

Child Care & Development Fund

Fiscal Year 2012-2013

Plan Pre-Print Comments by:

Inter-Tribal Council of California, Inc.

In general the plan asks for much more detail from Tribes in describing the activities and implementation of the CCDF Program. Some of the areas of the plan infringe on Tribal sovereignty and do not reflect a Government-to-Government relationship that exists between the Federal Government and Tribes.

Part 1 - Administration

1.2.1. – 658E(c)(3)(C) – This regulation seems out of place as it refers to administrative costs incurred by the state not Tribes.

1.2.2. – What exactly is this question asking? Do we need to describe our fiscal process? Draw down process? Payment Process? How consultants are chosen? Aren't we in control of the program by drawing down funds and paying programs expenditures?

1.3 - If the ACF gives us our estimates, why are we being asked these questions?

1.3.5 – 658G- Regulation refers to the state not Tribes.

1.6.2- Our program has found it difficult to determine all adults living in a household. For example, if a couple is not married but living together, there is no way for us to prove that the other parent does not live in the house. In some cases it seems that we making it harder for the families, who are living together and being honest in their applications, to get subsidy. We have no controls to be able to determine the whether or not two parents are living in the same household.

Part 2 - Developing the Child Care Program

2.1.1. To what extent will collaboration be required? Is simply talking to other agencies enough?

In conclusion, this plan is asking for a lot of information is going to take a substantial amount of time to complete. The estimated 17.5 hours that the ACF has determined will be needed to complete is highly unreasonable. Even the previous plan pre-print took much longer than 17.5 hours. ITCC estimates this new plan pre-print will take at least 40 hours to complete, possibly even longer.