

Summary of Guideline Updates: Responding to Tribal Engagement

The California Conservation Corps (CCC) is committed to creating flexible, accessible funding pathways for Tribal Corps programs. Based on invaluable feedback received during our Tribal Consultation Period from April 29-July 10, 2026, we have updated the Proposition 4 Draft Tribal Guidelines to better align with tribal priorities, streamline administrative processes, and ensure tribal sovereignty.

Below is an overview of key tribal comments and the corresponding updates made in the finalized guidelines.

1. Expanding Eligibility & Tribal Governance Options

- **What We Heard:** Tribes requested that eligibility be broadened so that Tribal government departments, Tribal enterprises, and tribally chartered entities can participate directly without being forced into rigid state-law structures.
- **How We Addressed It:** While underlying state funding statutes require grantees to be an eligible nonprofit workforce organization or part of a Joint Powers Authority (JPA), the guidelines now explicitly recognize that federally recognized California Native American Tribes can participate through existing Tribal government departments, enterprises, or tribally chartered entities by executing a simplified template JPA. Non-federally and federally recognized California Native American Tribes can also participate using an eligible 501(c)(3) structure.

2. Respecting Sovereign Immunity & Standardizing JPAs

- **What We Heard:** Participation in the program or executing agreements should not imply a general waiver of Tribal sovereign immunity. Additionally, standard agreements should be fair, negotiable, and include strong non-waiver protections.
- **How We Addressed It:**
 - **No Implied Waiver:** Guidelines state explicitly that applying for funds, signing a JPA, or accepting grant money does **not** constitute an implied waiver of sovereign immunity or jurisdiction.
 - **Avoidance & Narrow Risk Triggers:** Limited waivers are avoided whenever possible. They will only be requested under narrow risk conditions (e.g., if a Tribe requests an advance payment) and will be

strictly limited to the dollar amount advanced and the specific grant agreement.

- **Negotiable & Flexible Agreements:** The template JPA now includes clear non-waiver language, and Tribes retain the right to submit modified templates or terminate the JPA.

3. Financial Flexibility & Upfront Funding

- **What We Heard:** Reimbursement-only grants disadvantage smaller Tribes and create cash-flow barriers. Upfront funding, flexible indirect cost rates, and no matching requirements are essential.
- **How We Addressed It:**
 - **No Matching Funds Required:** Matching funds are completely optional and will not impact application scoring.
 - **Advance Payments:** Tribes demonstrating initial fiscal/cash-flow constraints can receive up to a **25% advance payment** upon grant execution for essential start-up costs (such as equipment, safety gear, or crew training).
 - **Fair Indirect Cost Rates:** Grantees can use their Federal Negotiated Indirect Cost Rate (NICRA), a 15% de minimis rate, a state-negotiated rate, or propose a custom rate.

4. Protecting Tribal Data Sovereignty & Culturally Sensitive Sites

- **What We Heard:** Reporting and application requirements must not force Tribes to disclose sensitive cultural sites, ceremonial locations, or confidential Traditional Ecological Knowledge (TEK).
- **How We Addressed It:**
 - **Generalized Mapping Options:** Applications do **not** require precise GPS coordinates or high-detail maps for sacred or culturally sensitive sites; broad regional polygon maps or buffered outlines are fully accepted without penalty.
 - **Data Sovereignty:** Tribes retain sole ownership and control over all submitted Tribal data, stories, photos, and cultural information. Sensitive cultural information is exempt from public disclosure.

5. Honoring Tribal Culture, Elders, & First Foods

- **What We Heard:** Guidelines should explicitly fund cultural stewardship, cultural burning, native plant restoration, and compensation for Tribal elders and knowledge holders.
- **How We Addressed It:**
 - **Expanded Work Categories:** Eligible projects explicitly include cultural burning preparation, native plant and first foods restoration, traditional gathering area enhancement, and cultural stewardship training.
 - **Compensating Elders:** Compensation for Tribal elders, cultural practitioners, monitors, and language keepers guiding youth crews is now fully reimbursable under direct personnel/consultant costs.

6. Culturally Appropriate Youth & Supports

- **What We Heard:** To keep Native youth engaged, funding must cover holistic supports like meals, transportation, stipends, childcare assistance, gear, and counseling.
- **How We Addressed It:** "Culturally Appropriate Youth Supports" are explicitly defined as eligible project operating expenses. Grants can cover stipends, meals, travel, work clothing, safety gear, case management, and cultural activities.

7. Tribal Control Over Program Design & Flexible Land Access

- **What We Heard:** Programs should not impose a "one-size-fits-all" model, and land tenure rules should accommodate ancestral lands or partner properties.
- **How We Addressed It:**
 - **Program Autonomy:** Tribes have full discretion over crew structures, recruitment criteria, and seasonal operations to match local governance, cultural priorities, and seasonal practices.
 - **Flexible Land Tenure:** For work on ancestral territories, trust lands, or federal lands, the CCC will accept flexible Tribal stewardship agreements or MOUs in place of standard fee-title ownership deeds, provided they satisfy the required 10-, 20-, or 25-year site control duration based on the grant award size.

8. Accessible Scoring & Dedicated Technical Assistance

- **What We Heard:** Grant scoring should prioritize Tribal need, cultural benefit, and capacity-building rather than favoring applicants with dedicated grant writers. Technical assistance should continue throughout the project.
- **How We Addressed It:**
 - **Plain-Language Equity Scoring:** The evaluation rubric places heavy weight on Tribal benefit, cultural relevance, and youth pathways while evaluating clarity over complex accounting/grant writing formats.
 - **Ongoing Technical Assistance:** The CCC provides pre-application draft reviews, workshops, and virtual office hours, as well as hands-on support during invoicing, reporting, and CEQA/NEPA navigation throughout the life of the grant.

Questions or Need Assistance?

We are here to help you navigate the application process! Please reach out to our team at **TribalCorps@ccc.ca.gov**.