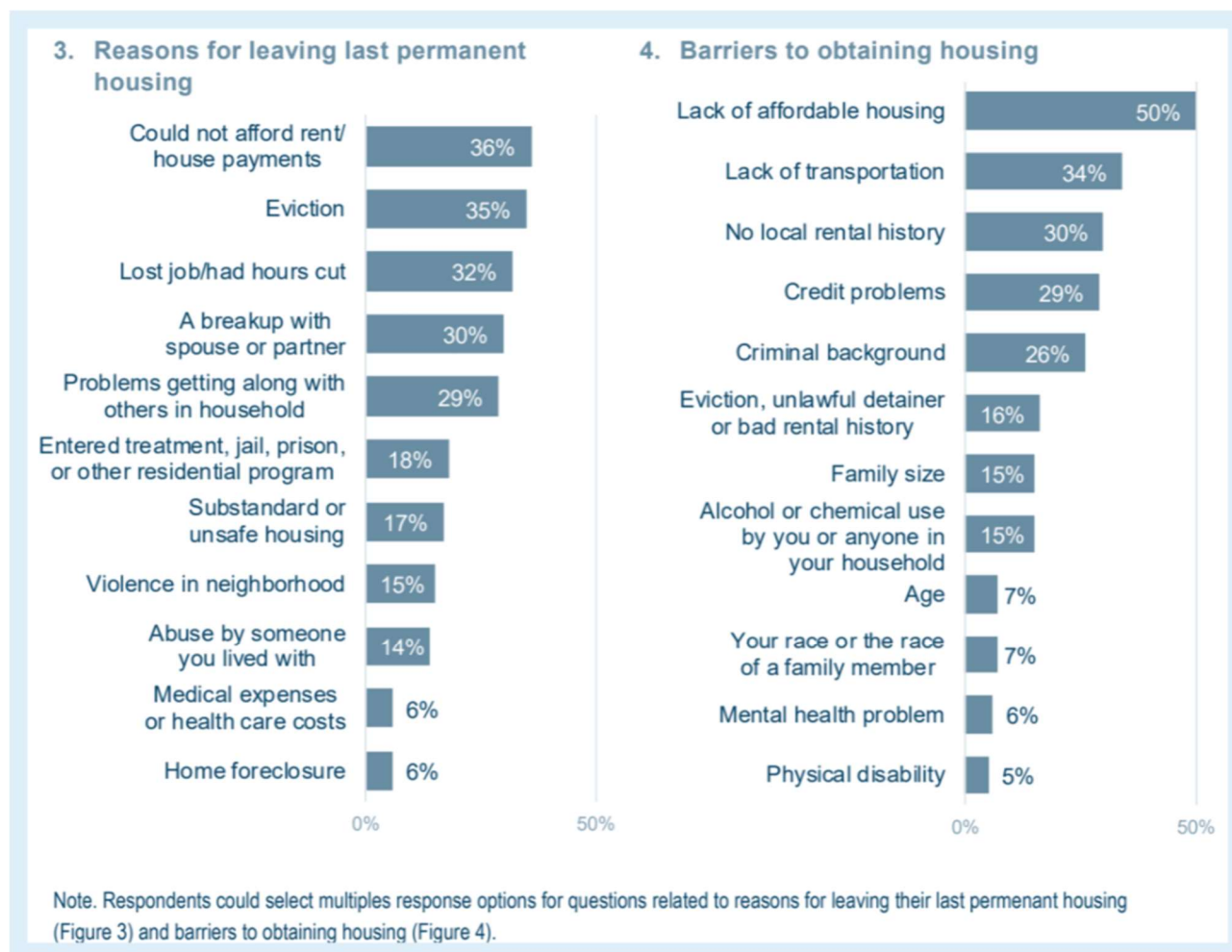
Wilder Research conducted research on “Homelessness on Minnesota American Indian Reservation--Findings from the 2018 Minnesota Reservation Homeless Study,” (April 2020) and shared the following data.



This data reflects that there is a higher percentage (49%) of adults, ages 25-54, who are experiencing homelessness or near homelessness followed closely by children ages birth-17 (33%).

Also from “Wilder Research,” respondents were asked about reasons for leaving last permanent housing and barriers to obtaining housing. Here is the data from those questions.

Due to the homelessness issues at Mille Lacs, Aanjibimaadizing provides transitional housing named Zakab Biinjina, meaning peace within, in partnership with Mille Lacs Band Housing as a support service to assist families to self-sufficiency. Aanjibimaadizing provides this housing as a supportive service that includes lower rental and utility payments with required case management to improve client outcomes. Housing is considered a basic need to family stability and requires support from the program for clients to become successful at their goals.



Mille Lacs Band of Ojibwe (MLBO) operates a women’s shelter for abused women and a homeless shelter at the Mino-Bimaadiziwin hotel. Additionally, there are multiple generations often sharing housing which is a culturally appropriate practice. Even with the aforementioned services, there is a housing shortage on the reservation.

### *Food Desert*

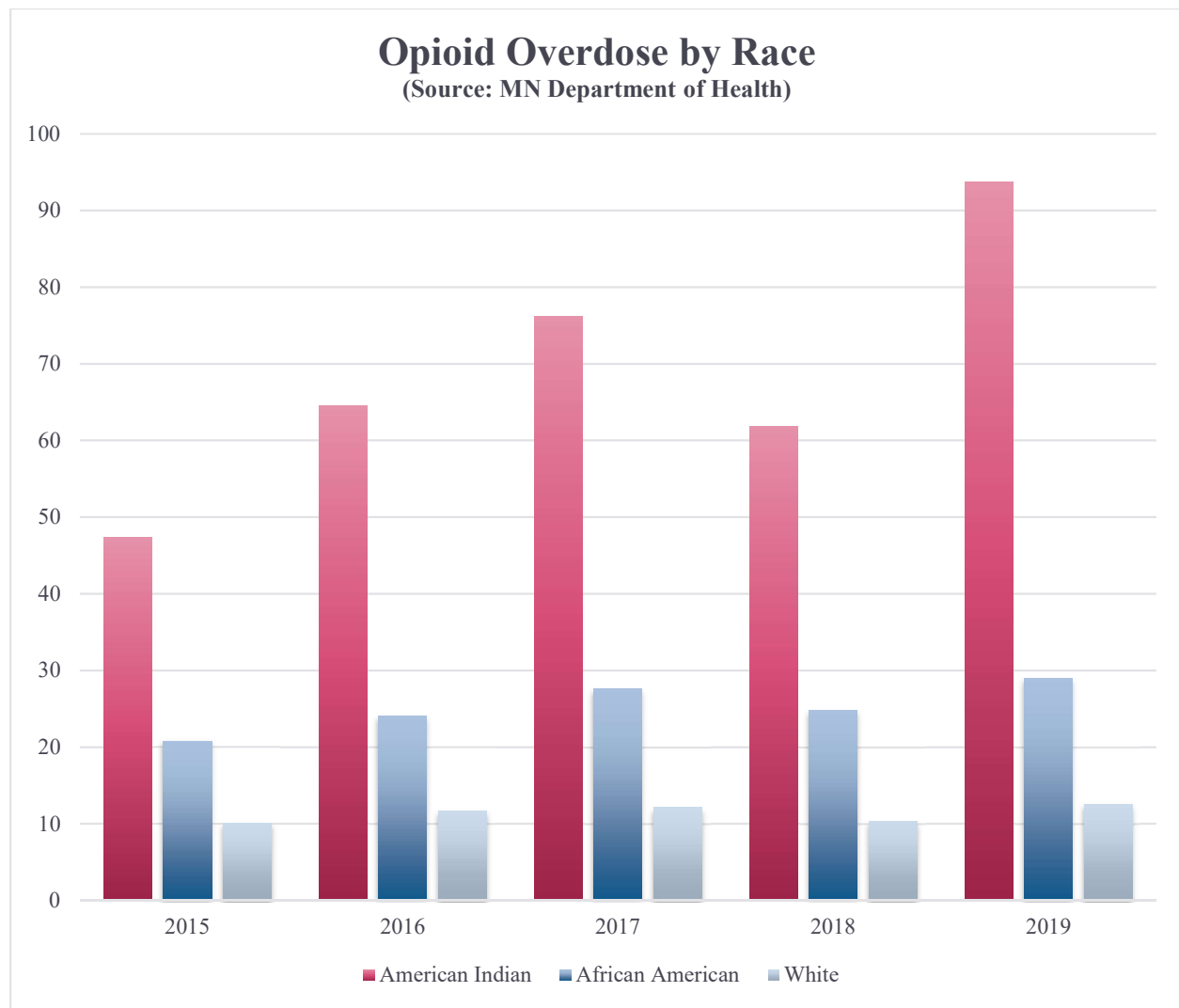
According to the “Minnesota Department of Health—Food Access: Access to Health and Affordable Food,” (5/1/2019)—Focus on Health Equity: American Indian Communities & Tribal Nations, between 2012 and 2014 in Minnesota, one in three American Indian new mothers reported being ‘food insecure’ one year before their baby was born. Specifically, for tribal nations in Minnesota, all of the Red Lake Reservation area qualifies as a food desert, and large percentages of White Earth, Leech Lake, Mille Lacs, and Bois Forte Reservations areas are also considered food deserts. Traditional (indigenous) foods have provided nutrition and promoted health to tribal and American Indian communities for generations and strategies to improve food access for tribes need to be planned and implemented in partnership with tribal and American Indian communities. <https://www.health.state.mn.us/docs/communities/tilev/foodaccess.pdf>

According to the website, “The Annie E. Casey Foundation,” a food desert is defined as “geographic areas where residents have few to no convenient options for securing affordable and healthy foods — especially fresh fruits and vegetables. Disproportionately found in high-poverty areas, food deserts create extra, everyday hurdles that can make it harder for kids, families and communities to grow healthy and strong.” <https://www.aecf.org/blog/exploring-americas-food-deserts>

The majority of Aitkin and Pine counties are also considered food deserts, which is exacerbated due their size and geographic isolation.

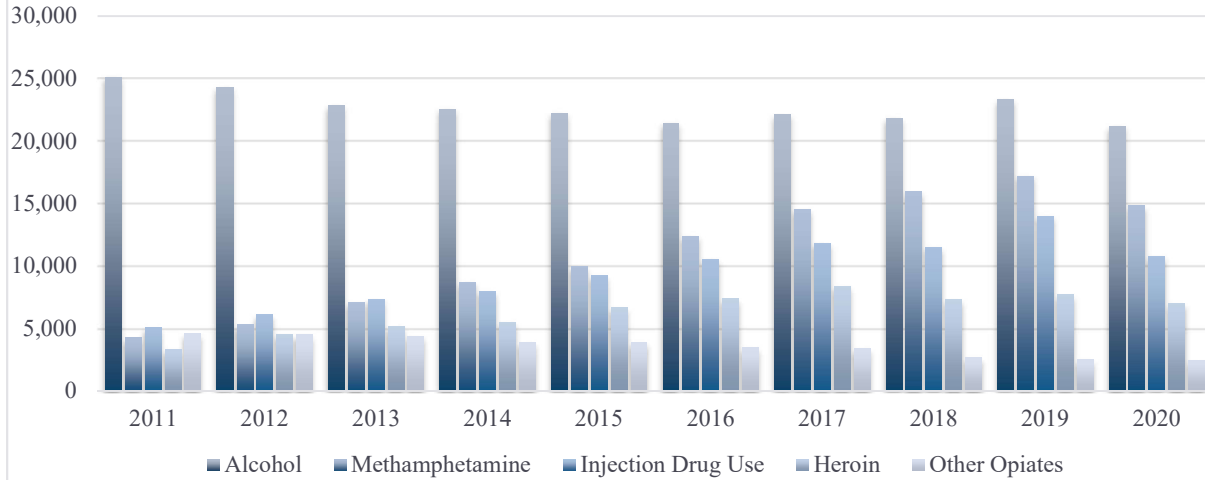
### ***Chemical Use and Abuse***

There is significant alcohol and chemical abuse among Mille Lacs Band Families. This was listed as one of the major concerns on recent community surveys. Opioid use has been on the rise, in addition, there have been several deaths this past year linked to alcohol and drug use.



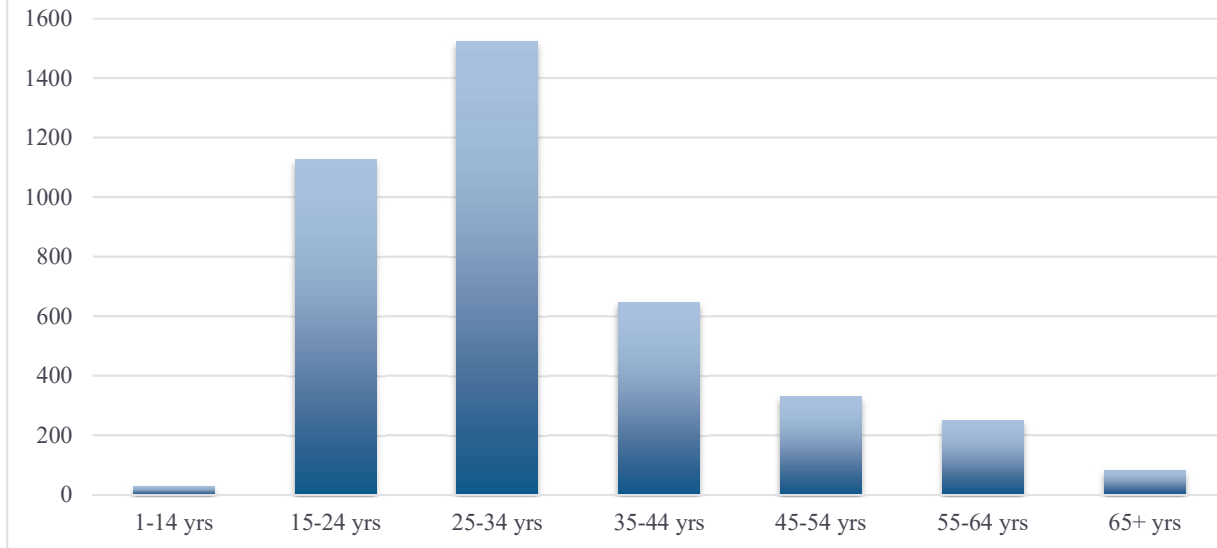
## Substance use disorder treatment for adults in Minnesota

(Source: MN Department of Health)

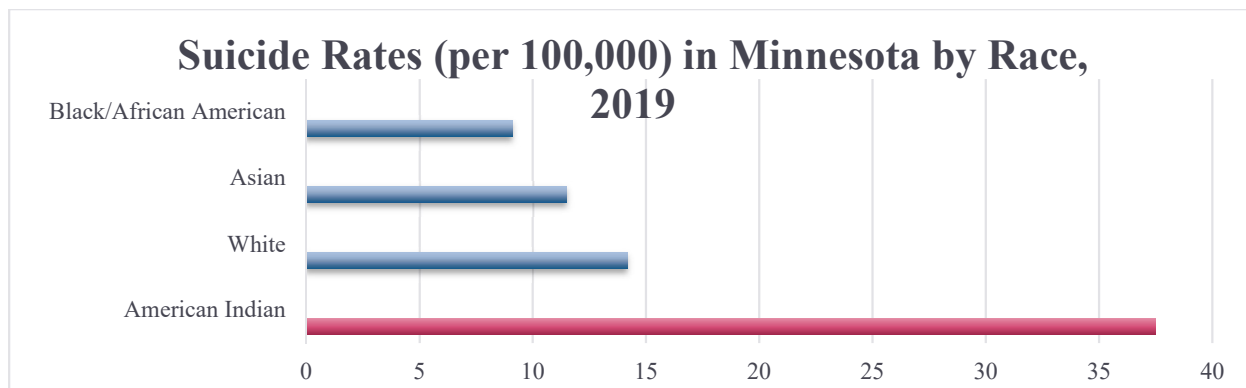


## 2020--Ages 15-34 years with ER visits for opioid-involved overdoses

(Source: MN Department of Health)



Opioid use for American Indians in the State of Minnesota is double or triple the rates of other races and ethnicities. The age rates of those affected are highest in the population aged 15-34. This is an epidemic that is affecting MLBO clients. Besides opioids, the rates for other substance abuse disorders and treatments is high. The program is committed to working in partnership with health care agencies and substance use disorder (SUD) clinics to assist clients in addressing their needs.



Almost all substance use disorders are associated with increased suicide risk. We see this in suicide data from the Minnesota Department of Health. In addition, mental health issues such as depression, anxiety, and self-harm are impacting the population we serve, with incredibly high rates noted in youth in Mille Lacs and Pine Counties. Working with the State of Minnesota and other MLBO departments, we have developed a Suicide Prevention Task Force to bring awareness to this issue, specifically to the agencies that work with our youth and adult clients.

### ***Health Professional Shortage***

The health professional shortage can increase the length of time it takes children and clients to be seen for appointments and follow-up care. According to the Minnesota Department of Health, Mille Lacs and Pine counties are designated as low-income Health Professional Shortage Areas (HPSA). Aitkin, Mille Lacs, and Pine counties are designated as Dental Health Professional Shortage Areas. The MLBO has two full-time dentists working at the Indian Health Service clinic.

### ***Mental Health***

Many of the clients have experienced historical trauma and adverse childhood experiences (ACEs) which negatively impact their ability to obtain and retain employment. The program continues to train on trauma and ACEs. Aanjibimaadizing will establish partnerships or referrals to assist clients as needed.

### ***Criminal Backgrounds and Re-entry***

A significant number of participants have criminal background issues that impact their employment. The 477 plan will work to reduce recidivism and increase job readiness. Individualized plans and resources will be used to assist clients with re-entry. Connections with parole agents, national resources and businesses will be made to find opportunities for clients.

### ***Graduation Rates***

Minnesota Public Radio published statistics with 2018 graduation rates. American Indian students had the lowest graduation rates in the state at 51% compared with an 83.2% overall graduation rate in the State of Minnesota. Per a survey completed by Aanjibimaadizing in January 2019, approximately 25% of respondents did not have a GED or high school diploma.

## **Menu of Services** (other services than those listed here may be provided)

- A computer lab is available in all service districts for clients to create a resume, job search, access educational programming, and for placement testing.
- Resume writing, mock interviews, and application assistance is available with program instructors. The program is hiring additional instructors to assist in District 2, District 3, and the Urban area.
- Transportation may be provided, if staffing allows. The program may purchase vehicles to transport clients to address barriers. The development of a transportation system is a goal where a regular transportation system is established, or ride sharing between clients can be done.
- Small business development assistance.
- Entrepreneurial development.
- The program participates in career fairs.
- Subsidized employment opportunities are located in all service areas.
- Support services to help clients obtain and retain employment.
- Zakab Biinjina supportive housing.
- Multiple educational and training opportunities that promote obtaining a job, retaining a job, educational advancement, and career advancement.
- Ojibwe resources may be used by participants in the program, schools and community.
- Cultural activities and support including by not limited to: sewing, beading, dance and drum, wild rice harvest, maple syrup harvest, respect for elders, service to the community, and language.
- The program offers trainings, or provides mini-conferences to address employment issues, classes, and skill development.
- TANF, or cash assistance to families in need.
- Ge-Niigaanizijig Youth program for youth age kindergarten to age 20.

The Program is open to all clients and actively recruits. Aanjibimaadizing has an office in the Urban area, District 1, District 2 and District 3. Youth Services are provided in District 1, District 2, District 2a, and District 3. The offices welcome walk-in clients. Clients can also call or email. Aanjibimaadizing has information on the MLBO website and an informational Facebook account. Community meetings may be attended to promote the program.

## **Partners**

The Program is actively recruiting new partners at every opportunity. There are several departments within the Mille Lacs Band of Ojibwe (MLBO) that serve primarily similar clients including: MLEE, Mino-Bimaadiziwin hotel, Community Support Services, Public Health, MLBO Housing Department, Mille Lacs Corporate Ventures, MLBO Tribal Offices, and Family Services.



In January 2022 during the State of the Band address, the Chief Executive gave the directive to eliminate ‘red tape’ among MLBO tribal departments and to coordinate our services with other Tribal programs, thus decreasing the amount of time that participants spend completing applications. This became an Aanjibimaadizing goal. In addition, having a streamlined system will maximize funding and help our families in becoming self-sufficient and community leaders.

Aanjibimaadizing will also partner with the Grand Casino, the local schools, Wewinabi Inc. (the non-gaming business office), local community agencies, small businesses, non-profits, and large corporations in all service area counties to ensure relationships are built to network and for our clients to have a sense of community.

## Aanjibimaadizing Program Budget

The table below lists the costs to efficiently run the Aanjibimaadizing program which directly helps the Mille Lacs Band of Ojibwe community.

To ensure the future of the Mille Lacs Band of Ojibwe, additional funds will be expanded for youth programming to: develop internships/mentorships, create school partnerships, offer healthy life choice programming, increase high school graduation rates, and increase college attendance.

Another goal is to develop a ‘training center’ for participants to focus on certifications and skills to get jobs in the local areas. To guarantee clients are able to attend training opportunities, transportation development will also be examined.

Administrative Costs	Amount
Administrative Wages	\$ 454,927.00
Admin Staffing and Benefits Expense	\$ 224,287.00
Equipment, Travel, Training, and Office Expense	\$ 152,000.00
IDC (10.82%)-IDC is not counted for contracts and cash assistance	\$ 407,685.00
<b>Subtotal</b>	<b>\$ 1,238,899.00</b>
Staffing Wages	\$ 1,900,000.00
Staffing Benefits Expenses	\$ 400,000.00
Support Services and Program Services Expenses	\$ 1,045,038.00
Economic Development	\$ 514,760.00
<b>Subtotal</b>	<b>\$ 3,859,798.00</b>
<b>TOTAL BUDGET</b>	<b>\$ 5,098,697.00</b>

## **Aanjibimaadizing Program Management**

The Aanjibimaadizing program is overseen by an Executive Director.

The Director of Case Management oversees Case Managers and Intake staff, who work directly with clients, building relationships and obtaining necessary paperwork.

The Training Manager oversees the Instructors, who create a training menu in all Districts and the Urban area. In addition, Instructors assist applicants in a timely manner, to ensure the client is ready for the workforce.

The Director of Community Services oversees the Crew Leaders, who work to provide community services in each district, serving Mille Lacs Band Elders who may need additional assistance.

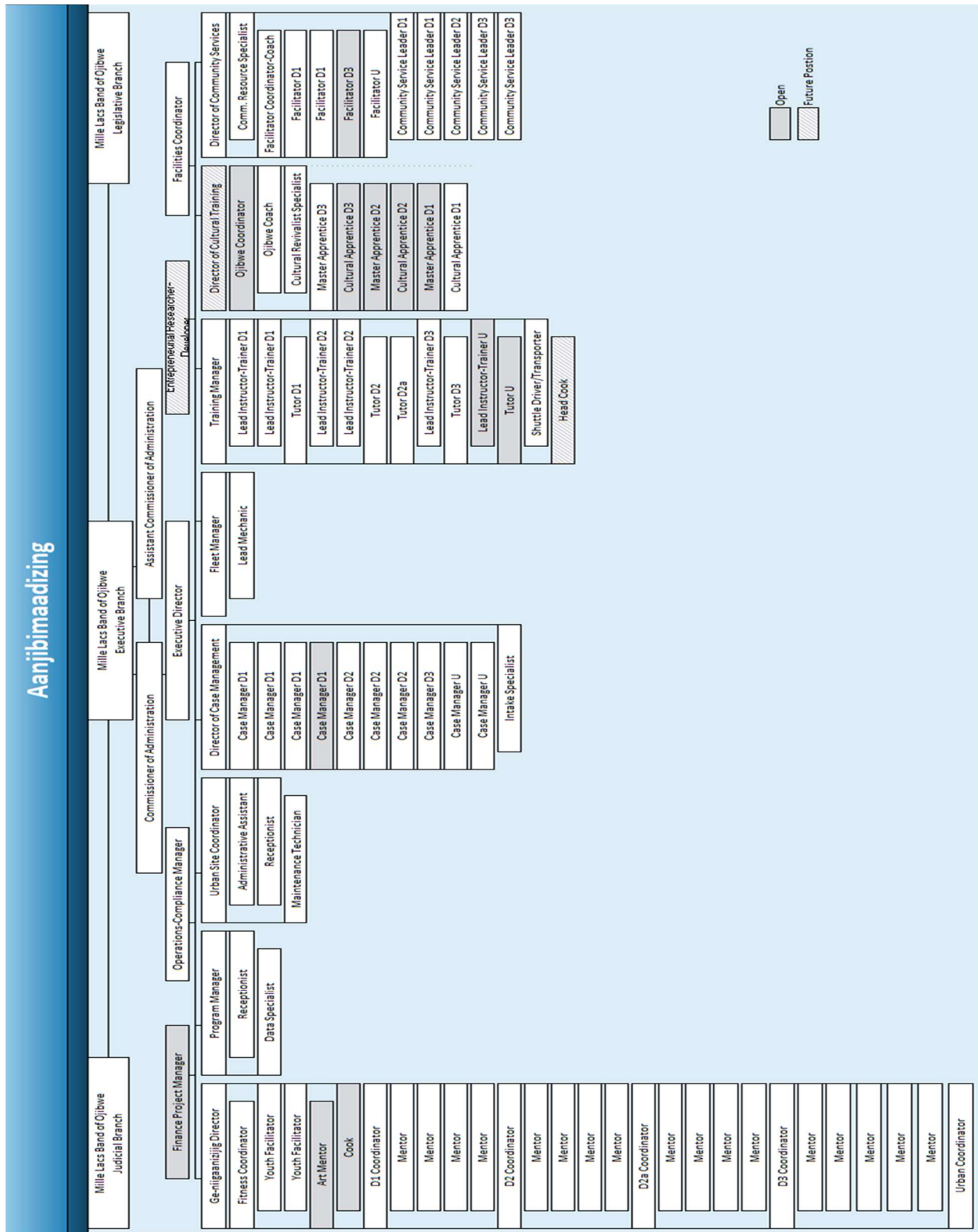
The Director of Ge-Niigaanizijig oversees the Youth Mentors in all Districts to promote healthy life choices, financial literacy and career exploration with youth in the area.

All Directors and the Training Manager provide direct client service at a minimum of 50% of the time.

Furthermore, the Mille Lacs Band of Ojibwe has Commissioners that oversee Administration, Health and Human Services (HHS), Department of Natural Resources (DNR), Community Development, Education, and Finance. There is also a Commissioner who oversees Mille Lacs Corporate Ventures, which is the MLBO businesses.

These six service department Commissioners comprise the Administrative Policy Board (APB). APB provides oversight and policy approval for the department. Band Assembly is comprised of three popularly elected officials representing all Mille Band Communities and the Secretary Treasurer, whose dual role is to act as the Speaker of Assembly.

## Current Organizational Chart



## **Accountability of the Delivery of Services**

The Program currently uses an electronic system for recording data and reporting. All staff recently had training in the use of this system. This integrated data system includes demographics, collects data for the F-TANF report, and data for the 477 Statistical report. The staff must ensure data entry in a timely manner to maintain accurate records.

The Program uses the accounting system of the MLBO. The MLBO follows Uniform Guidance and all applicable accounting requirements. A yearly budget audit is completed by the Tribe. All items found to be non-compliant are corrected with an action plan. All budget items are coded in the Aanjibimaadizing program, signed by the Executive Director, then approved by the Commissioner of Administration, and finally approved and processed in the Office of Management and Budget (OMB). Budgets are received for review from OMB on a weekly basis, or upon request.

After meeting with OMB, the Program consolidated 477 budgets into one large budget and tracks expenses by line item codes linked to specific activities. The Casino Revenue, Interest Budget, revenues from entrepreneurial endeavors, and State funding will be kept in separate budgets.

For reporting purposes, costs associated with the administration of the program will be tracked separately to facilitate accurate accounting and separation of program costs.

For each year the MLBO receives or expends TANF funds, the MLBO will comply with the fiscal accountability provisions of section 5(f)(1) of the Indian Self-Determination and Education Assistance Act (25 U.S.C. 450c (f)(1), relating to the submission of a single agency audit required by chapter 75 of Title 31, United States Code.

## **Selective Service Registration**

Adult males between the ages of 18 and 26 years of age, or born after 1959 will be required to show proof of selective service registration. If not registered and no longer allowed to register, applicants will be asked to provide convincing evidence that failure to register was not knowing and willful. The Executive Director will review each case and make the decision if the selective service requirement is waived.

## **Child Support Enforcement**

Program clients who are receiving TANF assistance must cooperate with the appropriate Child Support agency to maintain eligibility for TANF funded assistance. Program staff will work with the MLBO Child Support Office and the State of Minnesota Child Support Office to assist in this process. The Program will not require assignment of Child Support to the Program as a condition of eligibility of services.

## **Penalties Against Individuals**

Individuals that falsify information to obtain assistance, misuse program funds, or misrepresentation of themselves or circumstances to receive Program assistance shall be required to pay back all funding received by the program. Per capita payments may be garnished. No Program services will be available for a period of one year or until funds have been repaid in full, whichever is longer. Clients will be notified by mail of any adverse action taken and such notice shall include the violation, their right to appeal, and the appeal process.

### **Emergency Process**

An emergency may be declared or defined by the Federal, State, or Tribal government. During a state or time of emergency Aanjibimaadizing will work closely with the Tribal Emergency Response Committee (TERC) to develop and ensure safe practices and policies for staff and clients. External policy revisions for operation may be completed at any time and noted at Administration Policy Board to meet changing safety needs of clients and staff. The 477 Program Emergency Disaster Response expenditures will be consistent with P.L. 102-477 (25 U.S.C. § 3401 et. seq) and all applicable statutes and regulations.

Emergency processes may also be used to assist clients to prepare for emergencies.

### **Waivers**

The Tribe has requested a waiver for youth family income eligibility.

### **Grievance Process**

An opportunity for a fair hearing is available to any program applicant or client who believes they received non-standardized service, or are dissatisfied with actions or decisions taken by program staff. The following outlines the grievance process, as included in the 477 plan, dated 10/1/2022-9/30/2025, as approved by the Federal Granting Agency. It is the responsibility of the program applicant or client to ensure all steps in the grievance process are followed:

- A signed and dated release of information form must be on file with the Aanjibimaadizing Program in order for the staff to share and/or discuss the case outside of the Aanjibimaadizing Program.
- The applicant or client will be informed of their right to a review of the actions or decisions of the Program staff at the time of application. The request for a review must be in writing, detailing the reason the action is being challenged and submitted to the Executive Director of Aanjibimaadizing programs within 10 days of the adverse action. The Executive Director of the Aanjibimaadizing programs shall investigate the complaint and attempt to resolve disputes or issues informally whenever possible.
- If such informal resolution is not practical or possible, the Program Administrator shall issue a decision on the matter within 5 business days of its presentation to him/her, in

writing, and supply a copy of the same to the applicant or participant and affected Program Staff.

- Within 10 days after the issuance of the Executive Director or Aanjibimaadizing program's decisions, any affected person may file a written appeal to the program grievance committee, which shall review and hear the matter within 30 days.
- The Program Grievance Committee membership shall be established as needed by the Mille Lacs Band of Ojibwe Assistant Commissioner of Administration and made up of no less than three Commissioners or Directors of Tribal Programs (or their designees) and shall not include the Executive Director of the Aanjibimaadizing programs.
- The Program Grievance Committee shall issue its decision within 30 days of the conclusion of a hearing.
- If no appeal to the Program Grievance Committee is made within the time allowed, the decision of the Executive Director shall be final and shall not be subject to appeal.
- If, after exhaustion of this procedure, the participant or client is not satisfied, they have the right to file a fully documented grievance to:

Attention: Division Chief  
Division of Workforce Development  
MLB MS 4513, 1849 C St. NW Avenue  
Washington, DC 20240

Questions or complaints alleging a violation of nondiscrimination provisions of WIA Section 188, may be mailed directly to the Director, Civil Rights Center, US Department of Labor, Room N-4123, 200 Constitution Avenue N.W., Washington, DC 20210, for processing.

## **Retrocession**

If the MLBO elects to retrocede the TANF program back to the State, it will adhere to and meet all pertinent statutory and regulatory requirements.

## **Public Comment Period**

The 477 plan, including the section addressing TANF was sent for public comment by MLBO wide email and posted on the Aanjibimaadizing website on April 1, 2022 for a Public Comment on May 17, 2022. People who wished to comment could do so by email, in-person, or by zoom. There were no comments.

## **Plan Enhancements**

Lack of a valid driver's license or reliable transportation is a barrier to our participants' employment. This issue is especially prevalent in the rural areas. The plan will work to assist

clients in obtaining their driver's license and maintaining reliable transportation. Transportation will be provided for clients to training and for other services as staffing patterns allow. A Program goal is to expand transportation services.

Graduation rates are lower for American Indian youth in the State of Minnesota. The State is working to address racial disparities. The Program will work to enhance youth programming that supports education including, but not limited to: partnerships with local schools, tutoring, internships, incentives for educational goals, and developing job readiness programs for students.

Ojibwe language and culture revitalization is regarded as critical by the MLBO elders to promote self-sufficiency. Language and cultural resources, training, and experiences will be used to educate and enhance the lives of participants.

Substance abuse, mental health and trauma are issues affecting Tribal members. The Program will work with Family Services, Community Services and Behavioral Health to coordinate services for participants. Focusing on the holistic health of clients will aid them in the long-term success of obtaining and retaining employment. A goal is to work on developing a one-stop shop for clients to access multiple services at one time.

The need for housing in our service areas is critical. Homelessness is prevalent, with many of our Aanjibimaadizing clients being considered homeless, or near homeless. The program supports housing options to increase family stability.

All plan enhancements support the four purposes of TANF.

## **Additional Resources**

The Program receives a small amount of funding from the Tribe to assist clients in paying for required documents, to assist people missing critical documents (e.g. obtaining a birth certificate) and to support clients who are over the income threshold.

Aanjibimaadizing continues to build community connections, for the next three years, we are developing partnerships with Mille Lacs Band Corporate Ventures, Wewinabi Inc. (the non-gaming MLBO businesses), Central Minnesota Adult Basic Education, Pine Technical & Community College, the MN Timberwolves, and others. The Program wants to make it easier for clients to access multiple services available through the MLBO, the state, and private companies. Through coordination, clients will be able to access multiple resources with one stop to develop self-sufficiency. This coordination of services is a work in progress.

## **Definitions**

In accordance with the requirements of P.L. 102-477 and 45 CFR 286.75(a)(1); and 286.150, the MLBO has adopted these definitions.

*Family:* Any household made up of one or more custodial parent or guardians, regardless of sexual orientation, marital status, or gender identity, presenting with minor children. For the purposes of this Plan, families must include enrolled MLBO members, 1st generation descendants of the MLBO, or enrolled members of other Federally Recognized Tribes.

*Needy:* shall be defined as having an identifiable and correctable barrier to employment, or identified advancement of employment with a calculated income not to exceed 200% of the poverty level.

*Needy Family:* shall be defined as any Tribal Member Family as defined by family and needy in this section.

*Tribal Member Family:* shall be defined as enrolled MLBO members, 1st generation descendants of the MLBO, enrolled members of other Federally Recognized Tribes, or other members with direct ties to the MLBO such as a spouse, cohabitant, or children residing in the Plan service area.

*Appropriate Child Care:* shall be the biological parent, step-parent, direct family members to the child who has taken a Program approved Child Care course or training. It shall also be defined as a licensed child care facility.

*Reasonable Distance:* shall be defined as the same adopted by the MLBO TERO Ordinance.

*Affordable Child Care:* shall be any certified individual or facility that conforms to the industry standard rates. Charges may not exceed \$6.00 per hour.

*Unsuitability of Informal Child Care:* shall be defined as untrained or uncertified person or facility other than a parent, step-parent, or legal guardian.

*Children in Need of Protective Services, or At-Risk Children:* shall be defined as youth living in poverty, children whose families are on TANF, or who have exited TANF in the last 12 months, and/or children in out-of-home placements.

*Provider Types:* shall be defined tribally or state licensed child care centers, state licensed family child care providers, or relative care providers.

*Relative Care Providers:* shall be defined as grandparents, great-grandparents, siblings, aunts, and uncles. They may reside in the same household.

## **Attachments**

1. Child Count Declaration
2. CCDF Public Meeting Flyer
3. CCDF Public Comments
4. TANF Public Comment Flyer
5. TANF Public comments



6. Sliding Fee Scale
7. Assurances
8. References-see page 50

## References

- [Health Profession] Shortage designations.* (2022, March). From MN Department of Health: <https://www.health.state.mn.us/facilities/underserved/designation.html>
- Amherst H. Wilder Foundation.* (2022, March). From Homelessness on Minnesota American Indian Reservations: Findings from the 2018 Minnesota Reservation Homelessness Study: <https://www.wilder.org/wilder-research/research-library/homelessness-minnesota-american-indian-reservations-findings-2018>
- Blog--Food Deserts in the United States.* (2022, March). From The Annie E. Casey Foundation : <https://www.aecf.org/blog/exploring-americas-food-deserts>
- Bolin, A. (2022, March 17). Chief of Staff, Mille Lacs Corporate Ventures. Onamia, MN, United States of America.
- Food Access--Access to Healthy and Affordable Food.* (2022, March). From MN Department of Health: <https://www.health.state.mn.us/docs/communities/titlev/foodaccess.pdf>
- Indian Affairs.* (2022, March). From U.S. Department of the Interior: <https://www.bia.gov/sites/bia.gov/files/assets/bia/ots/pdf/idc-018737.pdf>
- Macht, C. (2021, December). *Minnesota Vacancies Surge in 2021.* From MN Employment and Economic Development: <https://mn.gov/deed/newscenter/publications/trends/december-2021/vacancies.jsp>
- Mille Lacs Band of Ojibwe.* (2022, March). From Reservation Map: <https://mlbo.dev/about/reservation-map>
- Mille Lacs Band of Ojibwe.* (2022, March). From Our Government: <https://millelacsband.com/government/government#:~:text=Our%20three%2Dbranch%20governing%20system,general%20welfare%20of%20Band%20Members.>
- Minnesota Child Care Assistance Program--Copayment Schedules, Effective October 4, 2021.* (2022, March). From MN Department of Human Services: <https://edocs.dhs.state.mn.us/lfserver/Public/DHS-6413j-ENG>
- Minnesota Early Childhood Risk and Reach.* (2022, March). From Amherst H. Wilder Foundation: <https://www.wilder.org/wilder-research/research-library/minnesota-early-childhood-risk-and-reach>
- Minnesota Indicators.* (2022, March). From The Annie E. Casey Foundation Kids Count Data Center: <https://datacenter.kidscount.org/data#MN/2/0/char/0>
- Minnesota Unemployment Statistics LAUS (Local Area Unemployment Statistics) Data.* (2022, March). From MN Employment and Economic Development: <https://apps.deed.state.mn.us/lmi/laus/GeogSelect.aspx>

- My Tribal Area.* (2022, March). From United States Census Bureau:  
<https://www.census.gov/tribal/?aianihh=2270>
- Ojibwe, M. L. (2022, March). *TERO*. From Mille Lacs Band of Ojibwe:  
<https://millelacsband.com/government/departmentspublic/tero>
- Ojibwe, M. L. (2022, January 11). *YouTube*. From Mille Lacs Band of Ojibwe:  
<https://www.youtube.com/watch?v=lOy3Dvh4QBU&t=10760s>
- Opioids--Drug Overdose Dashboard.* (2022, March). From MN Department of Health:  
<https://www.health.state.mn.us/opioiddashboard>
- Quick.* (n.d.). From  
<https://www.census.gov/quickfacts/fact/table/aitkincountyminnesota,millelacscountyminnesota,MN,US/PST045221>
- Quick Facts--Minnesota.* (2022, March). From United States Census Bureau:  
<https://www.census.gov/quickfacts/fact/table/MN,US/PST045221>
- Sanchez, S. (2022, March 11). Director of Human Resources, Mille Lacs Band of Ojibwe. Onamia, MN, United States of America.
- Suicide Prevention Data and Reports.* (2022, March). From MN Department of Health:  
<https://www.health.state.mn.us/communities/suicide/data/suicidedata.html>
- Title 8--Children and Families.* (2022, March). From Mille Lacs Band of Ojibwe:  
<https://millelacsband.com/government/tribal-register/constitution-and-band-statutes/title-8-children-and-families>
- Zdechlik, M. (2022, March). *Minn. high school graduation rate up but racial gaps persist.* From MPR News: <https://www.mprnews.org/story/2019/04/23/minnesota-high-school-graduation-rate-continues-to-increase>