

Exhibit C: Comprehensive list of changes and additions to CCO Policies & Procedures

1. IV, C, a.(i.)- added "...as a civic organization" to "operates on a no-profit basis".
2. IV, D- added section *Name, Membership and Titles*
3. V., I., b.(1.)- added language for staggering of terms for At-Large Advisory Committee Members.
4. V, III, e.(1.)- added language clarifying organization titles for governance offices
5. V,III- Deleted section on "Non-Participating At-Large Organizations"
6. VI- Added new chapter on Affiliate Organizations
7. VII, D., d.(vi.)- Added CCO Public Health & Wellness Grant
8. VIII, A., a. & VIII, A., a.(i.)- Added 50 % utility cost share for Cherokee Nation owned Community Buildings
9. X., B., 1.(b.)- Language Hub Churches: Added language to set funding limit up to \$100,000.

CHEROKEE NATION

Community & Cultural Outreach Department

Policies & Procedures

Chapter **Subject**

- I. Mission and Core Values
- II. Amendments; Public notice; Controlling version
- III. Organizational Chart
- IV. CCO Participating Organizations
- V. At-Large Organizations
- VI. Non-CCO Participating Organizations
- VII. Grants
- VIII. Community Buildings
- IX. Political Activity
- X. Language Hub Churches
- XI. Ceremonial Grounds
- XII. Volunteer Program
- XIII. Cemetery Maintenance and Restoration

MANUAL:	<i>CCO Policies & Procedures</i>	CHAPTER: I	
SUBJECT:	<i>Mission & Core Values</i>	SECTION SUBSECTION:	
FIRST EFFECTIVE DATE: October 31, 2022	April 1, 2022	SUPERCEDES MATERIAL DATED:	All
APPROVED BY <i>Director, CCO</i> <i>Secretary of State</i>	 	DATE: <i>11/16/2023</i>	

POLICY

This Chapter sets forth CCO’s mission statement and core values.

A. Mission Statement



The Community & Cultural Outreach Program’s mission is to assist community-based organizations’ ability to increase their effectiveness to enhance essential services to those most in need, and build upon the organization capacity of each community, diversify resources, and create collaborations to serve those in Cherokee communities promoting our culture and history.

B. Core Values

The core values of CCO are:

1. To deliver support services and resources to grass roots community organizing in Cherokee communities within the reservation and at-large
2. To effectively and efficiently manage resources allocated to CCO by the Council of the Cherokee Nation and Administration in a manner that complies with all relevant laws, rules, regulations and the highest ethical standards.
3. To conduct its work without regard to political considerations or political influence.
4. To conduct its work on a non-discriminatory basis, including by effectuating the purposes and policies of the Principal Chief’s Executive Order on Equality.

Policy

MANUAL:	<i>CCO Policies & Procedures</i>	CHAPTER: II	
SUBJECT:	<i>Amendments, Public Notice, Controlling Version</i>	SECTION SUBSECTION:	
FIRST EFFECTIVE DATE:	April 1, 2022	SUPERCEDES MATERIAL DATED:	All
APPROVED BY <i>Director, CCO</i> <i>Secretary of State</i>	 	DATE: <i>11-6-2023</i>	

This chapter sets forth the policy with respect to amendment to CCO policies and procedures, public notice of these policies and procedures and the controlling version of all policies and procedures.

A. Amendments

Amendments to these policies and procedures will be approved by the Director of the CCO and the Secretary of State of the Cherokee Nation, to whom approval is delegated by the Principal Chief.

B. Public Notice

A copy of these policies and procedures, and any amendments thereto, though not required by Cherokee Nation law, will be made available for public and elected official inspection by:



1. Providing a copy (in final or final draft form) to the Principal Chief, the Deputy Principal Chief and the Speaker of the Council of the Cherokee Nation.
2. Making a copy available on the Cherokee Nation website.
3. Providing a copy to CCO participating organizations upon request.

C. Controlling Policies & Procedures

1. The policies and procedures controlling CCO operations shall be the copy on file with the Director of CCO, irrespective of any inadvertent failure to provide notice under Section B of this Chapter and irrespective of any difference in the copy on file with the director and the copy made publicly available or made available to elected officials. The Director of CCO shall comply with Subsection B of this chapter within a reasonable period of time after any differences in versions of the policies and procedures are brought to their attention.

Cherokee Nation CCO Department – Policies and Procedures

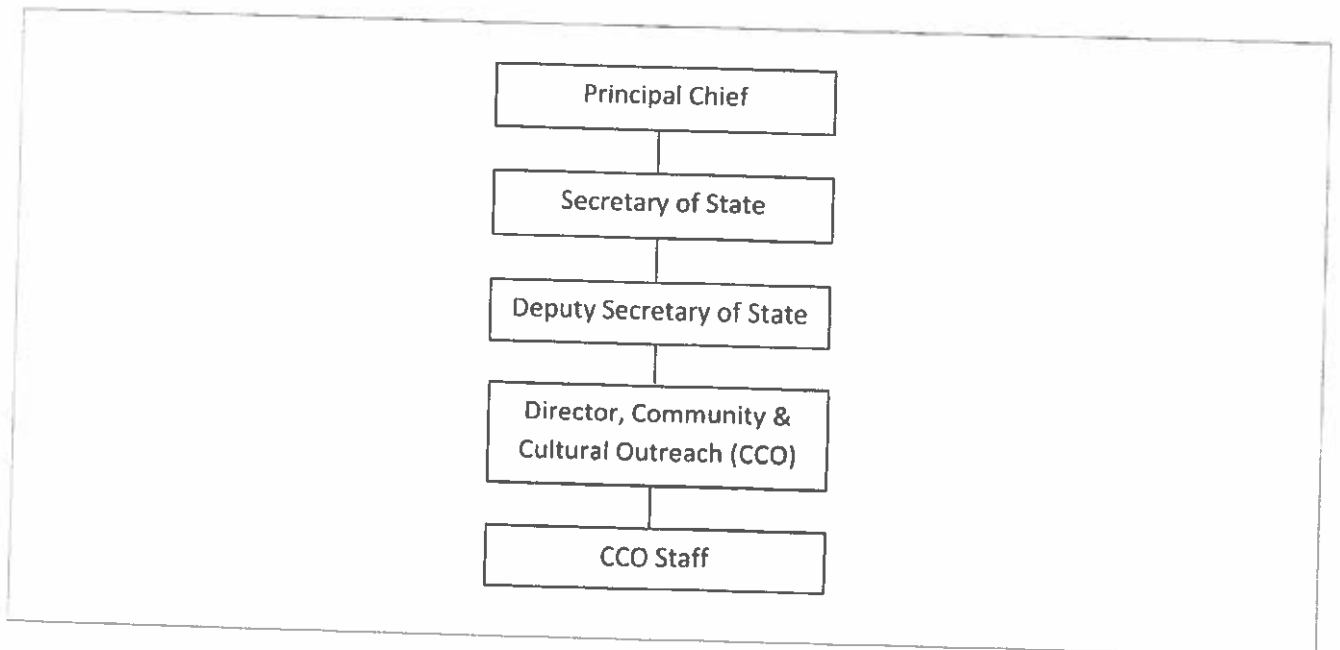
2. The Director of CCO has the authority to resolve any ambiguity, vagueness, conflict or other defect in these policies and procedures guided by his or her professional judgment, other Cherokee Nation law and policy and the mission and core values of CCO set forth herein. Such resolution shall be reduced to writing, communicated to relevant parties and utilized to inform future amendments to these policies and procedures.
3. Nothing in these policies and procedures create or extinguish any legal rights by any individual or entity under any law, including Cherokee Nation law.



MANUAL:	<i>CCO Policies & Procedures</i>	CHAPTER: III	
SUBJECT:	<i>Organizational Chart</i>	SECTION SUBSECTION:	
FIRST EFFECTIVE DATE:	October 31, 2022	SUPERCEDES MATERIAL DATED:	All
APPROVED BY <i>Director, CCO</i> <i>Secretary of State</i>	 	DATE: <i>11-6-2023</i>	

Policy

The purpose of this chapter is to set forth the basic organizational chart of CCO within the Cherokee Nation executive branch.

A. Organizational Chart



MANUAL:	<i>CCO Policies & Procedures</i>	CHAPTER: IV	
SUBJECT:	<i>CCO Participating Organizations</i>	SECTION SUBSECTION:	
FIRST EFFECTIVE DATE:	July 23, 2024	SUPERCEDES MATERIAL DATED:	All
APPROVED BY <i>Director, CCO</i> <i>Secretary of State</i>	 	7.23.2024 DATE: 7-23-2024	

Policy

The purpose of this chapter is to establish standards for determining whether an entity is a CCO Participating Organization.

A. CCO Participating Organization

1. Generally, an entity seeking to access resources made available through CCO must be a “CCO Participating Organization” within the meaning of CCO Policies and Procedures, except to the extent that CCO is providing technical assistance or making resources specifically available to newly formed organizations.

B. Annual Determination by Director

1. On at least an annual basis in October of each fiscal year, or at other times as the need for amendments warrant, the Director of CCO shall certify in writing a list of “CCO Participating Organizations,” which shall be controlling for all purposes under these policies and procedures.
2. Said determination shall be made available for public inspection via the Cherokee Nation website and by disclosure to the Principal Chief, Deputy Principal Chief and Speaker of the Council of the Cherokee Nation and to each entity appearing on the list.
3. The Director shall certify an inaugural list in 2023 after approval of these rules and procedures.

C. Standards for CCO Participating Organization Determination

- a. The Director shall determine whether an entity is a CCO Participating Organization by finding that an entity:
 - i. Operates on a non-profit basis as a civic organization,
and
 - ii. Exists primarily for the purpose of promoting Cherokee language, culture, history or traditions.
and
 - iii. Has substantial participation with Cherokee Nation Community and Cultural Outreach during the previous 12 months. The Director shall determine “substantial participation” based *any* of the following:
 - A. Participation in CCO grant programs.
 - B. Participation by organization representatives in CCO informational or training events / meetings.
 - C. Hosting official CCO events.
 - D. Acts as lessor or operator of a Cherokee Nation community building.
and
 - iv. Is in substantial compliance with requirements of all grants or other funding provided by any Cherokee Nation based on the entities affirmation and the Director’s independent assessment and has otherwise used resources provided by Cherokee Nation in a manner consistent with the mission and core values of CCO.
and
 - v. Is in compliance with the “political activity” section of these Policies and Procedures and in substantial compliance with all CCO Policies and Procedures not otherwise specified in this section.
and
 - vi. In the case of at-large community organizations, is in compliance with published CCO policies on “chartered at-large organizations.” A chartered at-large organization is deemed a CCO participating organization.
and
 - vii. Does not allow the use of alcohol on the premises or at any official function.

● **Name, Membership and Titles**

1. **Name:** Organizations deemed “CCO Participating Organizations” as of fiscal year 2024 are discouraged from adopting names that lack reference to the primary geographic region or community which it serves. Organizations that utilize such names are encouraged, but not required, to modify names or include “[name of organization] of [community] on either a formal or informal basis. Any organization applying for first time “CCO Participating Organization” status after October 1, 2025 are required to include the aforementioned geographic reference in its name.
2. **Membership:** Each Organization will maintain a minimum of 60% Cherokee Nation citizen participation. Verification will ordinarily be through self-reporting by the organization. Cherokee Nation will assist the organization in verifying citizenship as needed.

Organizations shall set requirements for membership as part of the Organizations official Bylaws. Such requirements shall be in compliance with CCO’s policies and procedures and shall not limit membership in any way.

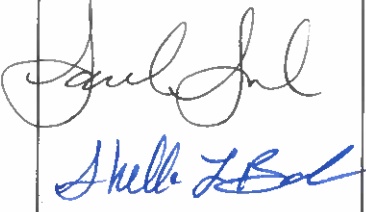
Organizations shall submit to the CCO Director an official annual roll of current members, as well as a list of all citizens who have been denied membership. Such list shall be reviewed by the Director of CCO for compliance and the Director shall make recommendations to the Organization as seen fit.

- a. **Organizational Governance Titles:** Organizations are encouraged, but not required, to adopt conventional titles for its governance offices, such as “chairperson” “vice chairperson” “treasurer,” board member” etc. The use of unconventional governance office titles are permitted except those that could reasonably create public confusion such as “Chief.”

E. Notice to Affected Entities; Reconsideration of Removal or Omission from CCO Participating Organization List

1. **Special Notice:** In addition to the public and elected official notice requirements set forth herein, the Director shall provide a copy of the CCO Participating Organization list to any entity removed from the list, any entity which sought its placement on the list or in the case of the inaugural list issued pursuant to these rules in Fiscal Year 2023, any entity which previously participated in CCO grant programs but which was excluded from the inaugural list. Said notice shall advise, at a minimum, that the organization is not a CCO participating organization but is eligible for reconsideration in the succeeding fiscal year upon its written request or immediate reconsideration with a detailed written request citing relevant facts and relevant portions of CCO policies and procedures.
2. **Reconsideration:** Any entity which disputes its removal from or omission from the list of CCO Participating Organizations may seek

- a. Annual reconsideration in a succeeding fiscal year in writing to the CCO Director
 - b. Immediate reconsideration within 15 days of receiving notice of the list of CCO Participating organizations citing specific facts and the provisions of CCO policies and procedures for determination whether an entity is a CCO Participating organization.
3. **Determination on Reconsideration:** The Director’s determination as to a request to reconsider removal or omission of an entity from the list of CCO Participating Organizations is final and will be communicated to the requesting entity in writing advising whether the entity’s request has been “approved” or “denied” based upon the standards outlined in this policy.
- F. **No Legal Rights Created or Diminished by this Chapter:** Nothing in chapter rules creates any legal right by any person or entity to be included or excluded as a “CCO Participating Organization” or any right to access any resources available to CCO Participating Organizations, such as grants.

MANUAL:	CCO Policies & Procedures	CHAPTER: V	
SUBJECT:	At-Large Organizations	SECTION SUBSECTION:	
FIRST EFFECTIVE DATE:	July 1, 2024	SUPERCEDES MATERIAL DATED:	All
APPROVED BY Director, CCO Secretary of State		7.23.2024 DATE: 7-23-2024	

Policy: The purpose of this chapter is to establish standards for formally chartering at-large community organizations and the At-large advisory committee, pursuant to the Principal Chief’s 2019 Executive Order 2019-02 on this subject.

- A. Policies and Procedures for At-Large Organizations [*Note, these rules reiterate, unchanged, the policies and procedures issued from CCO in or about October 2019. Accordingly, the number system below varies from the number system used elsewhere in the rules and procedures.*]

Introduction: The foregoing Cherokee Nation Community and Cultural Outreach Policies and Procedures for At-Large Organizations is designed to implement the Principal Chief’s 2019 Executive Order, replace policies and procedures for the now-defunct Cherokee Nation Community Association and to enhance how CCO engages with and supports at-large Cherokee citizens and organizations.

I. At-Large Advisory Committee
a. Purpose of Committee:

The Principal Chief’s 2019 Executive Order replaces the Cherokee Nation Community Association (CNCA) with a four-person “At-Large Advisory Committee” to meet quarterly. Committee Members serve a one-year term. The purpose of the Committee is to allow for input from as many community organizations as possible.

b. Selection of Committee Members

The Principal Chief selects committee members via recommendations from at-large community groups At-Large members of the Council of the Cherokee Nation and other at-large Cherokee citizens.

1. Staggering and Terms Begin October 1, 2025: Beginning with fiscal year 2025 (October 1, 2025) the Director of CCO shall randomly assign each incumbent Committee member a seat number and a system of staggered terms, the longest of which shall be three years, the shortest of which shall be one year, with full four year terms thereafter, subject to indefinite hold offer unless and until replaced or renewed by the Principal Chief.

Conduct of Advisory Board Meetings: Meetings may be conducted in person or via teleconference or video conference. Sufficient notice shall be given to afford Advisory Board members, as well as At-Large Council members, the opportunity to be present and participate in the meetings. The Director of CCO (hereafter, Director) is responsible for scheduling and conducting the meetings, serving as Chair of the advisory board for the purpose of facilitating discussion. The Director, at their discretion, may assign staff to attend meetings for the purpose of note taking and meeting facilitation. The Principal Chief and the at-large members of the Council of the Cherokee Nation shall be provided reasonable notice of all Advisory Board meetings and afforded the opportunity to participate.

II. Chartered At-Large Community Organization

- a. **Automatic Charter of Existing CNCA Chartered Organizations:** All actively participating organizations chartered under the CNCA will be automatically Chartered At-Large Community Organizations through the Executive Order.
- b. **Additional Charters:** Other organizations requesting to be chartered must make their intentions known to the Director of CCO for instructions. The Director will make available an application for a charter upon request. Charters remain effective indefinitely unless the Director determines that the At-Large Organization is substantially out of compliance with CCO policies and procedures. All references to “At Large Organizations” hereafter refer to Chartered At-Large Community Organizations unless otherwise noted.

III. Chartered At-Large Organization Policies and Procedures

a. Meeting Requirements

At-Large Organizations shall conduct meetings, open to their general membership, at least four times annually *in addition to* the annual Cherokee Nation meeting, annual Cultural presentation, annual history Presentations and technical assistance trainings.

b. Annual Funding

The Cherokee Nation will disseminate an annual grant of \$2,000 or equivalent in-kind value, per At-Large Organization to purchase equipment, assist with membership growth, and defray operating costs and other expenses. Those funds will be available after October 1, the beginning of the Cherokee Nation fiscal year. Other grant programs and forms of assistance may be developed. The foregoing is subject to availability of appropriated funds available for such grants.

c. Non-Profit / 501(c)(3) Status

At-Large Organizations must operate on a non-profit basis, irrespective of its formal structure. CCO via the Community Organizing Training and Technical Assistance (COTTA) Program will assist At-Large Organizations in obtaining legal non-profit status, including 501(c)(3) status, if the organization so desires.

d. Membership

Each At-Large Organization will maintain a minimum of 60% Cherokee Nation citizen participation. Verification will ordinarily be through self-reporting by the organization. Cherokee Nation will assist the organization in verifying citizenship as needed.

e. Board Composition

The governing board of an At-Large Organization will be comprised of a minimum of 51% Cherokee Citizens. The Board officers are required to be Cherokee Citizens to include the Chair, Asst. Chair, Secretary/Treasurer. Compliance with this provision requires confirmation of citizenship of each officer by the Director. Upon an initial tentative finding of non-compliance, the At-Large Organization will be afforded an opportunity to demonstrate compliance with this provision.

1. Organizations are encouraged, but not required, to adopt conventional titles for its governance offices, such as “chairperson” “vice chairperson” “treasurer,” “board member” etc. The use of unconventional governance office titles are permitted except those that could reasonably create public confusion such as “Chief.”

f. At-Large Organization Financial Management, Dues, Etc.

Cherokee Nation has no role in the management of At-Large Organization finances except to the extent it seeks reasonable accountability for Cherokee Nation grant funding. Cherokee Nation will provide organizational and financial management training from time to time. Organization may assess reasonable membership dues and related fees.

g. Engagement in Civic Activity, Political Activity

Cherokee Nation encourages At-Large organization and organization members to engage to the fullest extent possible in the civic life of Cherokee Nation as well as the communities in which they live. At-Large Organizations may engage in efforts to educate members on state, local and federal issues impacting the organization, including but not limited to issues impacting Cherokee Nation. CCO will coordinate with Cherokee Nation’s Government Relations Department to assist At-Large Organizations in engaging on such topics.

At-Large Organizations must refrain from engaging in political activities, including but not limited to candidate or ballot question related endorsements or activities that could reasonably be perceived as an endorsement. Other constraints on political activity may apply relating to an At-Large Organizations’ non-profit status. At-Large Organizations should familiarize themselves with relevant state and federal law. *Irrespective of an At-Large Organization’s 501(c)(3) status*, all At-Large organizations are encouraged to use the following guidance from the Internal Revenue Service as a best practice:

From IRS.gov

“Under the Internal Revenue Code, all section 501(c)(3) organizations are absolutely prohibited from directly or indirectly participating in, or intervening in, any political campaign on behalf of (or in opposition to) any candidate for elective public office. Contributions to political campaign funds or public statements of position (verbal or written) made on behalf of the organization in favor of or in opposition to any candidate for public office clearly violate the prohibition against political campaign activity. Violating this prohibition may result in denial or revocation of tax- exempt status and the imposition of certain excise taxes. Certain activities or expenditures may not be prohibited depending on the facts and circumstances. For example, certain voter education activities (including presenting public forums and publishing voter education guides) conducted in a non-partisan manner do not constitute prohibited political campaign activity. In addition, other activities intended to encourage people to participate in the electoral process, such as voter registration and get-out- the-vote drives, would not be prohibited political campaign activity if conducted in a non- partisan manner.

On the other hand, voter education or registration activities with evidence of bias that (a) would favor one candidate over another; (b) oppose a candidate in some manner; or (c) have the effect of favoring a candidate or group of candidates, will constitute prohibited participation or intervention.”

Nothing herein restrains an individual member or officer of an At-Large organization, acting in their individual capacity, from engaging in political activity of any kind.

However, At-Large organization members and particularly officers should be mindful of not purposefully or inadvertently using their position within an At-Large Organization to engage in political activity.

h. Point of Contact / Electronic Communication / Social Media / Public Access

1. Point of Contact: At-Large Organizations must assign at least one administrator / point of contact to send and receive all written and electronic correspondence for the organization and to publicly communicate on behalf of the group electronically, including on social media, in a manner consistent with these policies and procedures. The organization shall provide CCO with all relevant contact information. CCO encourages At-Large organizations to set up Google accounts as their point of contact email address for ease of communications and for sharing documents and other information conveniently and electronically. CCO can assist in setting up such access.

2. Public Disclosure of At-Large Organization Contact Information

Broad access by interested members of the public to At-Large Organizations is vital to successful community organizing. Accordingly, in addition to providing full contact information to CCO, At-Large Organizations

1. Must provide CCO with the following contact information, which will be published on Cherokee Nation’s websites and made available to Cherokee Nation citizens and Cherokee Nation officials upon request:

- At-Large Organization Name
- Name of At-Large Organization’s President or Assigned Point of Contact
- At least one means of directly contacting the At-Large Organization, such as email address or phone number.

CCO encourages At-Large organizations to provide CCO with as much publicly available contact information as possible.

3.Social Media: No later than October 30, 2023, each At-Large Organization shall have a presence of some form on some social media platform, such as Facebook. CCO will provide relevant technical assistance to meet this requirement, upon request.

i. CCO Supported Meetings

1.Annual Meeting

At least once per year CCO will partner with each At-Large Organization to provide an annual potluck event*, with substantial financial support from CCO. Cherokee Nation officials, staff and history and cultural presenters will be made available. CCO will seek input from the host organization with respect to the meeting agenda. (*unless otherwise restricted by CN Administration due to health risk mitigation.)

2.Culture & History Presentations

Each At-Large Organization will receive one face-to-face history presentation and one cultural presentation annually. In addition, online presentations will be available

3.Annual Conference & Cultural Enrichment Activities

1. CCO will conduct an annual Conference of Community Leaders and Cultural Enrichment, ordinarily in Tahlequah, OK, make attendance available to members of At-Large Organizations. One Cherokee Citizen representing each organization will be sponsored by the Cherokee Nation to attend the conference. **Other Meetings, Engagement:** Meetings and presentations provided by the Cherokee Nation on cultural programs and community organizing may be available online and archived. At-Large Organizations are encouraged to reach out to other organizations, at-large and in-nation, for additional training and engagement without the participation of the CN.

Travel will be coordinated through Community & Cultural Outreach. That sponsorship is limited to government rates of lodging, travel and per diem. Unlimited additional representatives may attend, if pre-registered, at their own expense, e.g., travel, lodging, food, etc.

j. Engaging with Federally Recognized Area Tribes; Prohibition on Engaging with Non-Federally Recognized “Tribes.”

Community organizations are encouraged to form relationships and partnerships with federally recognized tribes in their areas for cultural exchange, governmental affairs and civic activities. At-Large organizations should contact CCO in advance of inviting any area tribal representatives to Cherokee Nation supported events so that an appropriate welcome can be planned.

The foregoing does not apply to non-federally recognized organizations posing as “tribes.” When in doubt about the status of an organization purporting to be a tribe, please contact CCO.

k. Sister Communities Program



At-Large Organizations are encouraged to matchup with a local Cherokee community organization in order to bring together opportunities to confer, assist, advise with other Cherokees, regardless of geographic location. Funds are/may be available to the local communities for onsite visits to the at-large communities.

l. CCO Annual Review of At-Large Organization

The CCO Director will conduct an annual review of each Chartered At-Large Organization in August of each year to ensure compliance of the policies and procedures herein. The Director will provide the organization with feedback, suggestions and other guidance based on this review. If the Director determines that the At-Large Organization is substantially out of compliance with the policies and procedures herein, the Director will place the At-Large Organization under extended review for up to one year, pending further satisfactory review by the Director. The Director will provide the At-Large Organization with a clear written explanation of the basis for the extended review. In all cases the Director will endeavor to assist the At-Large Organization gain compliance. At-Large Organizations who lose, or withdraw from, a Charter will not be provided with the benefits described herein but may apply for a new charter, granted at the discretion of the Director.

m. No Guarantee of Benefits, Subject to Revision

The foregoing policies and procedures are designed to guide at-large citizens, their organizations and CCO in engaging with each other to build strong Cherokee communities. No benefit described herein is guaranteed. No policy or procedure described herein provides any legally enforceable right to any individual or organization or liability on the part of Cherokee Nation. All of the foregoing policies and procedures are subject to applicable law and subject to change by action of the Director. Any changes will be provided to Chartered At-Large Organizations with reasonable notice.

MANUAL:	<i>CCO Policies & Procedures</i>	CHAPTER: VI	
SUBJECT:	<i>Affiliate Organizations</i>	SECTION SUBSECTION:	
FIRST EFFECTIVE DATE:	July 1, 2024	SUPERCEDES MATERIAL DATED:	All
APPROVED BY <i>Director, CCO</i> <i>Secretary of State</i>	 	7-23-2024 DATE: 7-23-2024	

Policy

The purpose of this chapter is to address CCO’s engagement with Affiliate Organizations.

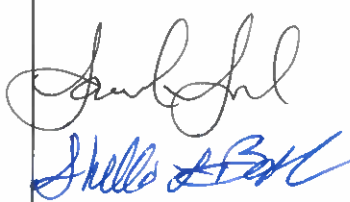
Introduction- CCO is open to inquiries from any entity interested in becoming a CCO participating organization. CCO will provide technical assistance on community organizing, and access to CCO grants where applicable. CCO will endeavor, subject to its primary objective to serve CCO participating organizations, to coordinate Affiliate organizations with various departments and resources from the Cherokee Nation, as Cherokee Nation deems appropriate.

I. Affiliate Organization Designation:

A. An organization that wishes to become an Affiliate Organization shall meet the following eligibility requirements:

1. Exist primarily for the purpose of promoting Cherokee language, culture, history or traditions to Cherokee Citizens.
 2. Must operate on a Non-Profit basis.
 3. Governing board or structure must be 51% Cherokee Citizens. Board members, Chair, Asst. Chair, and Secretary/Treasurer have to be Cherokee citizens.
 4. Must have a minimum of 60% Cherokee Nation Citizen Participation within the organization.
 5. Must have a working relationship with CCO for a minimum of 3 years.
3. After year 3 of successfully operating as an Affiliate Organization, Affiliate Organizations may seek application to become a Chartered At-Large Organization subject to approval of the Director of CCO.

4. Application: Organizations seeking CCO Affiliate Status may apply for such designation on or after the effective date of these policies or any amendment thereto, subject to approval by the Director of CCO (reviewed and approved / reapproved on an annual fiscal year basis) provided:
5. Any organization that in the opinion of the Director has substantially met the requirements set forth above for the past three years will be administratively deemed a CCO Affiliate Organization beginning with Fiscal Year 2025, subject to annual review.
6. Publication: The Director shall include the approved list of CCO Affiliate Organizations with the periodic list of CCO participating organization.

MANUAL:	<i>CCO Policies & Procedures</i>	CHAPTER: VII	
SUBJECT:	<i>Grants</i>	SECTION SUBSECTION:	
FIRST EFFECTIVE DATE:	July 1, 2024	SUPERCEDES MATERIAL DATED:	All
APPROVED BY <i>Director, CCO</i> <i>Secretary of State</i>		7-23-2024 DATE: 7-23-24	

Policy

The purpose of this chapter is to set forth general CCO policies and procedures, applicable where specific policies and procedures set forth elsewhere in this document, or were set forth in specific grant program rules, do not apply.

A. CCO Administered Grants:

a. **Generally:** Grants made available through CCO are subject to the terms and conditions of each grant program. Those terms and conditions will be made available to potential grant applicants and are controlling to the extent consistent with CCO Policies and Procedures.

b. Eligibility:

i. **CCO Participating Organizations; New Organizations:** Generally, only CCO participating organizations are eligible to receive grants administered by CCO, provided that CCO may make capacity building grants to new organizations intent on becoming a CCO participating organization.

- ii. **Geographic Limitations:** CCO endeavors to make funding opportunities available to CCO Participating Organizations both outside and inside the Cherokee Nation Reservation. Some grants may be limited to within the Cherokee Nation Reservation to meet various important interests of Cherokee Nation, including but not limited to logistics, efficient use of finite resources and the support of historic Cherokee Nation communities.

B. Grant Close Out: CCO shall provide each grantee with written notice of the requirements to successfully close out grants administered by CCO. CCO shall provide each grantee with written notice of compliance, non-compliance or an “information request” seeking additional information concerning a grant. The failure to successfully close out a grant could result in a range of actions by CCO, including but not limited to suspension of an organization as a CCO participating organization.



C. Grant Programs

- c. **Policies and Procedures Incorporated in all grant Programs:** All grant programs administered by CCO shall incorporate these Policies and Procedures by the following reference of substantially equivalent language:

At all relevant times periods to this grant, the grantee shall be in compliance with CCO Policies and Procedures.

D. List of Grant Programs: The following is non-exhaustive list of CCO administered grant programs along with a brief description:

- i. **Community Organizing, Technical Training and Assistance Grant (COTTA):** This grant allows new and existing organizations to have seed money with which to maintain and develop operations and fundraisings.
- ii. **Housing, Jobs and Sustainable Communities Act (HJSCA) Grant (term limited)** – Provides capital project funding for building, repairing and maintaining structures and equipment.
- iii. **Community Works – (perpetual)** Provides capital project funding for building, repairing and maintaining structures and equipment.
- iv. **Ceremonial Grounds** – Provides funds for operations and support to identified, established Cherokee Nation ceremonial grounds.
- v. **Community Impact Grants** – Funds have a wide latitude for uses.
- vi. **CCO Public Health & Wellness Grant-** Provides capital project funding and/or purchases that improve the health and well-being of the community.

MANUAL:	CCO Policies & Procedures	CHAPTER: VIII	
SUBJECT:	Community Buildings	SECTION SUBSECTION:	
FIRST EFFECTIVE DATE:	July 1, 2024	SUPERCEDES MATERIAL DATED:	All
APPROVED BY <i>Director, CCO</i> <i>Secretary of State</i>	 	7.23.2024 DATE: 7-23-2024	

Policy

It is the policy of CCO to provide or otherwise facilitate support for the construction, repair and maintenance of community buildings operated by CCO Participating Organizations as a means of strengthening Cherokee Nation communities and otherwise meeting vital interests of the Cherokee Nation.

- A. **Policy Favoring Cherokee Nation Ownership of Community Buildings:** It is the policy of the Cherokee Nation to primarily support community organizing efforts at community buildings through a combination of: (i) Cherokee Nation’s ownership of Community Buildings and related infrastructure, (ii) long term nominal fee lease back agreements with CCO Participating Organizations, (iii) providing operational and capital maintenance and capital project support for community buildings in collaboration with CCO Participation Organizations. Cherokee Nation will secondarily support community organizing efforts at community buildings not owned by Cherokee Nation. This policy serves to protect the investment of Cherokee Nation, and therefore the Cherokee people, by favoring the ownership community buildings under Cherokee Nation while at the same time empowering local CCO Participating Organizations with day-to-day control of the community buildings and with long term planning of use of the community buildings.
 - a. **Where Cherokee Nation Owns the Community Building:** Where Cherokee Nation owns a community building, such facilities are assets of the Cherokee Nation subject to the full support of available Cherokee Nation programs and services, including capital construction, repair and maintenance on a collaborative basis with the CCO Participating Organization and respectful of long-term lease agreements with the organization. Such long-term lease agreements shall require Cherokee Nation and the CCO Participating Organization lessee to agree to a cost share agreement in which

Cherokee Nation shall pay fifty percent (50%) of the monthly utility costs of the community building. CCO capital grant programs are available without limitation for CCO Participating Organizations that operate community buildings owned by the Cherokee Nation, other than the normal terms and conditions of the grants and Cherokee Nation’s general policy of grant programs operating subject to available funding. Such buildings, as assets of the Cherokee Nation, are also subject to additional capital construction, repair and maintenance projects paid for by Cherokee Nation through other programs. CCO shall endeavor at all times to empower the lessee CCO Participating Organization with meaningful notice and consultation opportunities as to the construction, remodel, repair or maintenance of such properties. CCO will work to foster a sense of respect for and substantial deference to CCO Participating Organization as the primary stakeholder at the community building.

- i. **Fifty Percent Cost Share:** Upon an executed lease and/or Memorandum of Understanding between Cherokee Nation and the CCO Participating Organization, Cherokee Nation shall cover 50% of the annual cost of utilities that the Community Building incurs. Eligible utilities for cost sharing are limited to water, sewer, electric, gas and trash service. CCO Participating Organizations are required to provide a utility statement to CCO at the end of each fiscal year, at which time Cherokee Nation will provide reimbursement.
- b. **Where Cherokee Nation Does Not Own the Community Building:** Where a CCO Organization operates a community building that is not owned by Cherokee Nation, CCO will continue to provide substantial support for construction, repair and maintenance of such buildings, though to a lesser degree than that provided to buildings owned by the Cherokee Nation. The limitations are:
 - i. **Lifetime Non-Emergency Capital Cap:** For the life of the non-Cherokee Nation owned community building, Cherokee Nation may spend up to \$75,000, exclusive of “Emergency Repairs” set forth below.
 - ii. **Annual Non-Emergency Capital Cap:** Annually for a non-Cherokee Nation owned community building, Cherokee Nation may spend up to \$25,000 exclusive of “Emergency Repairs” set forth below.
 - iii. **Emergency Repairs Exempt from Cap:** The limitations set forth in subsections i and ii, above, do not include requests for “Emergency Repairs” where, per the determination of the Director, the repairs address conditions which if not promptly remedied presents a significant hazard to the life, health or safety or Cherokee Nation citizens utilizing the facility. In making this determination the Director shall take into account the degree of hazard presented to Cherokee Nation citizens and the extent to which the emergency was a result of unforeseen circumstances rather than a failure of the organization to attend to preventive maintenance measures. Examples of such emergencies may include damages to electrical, water or wastewater systems by accident or natural disasters or inoperable conditions of otherwise well-maintained HVAC systems. This subsection operates as a safe harbor for organizations operating non-Cherokee Nation owned community buildings that experience hazardous

conditions at such buildings based on circumstances that could not be reasonably foreseen.

- iv. **Self-Reducing Deed Restriction:** When any expenditure, *inclusive of* “Emergency Repairs” exceeds \$15,000 in a single fiscal year that expenditure is subject to a self-reducing deed restriction placed on the property which reduces by \$5,000 each year until the restriction is reduced to zero. Such restrictions may be filed cumulatively from fiscal year to fiscal year. Such restriction protects Cherokee Nation’s investment in the property in cases of transfer of ownership of the property to a third party.

B. Requirement That Community Buildings be Sited within Cherokee Nation Reservation; Limited Waiver for Good Cause: All CCO operated grant programs and other resources supporting community buildings shall be limited to buildings sited within the Cherokee Nation reservation, provided:

- a. The Director may in limited circumstances recommend a waiver of this policy to the Principal Chief or his designee for good cause shown. The Director shall weigh the totality of the following factors when considering whether recommend such waiver:
 - i. The close proximity of the current or proposed community building to the Cherokee Nation reservation generally and to a Cherokee community or historic site in particular.
 - ii. The absence a Cherokee Nation community building within 30 miles of the current or proposed community building.
 - iii. The nature of any pre-existing relationship between the organization operating the community building and Cherokee Nation that may align with CCO’s mission.
 - iv. Whether the proposed or current community building will be transferred to Cherokee Nation in line with the generally policy favoring Cherokee Nation ownership.
 - v. Whether the resources needed by the community building are in the nature of an “Emergency Repair” within the meaning of this Chapter.
 - vi. Whether the site falls within the reservation boundaries of any other federally recognized tribe and whether the Director anticipates any conflicts between the interests of the other federally recognized tribe and Cherokee Nation should the waiver be granted.
- b. **Requirement that the facility can be utilized by CCO Volunteer Program participants as a hub of operations during their brief job functions.**
 - i. The Director or his designee may request an organization with a facility which allows participants to have 24/7 access to full facility, including kitchen, showers and bathrooms.

- ii. Organization shall work with the Volunteer Coordinator and supply a list of small projects the facility may need during their building usage, which may include painting, scraping, facility care, etc.
 - iii. The organization will not be reimbursed for any utilities during their stay.
 - iv. The volunteers are required to provide their own transportation, food, toiletries and sleeping needs.
 - 1. CCO will have a staff member directing their projects during the daytime work but will not stay with them overnight.
- c. Requirement that the facility can be utilized by CCO Participating Organizations who do not have an associated building for small functions.**
- i. The Director or his designee may request an organization with a facility which allows free access to the entire facility, including kitchens when requested.
 - ii. Building host Organization functions shall have precedence if calendars coincide.
 - iii. Affected Organizations shall work together in order to provide entry, requirements (i.e., cleaning, sanitation, stowage, etc), signage displays, written agreements, and other needs.
 - iv. The gatherings shall be only for one day and no longer than 4 hours in length.

MANUAL:	<i>CCO Policies & Procedures</i>	CHAPTER: IX	
SUBJECT:	<i>Political Activity</i>	SECTION SUBSECTION:	
FIRST EFFECTIVE DATE:	April 1, 2023	SUPERCEDES MATERIAL DATED:	All
APPROVED BY <i>Director, CCO</i> <i>Secretary of State</i>	 	DATE: <i>11-6-2023</i>	

Policy

It is the policy of CCO to encourage civic participation among CCO participating organizations and members of such organizations in a manner consistent with best practices for non-profits while discouraging partisan political on intra-tribal political activity which could undermine CCO Participating Organizations or put such organizations legal status in jeopardy.

A. Engagement in Civic Activity, Political Activity

- a. Cherokee Nation encourages CCO Participating Organizations and their members to engage to the fullest extent possible in the civic life of Cherokee Nation as well as the communities in which they live.
- b. CCO Participating Organizations must refrain from engaging in political activities, including but not limited to candidate or ballot question related endorsements or activities that could reasonably be perceived as an endorsement. Other constraints on political activity may apply relating to a CCO Participating Organization’s non-profit status. Organizations should familiarize themselves with relevant state and federal law. *Irrespective of an At-Large Organization’s 501(c)(3) status*, all CCO Participating Organizations are encouraged to use the following guidance from the Internal Revenue Service as a best practice:

From [IRS.gov](https://www.irs.gov)

“Under the Internal Revenue Code, all section 501(c)(3) organizations are absolutely prohibited from directly or indirectly participating in, or intervening in, any political campaign on behalf of (or in opposition to) any candidate for elective public office. Contributions to political campaign funds or public statements of position (verbal or written) made on behalf of the organization in favor of or in opposition to any candidate for public office clearly violate the prohibition against political campaign activity. Violating this prohibition may result in denial or

revocation of tax- exempt status and the imposition of certain excise taxes. Certain activities or expenditures may not be prohibited depending on the facts and circumstances. For example, certain voter education activities (including presenting public forums and publishing voter education guides) conducted in a non-partisan manner do not constitute prohibited political campaign activity. In addition, other activities intended to encourage people to participate in the electoral process, such as voter registration and get-out- the-vote drives, would not be prohibited political campaign activity if conducted in a non- partisan manner.

On the other hand, voter education or registration activities with evidence of bias that (a) would favor one candidate over another; (b) oppose a candidate in some manner; or (c) have the effect of favoring a candidate or group of candidates, will constitute prohibited participation or intervention.”

- c. **Intra-Tribal Political Activity:** CCO Participating Organizations, as well as their officers or board members in their official capacity, should refrain from engaging in intra-tribal political activity within the Cherokee Nation, i.e., engaging in the Cherokee Nation political process in the organization or officer’s official capacity on behalf of or in opposition to a candidate or ballot question.
- d. *Nothing herein restrains an individual member or officer of an CCO Participating Organization, acting in their individual capacity, from engaging in political activity of any kind.* However, organization members and particularly officers and board members should be mindful of not purposefully or inadvertently using their position within an organization to engage in political activity.

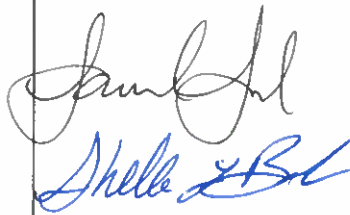
A. Use of CCO Community Buildings, Property, for Political Events

- a. A CCO Participating Organization may allow use of any property under its control for political purposes by a third party, provided:
 - i. The property is made available without political bias.
 - ii. The rental fee for the property reflects fair market value, avoiding claims that the space was made available as an “in kind” political donation.
 - iii. An organization reserves the right to deny access to the property to any political activity across the board.
 - iv. Nothing herein requires an organization to deny availability of the space to other interested parties or otherwise alter the manner in which it makes its property available for use in order to give “equal time” to any particular political candidate or entity.

B. Board Membership by Candidates, Cherokee Nation Elected Officials, Prohibited

- a. An organization loses their status as CCO Participating Organizations at all times in which a:

- i. Candidate for Cherokee Nation elected office serves on the organization's governing board.
 - ii. Cherokee Nation elected official serves on the organization's governing board, provided: the organization may engage a Cherokee Nation elected official in an advisory or ex-officio status wherein elected official has no voting rights on any organization governing board or committee.
- b. The Director of CCO will notify the organization, in writing, that the Director intends to remove the organization's CCO Participating Organization status upon "information and belief" of non-compliance with this section, providing the organization with 15 days to respond and demonstrate compliance with the section. Absent such demonstration, the organization is deemed a non-CCO participating entity until the organization demonstrates compliance with this section.

MANUAL:	<i>CCO Policies & Procedures</i>	CHAPTER: X	
SUBJECT:	<i>Language Hub Churches</i>	SECTION SUBSECTION:	
FIRST EFFECTIVE DATE:	July 1, 2024	SUPERCEDES MATERIAL DATED:	All
APPROVED BY <i>Director, CCO</i> <i>Secretary of State</i>		7.23.2024 DATE: 7-23-2024	

Policy

It is the policy of CCO to provide or otherwise facilitate support for the construction, repair and maintenance of churches deemed Cherokee Language Hubs as a means of language revitalization and strengthening Cherokee Nation communities.

- A. A church shall be designated as a language hub by meeting the following criteria:
 - 1. Cherokee is spoken organically during church functions.
 - 2. During the fiscal year in which the funding is granted the primary church officiant is a Cherokee speaker and utilized the Cherokee language during services¹. Special consideration will be given to churches where Sunday school classes are held in the Cherokee language by a fluent speaker designated to teach by the Church.
 - 3. A majority of church members are fluent Cherokee speakers, or a substantial minority of church members are fluent Cherokee speakers and the church incorporates Cherokee into a regular and substantial part of the church service such that attendees and fluent speakers have a regular and substantial opportunity to hear the Cherokee language spoken organically;

- B. Official Roster of Cherokee Language Hub Churches:

¹ On occasion a church with a Cherokee speaker as its pastor may lose that pastor to death or other circumstances and utilize a temporary pastor who is a non-speaker. This provision errs on the side of inclusion.

1. Churches on the attached Roster of Cherokee Language Hub Churches have met the above-mentioned criteria and are eligible for CCO administered Community Works or Sustainability grants under the following special criteria:
 - a) Funding is limited to equipment, capital repair, capital replacement and accessibility projects. Funding for church operations is prohibited.
 - b) Funding is limited to up to \$100,000.00
 - c) Cherokee Nation should not be the sole funder of a project.
 - d) Funding is prohibited on projects to expand, improve or construct facilities whose sole purpose is to provide religious worship and is restricted for broader community use.
 - e) All CCO policies regarding property ownership are waived in favor of a memorandum of agreement between the church and Cherokee Nation based on the template agreement attached as **Exhibit B**.

2. The Executive Director of Language Services shall be responsible for certification of the Official Roster of Cherokee Language Hub Churches and shall examine the list annually for changes to church structures, pastoral or leadership changes, and any changes that effect the eligibility of the churches.

EXHIBIT A (Roster of Language Hub Churches with Cherokee Speaking Pastors)

<p>Belfonte Baptist Church 474960 E. 1007 Road Muldrow, OK 74948 Pastor: Charlie Shell*</p>	<p>Elm Tree Baptist Church P.O. Box 511 Tahlequah, OK 74465 Pastor: D.J. McCarter*</p>	<p>First Indian Baptist Church P.O. Box 826 Tahlequah, OK 74464 Pastor: Dennis Sixkiller*</p>
<p>Elm Prairie Baptist church 59459 CR 552 Rose, OK 74363 Pastor: Joe Christie*</p>	<p>Hillside Baptist Church 6814 CR 373 Eucha, OK 74342 Pastor: Jess Williams*</p>	<p>Cherry Tree Baptist Church P.O. Box 1373 Stilwell, OK 74960 Pastor: David Mink*</p>
<p>Euwasha Baptist Church P.O. Box 118 Salina, OK 74365 Pastor: Richard Budder*</p>	<p>Long Prairie Baptist Church P.O. Box 537 Kansas OK 74347 Pastor: George Cochran*</p>	<p>Four Visions Baptist Church Joe Galcatcher P.O. Box 1304 Stilwell, OK 74960 Pastor: John Flute*</p>
<p>Pine Tree Baptist Church P.O. Box 1744 Sallisaw, OK 74454 Pastor: Phil Watie*</p>	<p>Ribbon Baptist Church P.O. Box 175 Spavinaw, OK 74365 Pastor: Floyd Kingfisher</p>	
<p>Steeley Baptist Church c/o Brenda Hair 48173 CR 492 Salina, OK 74365 Pastor: Richard Guy Soldier*</p>	<p>New Jordan Baptist Church P.O. Box 757 Salina, OK 74365 Pastor: Russell Feelings*</p>	<p>Rock Fence Baptist Church Route 2 Box 47201 Stilwell, OK 74960 Pastor: Judge Fourkiller*</p>
<p>Sycamore Springs Baptist Church P.O. Box 137 Jay, OK 74346 Pastor: Richard Pickup*</p>	<p>Oak Grove Baptist Church P.O. Box 268 Porum, OK 74455 Pastor: Henry Birdtail*</p>	<p>Round Springs Baptist Church P.O. Box 7 Eucha, OK 74342 Pastor: Rufus King*</p>

MEMORANDUM OF AGREEMENT

Between

Cherokee Nation
and
(Language Hub)

In order to meet and achieve the mutual interests in strengthening Cherokee Nation communities and revitalizing the Cherokee language, the parties agree as follows:

1. Cherokee Nation shall distribute funds under grant programs administered by its Community and Cultural Outreach (CCO) Department to Language Hub.
2. Language Hub will utilize the funding in accordance with policies and procedures for the aforementioned grant programs and acknowledges that a copy of those policies and procedures has been received and reviewed by Language Hub prior to executing this agreement.
3. Concerning the funds made available under this agreement, Language Hub shall provide financial statements with details of payments to the Community and Cultural Outreach (CCO) Department.
4. Funds made available under this agreement are: \$_____
5. In further consideration for the funds provided under this agreement, Language Hub agrees:
 - a. To work in good faith with the Cherokee Nation Language Department on language preservation efforts at the Language Hub for a minimum of 1 hour for every \$50 of grant funding for the lifetime of the Language Hub. Said work shall include, but may not be limited to, on site meetings at Language Hub on the subject of language revitalization strategy and instruction and recording of speakers and functions for language preservation and study, and such other efforts as the parties may find mutually benefits them to achieve their mutual interests.
 - b. To the extent that funds under this agreement exceed \$100,000, and in the event that Language Hub determines it will sell the property on which improvements made with said funds is situated, Language Hub will provide Cherokee Nation with the exclusive option to purchase said property, via written notice, for a period of 60 days. *Nothing in this agreement creates an obligation on the part of Language Hub to sell its property or for Cherokee Nation to purchase said property.*
 - c. Cherokee Nation, at its option within one year from the date of this agreement, may file a self-reducing deed restriction not to exceed \$100,000 on the Language Hub's property and improvements described herein, with said self-reduction reducing annually and equally across five years from the date of the filing of said deed restriction until said deed restriction reaches \$0 at which time said deed restriction is null, void and withdrawn by operation of this agreement.
6. This document constitutes the entire agreement entered into voluntarily by the parties and any changes must be agreed upon in writing.
7. Date of Agreement:

Signature Page

Cherokee Nation Administration

Date

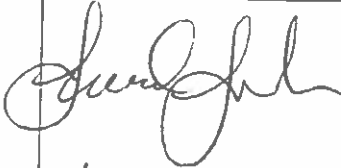

Cherokee Nation Speakers Services

Date

Language Hub Representative

Date

Exhibit B

MANUAL:	CCO Policies & Procedures	CHAPTER: XI	
SUBJECT:	Ceremonial Grounds Funding	SECTION SUBSECTION:	
FIRST EFFECTIVE DATE:	April 1, 2023	SUPERCEDES MATERIAL DATED:	All
APPROVED BY <i>Director, CCO</i> <i>Secretary of State</i>	 	DATE: 11-6-2023	

Policy

It is the policy of CCO to provide or otherwise facilitate support for the financial support of ceremonial grounds deemed Cherokee Cultural Hubs as a means of ceremonial perpetuation and strengthening Cherokee Nation communities.

- A. A Cherokee Nation recognized ceremonial ground will demonstrate the following practices:
- Historical Cherokee ceremonies are routinely conducted following the sacred ceremonial calendar.
 - Must perpetuate and preserve the proper and positive use of medicine* while on the grounds and during ceremonies. *Medicine is a term used to identify the use of plants and rituals associated with Cherokee traditions as handed down through oral history.
 - Must reside within the Cherokee Nation reservation boundaries.
 - Must honor sacred lifeways through actions and activities while on the grounds.

B. Funding criteria:

- Ceremonial Grounds listed below are considered by Cherokee have met the above mentioned criteria and are eligible for CCO administered funding:
 - Funding is limited to food and food preparation, utilities payments, temporary toilet rentals, as well as consumable items such as plates, napkins, and similar materials, etc. Capital projects, repairs or equipment replacement should be reported to CCO for Cherokee Nation assistance.
 - Any political activity on ceremonial grounds is prohibited.
- The grounds are not required to have an EIN# or 501c3. CCO can work with each grounds leadership in order to discern their status and desired payment pipeline and assist with the application and reporting. Many of the ceremonial grounds work diligently to follow our form of governance and we wish to respect that while offering this financial support.

receiving assistance on behalf of a Cherokee cemetery must sign a tax responsibility acknowledgement form.

An additional \$200 is available for headstone repair, restoration or replacement.

The individual or organization receiving the funds must complete the project by the end of the fiscal year. The individual or organization must provide the following in order for the project to be complete:

- a) A written account of the use of the funds.
- b) A copy receipts for purchases made using the funds.
- c) Those individuals or organizations that do not provide the required documentation by September 1, will not be eligible to receive further funding from the Cherokee Nation.

5) Removal and Termination:

- a) An individual or organization that fails to comply with the policy and procedures of the Cherokee Nation Cemetery Restoring Assistance Program will be ineligible for future participation in the program. The Cherokee Community & Cultural Outreach Director may take any action deemed necessary for the retrieval of the funds from the individual or organization if the eligibility requirements are not met.

6) Right to Appeal:

- a) In the event the individual or organization feels they were wrongfully made ineligible, they may appeal the decision to the Deputy Secretary of State. The decision of the Deputy Secretary of State will be final and no further appeal will be allowed.

7) Funds Allocation:

- a) The funds will be allocated equally between the 15 districts of the Cherokee Nation reservation. Once applications are received and the deadline has passed, if it is determined that there are surplus funds within a district, then those funds will be reallocated to meet unmet needs from other districts having eligible applications. After all eligible applications have been funded, any remaining funds may be utilized for emergency cemetery preservation as requested by individuals or communities and deemed appropriate by the Director of Community & Cultural Outreach.