



THE MILLE LACS BAND OF
OJIBWE INDIANS

Legislative Branch of Tribal Government

JOINT RESOLUTION 14-02-22-11

A JOINT RESOLUTION TO APPROVE THE REVISED PUBLIC LAW 102-477 PLAN FOR THE MILLE LACS BAND OF OJIBWE, FOR THE NEXT THREE YEAR CYCLE, BEGINNING OCTOBER 1, 2010 THROUGH SEPTEMBER 30, 2013.

- WHEREAS, the Mille Lacs Band Assembly is the duly elected governing body for the Mille Lacs Band of Ojibwe, a federally-recognized Indian Tribe, and
- WHEREAS, according to 3 MLBSA § 2(d), the Band Assembly is empowered to adopt resolutions to promote the general welfare of the people of the Band; and
- WHEREAS, the Chief Executive is empowered to exercise the Executive Branch powers of the Band; and
- WHEREAS, the Mille Lacs Band has established as a priority the improvement of the social and economic conditions and quality of life for the people of the Mille Lacs Band of Ojibwe; and
- WHEREAS, the goal of the Mille Lacs Band of Ojibwe is to promote the general welfare of Band members by providing training, employment, counseling and other opportunities to obtain economic self-sufficiency for tribal members; and
- WHEREAS, the purpose of the proposed P.L. 102-477 Plan has been revised to identify the restructure of the current Workforce Center, including TANF and TERO, to the Department of Labor; and
- WHEREAS, the proposed P.L. 102-477 Plan is to provide employment and training related services for the next three year cycle, beginning October 1, 2010 through September 30, 2013.
- NOW THEREFORE BE IT RESOLVED, that the Mille Lacs Band of Ojibwe hereby approves the revised Public Law 102-477 Plan.

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DISTRICT II

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DISTRICT IIA

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DISTRICT III

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URBAN OFFICE

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WE DO HEREBY CERTIFY, that the foregoing resolution was duly concurred with and adopted at a special session of the Band Assembly in Legislative Council assembled, a quorum of legislative being present on the 2nd day of December, 2010 at Vineland, Minnesota by a vote of 3 FOR, 0 AGAINST, 0 SILENT.

IN WITNESS WHEREOF, we, the Band Assembly hereunto cause to have set the signature of the Speaker of the Assembly to be affixed to this resolution and forwarded to the Chief Executive for concurrence.



Curt Kalk, Speaker of the Assembly

IN CONCURRENCE, with the action of the Speaker of Assembly, I the Chief Executive hereunto cause to have set my hand to this resolution.



Marge Anderson, Chief Executive


OFFICIAL SEAL OF THE BAND



Mille Lacs Band of Ojibwe

Tribal Employment, Training and Related Services

P.L.102-477 PLAN

Plan Date: October 1, 2010 to September 30, 2013

Submitted by:

Mille Lacs Band 477 Workgroup

Carolyn Shaw, Assistant Commissioner of Administration

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Mille Lacs Band of Ojibwe
477 Plan
October 1, 2010 through September 30, 2013

Mission Statement

By providing training, employment, and counseling, we will build stronger, healthier and more successful individuals, families, and communities. We will develop relationships and trust with every participant to better understand their challenges, values, and potential. With this information we will help them create an Individual Employment Plan that will empower them and ensure their self sufficiency.

Vision

Mille Lacs Band members will be self-sufficient and live out the native culture and pride their Elders and ancestors fought and sacrificed to preserve.

Philosophy

Life is not really as it seems, but what we make it to be.

Duration of Plan

The duration of this plan will be from October 1, 2010 through September 30, 2013.

Service Area

The Mille Lacs Band of Ojibwe (The Band) is a federally recognized Chippewa tribe located in rural, northeast central Minnesota. The Band has three unique, yet unified districts which are as follows: District I: Vineland, located north of Onamia. District II: Isle and East Lake, located in Isle, and southeast of McGregor respectively; and District III: Lake Lena, located east of Hinckley on the Wisconsin border. The Band services the six counties of Aitkin, Crow Wing, Morrison, Mille Lacs, Pine and Benton. The Band also has an urban service area which covers the three counties of Anoka, Hennepin and Ramsey. At this time, there are approximately 4,224 enrolled members of the Mille Lacs Band.

Service Population

The reservation-based center will service all enrolled Mille Lacs Band members, first generation descendants of an enrolled Mille Lacs Band member, and eligible family members of an enrolled Mille Lacs Band member.

Each group will be eligible for specific services as defined throughout the 477 Plan, under eligibility on pages 19-22 and in the 477 Policy and Procedure Manual, which is anticipated to be completed by January 1, 2011.

The urban office will service all enrolled Minnesota Chippewa Tribe (MCT) members.

Government Structure

The Mille Lacs Band's government is based on a separation of powers, similar to the United States government, to help ensure proper checks and balances.

The Executive Branch, led by the Chief Executive, implements Band laws and administers the Band's programs and services. The Chief Executive of the Mille Lacs Band is Honorable Marge Anderson. Chief Executive Anderson oversees the Executive Branch of the Mille Lacs Band government to include her cabinet which consists of the Commissioner of Administration, John Dunkley, Assistant Commissioner of Administration, Carolyn Shaw, Commissioner of Health and Human Services, Don Eubanks, Commissioner of Education, Dennis Olson, Commissioner of Community Development, Sam Moose, Commissioner of Corporate Affairs, Vacant, Commissioner of Natural Resources, Vacant and Solicitor General, Barbara Cole.

Several of these commissioners also sit on the Mille Lacs Band Administration Policy Board (APB). APB is comprised of the following executive officers, Commissioner of Administration, John Dunkley, the Assistant Commissioner of Administration, Carolyn Shaw, the Commissioner of Natural Resources, vacant, the Commissioner of Health and Human Services, Don Eubanks, the Commissioner of Education, Dennis Olson, and the Commissioner Community Development, Sam Moose.

The duties of the APB include, but are not limited to approving and administering lawful activities regarding contracts, grant awards, and grant proposals within the Mille Lacs Band for the benefit of the Non-Removable Mille Lacs Band Chippewa Indians. APB has the right to negotiate any contract on behalf of the Mille Lacs Band; however, any negotiations may be ratified by the Band Assembly.

Mille Lacs APB also regulates all employee performance, which includes the hiring and dismissal of any employee. Upon advice and consent from the Chief Executive, the APB can recommend any measure to the Band Assembly for their consideration. It is the responsibility of the APB members to perform all duties assigned by the Chief Executive, and to have the betterment of the Mille Lacs tribal members in mind with every decision. In order for any official transactions to occur, a quorum of four members must be in attendance.

The Legislative Branch, known as the Band Assembly, enacts laws that regulate the Band's affairs and appropriates money for Band programs and services. The Secretary-Treasurer, Curt Kalk oversees the Legislative Branch and the elected representatives from each district to include Sandra Blake, District I Representative, Marvin Bruneau, District II & IIA Representative, Diane Gibbs, District III Representative and Commissioner of Finance, Angella Roby.

The Judicial Branch, or Tribal Court, upholds the Band's laws and ensures justice is served equally to all Band members. The Chief Justice, Rayna Mattinas oversees the Judicial Branch of the tribal government.

The main governmental offices are located on the District I reservation area. There are community centers in each district which houses government programs staff from a wide variety of programs along with a health care clinic in each district. The urban office is a leased building that houses community service and the workforce staff.

Policies and Procedures

The anticipated completion date for the 477 Plan Policy and Procedure Manual is January 2011. The manual will ensure consistency of operations from one site to another. A consultant will be contracted to assist the DOL with the 477 Plan Policy and Procedure Manual. Care will be taken to consider the unique differences of each district and the urban area served. The Mille Lacs Department of Labor (DOL) will develop clearly written operational policies and procedures that include definitions, formulas, and practices. The intention of the policies and procedures will

be to ensure accurate and timely reporting; establish compliance with federal requirements; streamline and enhance program operation, as well as ensure consistency; fairness, and reduce arbitrary decisions on providing service. With the approval of the Mille Lacs Band Elected Officials, the Executive Director of the DOL may change, add or delete any policy or procedure at any time without modifying the 477 Plan.

Community Involvement with Plan

Input from meetings with Tribal leaders and community members to include a Tribal Elder round table have been utilized in writing this plan starting May 2010. Involvement of community members will continue with the writing of the policies and procedures. The Executive Director will attend community and Elder meetings to continue gathering input from Tribal members.

Employment Opportunities

Employment opportunities available in our service area vary from district to district. District I – Vineland has the greatest available employment opportunities. The Band operates a large gaming property which includes a convention center, hotel, three restaurants, gift shops, coffee shop, candy store, and childcare center. In addition, there is a community center, corporate office, tribal government center, clinic, upper and lower schools, museum, convenience store, grocery store, movie theatre, and resort all located in District I.

District II – East Lake and Isle are currently being evaluated by the Mille Lacs Band Corporate Commission for economic and community development. Both East Lake and Isle have community centers and East Lake has a combination convenience store and Laundromat for Band-provided employment opportunities.

District III – Lake Lena also has a large casino property, which is located 30 miles from the community center. The casino property includes a hotel, convention center, restaurants, lounge, childcare center, gift shops, and a beauty salon. In addition, there is a recreational vehicle park, additional hotels, convenience store, auto care center, golf course, governmental affairs office, and a community center that provide employment opportunities for Band members.

Most jobs available at the Band enterprises are service-oriented and entry level due to the large casino properties. The established minimum wage is currently \$7.50 per hour for Band-owned businesses.

The Mille Lacs Department of Administration implemented a Labor Pool Program May 17, 2010 that is presently funded by limited funds from the Band's net revenue. The program has over 350 enrolled Mille Lacs Band members; of those, 250 have become temporarily employed through jobs such as lawn care, community clean-up projects, DNR projects,

cultural projects, intern positions within the government, and other Band entities. They have also assisted our Elders and handicapped and fellow Band members with several projects. The program pays the Band members a livable wage and allows them to work up to 40 hours per week. The Labor Pool Program has brought hope and pride back to the people and communities.

While there is some non-Band employment available locally, many Band members have been subject to discrimination in hiring. Another barrier to unemployment includes having limited to no work experience, lack of transportation, loss of driving privileges, lack of childcare, chemical dependency, criminal records, hopelessness, and low self-esteem. The 477 program seeks to address these conditions, and build a responsible workforce that is prepared to take advantage of opportunities by receiving appropriate training and supportive services to build future self-respect and self-sufficiency. The DOL will develop qualified, productive, and confident people and build a network on and off the reservation to locate employment opportunities.

Economic Development Opportunities

Future economic development projects may include, but are not limited to a clothing closet, food pantry, babysitting co-op, car care center, and a used car dealership which would be operated by 477 participants.

Fiscal Accountability

Nothing in the 477 Plan shall be construed so as to interfere with the ability of the Secretary or the lead agency to fulfill the responsibilities for the safeguarding of Federal funds pursuant to the Single Audit Act of 1984 [31 U.S.C. 7501 et seq.].

Protection of Family Privacy

Protection of family privacy will be thoroughly defined in 477 Plan Policy and Procedure Manual.

Organizational Units and Strategy to Deliver the 477 Services

Overview of Strategy/Demonstration

The Mille Lacs Band of Ojibwe (The Band) is currently in the process of implementing a Department of Labor (DOL) one-stop center in District I, Onamia Minnesota. The DOL will consist of a Training and Development Department, Tribal Employment Rights Office (TERO) and a Support and Referral Services Department. These departments will be overseen by an Executive Director with an administrative staff of three (3) Directors, Intake Counselor and

Database/Report Specialist, general and support staff needed to effectively operate each department and outreach positions for outer districts.

The Mille Lacs Band has identified and created a database of over 350 unemployed Band members within our Labor Pool Program. Moving forward, the DOL would like to identify and combat the barriers and challenges that have prevented these Band members from obtaining or retaining employment. The Band's DOL recognizes that barriers and challenges must be addressed and eliminated before training and employment initiatives can be successful. The Labor Pool Program will transfer to the DOL TERO Department after this 477 Plan is approved and all Labor Pool participants will be required to complete a one-on-one intake session with the 477 Program.

This one-on-one counseling intake session will build relationships and trust with every participant so we can get to know the whole person and identify their challenges and barriers and what is important to them, who they are, and what they can be. We will help them identify their strengths and gifts and boost their confidence. With this information, we will partner with the participant to develop an Individual Employment Plan (IEP) that will ensure self-sufficiency and help them re-create their life.

The participants will walk into a warm and inviting center where they will be greeted by a very pleasant receptionist who will introduce them to the Intake Specialist/Counselor who will be a highly-trained people person. The Intake Specialist Counselor will visit and get to know the participant personally and begin to build a relationship of trust and respect. The Intake Specialist/Counselor will acquire necessary information and determine appropriate assessments to identify any barriers or challenges the participants may have, their values, and what profession they would like to pursue. The Intake Counselor will make every participant aware of the services the DOL has to offer. The initial intake will cover previous employment history, identify any type of social or supportive services deemed necessary, and the appropriate training and development. It may be determined that the participants are ready for job placement. The Intake Counselor will then begin the participants' Individual Employment Plan (IEP).

The next step is to introduce them to their Case Worker who will assist the Intake Counselor and the participant to finish developing their IEP and to begin implementing their plan by referring them to the appropriate department. Case Workers will be in compliance with 25 CFR 20.318. Initial assessments include the Whole Person Assessment series of testing to determine interests, aptitudes, and abilities. The Test of Adult Basic Education (TABE) is used to assess educational level. The DOL will continuously look at additional assessments and other tools that may be beneficial to the participants.

If at any time the participant demonstrates or reveals any issues relating to chemical dependency, mental disorders, domestic abuse or anger issues, the Case Worker will offer an assessment to identify concerns and work closely with the participant on referrals to the Band's Health and Human Services department (HHS). DOL and HHS will collaboratively communicate

with one another on the progress and needs of each participant referred. There will be a waiver signed by participant so departments can share information. This waiver will cover all departments specified and integrated in the 477 Plan.

The Case Workers from all districts and the urban office will be required to keep a daily activity log containing data on contacts with the participants. This information will be sent to the Database Report Specialist before noon the following work day. The Database Specialist will input this information immediately. The DOL is currently utilizing database systems which include Eaglesun (TAS), MAXIS, and MMIS. The Database Specialist will identify any red flags such as, but not limited to sanctions, low participation rates, or lack of contact with participants, and bring these red flags to the attention of the Executive Director to immediately address. The Database Specialist will be responsible for payroll, data entry, spreadsheets, and timely reports.

Department of Labor Staff

Within the Mille Lacs Band Administrative structure, responsibility for oversight of the 477 Plan rests with the Commissioner of Administration. The main program site is at the Mille Lacs Band Government Center.

Administration:

1. **Commissioner of Administration** – responsible for overall direction of the program, supervises the Executive Director of Department of Labor
2. **Assistant Commissioner of Administration**-assists Commissioner of Administration with overall direction of the program, as directed.
3. **Executive Director of Department of Labor** – will manage the 477 Program budget and oversee all departments and Directors within those departments
4. **Director of Training and Development** – will evaluate and develop all training activities and programs and manage staff
5. **Director of Support and Referral Services** – manages support services and referral department and staff
6. **Urban Support and Referral Services Manager** –manage the urban office and staff
7. **Director of TERO** – oversees the operation and compliance of the Mille Lacs Band's Indian Employment Rights office, job placement, job development and Labor Pool

General Staff:

1. **Case Workers**
2. **Case Managers**
3. **Job Developers**
4. **Training Specialist**
5. **Youth Program Counselor**
6. **Youth Program Mentors**

7. Intake Specialist Counselor
8. Database/Report Specialist
9. Facilitators
10. Labor Pool Coordinators
11. Job Placement Manager
12. Grievance/Internal Compliance Officer
13. Compliance Officers
14. Urban Support Service Manager
15. Recruiter Career Counselor

Support Staff:

1. Executive Administrative Assistant
2. Executive Receptionist
3. Administrative Assistant
4. Receptionist
5. Maintenance

The Department of Labor in District I contains a 15-person classroom for training. The classroom utilizes video and related visual-communication technology to enhance our training efforts. There is also a 15-station computer classroom to provide computer-generated study. All computers have internet access for participants to use for job searches or other related research or computer-based testing. Community technology centers have been developed in the outer districts and urban area for the DOL program participants.

DOL Staff Training

The DOL staff will be provided training to maximize the effectiveness of services. Case management and database training is priority. Cross-training will also be implemented into the DOL Departments.

DOL Training & Development Department Services

The following training and development activities will be offered to participants identified under eligibility on pages 19 of this plan:

1. Assessments for adults and youth
2. Computer training for adults and youth
3. GED preparation for adults and youth
4. Tutoring for adults and youth
5. Youth and adult educational classes as needed or requested
6. Workshops or one-on-one training for adults and youth on life skills such as:
 - a. Budgeting
 - b. Etiquette
 - c. Communication

- d. Family and relationship building initiatives
 - e. Parenting
 - f. Professionalism
 - g. Handling emotions
 - h. Dealing with stress
 - i. Conflict resolution
 - j. Self-esteem for men and women
 - k. Dress for success
7. Job related education for adults and youth
 - a. Job search
 - b. Preparation
 - c. Interviewing
 - d. Performance
 - e. Retention
 - f. Improving promotion potential
 - g. Job skills training
 8. Health and wellness for adults and youth
 - a. Importance of exercise
 - b. Preparing healthy meals
 - c. Importance of hygiene/physical and dental care
 9. Youth programs, activities and events
 - a. Year round employment programs
 - b. Summer Youth employment programs
 - c. Recruiters/Job Counselors visiting schools to encourage post-secondary education opportunities and employment opportunities within the Band, casinos, and Corporate Commission
 - d. Talent shows to build confidence and inspire other teens
 - e. Gang awareness/prevention/resistance classes
 10. Prevention initiatives for adults and youth
 - a. Out of wedlock pregnancy prevention initiatives for adults and youth
 - b. Planned parenthood workshops
 - c. Teen parents and single parents sharing their experience with others
 - d. Self-respect and self-esteem training
 - e. Social responsibility
 - f. Financial responsibility/cost of raising a child
 11. Cultural training and camps for adults and youth
 - a. Language
 - b. Activities (drum, dance, crafts, etc.)
 - c. Ceremonies (drum, pow wows, feasts, etc)
 - d. Harvesting (rice, syrup, hunting, netting, etc.)
 12. Dealing with criminal records and history for adults and youth
 - a. Corrective resume writing
 - b. Making right choices and consequences of choices
 - c. Offender re-entry programs

13. Conferences for adults and youth

With the approval of the Administration Policy Board and Mille Lacs Band Elected Officials, the Executive Director of the DOL may then change, add or delete any of the listed trainings at any time without the necessity of modifying the 477 Plan.

DOL TERO Services

The DOL's Tribal Employment Rights Office (TERO) will be obligated to refer to TERO laws if they supersede the 477 Plan and its Policies and Procedures in regard to employment rights.

Functions that TERO or positions under TERO will oversee include:

1. Develop and initiate job placement to include internships, apprenticeships, job shadowing, labor pool, job volunteering, on-the-job training, community service, subsidized employment, supportive work programs, cultural harvesting, ceremonies, and activities. These job placements will mainly be within the Band's government, casinos, Corporate Commission and other Band owned businesses, and entities.
2. Network to outside businesses and companies through internet, newspapers, and flyers to locate employment opportunities.
3. Provide incentives to existing businesses, and attract new businesses on behalf of 477 participants, including but not limited to payment of tools, uniforms or other necessities directly related to the actual work performed. Also, offering supportive work programs and subsidizing wages of participants.
4. Utilize all employment opportunities presented from outside employers.
5. Work with appropriate departments to develop an offender re-entry program.
6. Enforce Native American employment rights and Mille Lacs Band member preference where applicable and pursue penalties to include fees, fines and disciplinary action for violation of TERO laws. These fees will be used to support the Labor Pool and DOL's unmet needs.
7. Work collaboratively with the Gaming Regulatory Authority (GRA) and the Mille Lacs Band Corporate Commission to eliminate the restrictive hiring policies that are preventing Band members from being hired at the casinos, corporate, and Band owned businesses.
 - a. TERO will submit a proposal to the GRA and Corporate Commission that will address the possibility of waivers regarding the restrictive hiring policies for Band members so they can obtain employment within the businesses they own. There will be more accountability on the part of the participants to continuously strive to improve and re-create their life.
8. Contract with business organizations or associations to expand participation of employers in welfare-to-work initiatives and encourage the hiring of 477 participants in our service areas.
9. Work with the DOL Training and Development Department to provide specialized training for managers and supervisors within our tribal government, Band entities such as schools, clinic, casinos, Corporate Commission, and other Band owned

business entities, as well as private industry such as construction companies that perform work on reservation on how to work with newly hired TANF/477 participants who have serious barriers to employment and other employment issues.

DOL Support & Referral Services

Support services guidelines will be placed in 477 Policy and Procedure Manual to guide the 477 staff through the supportive services processes, eligibility and support limits. Monetary services will be provided through electric benefit transfer (EBT) cards, cash cards, checks, payroll, stipends, vouchers, or electronic payments.

Support services offered include, but are not limited to:

1. Work activities to include but not limited to:
 - a. Subsidized employment private and public sector
 - b. Unsubsidized employment private and public sector
 - c. Job search and job readiness
 - d. Community service
 - e. Work experience
 - f. On-the-job training
 - g. Education and training identified in IEP
 - h. Caring for a child of a participant who is performing an eligible work activity
2. Stipends for on-the-job training to include but not limited to apprenticeships & internships
3. Stipends for living allowance (food, gas or other justified "living expenses")
4. Stipends for attendance of training, educational and cultural activities
5. Childcare assistance
6. Limited tuition payments for Post-Secondary/Vocational Education
7. Additional lab, book, supplies or rental fees for Post-Secondary/Vocational Education expense not covered by other educational resources
8. Internet connection fees and one year of internet service if enrolled in Post Secondary/Vocational Education
9. Laptop computer if enrolled in Post Secondary/Vocational Education
10. Additional licensure for Post-Secondary/Vocational Education not covered by other educational resources
11. Additional testing fees for certifications for Post-Secondary/Vocational Education not covered by other educational resources.
12. Additional mileage reimbursement for Post-Secondary/Vocational Education not covered by other educational resources
13. License Obtainment/Renewal fees
14. Fees for identification documents
15. Vehicle Insurance payments, registration, repair, and maintenance
16. Mileage reimbursement

17. Clothing allowance for school (children, youth & adult) and employment (youth & adult)
18. Moving/Relocation expenses
19. Tools/safety equipment
20. Union dues
21. Registration fee, per diem and travel expense for Seminar/Conference/Workshop that are identified in IEP
22. Shelter assistance
23. Utility assistance
24. Transportation service
25. Referral service and assistance to services outside and within the Band entities to include, but not limited to chemical dependency, mental and behavioral health, etc.
26. Incentives for meeting approved IEP goals
27. Faxing, copying, mailing, filling out applications or other documents
28. Transitional Services to assist participants in retaining employment for up to one year.

TANF cash assistance, food service, and medical assistance are offered as a support service but with different eligibility requirements. (Please refer to eligibility on page 20 of this plan).

DOL Referral Services would include several programs now offered by the Mille Lacs Band Tribal Government through the government departments which will include, but are not limited to the Mille Lacs Band Departments of Administration, Education, Health & Human Services, Natural Resources, Gaming Regulatory Authority, Corporate Commission, Indian Legal Aid, and outside providers if necessary. Memorandums of Understanding (MOU) will be put in place with some of these Band departments to assist eligible participants with eliminating barriers and challenges they may be facing and are out of the realm or expertise of the Case Worker. Case Workers will work to ensure that the participants are referred to the appropriate service.

Results/Outcomes of Strategies

The 477 Plan annual report, which includes a narrative on the program accomplishments, will be reviewed by the Commissioner of Administration to ensure accountability. The Office of Management and Budget will be responsible to review and monitor the 477 budget prior to each fiscal year in collaboration with the Executive Director of the DOL and the Commissioner of Administration quarterly.

The Mille Lacs Band DOL annual performance standards:

Internal performance standards will be listed in 477 Plan Policy and Procedure Manual.

Five year projected outcome:

Work in collaboration with other departments to ensure a reduction in the following based on statistics acquired by January 1, 2011:

1. Unemployment
2. Tribal Government supportive services programs
3. Crime
 - a. Gang involvement and violence
 - b. Domestic abuse
 - c. Child neglect and abuse
 - d. Drunk Driving violations and accidents
 - e. Assaults
 - f. Thefts
 - g. Property Damage
4. Student drop-outs
5. Chemical Dependency
6. Teen pregnancies
7. Pregnancies out of wedlock
8. Dependency on welfare

Integration of Departments and Programs

Department of Health and Human Services
Native Employment Works (NEW)
Temporary Assistance for Needy Families (TANF)

Department of Labor
Workforce Investment Act (WIA) Adult Comprehensive Services
Workforce Investment Act (WIA) Youth Supplemental Services

Department of the Interior
Job Placement and Training (JPT)

Mille Lacs Band of Ojibwe Departments

Department of Education

Current educational resources available on the reservation include Early Head Start, Head Start, and K-12. The Mille Lacs Band operates the Mille Lacs Tribal College located near District I & District IIA which offers post-secondary classes in collaboration with Central Lakes College. Post-secondary classes are available at Central Lakes College Brainerd and Staples campuses which are located 35 miles from District I – Vineland.

For Band members who choose to attend higher education, the Band provides a scholarship program to supplement State and Federal grants. An additional Band program, called the Educational Enrichment Program, is available for adult educational classes and community education classes. This program provides up to \$500 per year, from a limited fund on a first come, first served basis for those who meet the eligibility guidelines.

Department of Health & Human Services

The DOL will continue to collaborate with the Band's HHS Department to develop an effective referral process to assist in chemical dependency diagnosis and treatment, mental health diagnosis and treatment, and basic physical health evaluations, and treatment.

MOU's have to be developed to provide access to Health and Human Services.

DOL will work with HHS to implement training, activities and events to encourage and develop more socially responsible youth and adults of child bearing age (12-50) to eliminate pregnancies out-of-wedlock. The importance of a two parent family will be reaffirmed as well as relationship building and counseling. The significance of being physically, emotionally, and financially prepared for a child will be reinforced in several trainings and during counseling. The DOL and HHS will work with parents who have lost their children and families due to addiction, abuse or other reasons. This goal will be supported by collaboration of the DOL and HHS, to the parents to reclaim their lives and children through education, employment, training, and counseling. With the supportive services available to help them through their barriers and challenges, the DOL and HHS can give them hope of a better tomorrow.

Department of Administration

The Department of Administration has administered the Labor Pool Program in which over 350 Mille Lacs Band members have applied. The department has been able to offer employment to over 250 Band members since May 17, 2010. This program has been funded by limited Band net revenue and has brought back hope and pride to the Band members participating. The program pays a livable wage and the Band member may work up to 40 hours per week if there are projects or work available. This program will transfer to the DOL TERO Department after this 477 Plan is approved and all Labor Pool participants will be required to complete a one-on-one intake session with the 477 Program so they can utilize services provided by the DOL to help them become permanently employed. The Commissioner of Administration and the Assistant Commissioner of Administration will assist with ensuring that all departments within the Mille Lacs Band Tribal Government cooperate and support the DOL regarding employment for 477 participants.

Department of Natural Resources

The Department of Natural Resources provides many of the projects for the Labor Pool Program including cultural activities. Our Tribal Elders have recognized and expressed to the DOL staff that getting our people involved in cultural activities and ceremonies is critical to changing the present and altering the future for the better.

Corporate Commission/GRA/Indian Legal

TERO will work collaboratively with the Corporate Commission, Gaming Regulatory Authority (GRA), and Indian Legal Aid of the Mille Lacs Band to employ Band members within the Corporate Commission and Band owned businesses. These departments will work to develop a re-entry program for participants with criminal backgrounds.

The DOL Training and Development Department will work closely with the Corporate Commission's Band Member Development Department (BMDD) to ensure that the Band member receives all training and development necessary for them to retain their employment and advance within the business. Wage subsidies can be offered by the DOL to encourage retention and initiate advancements of Mille Lacs Band members working at the casinos, corporate, and its business entities.

Eligibility

Training and Development

Training and Development activities listed in the 477 Plan that are provided by the Training and Development Department have no income eligibility and are available to all enrolled Mille Lacs Band members, first generation descendants of an enrolled Mille Lacs Band member and eligible family members of an enrolled Mille Lacs Band member who reside in the reservation-based service areas. Urban office services MCT members residing in the urban service area. Offering these services to individuals mentioned will be a proactive initiative, building more socially responsible individuals and communities; therefore, preventing out-of-wedlock pregnancies and ending dependency on welfare. It will serve all four purposes of TANF.

Support Services

Support services guidelines will be placed in 477 Policy and Procedure Manual to guide the 477 staff through the supportive services processes, eligibility and support limits. Monetary services will be provided through electric benefit transfer (EBT) cards, cash cards, checks, payroll, stipends, vouchers, or electronic payments.

Qualifications include:

- Household income must be below 300% of the 2010 Federal Poverty Guideline (chart in 477 Plan Policy and Procedure Manual) and;
- Adults must be actively implementing their Individual Employment Plan with the DOL and the service provided must support their plan

Documentation necessary for supportive services include:

- Proof of last 6 month income for participant
- Proof of registration with Selective Service (males ages 18-25)
- Proof of Tribal Enrollment
- Job Verification (if employed)

TANF Cash Assistance

TANF cash assistance will be provided to an eligible assistance unit as defined in this plan on page 23 which, must include an eligible child or pregnant women and is located in the reservation-based or urban service area. MFIP/DWP assistance standard will be used to determine income eligibility for cash assistance. Standard chart can be found in the 477 Plan Policy and Procedure Manual.

The Band will contract with the State of Minnesota, to provide cash assistance benefits through an electronic benefit transfer system. Cash assistance will be issued through the EBT System. The state will submit a monthly billing for the amount of benefits paid to the eligible participant. The Band will pay the billing within the specified time period via electronic transfer. Cash Assistance payment and billing process will be thoroughly defined in the 477 Plan Policy and Procedure Manual.

Food Support and Medical Assistance

The Band shall take and act on applications for food service medical assistance (MA) for participants. Such applications shall be entered on the state MAXIS and MMIS. The Medical Assistance programs shall be processed and administered in accordance with state and federal policy and law. As contracted with the state, the Band's staff time spent on administering food service and medical assistance will be reimbursed. Reimbursement process will be thoroughly defined in the 477 Plan Policy and Procedure Manual.

Labor Pool

Labor Pool eligibility requirements include:

- Must be an Enrolled Mille Lacs Band Member - Verified through MLB Tribal ID or Certificate of Enrollment from MLB Enrollment Office
- Must be eighteen (18) years of age
- Must complete all new hire paperwork for MLB Human Resources Department and provide two forms of identification
- Must be unemployed or working less than forty (40) hours
- Must complete intake process and have an active (IEP) in place with the Band's DOL
- Must comply with the Mille Lacs Band of Ojibwe Policies and Procedures

Time Limits

The time limit to receive cash assistance is 60 months with some exceptions and exemptions, which are listed in 477 Plan Policy and Procedure Manual.

Minimum Work Participation Rates

Minimum work participation rates for single parent families are a minimum of twenty (20) hours per week. The hours spent in work activities for a two-parent family must be combined to total forty (40) hours per week. The family has the option to decide who will work what number of hours as long as the combined hours total forty (40) hours. Work participation rate exemptions are thoroughly defined in 477 Policy and Procedure Manual.

Work Experience Activities

Work experience activities are listed under support services and will be thoroughly defined in 477 Plan Policy and Procedures.

Veteran Preference

Veterans who are enrolled Minnesota Chippewa Tribe (MCT) members residing in the service areas of this plan and who meet eligibility requirements will receive top priority for services offered in this 477 Plan.

Income Exclusions

Income exclusions exist to determine eligibility for services and will be calculated where allowed. These exclusions will be defined in the 477 Policy and Procedure Manual.

Earning Disregards

Earning disregards for employed participants will be listed in the 477 Plan Policy and Procedure Manual.

Resource Limits

Resource limits will be thoroughly defined in 477 Policy and Procedure Manual.

Prevention of Duplication of Services

Duplication of services will be prevented by utilizing the State of Minnesota's electronic management information system, MAXIS which is capable of cross-referencing applications and will indicate if the participant is receiving assistance from a county or tribal cash assistance program with the State of Minnesota. A family receiving assistance under the 477 Plan or receiving TANF cash assistance may not receive duplicative assistance from other State or Tribal programs funded under Title IV-A of the Social Security Act, as amended.

Penalties Against Individuals

Penalties against individuals will be thoroughly defined in 477 Plan Policy and Procedure Manual.

Good Cause Exemptions

Good Cause Exemptions will be thoroughly defined in 477 Plan Policy and Procedure Manual.

Definitions

Definition "Indian"

"Indian" for the purpose of this plan will include all enrolled Minnesota Chippewa Tribe (MCT) members.

Definition "Indian Families or Indian Households"

An Indian family consists of one parent or one head of household who is an enrolled Mille Lacs Band member that reside in the reservation-based service area; in the urban service area, an Indian family consists of one parent or head of household who is an enrolled MCT member that reside in the urban service area. For the purpose of this 477 Plan, a single individual who is an enrolled Mille Lacs Band member or an enrolled MCT member who lives alone will be considered an Indian family or household of one.

Definition "Eligible Family Member"

An eligible family member for the purpose of this plan includes spouse, significant other who lives in home 100% of the time, and all children of whom the enrolled Mille Lacs Band member, first generation descendant of an enrolled Mille Lacs Band member, and an enrolled MCT member has legal physical custody and are full-time students up through the age of 21 who live in the home over 50% of the time. Students living away from home while in school will be exempted from living in the home over 50% of the time.

Definition "Needy Families"

Needy families are Indian families as defined in this plan whose household income is below the 300% Federal Poverty Guidelines. (Federal Poverty Chart will be placed in 477 Policy and Procedure Manual.

Definition "Assistance"

DOL staff will reference 45 CFR 286.10 regarding the term "assistance." 45 CFR 286.10 will be placed in the 477 Plan Policy and Procedure Manual.

Definition "Assistance Unit"

An assistance unit includes one parent or head of household that is an enrolled Mille Lacs Band member, first generation descendant of an enrolled Mille Lacs Band member, and an enrolled MCT member, and all "eligible family members" as defined on page 23 of this plan. 477 Policy and Procedure Manual will define thoroughly the exceptions, exemptions and other factors regarding assistance units.

Definition "Eligible Child and Pregnant Woman"

An eligible child is one of whom an enrolled Mille Lacs Band member, first generation descendant of an enrolled Mille Lacs Band member and an enrolled MCT member has legal physical custody and are full-time students up through the age of 21 who live in the home over 50% of the time. Students living away from home while in school will be exempted from living in the home over 50% of the time. A pregnant woman must provide documentation from a physician verifying her pregnancy.

Grievance and Appeals Procedure

The Mille Lacs Band Department of Labor has established a uniform grievance procedure. It contains provisions which apply to all program participants engaged in any type of activity under this 477 Plan. The procedure ensures due process and establishes a series of levels, starting with informal resolution at the staff level.

The participant, herein known as the complainant, must make a request for a conciliation conference in writing, in person or by telephone within ten (10) business days of the incident to the TERO Grievance/Compliance Officer. If a timely request for conciliation is received, the Grievance/Compliance Officer will arrange for the conference to take place within five (5) business days from the date that the request is received. The conciliation conference will be heard by the DOL Grievance/Compliance Officer or their appropriate designee.

If for any reason the complainant is not satisfied with the resolution, within ten (10) business days upon receipt of the Grievance/Compliance Officer's official answer, the complainant may make a written request for the Executive Director of the DOL to review the decision made by the Grievance/Compliance Officer. Within five (5) business days of receipt of the written request for review, the Executive Director of the DOL will review the complaint and notification will be sent for a hearing with the Grievance Committee defined in 477 Policy and Procedure Manual. The Grievance Committee will have authority to make any adjustments deemed appropriate to resolve the complaint. After the hearing with the Grievance Committee, the Executive Director of the DOL must inform the complainant within five (5) business days of their decision.

If the complainant believes that his/her grievance has not been adequately resolved by the Grievance Committee, he/she must file a written complaint with the Mille Lacs Band Tribal Court (the court) within (10) business days of their receipt of the written decision. The court will notify the complainant of their hearing date and determination of hearing.

All complainants who have exhausted all the tribal levels of appeals have the right to grieve to the Secretary of the Interior through the Division of Workforce Development Program in Washington D.C.

All complainants who have exhausted all the tribal levels of appeals for a discrimination complaint have the right to contact the Department of Interior Civil Rights Center.

The complainant must continue to cooperate and comply with other program requirements as outlined in their Individual Employment Plan (IEP).

The Mille Lacs Band Human Resources Office also has a grievance and appeals procedure applicable to all government staff. It applies to all staff employed in the DOL.

All employee grievance and appeals procedures are on file for review in the offices of the Human Resources Department.

Regulatory Waivers

The Mille Lacs Band of Ojibwe Department of Labor requests a waiver of any statutory provision, regulation, policy or procedure necessary to combine employment and training-related Federal grants, identified on Page 17, into a single plan with a single budget and a single reporting system.

It is stated in Public Law 102-477, Sections 7 Plan Review that:

"Upon receipt of the plan from a tribal government, the Secretary of the Interior shall consult with the Secretary of each Federal department providing funds to be used to implement the plan, and with the tribal government submitting the plan. The parties so consulting shall identify any waivers of statutory requirements or of Federal departmental regulations, policies, or procedures necessary to enable the tribal government to implement its plan."

The Band trusts that this will happen.

SF 424

See Attachment A

Attachment A

OMB Number: 4040-0004
Expiration Date: 01/31/2009

Application for Federal Assistance SF-424		Version 02
*1. Type of Submission:		*2. Type of Application * If Revision, select appropriate letter(s)
<input type="checkbox"/> Preapplication		<input type="checkbox"/> New
<input type="checkbox"/> Application		<input checked="" type="checkbox"/> Continuation *Other (Specify) _____
<input checked="" type="checkbox"/> Changed/Corrected Application		<input type="checkbox"/> Revision
3. Date Received:		4. Applicant Identifier:
5a. Federal Entity Identifier:		*5b. Federal Award Identifier:
State Use Only:		
6. Date Received by State:		7. State Application Identifier:
8. APPLICANT INFORMATION:		
*a. Legal Name: Mille Lacs Band of Ojibwe		
*b. Employer/Taxpayer Identification Number (EIN/TIN): 41-1661577		*c. Organizational DUNS: 043482988
d. Address:		
*Street 1:	43408 Oodena Drive _____	
Street 2:	_____	
*City:	Onamia _____	
County:	Mille Lacs _____	
*State:	MN _____	
Province:	_____	
*Country:	USA _____	
*Zip / Postal Code	56359 _____	
e. Organizational Unit:		
Department Name: Department of Labor		Division Name: Administration
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix:	Ms. _____	*First Name: Carolyn _____
Middle Name:	_____	
*Last Name:	Shaw _____	
Suffix:	_____	
Title:	Assistant Commissioner of Administration	
Organizational Affiliation: Mille Lacs Band of Ojibwe		
*Telephone Number: 320-532-7480		Fax Number: 320-532-7505
*Email: carolyn.shaw@millelacsband.com		

Application for Federal Assistance SF-424

Version 02

***9. Type of Applicant 1: Select Applicant Type:**

I. Indian/Native Am Tribal Govn.(Fed. Recognized)

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

*Other (Specify)

***10 Name of Federal Agency:**

U.S. Department of Interior

11. Catalog of Federal Domestic Assistance Number:

CFDA Title:

***12 Funding Opportunity Number:**

*Title:

Public Law 102-477 _____

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Crow Wing, Mille lacs, Benton, Morrison, Altkin, Pine, Hennepin, Ramsey and Anoka counties in Minnesota

***15. Descriptive Title of Applicant's Project:**

Continuation of participation in P.L. 102-477. Program years for 10-1-2010 to 9-30-2013 to provide employment and training related activities and services to create self-sufficiency for eligible participants.

Application for Federal Assistance SF-424

Version 02

16. Congressional Districts Of:

*a. Applicant: MN08

*b. Program/Project: Public Law 102-477

17. Proposed Project:

*a. Start Date: 10/01/2010

*b. End Date: 9/13/10

18. Estimated Funding (\$):

*a. Federal	_____	4740424
*b. Applicant	_____	
*c. State	_____	
*d. Local	_____	
*e. Other	_____	
*f. Program Income	_____	
*g. TOTAL	_____	4740424

***19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- a. This application was made available to the State under the Executive Order 12372 Process for review on _____
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E. O. 12372

***20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes", provide explanation.)**

- Yes No

21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U. S. Code, Title 218, Section 1001)

** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions

Authorized Representative:

Prefix: Ms. *First Name: Carolyn

Middle Name: _____

*Last Name: Shaw

Suffix: _____

*Title: Assistant Commissioner of Administration

*Telephone Number: 320-5332-7480

Fax Number: 320-532-7505

* Email: carolyn.shaw@millelacsband.com

*Signature of Authorized Representative:

*Date Signed: 9-30-10

Application for Federal Assistance SF-424

Version 02

***Applicant Federal Debt Delinquency Explanation**

The following should contain an explanation if the Applicant organization is delinquent of any Federal Debt.



THE MILLE LACS BAND OF
OJIBWE INDIANS

43408 Oodena Drive • Onamia, Minnesota 56359
(320) 532-4181 • Fax (320) 532-7836

Office of the Solicitor General

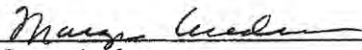
LETTER OF CREDENCE

July 20, 2009

To Whom It May Concern:

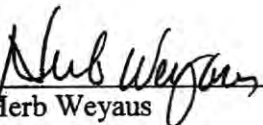
This letter shall serve as official notice that Carol Shaw, Assistant Commissioner of Administration for the Mille Lacs Band of Ojibwe has been designated with the authority to act on behalf of the Mille Lacs Band of Ojibwe and Marge Anderson, Chief Executive, in her official capacity. This Letter of Credence shall expire on June 30, 2013.

Signed:



Marge Anderson
Chief Executive
Mille Lacs Band of Ojibwe

Witness:



Herb Weyaus
Speaker of the Assembly
Mille Lacs Band of Ojibwe

**CONSOLIDATED BUDGET
SF 424A & Budget Narrative**

SF 424A

See Attachment B

Budget Narrative

See Attachment C

BUDGET INFORMATION - Non-Construction Programs

SECTION A - BUDGET SUMMARY						
Grant Program Function or Activity (a)	Catalog of Federal Domestic Assistance Number (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1. TANF		\$	\$	\$ 4,550,816.00	\$	\$ 4,550,816.00
2. WIA				59,636.00		59,636.00
3. N.E.W.				61,723.00		61,723.00
4. JPT				68,249.00		68,249.00
5. Totals		\$ 0.00	\$ 0.00	\$ 4,740,424.00	\$ 0.00	\$ 4,740,424.00
SECTION B - BUDGET CATEGORIES						
6. Object Class Categories	GRANT PROGRAM, FUNCTION OR ACTIVITY					Total (5)
	(1)	(2)	(3)			
a. Personnel	\$ 1,160,000.00	\$	\$	\$	\$	1,160,000.00
b. Fringe Benefits	609,787.00					609,787.00
c. Travel	35,000.00					35,000.00
d. Equipment	150,000.00					150,000.00
e. Supplies	100,000.00					100,000.00
f. Contractual	110,000.00					110,000.00
g. Construction						0.00
h. Other	2,244,897.00					2,244,897.00
i. Total Direct Charges (sum of 6a-6h)	4,409,684.00		0.00	0.00	0.00	4,409,684.00
j. Indirect Charges	330,740.00					330,740.00
k. TOTALS (sum of 6i and 6j)	\$ 4,740,424.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 4,740,424.00
7. Program Income	\$	\$	\$	\$	\$	0.00

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Prescribed by OMB Circular A-102

SECTION C - NON-FEDERAL RESOURCES					
(a) Grant Program	(b) Applicant	(c) State	(d) Other Sources	(e) TOTALS	
8. FY 2012 Federal Grant Funds	\$	\$	\$	\$ 0.00	
9. Fy 2012 Federal Grant Funds				0.00	
10.				0.00	
11.				0.00	
12. TOTAL (sum of lines 8-11)	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	
SECTION D - FORECASTED CASH NEEDS					
	Total for 1st Year	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
13. Federal	\$ 4,740,424.00	\$ 1,185,106.00	\$ 1,185,106.00	\$ 1,185,106.00	\$ 1,185,106.00
14. Non-Federal	0.00				
15. TOTAL (sum of lines 13 and 14)	\$ 4,740,424.00	\$ 1,185,106.00	\$ 1,185,106.00	\$ 1,185,106.00	\$ 1,185,106.00
SECTION E - BUDGET ESTIMATES OF FEDERAL FUNDS NEEDED FOR BALANCE OF THE PROJECT					
(a) Grant Program	FUTURE FUNDING PERIODS (Years)				
	(b) First	(c) Second	(d) Third	(e) Fourth	
16.FY 2012 Federal Grant Funds	\$ 1,185,106.00	\$ 1,185,106.00	\$ 1,185,106.00	\$ 1,185,106.00	
17.Fy 2012 Federal Grant Funds	1,185,106.00	1,185,106.00	1,185,106.00	1,185,106.00	
18.					
19.					
20. TOTAL (sum of lines 16-19)	\$ 2,370,212.00	\$ 2,370,212.00	\$ 2,370,212.00	\$ 2,370,212.00	
SECTION F - OTHER BUDGET INFORMATION					
21. Direct Charges:		22. Indirect Charges:			
23. Remarks:					

Attachment C

Mille Lacs Band of Ojibwe Public Law 102- 477 Plan October 1, 2010 - September 30, 2013

Budget Narrative

General:

The following is a budget narrative of how the Mille Lacs Band of Ojibwe intends to expense the Federal grant funds integrated into the 477 Plan. No State of Minnesota or Mille Lacs Band funds are listed at this time as they are being re-negotiated. For all expenses below, which are related to the 477 Plan, they will be tracked daily and charged to the appropriate grant or other funding source. For example, if a case worker services ten 477 participants and eight of them are TANF eligible, we will charge 80 percent to the TANF budget and twenty percent to another budget other than TANF.

A. Personnel Salaries and Wages

For personnel, we have estimated \$1,160,000 for staff listed in the 477 Plan. This amount includes \$230,000 for administrative personnel, which will count toward the 25 percent administrative cost cap.

B. Fringe Benefits

Fringe benefits are estimated at \$609,787. This amount includes \$111,734 for administrative personnel, which will count toward the 25 percent administrative cost cap. This amount will cover life insurance, disability, health, dental, FICA, retirement, unemployment, and worker's compensation for each staff member.

C. Travel

Local and non-local travel costs are estimated at \$35,000 based on expenditures of FY2010.

D. Equipment

Capital equipment costs are estimated at \$100,000, which includes but is not limited to vehicles, computers, printers, copiers, and general office furniture. Non-capital equipment costs are estimated at \$50,000, including general office equipment under \$500. Vehicles purchased by TANF will be used for only TANF clients. Vehicles purchased by other grants will be used for all 477 Participants.

Attachment C

E. Supplies

Supplies costs are estimated at \$100,000, which includes, but is not limited to office supplies, program supplies, printing, copying, postage, and communication.

F. Contractual

Contractual fees are estimated at \$110,000, which includes but is not limited to database systems such as TAS which is used for reporting purposes and there may be additional contractual costs for this system when the new plan is implemented.

G. Other

Other direct costs are estimated at \$2,244,897, including, but not limited to support services listed in the plan (refer to pages 14-15 of 477 Plan), trainings listed in the plan (refer to page 11-12 of 477 Plan), conferences, transportation expenses, insurance, repair and maintenance of vehicles, utilities, office lease and building maintenance. Costs will be determined by participants' eligibility for each support service and percentage of TANF versus non-TANF participants attending each training or conference. Of this estimated total, \$1,907,377 is not subject to the indirect cost rate. The remaining estimated balance of \$337,520 is subject to the indirect cost rate.

H. Indirect Costs

The following 477 Plan expenses are subject to the Indirect Cost Rate: salary, fringe, travel, non-capital equipment, supplies, and other activities as defined in Section G of this narrative. Indirect costs are estimated at \$330,740 when applying the current approved indirect cost rate of 14.75 percent. This percentage is determined by the U.S. Department of the Interior, National Business Center, and the subject organization in accordance with the authority contained in 2 CFR 225. Please see Attachment E in the 477 Plan for the official Cost Rate Agreement.

I. Administrative Costs

Administrative costs total \$672,474, which is within the 25 percent administrative cost cap and include:

Indirect Cost	\$330,740
Personnel	\$230,000
Fringe	\$111,734
Total	\$672,474

ASSURANCES AND CERTIFICATIONS

See Attachment D

ATTACHMENT D

ASSURANCES: NON-CONSTRUCTION PROGRAMS

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial, and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States, and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance or personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with all applicable Federal statutes. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964, (P.L. 88-352), (42 U.S.C. 2000d-2000d-6), which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972 (20 U.S.C. 1681-1688), which prohibits discrimination on the basis of sex and blindness; (c) Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), which prohibits discrimination on the basis of disability; (d) the Age Discrimination Act of 1975, 42 U.S.C. 6101-6107, which prohibits discrimination on the basis of age; and (e) the requirements of any other nondiscrimination statute(s) which may apply to the application.
6. Will comply, if applicable, with insurance purchase requirements of 42 U.S.C. 4012a that requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance.
7. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969, 42 U.S.C. 4321-4347; (b) Coastal Zone Management Act of 1972 (16 U.S.C. 1451 et seq.); and (c) the Clear Air Act of 1955, (42 U.S.C. Chapter 85, 7401 et seq.).
8. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, (16 U.S.C. 470f), and the Service Award Act of 1974 (16 U.S.C. 469a-1).
9. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act of 1984, (31 U.S.C. 7501-75).

CERTIFICATIONS: NON-CONSTRUCTION PROGRAMS

The certifications below are executed with the signing of the certification signature page and submission with the grant application or modification package.

CERTIFICATION REGARDING LOBBYING

The undersigned certifies, to the best of his or her knowledge and belief, that:

- (1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
- (2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this

- Federal contract, grant, loan or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions;
- (3) The undersigned shall require that the language of this certification be included in the award documents for all sub-awards at all tiers (including subcontracts, sub-grants, and contracts under grants, loans, and cooperative agreements) and that all sub-recipients shall certify and disclose accordingly; and this certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31 U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

The undersigned states, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL A Disclosure Form to Report Lobbying, in accordance with its instructions.

Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, Title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and no more than \$100,000 for each such failure.

**CERTIFICATION REGARDING DEBARMENT, SUSPENSION,
AND OTHER RESPONSIBILITY MATTERS
INSTRUCTIONS FOR CERTIFICATION--PRIMARY COVERED TRANSACTIONS**

1. By signing and submitting the certification signature page, the prospective primary participant is providing the certification set out below.
2. The inability of a person to provide the certification required below will not necessarily result in denial of participation in this covered transaction. The prospective participant shall submit an explanation of why it cannot provide the certification set out below. The certification or explanation will be considered in connection with the department or agency's determination whether to enter into this transaction. However, failure of the prospective primary participant to furnish a certification or an explanation shall disqualify such person from participation in this transaction.
3. The certification in this clause is a material representation of fact upon which reliance was placed when the department or agency determined to enter into this transaction. If it is later determined that the prospective primary participant knowingly rendered an erroneous certification, in addition to other remedies available to the Federal Government, the department or agency may terminate this transaction for cause or default.
4. The prospective primary participant shall provide immediate written notice to the department or agency to which this proposal is submitted if at any time the prospective primary participant learns that its certification was erroneous when submitted or has become erroneous by reason of changed circumstances.
5. The terms covered transaction, debarred, suspended, ineligible, lower tier covered transaction, participants, person, primary covered transaction, principal, proposal, and voluntarily excluded, as used in this clause, have the meanings set out in the Definitions and Coverage sections of the rules implementing Executive Order 12549. You may contact the department or agency to which this proposal is being submitted for assistance in obtaining a copy of those regulations.
6. The prospective primary participant agrees by submitting this proposal that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction.
7. The prospective primary participant further agrees by submitting this proposal that it will include the clause titled A Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion-

Lower Tier Covered Transaction," provided by the department or agency entering into this covered transaction, without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.

8. A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that is not proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, ineligible, or voluntarily excluded from the covered transaction, unless it knows that the certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant may, but is not required to, check the List of Parties Excluded from Federal Procurement and Non-Procurement programs.
9. Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.
10. Except for transactions authorized under paragraph 6 of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, suspended, debarred, ineligible, or voluntarily excluded from participation in this transaction, in addition to other remedies available to the Federal Government, the department or agency may terminate this transaction for cause or default.

CERTIFICATION REGARDING DEBARMENT, SUSPENSION, AND OTHER RESPONSIBILITY MATTERS PRIMARY COVERED TRANSACTIONS

The prospective primary participant certifies to the best of its knowledge and belief, that it and its principals:

- (a) Are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded by any Federal department or agency;
- (b) Have not within a three-year period preceding this proposal been convicted of or had a civil judgment rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (Federal, State or local) transaction or contract under a public transaction; violation of Federal or State antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property;
- (c) Are not presently indicted for or otherwise criminally or civilly charged by a governmental entity (Federal, State or local) with commission of any of the offenses enumerated in paragraph (1)(b) of this certification; and
- (d) Have not within a three-year period preceding this application/proposal had one or more public transactions (Federal, State or local) terminated for cause or default.

Where the prospective primary participant is unable to certify to any of the statements in this certification, such prospective participant shall attach an explanation to this proposal.

CERTIFICATIONS REGARDING DRUG-FREE/TOBACCO-FREE WORKPLACE REQUIREMENTS

1. By signing and/or submitting the certification signature page, the grantee is providing the certification set out below.
2. The certification set out below is a material representation of fact upon which reliance is placed when the agency awards the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violates the requirements of the Drug-Free Workplace Act, the agency, in addition to any other remedies available to the Federal Government, may take action authorized under the Drug-Free Workplace Act.
3. For grantees other than individuals, Alternate I applies.
4. For grantees that are individuals, Alternate II applies.

5. Workplaces, under grants, for grantees other individuals, need not be identified on the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplaces at the time of application, upon award, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for Federal inspection. Failure to identify all known workplaces constitutes a violation of the grantee's drug-free workplace requirements.
6. Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g. all vehicle; of a mass transit authority or State highway department while in operation, State employees in each local unemployment office performers in concert halls or radio studios).
7. If the workplace identified to the agency changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplaces in question (see 5., above).
8. Definitions of terms in the Non-procurement Suspension and Debarment common rule and Drug Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules:
 - a) Controlled substance means a controlled substance in Schedules I through V of the Controlled Substances Act (21 U.S.C. 812) and as further defined by regulation (21 CFR 1308.11 through 1308.15).
 - b) Conviction means a finding of guilt including a plea of Anolo contendere or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the Federal or State criminal drug statutes.
 - c) Criminal drug statute means a Federal or non-Federal criminal statute involving the manufacture, distribution, dispensing, use or Possession of any controlled substance.
 - d) Employee means the employee of a grantee directly engaged in the performance of work under a grant, including: (i) All direct charge employees; (ii) All indirect charge employees unless their impact or involvement is insignificant to the performance of the grant; and, (iii) Temporary personnel and consultants who are directly engaged in the performance of work under the grant and who are on the grantee's payroll. This definition does not include workers not on the payroll of the grantee (e.g., volunteers, even if used to meet matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of sub-recipients or subcontractors in covered workplaces).

CERTIFICATION REGARDING DRUG- FREE WORKPLACE REQUIREMENTS

The grantee certifies that it will or will continue to provide a drug-free workplace by:

- (a) Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition.
- (b) Establishing an ongoing drug-free awareness program to inform employees about:
 - (1) The dangers of drug abuse in the workplace;
 - (2) The grantee's policy of maintaining a drug-free workplace;
 - (3) Any available drug counseling, rehabilitation, and employee assistance programs; and
 - (4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace.
- (c) Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph (a).
- (d) Notifying the employee in the statement required by paragraph (a) that, as a condition of employment under the grant, the employee will:
 - (1) Abide by the terms of the statement; and

- (2) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction.
- (e) Notifying the agency in writing, within ten calendar days after receiving notice under paragraph (d)(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant.
- (f) Taking one of the following actions within 30 calendar days of receiving notice under paragraph (d)(2) with respect to any employee who is so convicted:
- (1) Taking appropriate personnel action against such an employee, up to and including termination consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
 - (2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency.
- (g) Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs (a), (b), (c), (d), (e) and (f).

CERTIFICATION REGARDING ENVIRONMENTAL TOBACCO SMOKE

Public Law 103-227, Part C--Environmental Tobacco Smoke, also known as the Pro-Children Act of 1994 (Act), requires that smoking not be permitted in any portion of any indoor routinely owned or leased or contracted for by an entity and used routinely or regularly for provision of health, day care, education, or library services to children under the age of 18, if the services are funded by Federal programs either directly or through State or local governments, by Federal grant, contract, loan, or loan guarantee. The law does not apply to children's services provided in private residences, facilities funded solely by Medicare or Medicaid funds, and portions of facilities used for inpatient drug or alcohol treatment. Failure to comply with the provisions of the law may result in the imposition of a civil monetary penalty of up to \$1000 per day and/or the imposition of an administrative compliance order on the responsible entity. By signing and submitting the certification signature page (Enclosure VI. D.) with this application the applicant/ grantee certifies that it will comply with the requirements of the Act. The applicant/grantee further agrees that it will require the language of this certification be included in any sub-awards which contain provisions for the children's services and that all sub-grantees shall certify accordingly.

CERTIFICATION OF RELEASE OF INFORMATION

Each grantee must indicate the Federal Share of the grant and the percentage of the grant financed by the Federal share. In this regard, the Certificate for Release of Information is cited below for this purpose. The submission of a signed application containing a copy of this Certification for Release of Information shall constitute the necessary certification.

The grantee agrees that when issuing statements, press releases, requests for proposals, bid solicitations or other documents describing the grant project or program, the grantee shall clearly state (1) the percentage of the total cost of the program or project which will be or is being financed with Federal money, and (2) the dollar amount of Federal funds for the project or program; except when, the project or program is competitive.

ASSURANCES AND CERTIFICATIONS - SIGNATURE PAGE

The Department of Labor will not award a grant or agreement where the grantee/recipient has failed to accept the ASSURANCES AND CERTIFICATIONS listed above. By signing and returning this signature page, the grantee/recipient is accepting the certifications set forth below:

- A. Assurances - Non-Construction Programs
- B. Certifications Regarding Lobbying, Debarment, Suspension, and Other Responsibility Matters and Drug-Free/Tobacco-Free Workplace Requirements
- C. Certification of Release of Information

APPLICANT NAME and LEGAL ADDRESS:

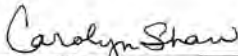
Mille Lacs Band of Ojibwe

43408 Odena Drive

Onamia, MN 56359

If there is any reason why one of the assurances or certifications listed cannot be signed, please explain. Applicant need only submit and return this signature page with the grant application or funding request. All other instructions shall be kept on file by the applicant.

Carolyn Shaw



Asst. Commissioner of Admin

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL

TITLE

Mille Lacs Band of Ojibwe

APPLICANT ORGANIZATION

DATE SUBMITTED

Please Note: This signature page and any pertinent attachments which may be required by these assurances and certifications shall be attached to the grant application.

Proposed



Mille Lacs Band of Ojibwe

TANF PLAN

Plan Date: January 1, 2011 to December 31, 2013

Submitted by:

Carolyn Shaw, Assistant Commissioner of Administration

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**DOL Certification regarding Lobbying – SF LLL,
Disclosure Form to Report Lobbying**

Mille Lacs Band TANF Plan

GOALS

Provide assistance, employment, and training related services to eligible families to:

- 1) Keep children in their own homes or the homes of relatives
- 2) Promote self-sufficiency among all eligible low income individuals to prevent and end dependency on government assistance
- 3) Encourage and ensure formation and maintenance of two-parent families
- 4) Prevent out-of-wedlock pregnancies by developing socially responsible youth and adults

Background and Comprehensive Strategy

Service Area

The Mille Lacs Band of Ojibwe (The Band) is a federally recognized Minnesota Chippewa tribe located in rural northeast central Minnesota. The Band has three recognized districts which are as follows: District I: Vineland, located north of Onamia. District II: Isle and East Lake, located in Isle and southeast of McGregor respectively; and District III: Lake Lena, located east of Hinckley on the Wisconsin border. The Band services the six counties of Aitkin, Crow Wing, Morrison, Mille Lacs, Pine and Benton. The Band has an urban service area which covers the three counties of Anoka, Hennepin, and Ramsey. At this time, there are approximately 4,224 enrolled members of the Mille Lacs Band.

Service population

The reservation-based center will service all enrolled Mille Lacs Band members, first generation descendants of an enrolled Mille Lacs Band member, and eligible family members of an enrolled Mille Lacs Band member as defined on page 22 of this plan. The urban office will service all enrolled Minnesota Chippewa Tribe (MCT) members.

NOTE: Each group will be eligible for specific services as defined in the TANF Plan Policy and Procedure Manual.

Government Structure

The Mille Lacs Band's government is based on a separation of powers, similar to the United States government, to help ensure proper checks and balances. The legislative branch, known as the Band Assembly, enacts laws that regulate the Band's affairs and appropriates money for Band programs and services. The executive branch, led by the Chief Executive, implements Band laws and administers the Band's programs and services. The judicial branch, or Tribal Court, upholds the Band's laws and ensures justice is served equally to all Band members. The Chief Executive of the Mille Lacs Band is Honorable Marge Anderson. Chief Executive Anderson oversees the Executive Branch of the tribal government to include her cabinet which consists of the Commissioner of Administration, John Dunkley, Assistant Commissioner of Administration, Carolyn Shaw, Commissioner of Health and Human Services, Don Eubanks, Commissioner of Education, Dennis Olson, Commissioner of Community Development, Sam Moose, Commissioner of Corporate Affairs, Vacant, Commissioner of Natural Resources, Vacant and Solicitor General, Barbara Cole. The Secretary-Treasurer, Curt Kalk oversees the Legislative Branch and the elected representatives from each district to include Sandra Blake, District I Representative, Marvin Bruneau, District II & IIA Representative, Diane Gibbs, District III Representative and Commissioner of Finance, Angella Roby. The Chief Justice, Rayna Mattinas oversees the Judicial Branch of the tribal government. The main governmental offices are located on the District I reservation area. There are community centers in each district which houses government programs staff from a wide variety of programs along with a health care clinic in each district. The urban office is a leased building that houses community service and the workforce staff.

Policies and Procedures

The existing TANF Plan Policy and Procedure Manual will be updated and revised to match the revised TANF Plan; the expected completion dated is January 1, 2011 to ensure consistency of operations from one site to another. A consultant will be contracted to assist the DOL with the Policy and Procedure Manual. Care will be taken to consider the unique differences of each district and the urban area served. DOL will develop clear written program operating policies and procedures that include definitions, formulas, and practices. These policies and procedures will aim to ensure accurate and timely reporting, establish compliance with federal requirements, streamline and enhance program operation as well as ensure consistency, fairness, and reduce arbitrary decisions on providing service. With the approval of the Mille Lacs Band Elected Officials, the Executive Director of the DOL may change, add, or delete any policy or procedure at any time without modifying the TANF Plan.

Community Involvement with Plan

Input from Tribal leaders and community members to include Tribal Elders has been utilized in writing this plan starting May 2010. Involvement of community members will continue with the writing of the policies and procedures. The Executive Director will attend community and Elder meetings to continue gathering input from Tribal members.

Employment Opportunities

Employment opportunities available in our service area vary from district to district. District I – Vineland has the greatest available employment opportunities. The Band operates a large gaming property which includes a convention center, hotel, three restaurants, gift shops, coffee shop, candy store, and childcare center. In addition, there is a community center, corporate office, tribal government center, clinic, upper and lower schools, museum, convenience store, grocery store, movie theatre, and resort all located in District I. District III – Lake Lena also has a large casino property, which is located 30 miles from the community center. The casino property includes a hotel, convention center, restaurants, lounge, childcare center, gift shops, and a beauty salon. In addition, there is a recreational vehicle park, additional hotels, convenience store, auto care center, golf course, governmental affairs office, and a community center that provide employment opportunities for Band members. District II – East Lake and Isle are currently being evaluated by the Mille Lacs Band Corporate Commission for economic and community development. Both East Lake and Isle have community centers and East Lake has a combination convenience store and Laundromat for Band-provided employment opportunities. Most jobs available at the Band enterprises are service-oriented and entry level due to the large casino properties. The established minimum wage is currently \$7.50 per hour for Band-owned businesses.

The Mille Lacs Department of Administration implemented a Labor Pool Program May 17, 2010 that is presently funded by limited funds from the Band's net revenue. The program has over 350 enrolled Mille Lacs Band members; of those, 250 have become temporarily employed through jobs such as lawn care, community clean-up projects, DNR projects, cultural projects, intern positions within the government, and other Band entities. They have also assisted our Elders and handicapped and fellow Band members with several projects. The program pays the Band members a livable wage and allows them to work up to 40 hours per week. The Labor Pool Program has brought hope and pride back to the people and communities.

While there is some non-Band employment available locally, many Band members have been subject to discrimination in hiring. Another barrier to unemployment includes having limited to no work experience, lack of transportation, transportation, loss of driving privileges, lack of childcare, chemical dependency, criminal records, hopelessness, and low self-esteem. The TANF program seeks to address these conditions, and build a responsible workforce that is prepared to take advantage of opportunities by receiving appropriate training and supportive services to build future self-respect and self-sufficiency. The DOL will develop qualified, productive, and confident people and build a network on and off the reservation to locate employment opportunities.

The Band's TANF program seeks to directly address these conditions, and build a responsible workforce that is prepared to take advantage of present opportunities by receiving appropriate training/job skills and supportive services to build future self-respect and self-sufficiency among our members. The Department of Labor (DOL) will develop qualified, productive and confident people and build a network on and off the reservation to locate employment opportunities.

Economic Development Opportunities

Future economic development projects may include, but are not limited to a clothing closet, food pantry, babysitting co-op, care car center, and a used car dealership which would be operated by 477/TANF participants.

Fiscal Accountability

Nothing in this plan shall be construed so as to interfere with the ability of the Secretary or the lead agency to fulfill the responsibilities for the safeguarding of Federal funds pursuant to the Single Audit Act of 1984 [31 U.S.C. 7501 et seq.].

Organizational Units and Strategy

Overview of Strategy/Demonstration

The Mille Lacs Band of Ojibwe (The Band) is currently in the process of implementing a Department of Labor (DOL) one-stop center in District I of the Mille Lacs reservation. The DOL will consist of a Training and Development Department, Tribal Employment Rights Office (TERO) and a Support and Referral Services Department. These departments will be overseen by an Executive Director with an administrative staff of three (3) Directors, Intake Counselor and Database/Report Specialist, general and support staff needed to effectively operate each department and outreach positions for outer districts.

The Mille Lacs Band has identified and created a database of over 350 unemployed Band members within our Labor Pool Program and now need to move forward to identify and eliminate the barriers and challenges that have prevented these Band members from obtaining or retaining employment. The Band's DOL recognizes that barriers and challenges must be addressed and eliminated before training and employment initiatives can be successful. The Labor Pool Program will transfer to the DOL TERO Department after this TANF Plan is approved and all Labor Pool participants will be required to complete a one-on-one intake session with the DOL to their needs.

This one-on-one counseling intake session will build relationship and trust with every participant so we can get to know them as people and identify their challenges, values, motivations, and potential. We will help them identify their strengths and gifts and boost their confidence. With this information, we will partner with the participants to develop an

Individual Employment Plan (IEP) that will ensure self-sufficiency and help them re-create their life.

The participants will walk into a warm and inviting center where they will be greeted by a very pleasant receptionist who will introduce them to the Intake Specialist/Counselor who will be a highly-trained people person. The Intake Specialist Counselor will visit and get to know the participants personally and begin to build a relationship of trust and respect. The Intake Specialist/Counselor will acquire necessary information and determine appropriate assessments to identify any barriers or challenges the participants may have, what is important to them and what profession they want to pursue. The Intake Counselor will make every participant aware of the services the DOL has to offer. The initial intake will cover previous employment history, identify any type of social or supportive services deemed necessary, and the appropriate training and development. It may be determined that some participants are ready for job placement. The Intake Counselor will then begin the participants' Individual Employment Plan (IEP).

The next step is to introduce them to their Case Worker who will assist the Intake Counselor and the participants to finish developing their IEP and to begin implementing their plan by referring them to the appropriate department. Case Workers will be in compliance with 25 CFR 20.318. Initial assessments include the Whole Person Assessment series of testing to determine interests, aptitudes and abilities. The Test of Adult Basic Education (TABE) is used to assess educational level. The DOL will continuously look at additional assessments and other tools that may be beneficial to the participants.

If at any time the participants demonstrate or reveal any issues relating to chemical dependency, mental disorders, domestic abuse or anger issues, the Case Worker will offer an assessment to identify concerns and work closely with the participants on referrals to the appropriate Health and Human Services department (HHS). DOL and HHS will collaboratively communicate with one another on the progress and needs of every participant referred. There will be a waiver signed by participants so departments can share information. This waiver will cover all departments specified and integrated in the TANF Plan.

The Case Workers from all districts and the urban office will be required to keep a daily activity log containing data on contacts with the participants. This information will be sent to the Database Report Specialist before noon the following work day. The Database Specialist will input this information immediately. The DOL is currently utilizing a contracted database systems which include Eaglesun (TAS), MAXIS, MMIS and Workforce One. The Database Specialist will identify any red flags such as, but not limited to sanctions, low participation rates, or lack of contact with participants, and bring these red flags to the attention of the Executive Director to immediately address. The Database Specialist will be responsible for payroll, data entry, spreadsheets, and timely reports.

Support Staff:

1. **Executive Administrative Assistant**
2. **Executive Receptionist**
3. **Administrative Assistant**
4. **Receptionist**
5. **Maintenance**

The Department of Labor in District I contains a 15-person classroom for training. The classroom utilizes video and related visual-communication technology to enhance our training efforts. There is also a 15-station computer classroom to provide computer-generated study. All computers have internet access for participants to use for job searches or other related research or computer-based testing. Community technology centers have been developed in the outer districts and urban area and will be used for the Department of Labor program participants.

DOL Staff Training

The DOL staff will be provided with continuing education and training to maximize the effectiveness of services. Case Management training will continue to be a priority. Database training is another important training that will be necessary for appropriate staff. Cross-training will also be implemented into the DOL Departments.

DOL Training & Development Department Services

The following training and development activities will be offered to adults and youth in the service areas and population identified under eligibility on page 18 of this plan:

1. Assessments for adults and youth
2. Computer training for adults and youth
3. GED preparation for adults and youth
4. Tutoring for adults and youth
5. Youth and adult educational classes as needed or requested
6. Workshops or one-on-one training for adults and youth on life skills such as:
 - a. Budgeting
 - b. Etiquette
 - c. Communication
 - d. Family and relationship building initiatives
 - e. Parenting
 - f. Professionalism
 - g. Handling emotions
 - h. Dealing with stress
 - i. Conflict resolution
 - j. Self-esteem for men and women
 - k. Dress for success

7. Job related education for adults and youth
 - a. Job search
 - b. Preparation
 - c. Interviewing
 - d. Performance
 - e. Retention
 - f. Improving promotion potential
 - g. Job skills training
8. Health and wellness for adults and youth
 - a. Importance of exercise
 - b. Preparing healthy meals
 - c. Importance of hygiene/physical and dental care
9. Youth programs, activities and events
 - a. Year round employment programs
 - b. Summer Youth employment programs
 - c. Recruiters/Job Counselors visiting schools to encourage post-secondary education opportunities and employment opportunities within the Band, casinos, and Corporate Commission
 - d. Talent shows to build confidence and inspire other teens
 - e. Gang awareness/prevention/resistance classes
10. Prevention initiatives for adults and youth
 - a. Out of wedlock pregnancy prevention initiatives for adults and youth
 - b. Planned parenthood workshops
 - c. Teen parents and single parents sharing their experience with others
 - d. Self-respect and self-esteem training
 - e. Social responsibility
 - f. Financial responsibility/cost of raising a child
11. Cultural training and camps for adults and youth
 - a. Language
 - b. Activities (drum, dance, crafts, etc.)
 - c. Ceremonies (drum, pow wows, feasts, etc)
 - d. Harvesting (rice, syrup, hunting, netting, etc.)
12. Dealing with criminal records and history for adults and youth
 - a. Corrective resume writing
 - b. Making right choices and consequences of choices
 - c. Offender re-entry programs
13. Conferences for adults and youth

With the approval of the Administration Policy Board and Mille Lacs Band Elected Officials, the Executive Director of the DOL may then change, add or delete any of the listed trainings at any time without the necessity of modifying the TANF Plan.

DOL TERO Services

The DOL's Tribal Employment Rights Office (TERO) will be obligated to refer to TERO laws if they supersede the TANF Plan and its Policies and Procedures in regard to employment rights. Functions that TERO or positions under TERO will oversee include:

1. Develop and initiate job placement to include internships, apprenticeships, job shadowing, labor pool, job volunteering, on-the-job training, community service, subsidized employment, supportive work programs, cultural harvesting, ceremonies, and activities. These job placements will mainly be within the Band's government, casinos, Corporate Commission and other Band owned businesses, and entities.
2. Network to outside businesses and companies through internet, newspapers, and flyers to locate employment opportunities.
3. Provide incentives to existing businesses, and attract new businesses on behalf of TANF participants, including but not limited to payment of tools, uniforms or other necessities directly related to the actual work performed. Also, offering supportive work programs and subsidizing wages of participants.
4. Utilize all employment opportunities presented from outside employers.
5. Work with appropriate departments to develop an offender re-entry program.
6. Enforce Native American employment rights and Mille Lacs Band member preference where applicable and pursue penalties to include fees, fines and disciplinary action for violation of TERO laws. These fees will be used to support the Labor Pool and DOL's unmet needs.
7. Work collaboratively with the Gaming Regulatory Authority (GRA) and the Mille Lacs Band Corporate Commission to eliminate the restrictive hiring policies that are preventing Band members from being hired at the casinos, corporate, and Band owned businesses.
 - a. TERO will submit a proposal to the GRA and Corporate Commission that will address the possibility of waivers regarding the restrictive hiring policies for Band members so they can obtain employment within the businesses they own. There will be more accountability on the part of the participants to continuously strive to improve and re-create their life.
8. Contract with business organizations or associations to expand participation of employers in welfare-to-work initiatives and encourage the hiring of TANF participants in our service areas.
9. Work with the DOL Training and Development Department to provide specialized training for managers and supervisors within our tribal government, Band entities such as schools, clinic, casinos, Corporate Commission, and other Band owned business entities, as well as private industry such as construction companies that perform work on reservation on how to work with newly hired TANF participants who have serious barriers to employment and other employment issues.

DOL Support & Referral Services

The DOL Support & Referral Department will offer several support services to include, but not be limited to work activities for the eligible service population and areas identified in TANF Plan. Specific support services offered to specific groups are defined in TANF Plan Policy and Procedure Manual. Income eligibility must be below the 300% 2010 Federal Poverty Guidelines. A chart of the poverty guideline will be included in the TANF Plan Policy and Procedure Manual. The participants must complete or have an Individual Employment Plan (IEP) in place and be actively participating and completing obligations of their plan. Mille Lacs Band members will have priority over other MCT members.

Support services offered include, but are not limited to:

1. Work activities to include but not limited to:
 - a. Subsidized employment private and public sector
 - b. Unsubsidized employment private and public sector
 - c. Job search and job readiness
 - d. Community service
 - e. Work experience
 - f. On-the-job training
 - g. Education and training identified in IEP
 - h. Caring for a child of a participant who is performing an eligible work activity
2. Stipends for on-the-job training to include but not limited to apprenticeships & internships
3. Stipends for living allowance (food, gas or other justified "living expenses")
4. Stipends for attendance of training, educational and cultural activities
5. Childcare assistance
6. Limited tuition payments for Post-Secondary/Vocational Education
7. Additional lab, book, supplies or rental fees for Post-Secondary/Vocational Education expense not covered by other educational resources
8. Internet connection fees and one year of internet service if enrolled in Post Secondary/Vocational Education
9. Laptop computer if enrolled in Post Secondary/Vocational Education
10. Additional licensure for Post-Secondary/Vocational Education not covered by other educational resources
11. Additional testing fees for certifications for Post-Secondary/Vocational Education not covered by other educational resources.
12. Additional mileage reimbursement for Post-Secondary/Vocational Education not covered by other educational resources
13. License Obtainment/Renewal fees
14. Fees for identification documents
15. Vehicle Insurance payments, registration, repair, and maintenance
16. Mileage reimbursement

17. Clothing allowance for school (children, youth & adult) and employment (youth & adult)
18. Moving/Relocation expenses
19. Tools/safety equipment
20. Union dues
21. Registration fee, per diem and travel expense for Seminar/Conference/Workshop that are identified in IEP
22. Shelter assistance
23. Utility assistance
24. Transportation service
25. Referral service and assistance to services outside and within the Band entities
26. Incentives for meeting approved IEP goals
27. Faxing, copying, mailing, filling out applications or other documents
28. Transitional Services to assist participants in retaining employment for up to one year.

TANF cash assistance, food service, and medical assistance are offered as a support service but with different eligibility requirements. (Please refer to eligibility on page 19 of this plan).

DOL Referral Services would include several programs now offered by the Mille Lacs Band Tribal Government through the government departments which will include, but are not limited to the Mille Lacs Band Departments of Administration, Education, Health & Human Services, Natural Resources, Gaming Regulatory Authority, Corporate Commission, Indian Legal Aid, and outside providers if necessary. Memorandums of Understanding (MOU) will be put in place with some of these Band departments to assist eligible participants with eliminating barriers and challenges they may be facing and are out of the realm or expertise of the Case Worker. Case Workers will work to ensure that the participants are referred to the appropriate service.

NOTE: Thorough guidelines for each of these support services and work activities will be placed in the TANF Plan Policy and Procedure Manual. TANF cash assistance, food service and, medical assistance offered if participants meet eligibility for these services (please refer to eligibility on page 19-20 of this plan).

Results/Outcomes of Strategies

The TANF Plan annual report, which includes a narrative on the program accomplishments, will be reviewed by the Commissioner of Administration to ensure accountability. The Office of Management and Budget will be responsible to review and monitor the TANF budget prior to each fiscal year in collaboration with the Executive Director of the DOL and the Commissioner of Administration quarterly.

The Mille Lacs Band DOL annual performance standards:

Internal performance standard will be listed in TANF Plan Policy and Procedure Manual.

Five year projected outcome:

Work in collaboration with other departments to ensure a reduction in the following based on statistics acquired by January 1, 2011:

1. Unemployment
2. Tribal Government supportive services programs
3. Crime
 - a. Gang involvement and violence
 - b. Domestic abuse
 - c. Child neglect and abuse
 - d. Drunk Driving violations and accidents
 - e. Assaults
 - f. Thefts
 - g. Property Damage
4. Student drop-outs
5. Chemical Dependency
6. Teen pregnancies
7. Pregnancies out of wedlock
8. Dependency on welfare

Integration of Departments and Programs

Federal Program

Department of Health and Human Services
Temporary Assistance for Needy Families (TANF)

Mille Lacs Band of Ojibwe Departments

Department of Education

Current educational resources available on the reservation include Early Head Start, Head Start, and K-12. The Mille Lacs Band operates the Mille Lacs Tribal College located near District I & District IIA which offers post-secondary classes in collaboration with Central Lakes College. Post-secondary classes are available at Central Lakes College Brainerd and Staples campuses which are located 35 miles from District I – Vineland.

For Band members who choose to attend higher education, the Band provides a scholarship program to supplement State and Federal grants. An additional Band program, called the Educational Enrichment Program, is available for adult educational classes and community education classes. This program provides up to \$500 per year, from a limited fund on a first come, first served basis for those who meet the eligibility guidelines.

Department of Health & Human Services

The DOL will continue to collaborate with the Band's HHS Department to develop an effective referral process to assist in chemical dependency diagnosis and treatment, mental health diagnosis and treatment, and basic physical health evaluations, and treatment.

MOU's have to be developed to provide access to Health and Human Services.

DOL will work with HHS to implement training, activities and events to encourage and develop more socially responsible youth and adults of child bearing age (12-50) to eliminate pregnancies out-of-wedlock. The importance of a two parent family will be reaffirmed as well as relationship building and counseling. The significance of being physically, emotionally, and financially prepared for a child will be reinforced in several trainings and during counseling. The DOL and HHS will work with parents who have lost their children and families due to addiction, abuse or other reasons. This goal will be supported by collaboration of the DOL and HHS, to the parents to reclaim their lives and children through education, employment, training, and counseling. With the supportive services available to help them through their barriers and challenges, the DOL and HHS can give them hope of a better tomorrow.

Department of Administration

The Department of Administration has administered the Labor Pool Program in which over 350 Mille Lacs Band members have applied. The department has been able to offer employment to over 250 Band members since May 17, 2010. This program has been funded by Band net revenue and has brought back hope and pride to the Band members participating. The program pays a livable wage and the Band member may work up to 40 hours per week if there are projects or work available. This program will transfer to the DOL TERO Department after this TANF Plan is approved and all Labor Pool participants will be required to complete a one-on-one intake session with the TANF Program so they can utilize services provided by the DOL to help them become permanently employed. The Commissioner of Administration and the Assistant Commissioner of Administration will assist with ensuring that all departments within the Mille Lacs Band Tribal Government cooperate and support the DOL regarding employment for TANF participants.

Department of Natural Resources

The Department of Natural Resources provides many of the projects for the Labor Pool Program to include cultural activities. Our Tribal Elders have recognized and expressed to the DOL staff that getting our people involved in cultural activities and ceremonies is critical to changing the present and altering the future for the better.

Corporate Commission/GRA/Indian Legal

TERO will work collaboratively with the Corporate Commission, Gaming Regulatory Authority (GRA), and Indian Legal Aid of the Mille Lacs Band to employ Band members within the Corporate Commission and Band owned businesses. These departments will work to develop a re-entry program for participants with criminal backgrounds.

The DOL Training and Development Department will work closely with the Corporate Commission's Band Member Development Department (BMDD) to ensure that the Band member receives all training and development necessary for them to retain their employment and advance within the business. Wage subsidies can be offered by the DOL to encourage retention and initiate advancements of Mille Lacs Band members working at the casinos, corporate, and its business entities.

Eligibility

Training and Development

Training and Development activities listed in the TANF Plan that are provided by the Training and Development Department have no income eligibility and are available to all enrolled Mille Lacs Band members, first generation descendants of an enrolled Mille Lacs Band member and eligible family members of an enrolled Mille Lacs Band member who reside in the reservation-based service areas. The urban office services MCT members residing in the urban service area. Offering these services to individuals mentioned will be a proactive initiative to building more socially responsible individuals and communities; therefore, preventing out-of-wedlock pregnancies and ending dependency on welfare. It will serve all four purposes of TANF.

Support Services

Support services will be provided to enrolled Mille Lacs Band members in the reservation-based service area. The urban area will offer supportive services to MCT members. Specific support services offered to specific groups are defined in TANF Policy and Procedure Manual. All eligible children (see definition on page 23 of this plan) of an enrolled Mille Lacs Band member will be eligible to receive specific support services as defined in the TANF Plan Policy and Procedure Manual. Monetary services will be provided through EBT cards, cash cards, checks, payroll, stipends, vouchers, or electronic payments.

Qualifications include:

- Household income must be below 300% of the 2010 Federal Poverty Guideline (chart in TANF Plan Policy and Procedure Manual) and;
- Adults must complete or have completed an Individual Employment Plan with the DOL and must be actively implementing their plan

Documentation necessary for supportive services includes:

- Proof of last 6 month income for participant
- Proof of registration with Selective Service (males ages 18-25)
- Proof of Mille Lacs Band Tribal Enrollment
- Job Verification (if employed)

TANF Cash Assistance

TANF cash assistance will be provided to an eligible assistance unit which must include an eligible child or pregnant women and is located in the reservation-based or urban service area. MFIP/DWP assistance standard will be used to determine income eligibility for cash assistance. Standard chart can be found in the TANF Plan Policy and Procedure Manual.

The Band will contract with the State of Minnesota, to provide cash assistance benefits through an electronic benefit transfer system. Cash assistance will be issued through the EBT System. The state will submit a monthly billing for the amount of benefits paid to the eligible participant. The Band will pay the billing within the specified time period via electronic transfer. Cash Assistance payment and billing process will be thoroughly defined in the TANF Plan Policy and Procedure Manual.

Food Support and Medical Assistance

The Band shall take and act on applications for food service medical assistance (MA) for participants. Such applications shall be entered on the state MAXIS and MMIS. The Medical Assistance programs shall be processed and administered in accordance with state and federal policy and law. As contracted with the state, the Band's staff time spent on administering food service and medical assistance will be reimbursed. Reimbursement process will be thoroughly defined in the TANF Plan Policy and Procedure Manual.

Labor Pool

Labor Pool eligibility requirements include:

- Must be an Enrolled Mille Lacs Band Member - Verified through MLB Tribal ID or Certificate of Enrollment from MLB Enrollment Office
- Must be eighteen (18) years of age
- Must complete all new hire paperwork for MLB Human Resources Department and provide two forms of identification
- Must be unemployed or working less than forty (40) hours
- Must complete intake process and have an active (IEP) in place with the Band's DOL
- Must comply with the Mille Lacs Band of Ojibwe Policies and Procedures

Time Limits

Time limit to receive cash assistance is 60 months with some exceptions and exemptions, which are listed in TANF Plan Policy and Procedure Manual.

Minimum Work Participation Rates

Minimum work participation rates for single parent families are a minimum of twenty (20) hours per week. The hours spent in work activities for a two-parent family must be combined to total forty (40) hours per week. The family has the option to decide who will work what number of hours as long as the combined hours total forty (40) hours. Work participation rate exemptions are thoroughly defined in TANF Policy and Procedure Manual.

Work Experience Activities

Work experience activities are listed under support services and will be thoroughly defined in TANF Plan Policy and Procedures.

Veteran Preference

Veterans who are enrolled Minnesota Chippewa Tribe (MCT) members residing in the service areas of this plan and who meet eligibility requirements will receive top priority for services offered in this TANF Plan.

Income Exclusions

Income exclusions exist to determine eligibility for services and will be calculated where allowed. These exclusions will be defined in the TANF Policy and Procedure Manual.

Earning Disregards

Earning disregards for employed participants will be listed in the TANF Plan Policy and Procedure Manual.

Resource Limits

Resource limits will be thoroughly defined in TANF Policy and Procedure Manual.

Prevention of Duplication of Services

Duplication of services will be prevented by utilizing the State of Minnesota's electronic management information system, MAXIS, which is capable of cross-referencing applications and will indicate if the participant is receiving assistance from a county or tribal cash assistance program with the State of Minnesota. A family receiving assistance may not receive duplicative

assistance from other State or Tribal programs funded under Title IV-A of the Social Security Act, as amended.

Penalties Against Individuals

Penalties against individuals will be thoroughly defined in TANF Plan Policy and Procedure Manual.

Good Cause Exemptions

Good Cause Exemptions will be thoroughly defined in TANF Plan Policy and Procedure Manual.

Protection of Family Privacy

Protection of family privacy will be thoroughly defined in TANF Plan Policy and Procedure Manual.

Child Support Enforcement

Child Support Enforcement will be thoroughly defined in TANF Plan Policy and Procedure Manual.

Definitions

Definition "Indian"

"Indian" for the purpose of this plan will include all enrolled Minnesota Chippewa Tribe (MCT) members.

Definition "Indian Families or Indian Households"

An Indian family consists of one parent or one head of household who is an enrolled Mille Lacs Band member that reside in the reservation-based service area; in the urban service area, an Indian family consists of one parent or head of household who is an enrolled MCT member that reside in the urban service area. For the purpose of this TANF Plan, a single individual who is an enrolled Mille Lacs Band member or an enrolled MCT member who lives alone will be considered a family or household of one.

Definition Mille Lacs Band "Eligible Family Member"

An eligible family member of an enrolled Mille Lacs Band member for the purpose of this plan includes spouse, significant other who lives in home 100% of the time, and all children of whom the enrolled Mille Lacs Band member has legal physical custody and are full-time students up to the age of 21 who live in the home over 50% of the time. Students living away from home while in school will be exempted from living in the home over 50% of the time.

Definition "Needy Families"

Needy families are Indian families as defined in this plan whose household income is below the 300% Federal Poverty Guidelines. (Federal Poverty Chart will be placed in TANF Policy and Procedure Manual.

Definition "Assistance"

The term "assistance" includes benefits designed to meet an eligible "Assistance Unit's" ongoing basic needs such as cash assistance, food support, and medical assistance. It excludes nonrecurring, short-term benefits designed to deal with a specific crisis situation or episode of need such as support services to include work activities. Assistance is thoroughly defined in TANF Policy and Procedure Manual.

Definition "Assistance Unit"

Indian families or households as defined in this plan with at least one eligible minor child or pregnant woman whose needs, assets, and income are considered together and who receive or are eligible to receive TANF cash assistance and other ongoing basic needs such as, but not limited to food support and medical assistance. TANF Policy and Procedure Manual will include and define thoroughly exceptions, exemptions and other factors regarding assistance units.

Definition "Eligible Child and Pregnant Woman"

Eligible child and pregnant woman for assistance purpose are thoroughly defined in TANF Plan Policy and Procedure Manual.

Grievance and Appeals Procedure

The Mille Lacs Band Department of Labor has established a uniform grievance procedure. It contains provisions which apply to all program participants engaged in any type of activity under this TANF Plan. The procedure ensures due process and establishes a series of levels, starting with informal resolution at the staff level.

The participant, herein known as the complainant, must make a request for a conciliation conference in writing, in person or by telephone within ten (10) business days of the incident to

the TERO Grievance/Compliance Officer. If a timely request for conciliation is received, the Grievance/Compliance Officer will arrange for the conference to take place within five (5) business days from the date that the request is received. The conciliation conference will be heard by the DOL Grievance/Compliance Officer or their appropriate designee.

If for any reason the complainant is not satisfied with the resolution, within ten (10) business days upon receipt of the Grievance/Compliance Officer's official answer, the complainant may make a written request for the Executive Director of the DOL to review the decision made by the Grievance/Compliance Officer. Within five (5) business days of receipt of the written request for review, the Executive Director of the DOL will review the complaint and notification will be sent for a hearing with the Grievance Committee defined in 477 Policy and Procedure Manual. The Grievance Committee will have authority to make any adjustments deemed appropriate to resolve the complaint. After the hearing with the Grievance Committee, the Executive Director of the DOL must inform the complainant within five (5) business days of their decision.

If the complainant believes that his/her grievance has not been adequately resolved by the Grievance Committee, he/she must file a written complaint with the Mille Lacs Band Tribal Court (the court) within (10) business days of their receipt of the written decision. The court will notify the complainant of their hearing date and determination of hearing.

All complainants who have exhausted all the tribal levels of appeals have the right to grieve to the Secretary of the Interior through the Division of Workforce Development Program in Washington D.C.

All complainants who have exhausted all the tribal levels of appeals for a discrimination complaint have the right to contact the Department of Interior Civil Rights Center.

The complainant must continue to cooperate and comply with other program requirements as outlined in their Individual Employment Plan (IEP).

The Mille Lacs Band Human Resources Office also has a grievance and appeals procedure applicable to all government staff. It applies to all staff employed in the DOL.

All employee grievance and appeals procedures are on file for review in the offices of the Human Resources Department.

ASSURANCES AND CERTIFICATIONS

See Attachment A