

**A DESCRIPTIVE STUDY OF TRIBAL TEMPORARY ASSISTANCE FOR  
NEEDY FAMILIES (TANF) PROGRAMS**

**OPRE Report 2013-34**

**September 2013**

# **A DESCRIPTIVE STUDY OF TRIBAL TEMPORARY ASSISTANCE FOR NEEDY FAMILIES (TANF) PROGRAMS**

## **FINAL REPORT**

OPRE Report 2013-34

Heather Hahn, Olivia Healy, and Chris Narducci – The Urban Institute  
Walter Hillabrant – Support Services International

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Girley Wright, Project Officer  
Office of Planning, Research and Evaluation  
Administration for Children and Families  
U.S. Department of Health and Human Services

*Project Director: Heather Hahn*

Urban Institute  
2100 M St NW 5th Floor  
Washington, DC 20037

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## Tribal Advisory Group Members

We would like to thank the members of the Descriptive Study of Tribal TANF Programs' Tribal Advisory Group. The views expressed in this publication do not necessarily reflect the views of these members.

**Miriam Jorgensen, Ph.D.**

Research Director, University of Arizona Native Nations Institute  
Research Director, Harvard Project on American Indian Economic Development

**Sarah L. Kastelic, Ph.D.**

Chief of Staff, National Indian Child Welfare Association

**Don Shircel**

Director, Family Services  
Tanana Chiefs Conference, Inc.

**Leila Help-Tulley, M.S.W.**

Training Manager, Staff Development and Training Department  
Navajo Nation Division of Human Resources

## OVERVIEW

Dozens of American Indian tribes and Alaska Native villages and corporations administer Tribal Temporary Assistance for Needy Families (TANF) programs. These tribes and villages have chosen to administer Tribal TANF programs, either alone or as part of a consortium with other tribes, rather than having tribal members receive benefits and services from state TANF programs. Through an examination of four diverse Tribal TANF programs, this study provides an in-depth, systematic description of program implementation, operations, outputs, and outcomes in selected sites, and identifies promising practices and other areas for further study.

The four Tribal TANF programs examined in the study were Oneida Tribe of Wisconsin's Tribal TANF program, the Navajo Nation Program for Self Reliance (NNPSR), the Tanana Chiefs Conference's (TCC's) Athabascan Self-Sufficiency Assistance Project (ASAP), and South Puget Intertribal Planning Agency's (SPIPA's) Tribes Assisting Native Families (TANF) program. The study included visits to the four Tribal TANF programs and analyses of information available in Tribal TANF plans and program documents, as well as data from HHS, the Census Bureau, and other data sources.

Overall, the study found that tribes use the flexibility of Tribal TANF to create diverse programs that reflect their unique circumstances, opportunities, and cultures. Elements of tribal culture were evident in the program design, in the way program staff and clients interacted, and in the types of activities in which clients were engaged. The Tribal TANF programs in the study generally focus on the broad goal of self-sufficiency, beyond the narrower goal of employment.

The four sites vary dramatically in geography, government, and other circumstances, but their clients face consistent challenges in achieving self-sufficiency, including a lack of transportation, substance abuse, family violence, limited child care, and the local economic situation. Each program pursues self-sufficiency for its clients through a combination of work, education, and case management. However, each program has a unique emphasis and philosophy, and a distinct program implementation approach. For example, the Oneida Tribe of Wisconsin focuses most intently on employment, while SPIPA emphasizes education and is philosophically grounded in the concept that family members have mutual obligations to each other. The Navajo Nation and TCC programs' focus on self-sufficiency is explicitly grounded in their traditional teachings and values. The programs have defined allowable work activities to accommodate their particular economic realities and opportunities as well as to reflect their tribal cultural values. Each of the four study sites allows client engagement in certain cultural activities to fulfill their work requirements, and each site has exceeded its required work participation rate in recent years.

Tribal leaders in these programs make the most of the flexibility allowed by the federal statutes and regulations. In nearly all the programs, staff highlight the current leader's vision and creativity as key assets of the program, even as each leader has taken his or her program in a somewhat different direction.

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## Executive Summary

This study examines four diverse Tribal Temporary Assistance for Needy Families (TANF) programs. Although the general welfare population and state TANF programs have been widely studied, less is known about the characteristics, implementation, and promising practices of Tribal TANF programs. This study provides an important opportunity to learn much about Tribal TANF programs, given the differences between Tribal TANF and non-Tribal TANF implementation requirements, the differing cultural traditions of American Indian/Alaska Native (AI/AN) people and other populations in the United States, the different economic conditions on Indian reservations, and the special relationship between tribes and the federal government.

Recognizing the sovereignty of American Indian tribes and the special circumstances of Alaska Native villages and corporations, the law creating TANF gave tribes the option to administer TANF programs either alone or as part of a consortium with other tribes rather than having tribal members receive benefits and services from state TANF programs. Because of the difficult economic circumstances on many Indian reservations, the law gives Tribal TANF programs more flexibility than it gives to states to design their programs to meet TANF requirements and goals.

How does that tribal context influence Tribal TANF implementation, and what is the relationship between that context and program outputs and outcomes? How do administrators and recipients experience the implementation of Tribal TANF? What insights can be gained about emerging areas of interest for future research? This study aims to explore these questions and better understand how Tribal TANF programs are being implemented in order to provide services for tribal members. More specifically, the study goals are to 1) provide an in-depth, systematic description of program implementation, operations, outputs, and outcomes in selected sites; and 2) identify promising practices and other areas for further study.

To address these research goals, the study team conducted site visits to four Tribal TANF programs and analyzed information available in Tribal TANF plans and program documents, as well as data from HHS, the Census Bureau, and other data sources. The site visits included semi-structured interviews with Tribal TANF administrators and staff, and administrators and staff of related programs. The team also conducted focus groups with Tribal TANF participants. The site visits occurred in October and November 2012. The four Tribal TANF programs included in the study were Tanana Chiefs Conference (Alaska); Navajo Nation (Arizona, New Mexico, and Utah), South Puget Intertribal Planning Agency (Washington); and Oneida Tribe of Wisconsin. Although these four programs are not representative of all Tribal TANF programs and the report findings are not generalizable, the descriptions of these four sites offer insight into the contexts, opportunities, and challenges that may apply to other individual programs or the Tribal TANF program as a whole.

## **Context of Tribal TANF Programs**

To understand the circumstances, challenges, and opportunities of the Tribal TANF programs in this study, it is important to understand the geographic, political, economic, and demographic contexts in which the Tribal TANF programs operate. The sites in this study vary dramatically in their geographies, governments, and other circumstances, from the Navajo Nation—a large, remote reservation with high unemployment and a strong, active native culture—to the Oneida Tribe of Wisconsin—a relatively small reservation with close ties to the economic and other opportunities of the nearby Green Bay area. Both the Tanana Chiefs Conference (TCC) and the South Puget Intertribal Planning Agency (SPIPA) include urban areas as well as rural areas, with much of the TCC area being extremely remote. The Navajo Nation is governed by a large tribal bureaucracy, while SPIPA is a nonprofit organization serving five small reservations, and the TCC is a nonprofit serving 37 Alaska Native villages.

Economic conditions vary across the four study sites, as well as within some of the sites. The Oneida Tribe of Wisconsin and SPIPA generally have more favorable economic conditions than TCC or the Navajo Nation, resulting in part from their proximity to larger population centers, although some specific locations within the SPIPA and TCC areas are more economically advantaged than others. The challenges clients face in achieving self-sufficiency are consistent across the sites. Each study site reported that client barriers include a lack of transportation, substance abuse, family violence, limited child care, and the local economic situation.

## **Descriptions of Tribal TANF Programs**

Like their distinct locations and circumstances, the four Tribal TANF programs in this study have taken distinct approaches to program implementation, including program goals, organization and management, and service delivery. With the exception of the Oneida Tribe of Wisconsin's Tribal TANF program, the other Tribal TANF programs have created unique names to exemplify their approaches: the Navajo Nation Program for Self Reliance (NNPSR), the TCC Athabascan Self-Sufficiency Assistance Project (ASAP), and SPIPA's Tribes Assisting Native Families (TANF).

The number of families receiving cash assistance through these Tribal TANF programs in 2011 ranged from fewer than 50 in the Oneida Tribal TANF program to about 4,500 in the NNPSR, with SPIPA Tribal TANF serving about 350 families and TCC serving about 150 families.

Self-sufficiency is the goal that each Tribal TANF program in this study has for its clients, and each program pursues this goal through a combination of strategies that includes work, education, and case management. However, each program has a unique emphasis and philosophy. For example, the Oneida Tribe of Wisconsin focuses most intently on employment, while SPIPA emphasizes education and is philosophically grounded in the concept that family members have mutual obligations to each other. The Navajo Nation and TCC programs' focus on self-sufficiency is explicitly grounded in their traditional teachings and values.

Tribal TANF programs have greater flexibility than state TANF programs particularly with regard to setting their work participation rates, establishing work hour requirements, and defining allowable work



activities. The Tribal TANF programs in this study have defined their allowable work activities to accommodate the economic realities and opportunities of their particular locations as well as to reflect their tribal cultural values. Engagement in traditional cultural activities was important to each of the four Tribal TANF programs. In each program, clients' engagement in certain cultural activities can be included in their self-sufficiency plans and count toward their work requirements. Such activities include caring for elders, managing livestock, participating in subsistence activities (e.g., hunting, fishing, and gathering), teaching subsistence skills to children, and performing the work of traditional practitioners.

With the nearby economic opportunities of Green Bay and a history of administering the state TANF program on the reservation before launching a Tribal TANF program, the Oneida Tribe of Wisconsin's Tribal TANF program bears the most resemblance to state TANF programs, compared with the other programs in this study. Perhaps the least similar to a state TANF program is the TCC Tribal TANF program in remote Alaska villages. In TCC's program, one part-time employee helps needy residents access all available services, including TANF, and subsistence activities like hunting and fishing are among the most viable options for achieving self-sufficiency. Nonetheless, each Tribal TANF program in the study has creatively used the flexibility of the program to help clients pursue self-sufficiency in ways that reflect both the challenges and opportunities of their people, environments, and circumstances.

The Tribal TANF programs that the research team visited incorporate tribal cultures into their TANF programs on multiple levels, beyond just the types of allowable activities. As one person said, "It's hard to separate anything we do from tribal culture." Elements of tribal culture were evident in the program design, in the way program staff and clients interacted, and in the types of activities in which clients were engaged. Grounding the program in tribal culture was empowering to clients, according to some of the staff and clients interviewed. The Navajo and Athabascan values of self-reliance are prominent in the program names of both the Navajo Nation Program for Self-Reliance and the TCC's Athabascan Self Sufficiency Assistance Partnership. In addition, the NNPSR logo and program model explicitly mirror the Great Seal of the Navajo Nation. While SPIPA serves people from many different tribes, a common identification as Native people is important to SPIPA's Tribal TANF program. SPIPA clients in the focus group summed it up as, "Here they treat you the Indian way." Similarly, the Oneida Tribal TANF program strives "to take care of our own people from a history and value standpoint consistent with [our] people."

Data on outcomes for Tribal TANF clients are available to varying degrees from the four programs the research team visited, but generally are limited. Program staff and clients nonetheless shared numerous stories of clients moving from homelessness to hopefulness and self-sufficiency. Jobs in health care, child care, gaming, fishing/fisheries, and tribal government or tribal-owned businesses were mentioned most frequently. The client success stories often included education on the way to employment. They also frequently referred to both the accountability structure of the Tribal TANF program and the wide range of supports the Tribal TANF program provides that help clients put together the various pieces of their lives.

Tribal TANF programs are held accountable by the Administration of Children and Families (ACF) for their official work participation rates, which measure the share of non-exempt clients participating in allowable work activities for at least a minimum number of hours per week, on average. Tribal TANF programs negotiate their required rates with ACF, and each of the four study sites has exceeded its required rate in the past few years. In 2008, the most recent year for which official rates are available, the calculated work participation rates ranged from about 32 percent for the Navajo Nation to almost 80 percent for SPIPA. All the study sites reported that rates have risen in recent years.

Tribal leaders in these programs made the most of the flexibility allowed by the federal program. In nearly all the programs, staff highlighted the current leader's vision and creativity as key assets of the program, even as each leader had taken his or her program in a somewhat different direction.

In conclusion, Tribal TANF offers tribes the opportunity to design assistance programs that make sense for the tribes' geographic, economic, and demographic circumstances and that are grounded in their unique cultural traditions and values. Each Tribal TANF program in this study provides a different example of how a tribe or group of tribes has seized this opportunity for the benefit of their clients and communities.

## I. Introduction

This study examines the diverse implementation approaches of four Tribal Temporary Assistance for Needy Families (TANF) programs. Although the general welfare population and state TANF programs have been widely studied, less is known about the characteristics, implementation, and promising practices of Tribal TANF programs. Little systematic research has examined how tribes use the flexibilities allowed under law or how they coordinate TANF with other programs. This study provides an important opportunity to learn much about Tribal TANF programs, given the differences between Tribal TANF and non-Tribal TANF implementation requirements, the differing cultural traditions of American Indians and Alaska Natives (AI/AN) peoples and other populations in the United States, the different economic conditions on Indian reservations, and the special relationship between tribes and the federal government. This study examines how the tribal context influences TANF implementation, the relationship between that context and program outputs and outcomes, how both administrators and recipients experience the implementation of Tribal TANF, and insights about emerging areas of interest for future research.

This study was designed to provide descriptive information to address the overarching research question: How are Tribal TANF programs being implemented to provide services for tribal members? More specifically, the study goals were to 1) provide an in-depth, systematic description of program implementation, operations, outputs, and outcomes in selected sites; and 2) identify promising practices and other areas for further study. As a descriptive study of four Tribal TANF programs, the study was not designed to evaluate the individual programs or the Tribal TANF program as a whole, or to produce generalizable results. Nonetheless, the systematic description of these four diverse Tribal TANF programs provides useful insights for better understanding the context, opportunities, and challenges that may apply to other individual programs or the Tribal TANF program as a whole.

## Background

### Tribal TANF Policy Context

The TANF block grant provides funds to states for the purposes of assisting needy families so that children may be cared for in their own homes or in the homes of relatives; reducing dependency on public benefits by promoting job preparation, work, and marriage; preventing and reducing the incidence of out-of-wedlock pregnancies; and encouraging the formation and maintenance of two-parent families. Recognizing the sovereignty of American Indian tribes and the special circumstances of Alaska Native villages and corporations, the law creating TANF gave tribes the option to administer TANF programs either alone or as part of a consortium with other tribes rather than having their tribal members receive benefits and services from state TANF programs.<sup>1</sup> Currently, there are 68 approved Tribal TANF programs serving about 300 AI/AN villages and the non-reservation AI/AN populations of

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<sup>1</sup> The TANF block grant was created by the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA), P.L. 104-193.

over 121 counties (including several major metropolitan areas, designated near-reservation towns, and six Alaska Native Regional Corporation areas).

Recognizing the difficult economic circumstances on many reservations, the TANF block grant gives Tribal TANF programs more flexibility than it gives to states to design their programs to meet TANF requirements. For example, Congress recognized the unique economic hardship facing American Indians living on reservations with high unemployment by permitting the extension of the law's 60-month time limit on receipt of TANF cash assistance. Any month that a recipient is living in Indian country or in an Alaskan Native Village with a population of at least 1,000 and where at least 50 percent of the adults living on the reservation or in the village are unemployed, does not count toward the recipient's time limit, whether enrolled in a tribal or state TANF program.<sup>2</sup> In addition, tribes can set their own requirements for the percentage of adults participating in work activities and may define work activities more broadly than the U.S. Department of Health and Human Services (HHS) has defined them for state TANF programs. Tribes have the same flexibility as states to set their own eligibility requirements and to determine what policies will govern mandatory sanctions for noncompliance with program rules. Tribes also have the same flexibility as states to determine the types of work supports—such as child care, transportation, and job training—they will provide as part of their TANF programs.

Tribal TANF programs also differ from state TANF programs in terms of some other requirements. For example, eligible tribes must submit a three-year Tribal TANF plan directly to HHS for review and approval, whereas states' plans are not subject to HHS approval, only certification that they are complete. Also, while states' TANF grants are based on the highest of three possible funding formulas, Tribal TANF grants must be based on the amount the state spent in fiscal year 1994 for all American Indians residing in the tribe's designated service area. Further, tribes are not eligible for some types of additional TANF funding that were originally provided for the states,<sup>3</sup> and tribes are not eligible to receive caseload reduction credits, which states can use to reduce their work participation rate requirements when their caseloads fall (GAO 2011). Table 1 summarizes the key differences in federal requirements for State and Tribal TANF programs.

Tribes can enter into partnerships with the states for additional funding and coordination of services. In addition, tribes have the option to "retro-cede" their program by returning it to the state, although no tribe has yet exercised this option.

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<sup>2</sup> P. L. 104–193.

<sup>3</sup> Tribes are not eligible for the Supplemental Grant or the Contingency Fund, which have been available to some states under certain conditions. However, tribes were eligible to apply for TANF Emergency Contingency Funds under the American Recovery and Reinvestment Act (the Recovery Act).

**Table 1: Key Differences in Federal Requirements for State and Tribal TANF Programs**

<b>Program areas</b>	<b>State TANF programs</b>	<b>Tribal TANF programs</b>
Program approval	<b>HHS does not approve state plans, but deems them complete.</b> To be eligible for a fiscal year, a state must have submitted a complete plan at some point within the prior 27 months, ending no later than the first quarter of the fiscal year.	<b>HHS approves plans.</b> Tribes must submit a three-year plan to HHS for review and approval, which, in part, identifies a tribe's service area and population.
Grant amounts	<b>Fixed grant amount based on an amount the state received under the previous AFDC program</b>	<b>Fixed grant amount based on certain amounts the state spent in fiscal year 1994</b> for all American Indians residing in the tribes' designated service area.
Eligibility for certain types of additional TANF funding	<b>Eligible</b> for the Supplemental Grant (available to a select 17 states) <sup>a</sup> or the Contingency Fund, <sup>b</sup> and were eligible to apply for TANF Emergency Contingency Funds under the Recovery Act.	<b>Not eligible for the Supplemental Grant or the Contingency Fund.</b> However, tribes were eligible to apply for TANF Emergency Contingency Funds under the Recovery Act.
Administrative costs	<b>Generally no more than 15 percent of the total grant award</b>	<b>Ceiling of 25 percent of the total grant award after first three years of administering the program</b> (35 percent in the first year, 30 percent in the second year, and 25 percent in the third year and beyond).
Work activities	<b>Twelve allowable work activities</b>	<b>May include additional work activities</b> beyond the 12 allowed for states, subject to HHS approval.
Work participation rates	<b>50 percent for all families and 90 percent for two-parent families</b>	<b>Can negotiate their own rate and work hour requirements</b> , subject to HHS approval.
Time limits (the maximum period in which participants can receive benefits) <sup>c</sup>	<b>60 months</b>	<b>Can set their own time limits</b> on welfare-related services, including cash benefits, subject to HHS approval. <sup>d</sup>
Caseload reduction credit <sup>e</sup>	<b>Eligible</b>	<b>Not eligible</b>
Hardship exemption	<b>No more than 20 percent</b> of a state's caseload can be exempt from time limits.	<b>Tribes can negotiate</b> , subject to HHS approval.

Source: GAO (2011).

<sup>a</sup> Legislative authority for TANF Supplemental Grants expired September 30, 2012.

<sup>b</sup> To draw on contingency funds, a state must both meet a test of economic "need" and a 100 percent of historic state spending maintenance-of-effort requirement, meaning the state must spend from its own funds more than what it spent in fiscal year 1994 on cash, emergency assistance, and job training in TANF's predecessor programs.

<sup>c</sup> Both states and tribes have the flexibility to make the time limit more restrictive than the federally designated 60 months.

<sup>d</sup> Tribes are able to exempt participants who meet a definition of hardship from the 60-month time limit. Individuals living in an area with 50 percent or higher unemployment are also exempt from the time limit in tribal programs. Otherwise, Tribal TANF participants are held to the 60-month time limit like in state programs.

<sup>e</sup> Under federal law, states are allowed to apply for a caseload reduction credit, which generally reduces work participation rate requirements for TANF programs, when caseloads decrease, although caseload reduction is not the only factor for lowering a state's work participation requirement.

**Self-governance and coordination of programs.** Under U.S. law, federally recognized American Indian tribes—sometimes referred to as nations, bands, pueblos, communities, rancherías, or villages—are sovereign governments. Congress has supported Indian self-determination and tribal consultation in formulating legislative provisions that further both policies. Federal agencies administering programs affecting tribes have developed regulations and policies that promote Indian self-determination and tribal consultation. Legislation and regulations permit tribes to operate programs and, in recognition of their special circumstances, may allow some degree of flexibility in program operations.

Like many states, some tribes have found it useful to coordinate funding and implementation of TANF with other social, employment, training and education, and housing programs. Small tribes face unique challenges in operating and coordinating TANF and other programs across different tribal offices and programs. Some have mitigated this challenge by forming consortia to provide employment, training, and other programs. A consortium enables small tribes to share program staff and operating costs. In addition, some tribes have established 477 programs (a federal initiative in P.L. 102-477), which can in some ways make it easier for them to use funding from multiple sources for employment and training activities and can facilitate more efficient coordination and management of different programs that share compatible goals, objectives, policies, procedures, and/or clients (Hillabrant and Rhoades 2001; Hillabrant, Rhoades, and Pindus 2003). While operating a 477 program can facilitate coordination, Tribal TANF funds spent as part of a 477 program still must be spent on activities that are authorized under TANF and are consistent with all applicable TANF statutory requirements, regulations, policies, and procedures.

**Socioeconomic circumstances of tribes.** The challenges related to welfare are nowhere more daunting than on Indian reservations and in Alaska Native villages. While the circumstances of each tribe are unique, most tribes face economic, education, housing, health, and other problems at levels of severity rarely seen in most other American communities. These problems have beset generations of AI/ANs and reflect unique historical and cultural factors. Compared with the U.S. population overall, socioeconomic circumstances in Indian country are characterized by high unemployment, low education levels, high poverty rates, poor health status, and substandard housing.

In addition to these factors that affect individual lives, economic success is hampered by the limited basic infrastructure needed to promote and support business development and associated job creation. Few private-sector employers have been attracted to Indian country, and few tribally owned or sponsored enterprises have generated enough jobs to dramatically reduce unemployment on reservations. Barriers to economic development and job creation include remote location and inaccessibility, high crime rates, and a lack of banks and investment capital. Despite such obstacles, innovative development efforts have produced sorely needed tribal revenue in some locations, most notably from gaming and related tourism. These initiatives have improved economic prospects and created jobs on some reservations. Nevertheless, most Indians living on reservations are poor, and unemployment rates are high (Hillabrant Rhoades, and Pindus 2004; GAO 2011).

**Strategies and challenges for implementing Tribal TANF programs.** Studies of Tribal TANF programs, almost all conducted in the early 2000s, identified strategies developed by some tribes to implement

Tribal TANF programs. For example, some tribes took advantage of provisions that allow them to define a wide spectrum of work activities to accommodate the training needs and cultural traditions of their recipients. Nonetheless, tribes have faced a number of challenges in implementing Tribal TANF programs. Many tribes found that TANF caseload and unemployment data on American Indians was incomplete and/or inaccurate, complicating the determination of TANF grant amounts for tribal programs and making it difficult to design and plan such programs. For example, some states have information on the number of AI/ANs receiving Aid to Families with Dependent Children in 1994 but lack any information by tribe. Many tribes also lack infrastructure, (e.g., automated information systems, broadband Internet access, modern transportation systems) to administer their programs efficiently—infrastructure states already had from administering welfare and other programs. Tribes have had to rely on contributions from various sources in addition to their basic TANF grants to cover Tribal TANF start-up costs and ongoing operating expenses. No additional funds are given for Tribal TANF start-up costs.

**The decision to operate Tribal TANF programs.** Research has found that, for many tribes, the decision to assume responsibility for TANF is difficult. On one hand, the prospect of tribal control of TANF represents the opportunity to improve services to tribal program participants, extend tribal self-determination, and expand program coordination. On the other hand, the cost of implementing and operating TANF, the risk that vulnerable tribal members may be harmed if services are inadequate, potential staffing problems, and problems with the state can deter tribes from taking over operation of the program. Weighing the advantages and disadvantages involves careful assessment and consultation among many stakeholders.

### Context and History of United States Indian Policy

In Indian country, TANF and related programs are inextricably linked to the unique legal, historical, cultural, and socioeconomic context that governs and influences the relationship among American Indian and Alaska Native governments and the United States. The legal status of tribes creates opportunities and challenges for TANF and other programs. Historical events disrupted or destroyed many traditional tribal economies, occupations, and family and other systems; the legacy of these events continues to reverberate throughout Indian country. Cultural values, norms, and expectations exert a strong influence on individuals, families, clans, tribal economies, and social service programs. To address these circumstances and needs, the federal government has promoted the development of business and economic development, job creation, and social welfare in Indian country through specific programs and legislation as well as through support of Indian self-determination and self-governance.

The scope of tribal sovereignty, self-determination, and self-governance has expanded and contracted in accordance with legislation and U.S. Supreme Court decisions. Nevertheless, with respect to social welfare programs, tribes possess some of the same attributes as states. They provide government services to members, enact laws, and enjoy immunity from suit (Pierson 2010).

**Impact of historical events.** European colonization of the Americas, wars, and subsequent policies of the United States resulted in loss of tribal lands and populations, disruption of tribal economies and social

systems, and increased tribal dependency on the federal government. The legacy for tribes includes economic costs associated with the loss of land and natural resources, high unemployment rates, lack of paying jobs, high demand for social services, and a distrust of outsiders.

Conflict with the English, Spanish, and Dutch colonies and subsequently with the United States had many negative consequences for Indian tribes and Native villages. More than 100 tribes were wiped out by war, starvation, and disease. Many surviving tribes were forced to leave their homelands and were restricted to reservations. These losses made many tribes dependent on the federal government for food, shelter, health services, education, and welfare (Sturtevant 1907).

Federal “assimilation” policy, which attempted to terminate reservations and induce Indians to abandon their languages, religions, and cultures and to adopt the ways of European Americans, dealt another blow to tribes in the latter part of the 19th century. The effects of the General Allotment Act of 1887, also known as the Dawes Act, are still apparent on reservations today. The Dawes Act authorized the Bureau of Indian Affairs (BIA) to allot parcels of reservation land to individual Indians. Each Indian’s allotment was to remain in trust (exempt from state laws and taxation) for 25 years. Portions of the reservation that were not allotted were declared “surplus land” and opened to non-Indians for homesteading. Tribes were compensated for whatever land was sold. The Dawes Act had serious effects:

- **Land owned by tribes fell from 138 million acres in 1887 to 48 million acres in 1934.** The economic cost associated with the loss of these lands and associated mineral and riparian rights is staggering. If tribes retained these lands today, their economies might be strikingly different.
- **Many tribal areas now have a “checkerboard” pattern of land ownership: land parcels are owned by a tribe, individual Indians, and non-Indians.** This makes it difficult to govern and manage tribal programs and activities on reservations.<sup>4</sup>
- **Tribal landholdings in the Indian territory were broken up.** In 1889, former Indian lands were opened to settlement, starting with the “Oklahoma land rush.” For example, 32 of the 33 federally recognized tribes in Oklahoma lost their reservations as a result of the Dawes Act.

In planning and executing development efforts that relate to allotted land, a tribe faces problems similar to those of other governments in trying to promote development and the general welfare of its citizens while respecting the rights and desires of individual property owners.

**Cultural and contemporary factors.** The circumstances of contemporary AI/AN communities reflect both the historical legacy of violence, subjugation, disease, loss of land, and economic deprivation as

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<sup>4</sup> The Dawes Act was not enforced on every reservation, so some reservations do not have checkerboard land ownership.



well as a remarkable resilience. Distinct tribal nations are built upon cultural lineages that have persevered—bound together by ties of family, language, history, and cultural heritage (Kingsley et al. 1996). Effective research in AI/AN communities requires cultural competence and sensitivity to traditional values, taking into account definitions and expectations of behavior within the community. Key contextual and cultural factors that affect social welfare needs and conditions and that shaped this research include the following:

- **Diversity.** There are 565 federally recognized tribes in the United States, constituting distinct cultural as well as political groups. Inter- and intratribal diversity among AI/ANs can affect service delivery as well as research designs in Indian country (Caldwell et al. 2005).
- **Mistrust.** As a result of historical and more recent events (e.g., wars, appropriation of Indian lands, forced migrations, abrogation of treaties, racism, misunderstandings, and exploitative research), tribal leaders and members sometimes mistrust federal, state, or local initiatives, including research (Caldwell et al. 2005).
- **Harsh, primarily rural conditions.** Indian territory, reservations, and the other areas set aside for American Indian containment were deliberately located far from existing settlement concentrations, often in the harshest and most remote settings. The American Indian population is far more rural than the overall population: according to the 2000 Census, 43 percent of American Indians reside in rural areas, compared with 20 percent of the total population (Listokin, Leichenko, and King 2006).
- **Different forms of family and household.** In some AI/AN communities, extended family is defined as a network of relationships as distinct from one's clan or tribe. Different interpretations of extended family can affect living arrangements, especially where high rates of morbidity and mortality may result in the death or loss of a custodial parent or guardian. Growing up in several different extended family households may be considered evidence of a strong support network rather than a sign of instability (Caldwell et al. 2005).
- **Different views of wealth, responsibility, and sharing.** Not unlike communities and groups outside Indian country, there are differences within and between tribes and Native villages regarding consumption versus investment; the utilization or preservation of natural resources; individual responsibilities to self, clan, tribe, current and future generations; and the accumulation of wealth. All these views influence social welfare and other programs in Indian country.
- **A greater tribal role in research.** In the past two decades, tribes, Native villages, and tribal consortia have taken an increasingly active role in challenging, as well as generating, research and program evaluation. These entities seek opportunities to influence research agencies and to exercise the power to reject unwanted research on their lands and with their people. The emergence of requirements for approval of research by Institutional Review Boards (IRBs) has supported the influence of tribes on research conducted in their

communities. Tribes are concerned not only with informed consent and the need to present information in a participant's primary language, but also with promotion of collaborative, participatory research models (Caldwell et al. 2005).

## Methodology

The design for this study is built around a conceptual framework that assumes many factors influence the operation of Tribal TANF programs. Factors the tribes can and cannot control may have a role in shaping Tribal TANF implementation. Using the conceptual framework as a guide (see Appendix 1), the study examined the following aspects of the selected Tribal TANF programs:

- External or contextual factors
- Tribal TANF organization and management
- Tribal TANF policies or priorities
- Service delivery practices
- Outputs and outcomes

To address the research questions, the study team conducted site visits to four Tribal TANF programs and analyzed information available in Tribal TANF plans and program documents, as well as data from HHS, the Census Bureau, and other sources. The four Tribal TANF programs included in the study were Tanana Chiefs Conference (Alaska); Navajo Nation (Arizona, New Mexico, and Utah); South Puget Intertribal Planning Agency (Washington); and Oneida Tribe of Wisconsin. These sites were selected to maximize diversity among the study sites but are not fully representative of the range of Tribal TANF programs. Each site visit was conducted over the course of three days by two or three members of the study team. The site visits included semistructured interviews with 14 to 23 Tribal TANF administrators and staff, and administrators and staff of related programs and organizations, either individually or in small groups. Each site visit also included at least one focus group with Tribal TANF clients. The site visit teams visited multiple offices serving Tribal TANF clients for each program except Oneida, which has only one office. Table 2 shows the number of days, interviews, focus groups, and Tribal TANF offices included in each site visit. The site visits occurred in October and November 2012.

**Table 2: Summary of Site Visit Details**

	<b>Days on site</b>	<b>Number of staff interviewed</b>	<b>Number of focus groups (and client interviews)</b>	<b>Number of Tribal TANF office locations visited</b>
<b>Navajo Nation</b>	3	17	1	3
<b>Oneida Tribe of Wisconsin</b>	3	14	1	1
<b>SPIPA</b>	3	23	1 focus group (and 1 individual client interview)	3 (staff from a 4th location traveled to one of the other offices for the interviews)
<b>TCC</b>	3	17	2	2

Table 3 summarizes characteristics of the Tribal TANF clients who participated in the focus groups. Overall, the focus groups contained a mix of men and women, and included people in all age ranges from 18 years old to over 60 years old. The focus group participants were recruited by the Tribal TANF programs and do not necessarily represent the range of characteristics of the programs' clients as a whole. For example, the SPIPA focus group participants were all enrolled in the same GED class. All clients who were present at the beginning of the focus groups were offered \$25 in cash or gift cards as compensation for their time and were assured that their continued participation was voluntary. None of the clients present at the beginning of the focus group left before the end of the discussion. Participants provided their demographic information on anonymous forms distributed during the focus group sessions.

**Table 3: Focus Group Participant Information**

Site	Number of people in focus group	Percent female	Age	Average number of children in household (range)	Hours worked per week	Percent currently participating in employment or skills training program	Percent residing on reservation	Percent of households that own a vehicle
<b>Navajo Nation</b>	10	80%	30% 18–25 years 20% 25–29 years 20% 30–39 years 0% 40–49 years 20% 50–59 years 10% 60 or above	2 (1 to 5)	20% 20 hours or more 10% less than 20 hours 70% not employed	50%	90%	60%
<b>Oneida Tribe of Wisconsin</b>	5	80%	40% 18–25 years 40% 25–29 years 20% 30–39 years 0% 40–49 years 0% 50–59 years 0% 60 or above	2.2 (1 to 5)	20% 20 hours or more 20% less than 20 hours 60% not employed	40%	40%	60%
<b>SPIPA</b>	10	50%	30% 18–25 years 10% 25–29 years 30% 30–39 years 10% 40–49 years 20% 50–59 years 0% 60 or above	1.9 (1 to 6)	100% not employed	100% (enrolled in a GED class)	20%	40%
<b>TCC (Fairbanks)</b>	2	50%	100% 18–25 years 0% 25–29 years 0% 30–39 years 0% 40–49 years 0% 50–59 years 0% 60 or above	2 (both had 2)	50% 20 hours or more 50% less than 20 hours	100%	N/A	100%
<b>TCC (Huslia)</b>	4	50%	0% 18–25 years 0% 25–29 years 75% 30–39 years 25% 40–49 years 0% 50–59 years 0% 60 or above	4.8 (3 to 8)	25% 20 hours or more 25% less than 20 hours 50% not employed	25%	N/A	50%

The interview notes and other project materials were managed, coded, and analyzed using NVivo, a qualitative analysis software program. The coding approach involved assigning a code (or multiple codes) to “chunks” of text (that is, specific interview lines) that addressed the theme(s) defined by the code(s). While coding and analyzing the interviews using an initial structure, additional topics and themes that emerged were incorporated as new codes, allowing for preexisting as well as emergent ideas to be systematically coded and analyzed. The research team then examined strategic extractions of information to identify key themes and supporting details for each research question.

**Tribal Advisory Group.** The study benefited from the input of a Tribal Advisory Group (TAG) of four experts on Tribal TANF and/or related programs. These members of tribes or tribal organizations assisted the research team in communicating with tribal sites and ensuring cultural sensitivity in all data collection methods, instruments, analyses, and reports.

**Site selection.** The four study sites were selected from an initial list of nine Tribal TANF programs that ACF provided to the study team. The four sites were selected through a process that involved interviewing regional ACF staff as well as officials in the potential study sites to obtain additional information and to determine their willingness and ability to participate in the study, and applying site selection criteria.

The study sites were selected to ensure the four programs together provided maximum diversity along criteria of interest, including region; type of service provider (contractor, intertribal consortia, state); size of service area; size of population served; type of service area (rural, suburban, urban); program maturity (years of existence); level of resources available to the program; nature of tribal-state relations; degree to which the Tribal TANF program incorporates tribal culture, values, and institutions; incorporation of TANF in the 477 program; unemployment rate in and near service area; and program work participation requirements. Because it was not possible to select a representative sample of all Tribal TANF programs, given resource constraints, site selection was purposive to facilitate the selection of programs that varied in these key dimensions.

**Study limitations.** As a descriptive study of four Tribal TANF programs, the study was not designed to evaluate the individual programs or the Tribal TANF program as a whole, or to produce generalizable results. Nonetheless, the systematic description of these four diverse Tribal TANF programs provides useful insights for better understanding the context, opportunities, and challenges that may apply to other individual programs or the Tribal TANF program as a whole.

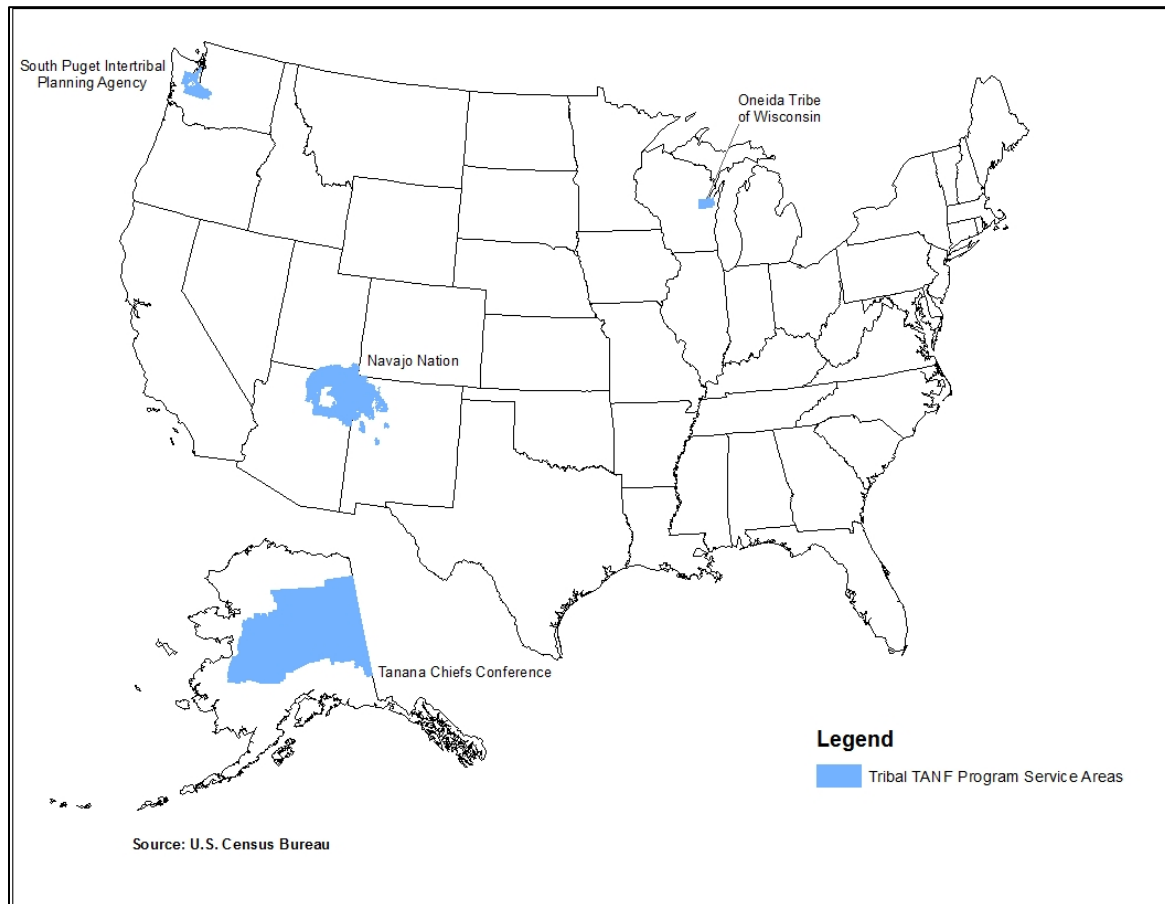
## Organization of This Report

This report is organized around the conceptual framework that guided the study design. The report explores the external context for each selected Tribal TANF program by describing the geographies, political and economic environments, and demographic characteristics of its locations. Next, the report systematically describes the selected Tribal TANF programs on a number of dimensions: 1) philosophies, goals, and strategies; 2) organizational structures and management; and 3) service delivery models. Having described the program contexts and inputs, the report then examines what is known about outcomes from Tribal TANF clients and their communities. Finally, the report discusses key lessons from the study and identifies promising practices and areas for further study.

## II. Descriptions of Tribal Sites

To understand the circumstances, challenges, and opportunities of the Tribal TANF programs in this study, it is important to understand the geographic, political, economic, and demographic contexts in which the Tribal TANF programs operate. Figure 1 identifies the Tribal TANF program service areas on a United States map.

**Figure 1: Locations of Tribal TANF Program Service Areas**



Across the tribal sites in this study and the United States as a whole, the AI/AN population is less educated, has less household income, is more likely to be poor, has more overcrowded housing, and has more single-parent households and “other” family structures than the non-native population (see table 4). Despite the consistent disadvantages of native populations compared with the non-native population, the disadvantages are greater in some tribal areas than in others. For example, educational attainment is lower for tribal members than for the non-native population in each of the four study sites, although some sites have higher educational attainment than others. Among AI/ANs living in the Navajo Nation and Tanana Chiefs Conference service areas, 6 percent and 7 percent have bachelor’s degrees or graduate degrees, compared with 14 and 17 percent in the SPIPA and Oneida services areas. However, among non-natives living in those same areas, at least 26 percent have bachelor’s degrees or

graduate degrees. The share of the AI/AN population without a high school diploma or GED ranges from 14 percent in Oneida to 34 percent in Navajo, while the range for the non-native populations in the study sites is 6 to 13 percent.

Economic conditions vary across the four study sites and within some sites. Oneida and SPIPA generally have more favorable economic conditions than TCC or Navajo, resulting in part from their proximity to larger population centers, although some specific locations within the SPIPA and TCC areas are more economically advantaged than others. The challenges clients face in achieving self-sufficiency are consistent across the sites. Each study site reported that client barriers include a lack of transportation, substance abuse, family violence, limited child care, and the local economic situation.

The remainder of this section describes each selected site, including the physical environment, local economy, and demographic characteristics of the overall population of the service area, as well as the characteristics and challenges of the Tribal TANF client population in particular.

**Table 4: Demographic Characteristics of Selected Tribal TANF Service Areas, 2010**

	Tanana Chiefs Conference		SPIPA		Oneida Tribe of Wisconsin		Navajo Nation		Alaska Service Areas		All US Tribal TANF Service Areas (excluding CA & AK)	
	AI/AN	Non-AI/AN	AI/AN	Non-AI/AN	AI/AN	Non-AI/AN	AI/AN	Non-AI/AN	AI/AN	Non-AI/AN	AI/AN	Non-AI/AN
<b>Share of population over 25 by education level</b>												
Without a high school diploma or GED	22%	6%	16%	9%	14%	9%	34%	13%	21%	7%	26%	12%
With a high school diploma or GED	41%	26%	30%	28%	36%	35%	33%	26%	41%	25%	32%	26%
With some college or associate's degree	30%	40%	40%	37%	33%	30%	27%	30%	31%	37%	32%	33%
With a bachelor's degree or graduate degree	7%	28%	14%	26%	17%	26%	6%	31%	7%	30%	10%	29%
<b>Share of population by age</b>												
Under 18 years	29%	25%	29%	24%	32%	25%	33%	23%	32%	26%	33%	24%
18–44 years	39%	42%	40%	36%	40%	36%	37%	43%	38%	38%	39%	37%
45–61 years	22%	23%	22%	24%	19%	24%	19%	21%	20%	25%	19%	23%
62 years or more	10%	9%	8%	15%	8%	15%	11%	13%	9%	11%	9%	16%
<b>Number of households</b>	3,916	38,115	7,287	531,623	3,283	164,748	55,976	47,588	26,029	221,454	193,805	6,087,339
<b>Ratio of AI/AN households to non-AI/AN households</b>	0.10		0.01		0.02		1.18		0.12		0.03	
<b>Average household size</b>	2.66	2.54	2.89	2.54	2.95	2.46	3.50	2.50	3.10	2.59	3.21	2.52
<b>Share of families with children below poverty</b>	25%	4%	21%	6%	37%	5%	38%	5%	23%	4%	34%	7%
<b>Housing</b>												
Share overcrowded	13%	4%	4%	2%	7%	2%	20%	3%	19%	4%	12%	3%
Homeownership rate	58%	61%	51%	66%	45%	69%	73%	57%	57%	64%	58%	66%



	Tanana Chiefs Conference		SPIPA		Oneida Tribe of Wisconsin		Navajo Nation		Alaska Service Areas		All US Tribal TANF Service Areas (excluding CA & AK)	
	AI/AN	Non-AI/AN	AI/AN	Non-AI/AN	AI/AN	Non-AI/AN	AI/AN	Non-AI/AN	AI/AN	Non-AI/AN	AI/AN	Non-AI/AN
<b>Share of households by family relationship</b>												
Family households												
Married w/child.	14%	25%	17%	20%	16%	22%	19%	18%	19%	23%	18%	20%
Married no child.	15%	28%	22%	30%	17%	30%	19%	26%	17%	28%	19%	29%
<b>Subtotal, married households</b>	<b>29%</b>	<b>53%</b>	<b>39%</b>	<b>50%</b>	<b>33%</b>	<b>52%</b>	<b>38%</b>	<b>44%</b>	<b>36%</b>	<b>51%</b>	<b>37%</b>	<b>49%</b>
Female head w/child.	14%	5%	13%	7%	19%	6%	14%	7%	13%	6%	14%	7%
Male head w/child.	5%	3%	5%	3%	5%	3%	5%	3%	6%	3%	5%	3%
<b>Subtotal, one-parent households</b>	<b>19%</b>	<b>8%</b>	<b>18%</b>	<b>10%</b>	<b>24%</b>	<b>9%</b>	<b>18%</b>	<b>10%</b>	<b>19%</b>	<b>9%</b>	<b>19%</b>	<b>9%</b>
Other family households	13%	4%	12%	7%	13%	5%	20%	7%	14%	5%	16%	7%
<b>Subtotal, family households</b>	<b>61%</b>	<b>65%</b>	<b>69%</b>	<b>67%</b>	<b>70%</b>	<b>66%</b>	<b>77%</b>	<b>61%</b>	<b>69%</b>	<b>66%</b>	<b>73%</b>	<b>65%</b>
Non-family households	39%	35%	31%	33%	30%	34%	23%	39%	31%	34%	27%	35%
<b>Total households</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>
<b>Average household income</b>	\$47,741	\$80,725	\$60,574	\$71,715	\$53,128	\$67,270	\$36,485	\$57,182	\$55,465	\$85,502	\$44,078	\$69,352
<b>Share of households by annual income</b>												
Less than \$15,000	23%	7%	16%	10%	20%	10%	32%	15%	17%	7%	24%	11%
\$15,000–\$34,999	28%	16%	21%	18%	27%	20%	29%	22%	26%	15%	28%	21%
\$35,000–\$49,999	16%	12%	17%	15%	16%	15%	13%	14%	16%	12%	15%	15%
\$50,000–\$74,999	12%	20%	19%	21%	19%	22%	13%	19%	16%	20%	16%	20%
\$75,000–\$99,999	11%	16%	11%	15%	10%	15%	7%	13%	10%	16%	9%	13%
\$100,000 or more	10%	28%	16%	22%	9%	18%	5%	16%	15%	30%	8%	20%

Sources: U.S. Census Bureau, Decennial Census 2010, and American Community Survey, 2006–2010 Five-Year Estimates.

Note: In some cases, service areas are an approximation; for service areas that include only a portion of a county, estimates presented include the entire county.

## Navajo Nation

The Navajo Nation is the most populous Indian reservation in the United States, with approximately 170,000 total residents and 145,000 Navajo people on the reservation, not including approximately 80,000 Navajos residing in nearby “border towns”—non-reservation towns located near the boundaries of the Navajo Nation. The Navajo Nation spans portions of Utah, New Mexico, and Arizona. The Tribal TANF service area consists of the reservation, three satellite communities, and several near-reservation communities.<sup>5</sup>

The reservation consists of a geographic area that is 27,000 square miles—second in size only to the Tanana Chiefs Conference. It is roughly the size of West Virginia, with scattered, remote communities separated by vast expanses of rural back country, a factor that has played a critical role in determining the economic and social constraints for the general population and for Tribal TANF clients. Though primarily rural, the Tribal TANF service area includes a combination of rural, suburban, and urban geographies.

The area is vulnerable to extreme weather conditions during winter that can often disrupt residents’ abilities to move about the Nation. There is very little public transportation, and it cannot meet the needs of those without reliable personal vehicles, which few Navajos have. Consequently, hitchhiking is prevalent. Transportation between population centers is among the most commonly mentioned challenges for service delivery and for Tribal TANF clients.

The influence of Navajo culture and history is strong and ingrained in both the Navajo Nation government and Tribal TANF (NNPSR) program’s overarching goals and strategies. In contrast to some Tribal TANF service areas, Indian households outnumber non-Indian households. Many elderly Navajo people actively pass along traditional practices, including the Navajo language. Many speak Navajo, and Navajo phrases and prayers are typical even in professional settings.

**Unemployment, the economy, and the job market.** On the reservation, unemployment is extremely high: over 50 percent. Many employment opportunities are seasonal and are associated with tourism and agriculture. Unemployment is lower between March and August and increases in the fall, reflecting the cyclical nature of these industries. Major employers in the area include Navajo Nation Government; Indian Health Services; Bureau of Indian Affairs; federal, state, and county offices; schools and several local colleges and universities; faith-based organizations; coal mines; power plants; economic development projects; and a range of small, local retail businesses.

The lack of employment opportunities speaks to the larger issue of economic isolation confronting the Navajo Nation and many other tribes. A major problem in the region and perhaps the single greatest challenge to the Tribal TANF program is that private-sector business growth is weak, and jobs that might

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<sup>5</sup> The three satellite communities are Ramah, Alamo, and Tohajiilee. The near-reservation communities are Gallup, Farmington, Aztec, Bloomfield, Magdalena, Cuba, Kirtland, Grants, Milan, and Socorro in New Mexico and the communities of Page, Grand Canyon, Joseph City, Marble Canyon, Snowflake, Holbrook, Wupatki, Winslow, and Flagstaff in Arizona.

allow families to become self-sufficient are hard to come by. For those without degrees, most employment is in the service industry, such as retail or restaurants, or in agriculture.

This type of job market is a problem for Tribal TANF recipients striving to become self-sufficient. The Tribal TANF caseworkers tend to encourage clients to go off the reservation to obtain higher education and training. Those who return to the reservation with a degree have problems finding jobs corresponding to their level of educational attainment and are forced to leave for better economic opportunities. Many residents move between the reservation and neighboring states seeking better housing, education, and job opportunities. Though there are several community colleges and technical training institutions on the reservation that are highly utilized, major nationally recognized schools can be found in the nearby border states.

**Overall population characteristics.** The Native Americans residing on the Navajo Nation, like those in many other tribal areas, are socioeconomically distressed relative to the rest of the country and relative to non-Indians living within the same geographic area (including the reservation and nearby border towns), according to U.S. Census data on AI/ANs. Over one-third of Indian households on the Navajo reservation are living in poverty, with over 60 percent of Indian households making less than \$35,000 and nearly a third making less than \$15,000. Educational outcomes of Native Americans in the Navajo Nation are poor. Over a third do not have a high school diploma, and only 6 percent have bachelor's degrees. Single-parent households are much more prevalent among AI/AN families than among non-Indians living in the Navajo Nation service area. Nearly half of Indian families with children within the Navajo Nation Tribal TANF service area are headed by a single parent, and three-quarters of these parents are women.

**TANF client characteristics and challenges.** There is a high prevalence of single mothers among the clients served by the NNPSR, as with Navajo families overall. Additionally, many NNPSR clients are third-party custodial guardians, often elderly mothers caring for their grandchildren. A third common type of client household is young two-parent families with little education and low employment prospects.

The number of families seeking assistance decreases in the summer and increases in the fall, due to seasonal shifts in certain low-skill employment sectors and the challenges of finding employment on the reservation. Despite the job market, tribal members feel strong cultural, language, clan, and tribal ties that make it difficult to leave the reservation in search of work, according to those interviewed. Additional factors also make leaving the reservation less attractive, such as the NNPSR's lack of time limits on receiving cash benefits. Because more than 50 percent of the adults on the reservation are unemployed, the months of assistance provided to families residing on the Navajo Nation are currently not counted toward the NNPSR's time limit of 60 months. Program staff say some clients have come to rely on the program as a permanent source of income, although caseworkers actively work to change this mindset.

Beyond the weak job market, challenges include transportation, a lack of safe, affordable housing and a lack of educational opportunities. In addition, substance abuse and domestic violence issues are major barriers for many Tribal TANF clients, according to program staff. Tribal TANF case managers are limited

in their capacity to address such domestic issues and can only refer clients to outside services. Another major barrier to employment is the lack of child care, which prevents Tribal TANF clients from securing and keeping full-time employment. Although NNPSR clients have priority in the system of Child Care and Development Fund (CCDF) providers, there is still a waiting list in some communities for children in NNPSR families.

## Oneida Tribe of Wisconsin

Located in suburban Green Bay, Wisconsin, the Oneida Tribal TANF program provides services to members of federally recognized tribes who reside on the Oneida Reservation in addition to Oneida tribal members living off reservation in Brown and Outagamie counties. The Oneida Reservation has approximately 5,000 enrolled members, with another 2,000 Oneida living in the Milwaukee area. The Oneida Tribe has resources that are not available on many other reservations, such as a public transit system and higher education support of up to \$20,000 for tribal members.

**Unemployment, the economy, and the job market.** The unemployment rate for Oneida tribal members residing on the reservation is 13.1 percent as of 2012. For those Oneida tribal members residing in Brown and Outagamie counties, the unemployment rate is 13.5 percent. By comparison, the unemployment rate for Oneida tribal members is higher than the unemployment rate in the Green Bay area, which is around 7 percent. Tribal TANF program staff and clients describe a weakened economy as a result of the recession. In the past, the Oneida Tribe was the largest employer in northeast Wisconsin, but it began to rely more on emergency temporary workers and other limited-term employees after the recession. Overall, gaming revenue for the tribe remains low. Gaming still provides a large number of employment opportunities in the area, but many Tribal TANF clients are prohibited from those jobs due to criminal history. Additionally, in the local economy outside the reservation, Tribal TANF program staff and clients cite an increase in temporary employment positions and cutbacks in hours due to the recession.

**Overall population characteristics.** The AI/AN population in Oneida has poorer socioeconomic outcomes than the non-AI/AN population living in the Oneida service area and in the rest of the nation, according to Urban Institute tabulations of U.S. Bureau of Census data. However, among AI/AN populations, those living in the Oneida service area have relatively better outcomes for some demographic characteristics. The Oneida AI/AN population has a higher average income, around \$53,000, compared with the national average of \$44,000 for AI/AN populations in other Tribal TANF service areas. Despite this, AI/AN families with children in the Oneida service area are more likely to live below the poverty line (37 percent of such families) than AI/AN families living in other Tribal TANF service areas, on average. Compared with the national AI/AN population living in Tribal TANF service areas, the Native American population in Oneida's service area has higher levels of education. Almost one-fifth of the Oneida native population has a bachelor's or graduate degree, while one-third has some college or an associate's degree. Among Oneida families with children, about half are headed by a single parent.

**TANF client characteristics and challenges.** Program staff report that the majority of Oneida Tribal TANF participants are single mothers ranging in age from 18 to 55 years old. Child-only cases make up only a small portion of the caseload due to the Oneida Tribal Kinship Care Program, which provides support for family members caring for relative children in their home.

Despite Oneida's public transit system, lack of transportation is one of the main barriers to work for Oneida Tribal TANF clients, according to program staff. Many clients do not have a driver's license or auto insurance or can't pay fines incurred for driving without a license and/or without insurance. Other barriers staff reported include criminal justice involvement, domestic violence, substance abuse, undiagnosed learning disabilities, physical disabilities, child care, and the local economic situation.

## **South Puget Intertribal Planning Agency**

The South Puget Intertribal Planning Agency (SPIPA) is an inter-tribal 501(c)(3) organization governed by five tribes in Washington State. Two of the governing tribes (Chehalis and Shoalwater Bay) do not participate in SPIPA's Tribal TANF program, while the other three tribes (Squaxin Island, Skokomish, and Nisqually) participate. Chehalis will begin participating in the Tribal TANF program in 2014. Nevertheless, all five tribes have representatives on the SPIPA Board of Directors and, thus, have a role in the governance of the SPIPA Tribal TANF program. In addition to the three reservation sites, the SPIPA Tribal TANF program runs two urban sites in Tacoma and Bremerton. SPIPA Tribal TANF's service area includes the three SPIPA member reservations as well as the Puyallup Reservation (a non-member). SPIPA also provides services to Native families from any federally recognized tribe living in Thurston, Pierce, Mason, and Kitsap counties. As such, SPIPA's Tribal TANF service area spans a mix of rural and urban areas both on and off multiple reservations.

**Unemployment, the economy, and the job market.** Economic conditions vary throughout SPIPA's service area. The Skokomish Tribal Nation and Nisqually Tribe both have on-reservation unemployment rates above 50 percent, exempting Skokomish and Nisqually clients from SPIPA Tribal TANF time limits. Squaxin Island Tribe's unemployment rate is below 50 percent and, thus, time limits apply. Squaxin Island and Nisqually are top sources of employment in their counties. Gaming and other tribal enterprises, such as Squaxin Island's tobacco factory and seafood enterprise, create a large number of job opportunities. The Skokomish Reservation, on the other hand, is rural and remote with a very weak job market. Seasonal work in diving and fishing is common in Skokomish. Other employment opportunities include tribal jobs or positions at the health clinic or local fisheries. Skokomish program staff explained that most Tribal TANF clients work but struggle due to low wages and limited hours.

Clients at SPIPA Tribal TANF's urban site location in Tacoma also described a weakened job market: "Out here there's no work. If there is a job here you're competing with 50–60 people." Discussing the particular challenges in the current economy, clients cited the high cost of living and an increasing need for educational credentials even for entry-level positions paying the minimum wage.

**Overall population characteristics.** AI/AN households in SPIPA's service area earn more on average than Native families living in other Tribal TANF service areas across the county, with an annual income of \$60,500 in SPIPA compared with \$44,000 in the rest of Tribal TANF services areas. The share of AI/AN

families living below the poverty line in SPIPA is less than the full Tribal TANF average, but it includes over a fifth of the Native families in the SPIPA service area. Census data also show the AI/AN population in SPIPA's service area tends to be more educated than the national Tribal TANF AI/AN population, although less so than the non-AI/AN population throughout the country. Among Native American families with children in SPIPA's service area, about half are single-parent families.

**TANF client characteristics and challenges.** SPIPA clients come from a wide mix of racial and ethnic backgrounds. While a majority of SPIPA Tribal TANF clients are members of the Skokomish, Nisqually, and Squaxin Island tribes, SPIPA Tribal TANF also serves clients from various other tribes. Spouses of SPIPA Tribal TANF clients also are required to participate in the program, regardless of their heritage. As with other study sites, a large share of SPIPA Tribal TANF clients are single parents and young mothers.

In addition to economic challenges, lack of transportation was identified as a main barrier to self-sufficiency for SPIPA Tribal TANF clients. Tribal TANF program staff across the SPIPA sites said many clients did not have driver's licenses. Staff relayed stories about clients who incurred fines for driving without a license and/or without insurance and could not pay them, resulting in thousands of dollars of debt in collections stemming from a minimal original fine. Lack of safe, affordable housing was also cited as a persistent problem by both staff and clients across sites; in Kitsap County the waiting list for Section 8 housing is 8–12 years. Other barriers to self-sufficiency include alcohol and drug use, fetal alcohol syndrome, learning disabilities, and lack of education. Program staff at SPIPA also described lack of self-confidence and self-esteem as an underlying barrier to self-sufficiency.

## Tanana Chiefs Conference

TCC is a Regional Alaska Native nonprofit corporation 501(c)(3) that grew out of the Alaska Native Claims Settlement Act and the historical organization among Athabascan tribes in the Alaska interior. TCC consists of 37 Athabascan Indian tribes whose members speak nine separate dialects and live in 48 communities ranging from 89 to 724 members.

The area served by TCC is in the interior of Alaska and is about the size of the state of Texas—235,000 square miles. This service area is divided into 6 subregions (Upper-Tanana, Yukon-Tanana, Yukon-Koyukuk, Upper-Kuskokwim, Lower-Yukon, and Yukon-Flats). In 2011, the total population of the service area was 86,130. Of this number, 10,626 were Alaska Natives, about half of whom lived in Fairbanks.

The sparsely populated Native villages are located in a rural environment. Generally, 30 to 200 miles separate the closest pairs of villages. Serious challenges confront these Native villages: a lack of transportation, telecommunications, accessible educational opportunities, modern water and sewage facilities, and safe affordable housing. These challenges are compounded by being far from urban centers and resources, and by extreme weather conditions. While not unique in Indian country, these challenges negatively affect village economies, the availability of unsubsidized employment, and community welfare.

Transportation among villages and the rest of the world is limited by the absence of connecting roads of any type. Consequently, transportation is generally limited to small aircraft that can land on the village

airstrip; boats, if the village is located near a river; and, in the winter months, dogsleds or snowmobiles. Limited communication facilities compound the transportation challenges. While satellite-based telephones and Internet service are often available at the village school, health station, and/or tribal headquarters (land lines/wired telephony is almost always absent), such service is unavailable in family homes. Other resources enjoyed by most Americans, such as running water and sanitation, are generally limited to the school, health station, tribal headquarters, and/or the village “washiteria” (a building with shared washing machines and, sometimes, showers); again, such resources are unavailable in village homes. On the other hand, electrical service is generally available throughout a Native village, provided by gasoline or diesel fuel generator.

The weather is another important factor in village life and the village economy. Summers are mild; however, when temperatures rise above 32°F, the tundra, which surrounds most Native villages, cannot support the weight of automobiles and other motor vehicles, making surface transportation impossible. In the winter, when the tundra freezes, surface transportation (e.g., dogsled, snowmobile, automobile) is possible and is used. Nevertheless, in the winter, temperatures sometimes fall below -50°F, making transportation and most economic activities difficult.

**Unemployment, the economy, and the job market.** Unemployment in the villages ranges from 20 to 90 percent. While there are some unsubsidized jobs available (e.g., teacher, nurse), most families engage in subsistence activities (e.g., fishing and hunting) and seasonal employment.

Native village residents, like other citizens of Alaska, enjoy the benefits of per capita dividends generally issued by the state based on revenues associated with oil and gas production. In recent years, these revenues have ranged between \$845 (2005) and \$2,069 (2008). Thus, a family of two adults and four children residing in a Native village (or elsewhere in the state) might receive between \$5,070 and \$12,414 per year—a significant amount that augments the food and related resources associated with hunting, fishing, and other subsistence economic activities.

**Overall population characteristics.** The average household income of the AI/AN population in the TCC service area is \$47,700, according to Census data. The majority of these households have incomes less than \$35,000 annually, and almost one-quarter have annual incomes below \$15,000. Among AI/AN families with children, one-quarter live in poverty. In contrast, only 4 percent of non-AI/AN families with children in the same geographic area live in poverty. Among the AI/AN population, more one-fifth lack a high school diploma or GED. While the majority has at least these credentials, only 7 percent of the AI/AN population in the TCC service area have a bachelor’s or graduate degree. Among AI/AN families with children, more than half are headed by single parents, primarily single mothers.

**TANF client characteristics and challenges.** The majority (60 percent) of the TCC program participants reside in Fairbanks. The remainder resides mostly in the Native villages. Of the participants residing in Fairbanks, most are younger single-parent families that have moved to the city seeking employment opportunities, according to program staff. In contrast, the participants who reside in the villages tend to be older, two-parent households with seasonal employment. According to program staff, many eligible

individuals do not apply to the Athabascan Self-Sufficiency Assistance Partnership (ASAP), reflecting the strong cultural value of self-sufficiency.

Formal education, critical to securing most unsubsidized employment, is a challenge for Native villages. While almost every village has a Head Start program and an elementary school, to secure a high school education, many children must leave home to attend a residential high school in another village, Fairbanks, or elsewhere. Postsecondary and vocational education are seldom available in Native villages, but are available in Fairbanks and other locations, generally at a great distance from the villages.

Taken together, the limited educational opportunities, the extreme weather, the lack of transportation and communication facilities and infrastructure, the great distances between villages and great distances from urban areas such as Fairbanks, as well as other factors result in unemployment rates greater than 50 percent and a reliance on subsistence economies in most Native villages served by TCC.

### **III. Descriptions of Tribal TANF Programs**

Like their four diverse locations, the four Tribal TANF programs in this study have taken distinct approaches, with some similarities and many differences. With the exception of the Oneida Tribe of Wisconsin Tribal TANF program, the other Tribal TANF programs have created unique names to exemplify their approaches: the Navajo Nation Program for Self Reliance; the TCC Athabascan Self-Sufficiency Assistance Project; and SPIPA's Tribes Assisting Native Families.

The number of families receiving cash assistance through these Tribal TANF programs in 2011 ranged from fewer than 50 in the Oneida Tribal TANF program to about 4,500 in the NNPSR.<sup>6</sup> NNPSR is the largest Tribal TANF program, serving about 25 percent of the national Tribal TANF caseload. Figure 2 shows the average monthly caseload size for each program annually from 2006 through 2011, the most recent year for which federal data are available. Figure 3 shows the same information, excluding NNPSR, so that the differences among the other programs are more apparent. The NNPSR caseload rose dramatically over this period, more than doubling from its lowest point, in 2007, while the ASAP caseload declined just as dramatically, falling by more than half. NNPSR managers attributed the caseload increases to a dearth of jobs in towns surrounding the reservation and a recent wave of Navajo tribal members moving back to the reservation to be near family and other social support, including Tribal TANF assistance; however, NNPSR managers also reported that the average monthly Tribal TANF caseload fell to 3,400 in 2012, due at least in part to a reduction in the maximum cash benefit amount and a related reduction in eligibility for Tribal TANF. TCC Tribal TANF managers offered two main explanations for the caseload decline, although they did not share specific supporting data: first, effective promotion of client self-sufficiency, through enhanced program coordination and collaboration across social service and health programs; and second, increased sanctions for clients, through heightened expectations for clients and closer monitoring by program staff. The Oneida Tribe of

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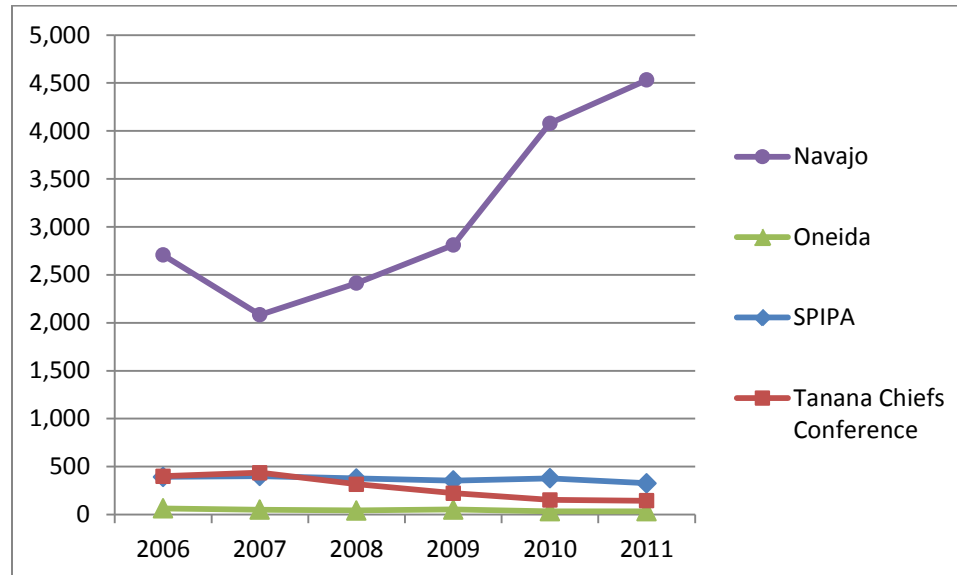
<sup>6</sup> These counts do not include families receiving only non-cash support services, such as crisis or diversion services.



Wisconsin and SPIPA Tribal TANF caseloads declined slightly over the period but remained relatively steady.

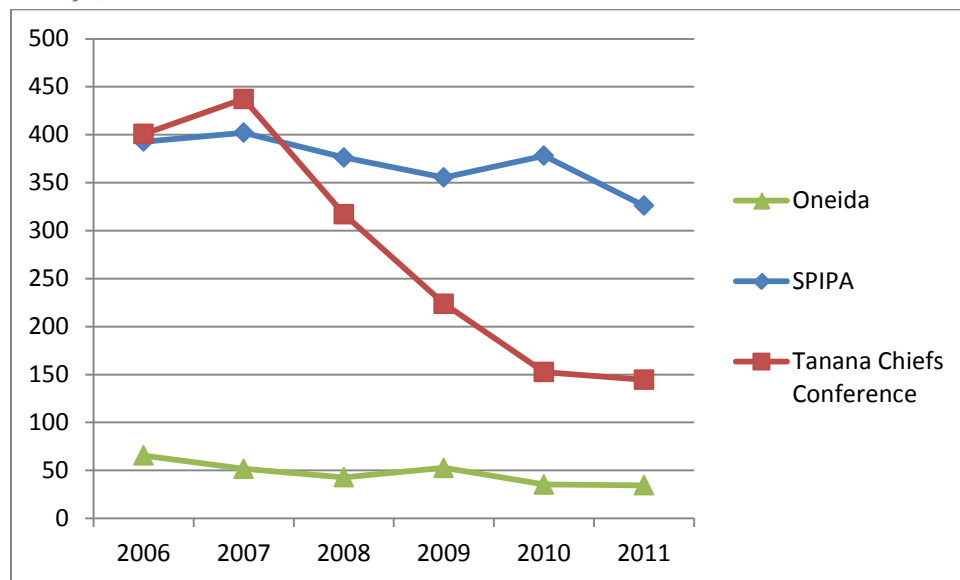
In 2011, the average “case” in each of the programs included about three individual recipients, such as a single parent with two children or a couple with one child. Since 2006, each program has averaged about three recipients per case, except NNPSR, where the average recipients per case has fallen from more than five recipients per case in 2006–2008 to about four in 2009 and three in 2010 and 2011.

**Figure 2: Number of Families Receiving Cash Assistance in Selected Tribal TANF Programs, 2006–2011**



Source: HHS/ACF data.

**Figure 3: Number of Families Receiving Cash Assistance in Selected Tribal TANF Programs, Excluding Navajo, 2006–2011**



Source: HHS/ACF data.

The remainder of this section describes the approaches of these four programs in detail, first examining the program philosophies, goals, and strategies, then examining their organizational structures and management, and finally detailing their service delivery approaches.

### **Tribal TANF Program Philosophies, Goals, and Self-Sufficiency Strategies**

Self-sufficiency is the goal that each Tribal TANF program in this study has for its clients, and each program pursues this goal through a combination of strategies that includes work, education, and case management; however, each program has a unique emphasis and philosophy. For example, the Oneida Tribe of Wisconsin focuses most intently on employment, while SPIPA emphasizes education and is philosophically grounded in the concept that family members have mutual obligations to each other. The Navajo Nation and TCC programs' focus on self-sufficiency is explicitly grounded in their traditional values and teachings.

#### **Navajo Nation Program for Self Reliance**

The NNPSR was founded on the belief that only the Navajo can attempt to reform welfare dependence by establishing a program that gives responsibility, decisionmaking, and self-reliance back to the tribal members. The concept of T'áá hwó ájít'éego is a core principle of the program's mission and strategy. This phrase captures the concept of exercising personal discipline and taking responsibility for one's life. A program brochure offers the following translations of the phrase: "It's up to you." "Nobody's going to do it for you." "Taking responsibility." "Be a hard worker." "Don't be lazy." A recent diabetes awareness campaign adopted the same motto, translating it as "just move it." The mission statement describes the NNPSR as a service provider that aims to "empower all families, based on the Navajo teachings of the

concept of T'áá hwó ájit'éego, to become self-reliant.” This is to be done ethically and with the intention of preserving families’ integrity.

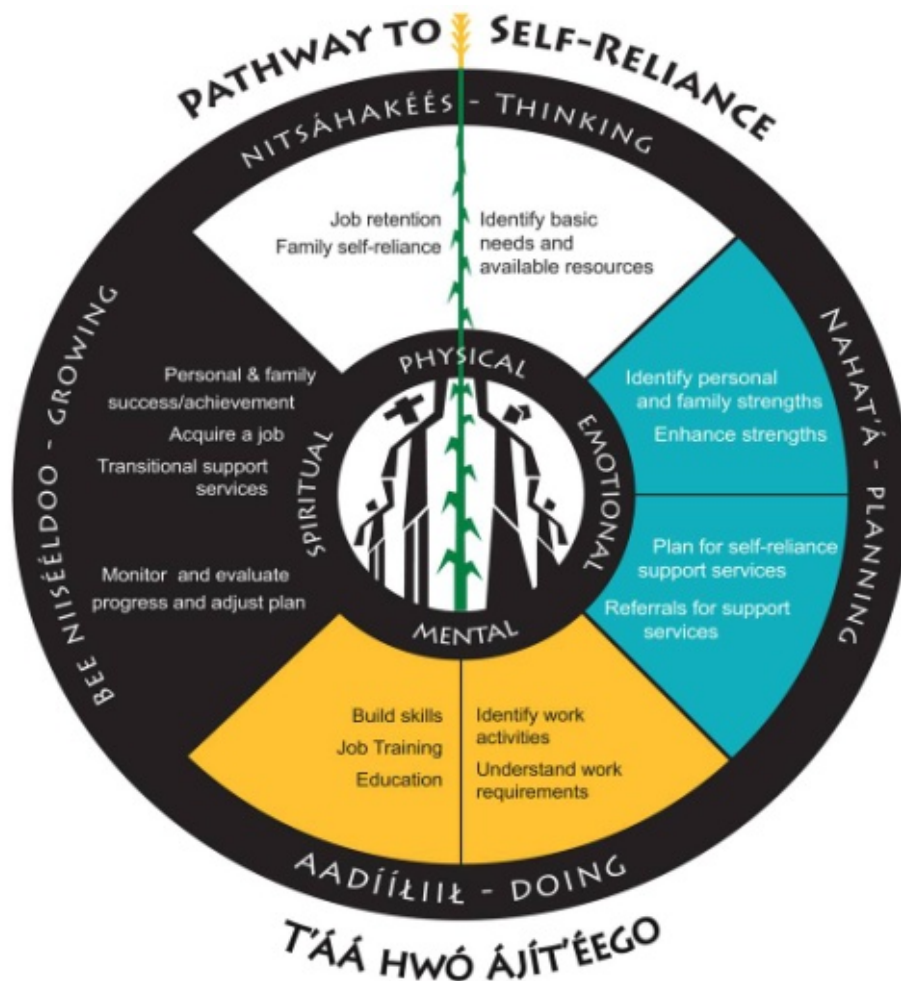
In conversations with multiple program staff, the idea of self-reliance emerged as a critical philosophy that drives program goals and strategies. Upon entering the program, clients are expected to develop a personal responsibility plan (PRP) that lists goals and benchmarks toward self-sufficiency. The clients must regularly meet with their case manager to discuss progress of the plan. Generally, case managers are continuously thinking of strategies to transform clients’ perception of the program from a permanent income subsidy to a temporary assistance benefit meant to empower families and to serve as a platform toward self-reliance. The transformation of individuals’ lives through the Tribal TANF program is seen by some program leaders as symbolic of the Navajo Nation’s transformation to autonomy.

**Think. Plan. Do. Grow.** Under the concept of self-reliance, both the NNPSR management and the client’s PRP reflect the traditional Navajo development model that includes four stages of learning and personal development: Think, Plan, Do, Grow. This development cycle directly informs NNPSR leadership in growing the program and improving effectiveness, as well as case managers’ and clients’ approach to developing a PRP. The process involves thinking through their career or organization goals, planning and setting the benchmarks required to meet that goal, acting on the plan, and making meaningful progress through evaluation and reflection. Interviewees emphasized that this final step in case management does not end the process, but rather the client returns again to the first stage to evaluate his/her efforts and refine his/her self-sufficiency plan. Figure 4 shows the Great Seal of the Navajo Nation side by side with the NNPSR logo. The NNPSR logo incorporates important symbols from the Great Seal, including corn, the colors associated with the four directions, and the opening at the top of the circle. Figure 5 shows the NNPSR program model, which also incorporates these symbolic elements.

**Figure 4: Comparison of the Great Seal of the Navajo Nation and NNPSR Logo**



Figure 5: NNPSR Program Model



The NNPSR focuses on creating an opportunity for clients to become self-reliant. The weak job market and historical legacy of U.S. government and Navajo Nation support have resulted in multigenerational reliance on welfare for a small portion of the Navajo population; the NNPSR has worked hard to dismantle this mindset through intensive case work and PRP development.

The NNPSR program focuses on client service as a core strategy for improving the outcomes of clients. In recent years more staff members with backgrounds in social services have been hired to enhance and refine the program's case management approach. This has resulted in a more rigorous intake and assessment procedure, more frequent training for employees, client development programs, and more intensive case management.

Every client's PRP includes strategies to improve his/her prospects of self-sufficiency, and caseworkers help clients develop activities that link clients with education and training opportunities that build toward self-sustaining employment on or off the reservation. According to focus group participants, case

workers develop a close rapport with clients to develop step-by-step programs that build toward degrees and certifications such as a childcare development associate and nursing degree for jobs that are available on the reservation. Any work activity that can bring the client closer to self-sufficiency can be built into the PRP's work requirements, and the plan is regularly monitored by caseworkers.

The program also seeks to end the cycle of generational poverty and focuses on children's outcomes to achieve this end. Clients are often permitted to focus on their children's educational needs over other requirements in the PRP. In-kind benefits are provided for uniforms and school supplies. A minor child who is not enrolled in school cannot be included in the benefit group. The program works closely with schools to ensure children are in attendance and to create youth development opportunities. One field office manager is regularly asked to speak to the student population because he is seen as a local role model. Program analysts in the central office are planning research projects on youth initiatives and outcomes.

### **Oneida Tribe of Wisconsin Tribal TANF Program**

The Oneida Tribal TANF program's philosophies, goals, and self-sufficiency strategies put a strong emphasis on job search and employment. As one staff member explained, "If they're not working when they walk in the door, we try to get them working." As part of the application process, individuals are required to do job search while waiting for their Tribal TANF application to be approved. Additionally, the Employability Plan, an individually tailored plan created by case managers for each client identifying barriers to employment and steps to overcome them, underscores the emphasis placed on employment as a key to self-sufficiency within the program. Though employment is the central strategy for self-sufficiency for those who are assessed to be job ready, clients are also encouraged to take GED classes and pursue other educational opportunities. These activities can be, and often are, included in a client's Employability Plan. In addition, one staff member cited education as a key factor in helping clients make a connection between employment and personal fulfillment, in other words helping shift clients' thinking from "I need to get a job" to "What do I want to do with my life?"

The employment focus of the Oneida Tribal TANF program mirrors Wisconsin's state TANF program (W2). Oneida has a unique history of having previously administered the state TANF program in tribal territory prior to transitioning to Tribal TANF. Unlike tribes beginning a Tribal TANF program from scratch, Oneida already had infrastructure in place, such as office space and a job center. Further, information technology infrastructure that allowed access to state data systems on other public benefits programs like SNAP and Medicaid was already in place. At the same time, Oneida Tribal TANF program staff describe having to operate within rigid and stringent requirements under the state TANF program. A key difference between the state TANF program and Tribal TANF program is the range of allowable work activities. In addition, families with incomes up to 185 percent of the federal poverty level are income eligible for Oneida's Tribal TANF, while the W2 program has an income limit of 115 percent of the federal poverty level for applicants. The Oneida Tribal TANF program also disregards 20 percent of a family's earnings when determining eligibility and allows a hardship exemption for individuals who are caring for an ill or incapacitated person, which the W2 program does not. While program staff cite greater flexibility within the Tribal TANF program compared to the state TANF program, Oneida's Tribal

TANF program continues to emphasize employment and promotes a “work first” approach to self-sufficiency.

### **SPIPA Tribal TANF Program**

The overall objective of the SPIPA Tribal TANF program is to help the Native community become self-sufficient. This goal was echoed by program managers and caseworkers across the various service delivery locations. When articulating the mission of the program, program staff consistently referred to Tribal TANF clients as “our people” and emphasized family in their definitions of self-sufficiency, which included the ability for parents to care for and serve as role models for their children without assistance from Tribal TANF.

The theme of family and community plays an important role in the SPIPA Tribal TANF program. Statements about family connection and community within the program were heard from program officials, caseworkers, and clients alike. One explained, “If someone comes to your house, you feed them. If they need a shower, you let them take a shower. That’s how I was raised, and that’s how I feel here... It’s like one big family.” Indeed, the Tacoma SPIPA Tribal TANF office not only offers a comfortable waiting area with children’s furniture and toys, but also has snacks available for clients. Although the other SPIPA Tribal TANF offices visited were not as large as the Tacoma Tribal TANF office, the program staff and clients interviewed spoke of the same concept of welcoming clients as family: “We have the ‘nobody leaves hungry’ attitude. We make any one of the clients feel they are part of the family.” It is this strong sense of family and community that motivates program staff. As one program manager explained, “We do approach this as a community issue. When they [TANF clients] do come through our doors, these are our families. We have ownership over what they’re facing. These are our cousins, brothers, aunts, uncles, grandmothers, and we have to make sure we assist them in every way we can.”

While clients are well cared for, the idea of mutual obligation is equally integral to the cultural view of family. Tribal TANF clients are expected to become self-sufficient, to be contributing members of the community, and to be positive role models for their children and others. As one program worker explained, “I truly believe that my people can do a lot... And, if they don’t, I’m going to call them on it.... in the Native world everyone is obligated to one another. I always tell the clients you have an obligation to come back and replace me. You have an obligation to the client down the street.” Clients internalized this message. In reference to paperwork associated with required work activities one client said: “That’s part of showing your initiative. The last thing they want to do is give you a paycheck for sitting at home. They want you be a participant in your own life.” Several clients spoke of the times they had been sanctioned after they had failed to turn in their time sheets or other paperwork on time. Most clients had been sanctioned only once and turned in their paperwork on time from then on.

Education is the main strategy for moving clients toward self-sufficiency. In fact, the SPIPA board has formally mandated education as the program’s highest priority. As a result, SPIPA Tribal TANF policy requires that all clients under the age of 55 obtain their GED. SPIPA Tribal TANF also counts school attendance for an associate’s or bachelor’s degree toward a client’s work requirement. One case

manager detailed the advice she gives to clients, “Don’t say ‘I just want to pay my bills.’ Have a dream to do something and work towards that.” Additionally, program staff emphasized the importance of embracing and connecting with one’s culture as key to helping clients become self-sufficient. “People need to capture who they are so they can move past and see how they want to be... How do you know who you are if you don’t know where you’re from?” they asked.

### **TCC Athabascan Self-Sufficiency Assistance Project**

Self-sufficiency, an Athabascan cultural value, permeates TCC ASAP. Family and individual self-sufficiency are primary program goals. Strategies for self-sufficiency include training, education, and employment. The program places a strong emphasis on participation in its subsidized employment program, created with Recovery Act funding, now in its third year of operation. Many of those who participate in the subsidized employment program, called “Gila,” are able to transition off ASAP at the end of their period of subsidized employment. ASAP promotes this subsidized work program, as well as seasonal employment, as a strategy for self-sufficiency because the wages earned through even limited employment allow individuals to access key public benefits. For example, clients who participate in the subsidized employment program and receive subsidized wages are then able to qualify for the earned income tax credit (EITC). Staff also explained that clients with seasonal employment can receive support from the EITC, Permanent Fund Dividend (PFD),<sup>7</sup> and unemployment compensation. Limited income combined with government supports can sustain clients throughout the year.

### **Organizational Structure and Tribal TANF Management**

The organizational and management structures for Tribal TANF programs vary considerably among the four study sites. While two of the Tribal TANF programs are administered directly by individual tribes (Navajo Nation and the Oneida Tribe of Wisconsin), the other two are administered by nonprofit organizations whose members are tribes that may or may not themselves participate in the Tribal TANF program. The four study sites vary in terms of the role of the tribal government in Tribal TANF policymaking, the extent to which the Tribal TANF programs are integrated with or distinct from other social services, and the funding structures of the Tribal TANF programs. Of the four study programs, only TCC operates Tribal TANF as part of a 477 program.<sup>8</sup>

Colocation and coordination of Tribal TANF with other social service programs depends both on the organizational structure of the tribal bureaucracies and on the size of the tribe or Tribal TANF program. The Navajo Nation’s Tribal TANF program is administered by the Navajo Nation Program for Self Reliance, a department under the Navajo Nation’s Division of Social Services. The Navajo Nation’s large size and siloed bureaucratic structure creates challenges for coordinating Tribal TANF with other

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<sup>7</sup> The PFD is a dividend paid to Alaskan residents. It was designed after the Trans-Alaska Pipeline System was built in 1977 to be an investment for future generations of Alaskans who would no longer have oil as a resource.

<sup>8</sup> As described in the report introduction, 477 programs (a federal initiative in P.L. 102-477) allow tribes to use funding from multiple sources in an integrated employment and training effort, and can facilitate coordination and management of programs that share compatible goals and clients. TANF funds included in a 477 program, however, must be spent on activities that are authorized under TANF.

programs, both on an administrative level and for individual clients, who must go to separate offices to obtain Tribal TANF, nutrition assistance, health insurance, and child support enforcement (CSE) services. The SPIPA Tribal TANF program also is administered separately from these other supports and services, which are administered by the state. However, the SPIPA Tribal TANF program staff have taken the initiative to coordinate access to these other services at the Tribal TANF offices, through the use of designated liaisons with the other programs, some of whom visit the Tribal TANF offices in person to facilitate access. In the Oneida Tribal TANF program, the same caseworkers administer Tribal TANF, nutrition assistance, and health insurance, providing seamless access for clients. A single Oneida office building houses the Oneida Tribal TANF program and all other major support services, further facilitating coordination and access for administrators and clients alike. Similar to Oneida, TCC's Tribal TANF program provides combined case management of Tribal TANF and other programs, and colocation of most major support services in its Fairbanks office. In the Alaska villages, a single worker provides villagers with information and access to all support services.

As shown in table 5, the annual Tribal TANF grants for the study sites range from \$835,924 for the Oneida Tribe of Wisconsin to over \$31 million for the Navajo Nation. The Oneida Tribe of Wisconsin is the only site that does not receive state maintenance-of-effort (MOE) funds. While the amount of federal funds should remain consistent over time, funding from the state can change from year to year, depending on the availability of state funds and the tribes' agreements with the states. SPIPA Tribal TANF, for example, receives a relatively large share of its total funds from Washington State, although it received less in 2011 than in 2010, and Tribal TANF officials report that they are concerned about the possibility of further reductions in state funding in the future.



**Table 5: Tribal TANF Program Funding, 2011**

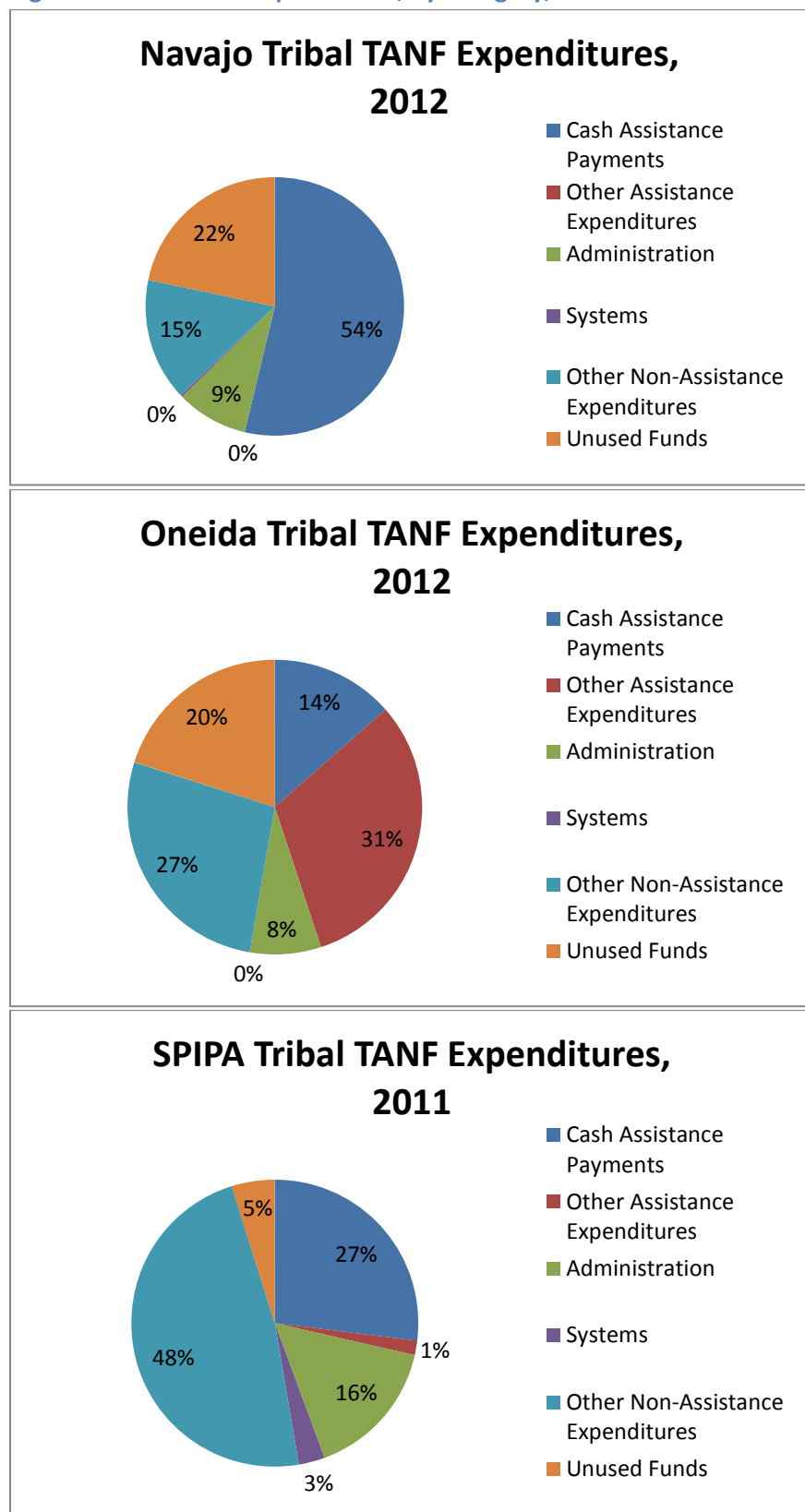
<b>Tribal entity</b>	<b>Number of tribes served</b>	<b>Year program began</b>	<b>Annual federal Tribal TANF funds</b>	<b>Funds from state(s)</b>
<b>Navajo Nation</b>	1	2000	\$ 31,174,026	\$2,308,872 (Arizona, New Mexico & Utah)
<b>Oneida Tribe of Wisconsin</b>	1	2003	\$ 835,924	\$0
<b>South Puget Intertribal Planning Agency (SPIPA)</b>	4	2004	\$ 5,153,492	\$3,255,724 (Washington)
<b>Tanana Chiefs Conference</b>	37	1998	\$ 2,443,973	\$2,301,200 <sup>a</sup> (Alaska)

Sources: ACF Ninth Report to Congress, Table 11.2; amounts from state from ACF-196T financial reports.

<sup>a</sup> Source: Tanana Chiefs Conference.

Figure 6 illustrates the differences among the Tribal TANF programs in how they spent their combined federal and state funds in the most recent year for which financial data were available. (Comparable financial information is not available for TCC because its 477 program blends funding across several programs.) The Navajo Nation spent the majority of its funds on cash assistance payments, while the Oneida Tribe of Wisconsin's two largest expenditure categories were "other assistance," which includes supports other than cash, like child care and transportation, and "other non-assistance," which could include such services as marriage and parenting initiatives, teen pregnancy prevention programs, education and youth programs, adult postsecondary education, mental health and addiction services, domestic violence services, and activities to remedy emergency or unusual crisis situations. SPIPA Tribal TANF's largest expenditure category was "other non-assistance," with cash assistance the second-largest category. The "total unused funds" category includes any unobligated or unliquidated funds.

Figure 6: Tribal TANF Expenditures, by Category, for Selected Tribal TANF Programs



Source: HHS/ACF Tribal TANF ACF-196T Financial Reports.

Tribal TANF programs have relationships not only with their tribal organizations and bureaucracies, but also with the federal ACF Regional Offices. The four Tribal TANF programs in this study are located in three different ACF Regions (SPIPA and TCC are in the same Region), but all four reported positive working relationships with the ACF Regional Offices. Tribal TANF program leaders work directly with officials at the ACF Regional Offices when there are questions about federal program rules or individual Tribal TANF program plans. The Regional Offices provide technical assistance and host regional meetings at which Tribal TANF program staff can meet and share best practices. Oneida Tribal TANF staff explained that their program adopted drug testing and began providing clients with a budget and budgeting instructions for cash assistance after learning about these practices from other tribes at the ACF regional meetings. SPIPA Tribal TANF staff reported that their process for having local offices propose activities was shared by ACF as a best practice, as was the Navajo Nation curriculum for program development. In addition to the regional meetings, Tribal TANF staff reported that the Peer TA network and webinars were valuable resources that were easily accessible and cut down on travel costs. Overall, the Tribal TANF program leaders reported feeling autonomous and able to operate independently, while seeing the Regional Office “as a positive resource to help us get to goal.” One program manager<sup>9</sup> added, “And, in a nice way, we trained them on what it means to work in Indian country.”

The remainder of this section provides detailed descriptions of how each of the selected Tribal TANF programs fits within the larger tribal government structure as well as the internal organizational structure of the Tribal TANF program. This section also describes how the selected Tribal TANF programs in the study approach performance management, fraud, and analysis of program data.

### **Navajo Nation Program for Self Reliance**

Navajo Nation government is modeled after the U.S. federal government and is highly bureaucratized. The Navajo Nation has a three-branch government system: legislative, executive, and judicial. The Tribal TANF program lies within the Navajo Nation’s Division of Social Services, which is in the executive branch, and the Health, Education, and Human Services Committee of the Navajo Nation Council, which is in the legislative branch and has oversight authority over the program. Expenditures and major policy decisions, such as the annual Tribal Family Assistance Plan (TFAP) need to go through multiple layers of approval. The Tribal TANF program managers have key contacts in the council to help sponsor bills, and this has proven an essential aspect of operating the program and its ability to be innovative in program design and management.

The NNPSR is a distinct department under the Navajo Nation Division of Social Services. It is headed by a department manager, who is responsible for managing the NNPSR; seven administrative support sections at the central office level (policy research, staff development, public relations, quality

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<sup>9</sup> Throughout this report the terms “program manager” and program “staff” are used broadly to describe program directors, senior staff, local office managers, site managers, case managers, and others, to protect the identities of the people interviewed. Likewise, the term “program staff” could include people with any of these roles as well as caseworkers, eligibility workers, or other program staff.

assurance, special projects, and finance and fraud, among others); and ten field offices responsible for providing direct services and assistance to program customers.

The NNPSR works closely with other agencies within this division and some outside this division. These include the food assistance program office (SNAP, formerly known as Food Stamps), CSE, workforce development, CCDF, and state agencies. The collaborations, discussed in greater detail in the Service Delivery section, operate as a web of referral partnerships with little specific policy guidance, and they are typically not linked through the formal organizational structure.

Program staff reported difficulty making Navajo government officials aware of the program's goals. Priorities may change every four years after council and presidential elections, and program staff are repeatedly tasked with reeducating the council. While the council oversight committee is said to be supportive of the program, many changes in NNPSR policy or leadership must be approved by the council. Regular procedures and innovations often must go through several layers before implementation. This has been difficult for NNPSR, which is attempting to respond nimbly and creatively to client needs. Program staff contended that while oversight prevents corruption and misallocation of money, such strict oversight can hinder the organization from operating efficiently, working closely with other government agencies, and being innovative in creating new initiatives.

**Funding structure.** The NNPSR operates with a combination of federal funding (\$31 million) and state MOE funds (\$2.3 million) from New Mexico and Arizona. The Navajo Nation does not operate a 477 program. Funding not spent during a given year can be carried over into reserves. In 2012, 22 percent of the combined federal and state funds for NNPSR were unspent, although some of this may have been obligated.

The program has intergovernmental agreements with the states of Arizona and New Mexico to receive MOE funds to expand services to individuals and families who reside in the New Mexico and Arizona portions of the Navajo Nation.

Tight budgets have affected assistance to clients and department operations. The most recent annual budget included a 10 percent cut in monthly benefit payments for all families, a difficult decision that was made after the program's annual expenditures exceeded the annual funding amount as a result of substantial caseload increases. The program also reallocated 100 percent of assistance to monthly benefit payments, as opposed to previous years when some assistance went toward in-kind assistance such as school supplies and uniform vouchers. Additionally, every three years, an assessment of the organizational structure and staffing is conducted to determine if any changes need to be made to improve the effectiveness and efficiency of the program. As a result of restructuring (including the elimination of positions that were determined no longer necessary), the difficulty in hiring for technical and specialized positions, and the length of time it takes to fill vacant positions, current staff have had to take on additional duties and responsibilities.

**Performance management and information technology (IT).** NNPSR contracts with Eaglesun, an IT company, to develop and maintain a Tribal TANF database using the Tribal Assistance System (TAS) software to track client and financial data. This is the primary means for entering data on clients,

running reports for federal and tribal entities, and fulfilling administrative tasks. NNPSR leaders have worked closely with Eaglesun to develop tailored data entry and reporting forms that are used for case management and for some limited performance measurement, though the staff is hoping to improve upon this.

The NNPSR program has a partnership with Wells Fargo Bank, which provides bank cards to clients. Program staff also use the system to track finances and produce reports.

The overall perception of the Eaglesun database is positive. One staff member called the system “perfect,” explaining that any piece of information about a client is available through the system. It has helped program staff reduce audit findings, which was a big concern after several deficiency findings from independent audits. However, the database can be difficult to use and isn’t seamless. Caseworkers often spend extra hours inputting data, and there is concern that data input is taking up too much of caseworkers’ time. Often other priorities take over, and program staff enter only critical payment data. As a result, nonessential client information can be unreliable.

So far, analyses of program data have focused on compliance with NNPSR and federal requirements, but the NNPSR Quality Assurance section is in the process of developing assessments of outcomes, such as the share of clients getting jobs, earning GEDs, and attaining certifications. Performance measurement is incorporated in the latest TFAP, which includes multiple purpose statements with specific measurable goals and objectives. Some programming and policies are designed using this data. For example, the TFAP includes a goal statement that 5 percent of clients will go into education, and so specific projects and initiatives are designed to drive clients toward this outcome. In addition, the NNPSR research section has conducted focus groups and surveys with specific subpopulations of clients to determine their needs and target initiatives to address them. For example, focus groups and surveys of grandparents raising grandchildren revealed a need for greater assistance with child care, early education, and legal counseling on custody-related issues, and research with teen parents revealed a need for additional pregnancy prevention training. A research finding about the lack of child care led to the development of the Child Care Academy, through which clients earn child development associate certificates.

**Fraud.** The NNPSR’s fraud unit also uses TAS and other information sources to investigate fraudulent activities, both internally and externally. Most fraud is client based and involves duplication of assistance from other programs or unreported income sources. To investigate cases, the team does extensive field work. The team also has a memorandum of understanding (MOU) with the Navajo Nation white-collar crime unit within the judicial system to conduct background checks. They use background checks to determine a felony or residency. They work with the state welfare agencies in Arizona and New Mexico to investigate duplication of assistance from state programs. If there is a history of criminal justice involving a felony or broken parole, the applicant is ineligible. A determination that a customer committed an intentional program violation results in a disqualification for one year for the first offense, two years for a second offense, and permanent disqualification for a third offense.

## Oneida Tribe of Wisconsin Tribal TANF Program

The Oneida Tribal TANF program operates with a relatively high degree of autonomy within the Oneida Tribe. The nine-member business committee—the Oneida tribal council—is prohibited by the Tribal Constitution from getting involved with day-to-day program operations. The business committee does not have any direct involvement in approving the Tribal TANF policy manual or budget. Even so, program staff field calls from the business committee once or twice a year about concerns tribal members have brought to the committee regarding benefits.

Oneida's business committee sits at the top of the organizational structure. Below the business committee, the Oneida Tribe's government is broken up into divisions, which are then broken up into areas. The governmental services division houses Oneida's social services area. The programs within the social services area include food distribution, Head Start, child support, children and family services (which includes child welfare and domestic violence for both men and women), and community and economic support.

Tribal TANF falls under the community and economic support program, along with 11 other programs: Native Employment Works, FoodShare (SNAP), BadgerCare (Medicaid), Medicaid Outreach, State Community Service Block Grant, State of WI LIHEAP, WI Shares Child Care, CCDF Child Care, State Family Services Respite Care Child Care, Tribal Community Support/Catastrophic Fund, and BIA General Assistance. These programs are divided into three categories: support services programs, economic support programs, and child care programs. Caseworkers work within one of the three subdivisions and must manage caseloads for clients receiving benefits from any of the programs in their area.

The Tribal TANF program falls under economic support, along with FoodShare, BadgerCare, Native Employment Works, and BIA General Assistance. Therefore, caseworkers, called economic support specialists, are responsible for clients eligible for Tribal TANF and any of the four other programs in economic support. One benefit of this setup is the overlap in case management across the programs. However, in practice, caseworkers are overworked and therefore unable to provide extensive case management. Further, caseworkers do not have the ability or resources to innovate within the Tribal TANF program because of the time and attention they devote to food, medical, and other assistance programs.

The 12 programs within community and economic support are located in Oneida's Center for Self-Sufficiency, located on the reservation near suburban Green Bay. This center also houses programs for children and family services, Head Start, behavioral health, Native American vocational rehabilitation, Workforce Investment Act, and more. The center serves as a "one-stop" facility for tribal members and promotes collaboration and coordination among programs. For example, program staff described walking clients down the hallway from their own department to the next department, ensuring that clients connected with other needed services. Similarly, the child support director might walk down the hall to meet with the economic support manager to discuss a client's child support compliance issues and the resulting implications for his or her Tribal TANF eligibility. Such collaboration allowed program

staff to connect clients with services more quickly and to address factors that might affect Tribal TANF eligibility.

Despite the high level of collaboration and close proximity of social service programs within the Center for Self-Sufficiency, the Oneida Tribe of Wisconsin does not operate a 477 program. Tribal TANF program staff and staff from other programs expressed concern that their funding might be diverted to other programs if all funding streams were pooled under a 477 plan. For this reason, program staff did not view 477 as a favorable option. However, they explained that the decision not to pursue a 477 plan was made at a higher level of leadership.

**Performance management and IT.** The combination of the Oneida Tribal TANF program, FoodShare, BadgerCare, and other programs in economic support allows case managers to work across the State of Wisconsin's database and Oneida's Tribal TANF database. Each caseworker in the economic support category has two computer screens. One screen shows the state system that houses client data on FoodShare, BadgerCare, and child support. It also shows the State Wage Record Query, for unemployment benefits, and links to the Social Security Administration (SSA), for SSA benefits. The second screen provides access to the Tribal TANF data management system, TAS Eaglesun. If an economic support caseworker enrolls an individual in Oneida Tribal TANF, she can then enter that change into the state database so the client's FoodShare benefit adjusts appropriately. Conversely, when working with Tribal TANF, caseworkers cited access to the information in the state database as essential for addressing Tribal TANF eligibility issues and managing Tribal TANF receipt.

The TAS Eaglesun data system that caseworkers use to enter Tribal TANF client information also interacts with the data system from Oneida's federal child care program and specific data systems for other internally funded programs operated out of Oneida's Center for Self-Sufficiency. Program staff are generally satisfied with the TAS Eaglesun data system and find requesting changes to the system easy and effective. They primarily use the TAS data to calculate the work participation rate. Caseworkers track employment outcomes of Tribal TANF clients in the form of three-, six-, and nine-month reports once they leave Tribal TANF cash payment. These reports are provided to the economic support manager, who then compiles the required quarterly reports. Program staff also track the monthly Tribal TANF expenditures and caseloads through the TAS Eaglesun system. A program manager remarked that caseworkers are too busy to be looking at performance measures beyond the work participation rate and required federal reporting on TANF expenditures and caseloads.

### **SPIPA Tribal TANF Program**

The Tribal TANF program operates within SPIPA's unique structure as an inter-governmental, inter-tribal nonprofit agency. SPIPA is governed by a board of directors, consisting of one representative from each of the five tribes that make up the agency—Chehalis, Nisqually, Skokomish, Squaxin Island, and Shoalwater Bay. Although at the time of this report only three of the five tribes participate in Tribal TANF, the board as a whole plays a large role in the program. As the SPIPA executive director explained, "Everything we do here is reviewed by the board and is shared with the board." The Tribal TANF policy manual and any other policy changes must be approved by the board. In addition, policies and

procedures often have to be reviewed by the tribal councils from each of the five tribes. A Tribal TANF advisory committee, with representatives from each of the three Tribal TANF programs, is also able to make recommendations to the board.

As a result, Tribal TANF program officials take a proactive approach in meeting with and educating the board of directors and tribal councils about Tribal TANF. When tribal council leadership changes, the agency executive director and Tribal TANF program manager brief the new council on program policies and procedures. The Tribal TANF program also provides reports to the board on key program characteristics such as the number of new clients, number of client exits, and expenditures.

Of the five SPIPA Tribal TANF offices, the three reservation sites operate under a unique sub-recipient relationship with SPIPA. For these sites—Nisqually, Skokomish, and Squaxin Island—SPIPA serves as the primary funder and the reservations sites are considered tribal partners, able to deliver Tribal TANF services within the policies of their own sovereign tribe. This relationship is governed by a formal memorandum of agreement between SPIPA and each tribe that outlines how the reservation site must manage the Tribal TANF program physically, programmatically, and with certain personnel policies and benefits. The program managers at the reservation Tribal TANF sites have control over how the program is run, who is hired and fired, what types of Tribal TANF activities are offered, and more. Examples of activities include GED classes, child wellness incentives, and résumé workshops. Tribal TANF sites must submit a proposal to the SPIPA Tribal TANF program to receive funding for an activity. The proposal process allows each site to provide activities tailored to site-specific needs, while allowing the program to maintain programmatic oversight, ensuring that services are equitable at all sites and activities meet one of the four goals of TANF.

Just as the SPIPA board may raise concerns with SPIPA Tribal TANF officials, a tribe's tribal council may raise concerns with their reservation's Tribal TANF program manager about an individual's benefits or denial of services. Again, negotiating this dynamic involves explaining Tribal TANF policy and constraints while also trying to work within policy to satisfy the tribal council. One tribe's program manager explained: "I take my leadership from the tribe, but I get my funding from SPIPA... So, for me it's a juggling act. I have to make sure we are within TANF policies at SPIPA, but I have to listen to tribal leadership." The two urban TANF sites—the Tacoma and Bremerton offices—are directly run by SPIPA Tribal TANF, with program managers who are SPIPA employees.

Within SPIPA, the program is led by the Tribal TANF program manager and four program coordinators. The program coordinators have responsibility for program operations and logistics, data reporting and compliance, database management, processing client service requests, reviewing proposals for program activities, fraud investigations, and all other program management activities. They work closely as a team, with each person having primary responsibilities but also able to take on each other's responsibilities when needed. The program managers and other SPIPA Tribal TANF staff spoke very positively of this organizational size and structure, which is small enough to facilitate close coordination and communication but large enough that it doesn't all fall on one person's shoulders.



All SPIPA Tribal TANF staff, from the program coordinators through the eligibility workers, are chosen with extraordinary care. Dozens of job applicants are rejected, and a position may remain unfilled until the right person is found. Once hired, SPIPA Tribal TANF program staff continue to receive guidance and support to help them develop to their full potential. The SPIPA Tribal TANF program manager devotes considerable attention to ensuring that the program is tapping each staff member's strengths, even if it means moving a staff member to a different role. He referred to this practice as making sure the program has the right people in the right seats on the bus. He said: "Once you determine what the core competencies are and what you're looking for, then you have to go find them, attract them, and keep them. It's a mission of passion."

In its first few years of existence, the SPIPA Tribal TANF program struggled to develop an effective organizational structure and management practices. SPIPA Tribal TANF program staff explained that funding is received 30 days before opening doors and providing services. In the beginning, it was like "building an airplane in mid-flight." After two years, the program contracted with the University of California, Davis to evaluate the program, a process that included receiving feedback from tribal partners, clients, and elected officials. Some of the feedback "wasn't very positive," according to the program officials, but it led the program to make some "significant adjustments." The evaluation led SPIPA, for example, to create memoranda of agreement with its tribal partners and to create an internal controls position within its management structure. While the original purpose of having this position was to improve the speed of service delivery, it ultimately led to SPIPA developing sophisticated internal control functions to systematically ensure program compliance.

**Funding structure.** Tribal TANF is by far the largest of the 35 programs managed by SPIPA. It accounts for nearly half of the agency's \$17 million budget portfolio of 100 federal, state, and private funds. According to SPIPA officials, tribes have chosen SPIPA to manage the Tribal TANF program in part to benefit from SPIPA's strong fiscal infrastructure and cost efficiencies. SPIPA Tribal TANF program managers noted that so far Tribal TANF funding has been sufficient to provide supportive services in addition to cash assistance; however, supportive services would be reduced or cut if caseloads were to rise or if funding were reduced. They noted that Tribal TANF carryover funds from prior years have been diminishing as the program has matured. In addition, the program currently receives MOE funds from the State of Washington, but the state has threatened to reduce those funds as a result of budget concerns.

**Performance management and IT.** Like several Tribal TANF programs, the SPIPA program uses the Eaglesun TAS software to track client and financial data. Program staff have found TAS useful in tracking critical data for federal, state, and daily management. A data-sharing agreement with the State of Washington also allows program staff to directly view client information in the state computer system. The program staff emphasized that this agreement represents the high degree of trust the state has with the SPIPA Tribal TANF program, based on the program's proven security measures.

SPIPA uses TAS and other software to track not only the work participation rate and other information required for federal reporting, but also a number of additional program indicators of interest to SPIPA and to the State of Washington. Because the Tribal TANF program receives funding from Washington

State, staff are required to report program performance results to the state. SPIPA tracks such information as the numbers of clients engaged in unsubsidized employment and other work activities and the reasons for case closures. SPIPA Tribal TANF program staff carefully track program performance to identify and address any negative trends. A program coordinator explained, “If we look at our reports and notice something is off—a good outcome is tapering down—we’ll pay attention and try to fix this.”

**Fraud.** The SPIPA Tribal TANF program has developed a number of internal controls to identify and prevent fraud. First, a single program coordinator, the internal controls person, has primary responsibility for reviewing all expenditure requests for compliancy, allowability, and reasonableness. The program coordinator was selected for her particular talents, which reportedly include an unusual ability to recognize patterns and discrepancies that could indicate errors or fraud in expense reports. Beyond relying on this special talent, the program coordinator has access to the computer system to verify information provided by clients and has trained all case managers to identify potential fraud and to verify client information. To protect the program coordinator’s independence, she has no interaction with individual clients. Cases of potential fraud are instead referred to another program coordinator, as well as to the program managers and case managers for investigation.

To further prevent fraud, the Tribal TANF program has made a number of changes to the way support services are provided. For example, in the past, clients were given purchase orders in the maximum-allowable amount to purchase personal care items and were expected to spend only what was needed. However, receipts showed that clients were instead purchasing additional, unnecessary items to use up the full amount of the purchase orders. In the past year, case managers have been instructed to give purchase orders in smaller amounts and to provide these only when asked, rather than offering them to all clients. In addition, the program created a project proposal process, through which individual program offices can request advance approval for events, activities, and projects. The proposal format addresses the four purposes of TANF as well as compliance issues, ensuring that program fund usage is reasonable and allowable.

### **TCC Athabascan Self-Sufficiency Assistance Project**

TCC has a 42-member board of directors that represents all member tribes, whether or not federally recognized; each board member has an equal vote. There are six subregional boards and a nine-member executive board of directors. The managers and employees of each program are responsible to the TCC board of directors and, thus, only indirectly to the member villages.

TCC operates the following programs: health and behavioral health, client development/Tribal TANF, tribal development (infrastructure), adult education, vocational education, vocational rehabilitation, child protection, foster care, and cultural and natural resources. Most, but not all, tribes in its service area use TCC’s programs and services. A few tribes elect to operate certain programs directly rather than receive services through TCC.

**Funding structure.** The TCC Tribal TANF program participates in the BIA 477 program. Over time, TCC has increasingly moved toward a holistic “one-stop” approach to providing social, education, training, and employment services. Currently, it is developing a single application identifying customer needs and

implementing a coordinated approach to meeting these needs and facilitating the self-sufficiency of individuals and families.

The advantages of the 477 program were said to include bringing together program funding streams, which “allow staff to deal with actual customer needs rather than being limited by a particular program’s policies, procedures, and budget.”<sup>10</sup> On the other hand, “this arrangement can be hard for program directors because they do not have their own pot of money.” TCC prepares an internal quarterly report for the 477 program. In addition, monthly reports are prepared for the state as well as for programs not participating in the 477. Reporting is complicated by the different programmatic and reporting requirements of different funders. For example, the definitions of age groups differ across programs, with some federal funds for youth employment serving youth up to age 21 and state employment funds serving youth from 14 to 24 years old.

**Relations with the State of Alaska.** The federal law establishing TANF includes a “Special Rule for Indian Tribes in Alaska,” making the requirements for Tribal TANF programs in Alaska comparable to the requirements for the state’s TANF program. The law does not include such rules for tribes in any other state.<sup>11</sup>

People residing in the TCC service area are not required to participate in the programs administered by TCC; they can elect to use programs administered by the state. In focus groups, some ASAP participants said that they had elected to use the TCC program rather than the state TANF program because ASAP processes applications faster. One person said that it took over two months for the state to approve his application. Others said that the financial benefits provided by ASAP are greater than those provided by the state’s TANF program and that ASAP has more meaningful work activities. “With ASAP, you feel like you’re earning your money,” one participant said. “You have to complete a time sheet. It gives you a responsibility. The state looks down on us. ASAP respects us and tries to help us more.”

**Performance management and IT.** The collection, analysis, and reporting of ASAP program data to improve program effectiveness and efficiency has evolved over time. Initially, reports were prepared quarterly. Currently, reports are prepared monthly and include such areas as program staff work activity rates and measures of program outcomes (e.g., unsubsidized employment, subsidized employment, and participation in education programs).

ASAP staff said they need information systems to complement and support the developing holistic, integrated services. For example, currently there is no information system that can identify if an employment and training client is also served by ASAP or another program. The client has to sign a release form to allow information sharing between programs.

ASAP has hired IT staff to identify, export, and analyze ASAP and other program data. These efforts have yielded useful analyses such as family composition, identifying trends, successes, and problems areas.

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<sup>10</sup> TANF funds spent as part of a 477 program must be spent on activities that are authorized under TANF and are consistent with all applicable TANF statutory requirements, regulations, policies, and procedures.

<sup>11</sup> See P.L. 104-193.

However, program staff said the Tribal TANF funding is not sufficient to cover the needed IT support staff, hardware, and software as well as corresponding staff training in using new systems. In contrast to states, which had IT infrastructure and resources in place to support TANF programs, few tribes had or even today have the needed IT infrastructure and resources. Consequently, Tribal TANF evaluation, reporting, and continuous quality improvement are a challenge to ASAP and other tribal programs.

## **Tribal TANF Service Delivery**

This section describes how Tribal TANF benefits and services are delivered in each of the selected Tribal TANF programs. Some aspects of service delivery are common to all four programs. Each program accepts applications; determines a family's eligibility for cash or other services; assesses the family's needs; provides benefits, services, and/or ongoing case management; requires adults to engage in activities that lead to self-sufficiency; and collaborates with or refers clients to other programs and services. All the programs use IT systems to deliver services, and they all deliver services in ways that reflect their tribal cultures. However, because of differences in tribal cultures, as well as differences in physical and political environments, the experiences of families participating in each of the four Tribal TANF programs in this study are likely to differ.

A family seeking Tribal TANF cash assistance in the Navajo Nation might have learned about the program through a Navajo-language radio ad, and probably traveled a great distance on foot, by family car, or by hitchhiking to reach one of the 10 offices located throughout the reservation. They will fill out a paper application for TANF and will need to travel to a different location to complete the application process for nutrition assistance and to verify their child support arrangements. If they are assigned to a particularly helpful caseworker, she might help them through the process of verifying their eligibility for TANF cash assistance. Their caseworker will identify herself by her given name as well as by naming the clans of her parents and grandparents. The family will work with the caseworker to develop a personal responsibility plan that will list the family's goals and the types of activities that the family will do step by step to pursue self-sufficiency. The plan will reflect the traditional Navajo growth cycle of Think, Plan, Do, Grow. Each adult in the family will be required to spend 24 hours per week on average on the acceptable activities, which could include, for example, a job or classes at the community college or providing traditional healings in the community.

A family seeking Tribal TANF cash assistance in the Oneida Nation of Wisconsin probably first learned of the program through word of mouth. They will go to the Self-Sufficiency Center that houses all the support services, and the intake worker will give them a paper application for TANF, as well as an application for any other program that the family specifically requests. The adults in the family will be given a drug test. Their case will be assigned to one of the two caseworkers who handle Tribal TANF, and who will also be their caseworker for the state nutrition and medical assistance programs. The adults in the family will be required to look for work before they receive any cash assistance, and they may continue to receive only case management without cash assistance. The adults will be required to engage in work activities

for 40 hours a week, although a couple can split the hours. The family is likely to be referred to community organizations for a wide range of other services.

A family seeking Tribal TANF cash assistance from the SPIPA TANF program might have heard about the program from their neighbors on the reservation or from a worker at the Washington State TANF office who told them they needed to apply to SPIPA, not the state. When the family walks into the SPIPA TANF office, someone will greet them and say, “Welcome. How can we help you?” A caseworker will complete the application process with the family and then will ask them about their dreams for the future. Together, they will develop a family success plan that lists the activities the adults will do to work toward those dreams. If an adult in the family does not have a high school diploma or GED, attaining a GED will be that adult’s first required step. A single parent will be required to spend at least 20 hours a week on the activities in the plan; a couple will be required to spend at least 30 hours a week, collectively. While working or in school, the family probably also will be engaged in trainings provided by the Tribal TANF office that incorporate traditional cultural activities. Their family success plan might also include other cultural activities that can lead to self-sufficiency. The family can access the state nutrition and medical assistance programs with the help of liaisons who visit the Tribal TANF office.

A family seeking Tribal TANF cash assistance in the interior of Alaska probably learned about the TCC ASAP program when they sought other supports, either at the Fairbanks office or from the person in their village who handles all supportive services. The family will provide information on their income and other circumstances and then might wait a month or more to learn what assistance they will receive. The family will work with the staff member to develop a Self-Sufficiency Plan that includes acceptable activities. The adults in the family will be required to engage in these activities for an average of 30 hours a week. If no jobs are available in the village, family members might compensate the tribe by hunting, teaching children subsistence activities, or taking care of elders. At some point, the adults probably will be flown to Fairbanks for a highly motivating two-day event, where they will learn interviewing and job skills and be offered at least temporary paid employment.

While these stories provide a glimpse into the differences among the delivery of Tribal TANF services, the sections below provide greater detail about service delivery in each of the four Tribal TANF programs.

### **Navajo Nation Program for Self Reliance**

NNPSR operates 10 field offices scattered throughout the reservation. Most are near more-concentrated settlements, but some satellite offices are located in smaller communities. These field offices range in number of program staff and services provided. For example, the field office located in Window Rock, the capital city, is housed in the same building as the central office. Here, clients have access to a range of services within the Tribal TANF program as well as other services located in the city. The Piñon office, by contrast, is located in a remote community and is staffed by only three to five people. Clients in such

remote communities have fewer employment opportunities and less access to training and other services typically provided by the NNPSR.

Despite great effort made by the Tribal TANF program to make field offices more accessible, clients still have difficulty accessing them. Caseworkers will often pick up clients for appointments if they do not have access to a personal vehicle. Program managers have considered a mobile field office that can reach clients in remote locations throughout the reservation, but this has not yet materialized.

Some clients actively seek out better educational and employment opportunities off the reservation. Clients seeking education or treatment for substance abuse problems can relocate off the reservation while still maintaining NNPSR participation; in this way, the program encourages clients to seek out self-sufficiency even if it means leaving the reservation.

**Application, intake, and assessment process.** Applicants complete paper applications. They must pass several steps to validate eligibility, including CSE compliance, verification of child custody, and documentation of income, among others. Applicants are responsible for providing the data required by the verification process. Obtaining the required data can be arduous given the transportation barriers on the reservation. Focus group participants complained about this part of the program. In some cases, caseworkers can help applicants with the process; however, it is at the caseworker's discretion.

Applicants found eligible are required to participate in orientation, which includes the following assessments: 1) the Barriers to Employment Success Inventory, which looks at possible barriers such as substance abuse, education, and transportation; 2) the Test of Adult Basic Education, which assesses grade level; and 3) an interest inventory, which gauges interest in various career paths. Multiple interviewees discussed the importance of this part of the orientation. Each caseworker completes training to conduct them correctly. The assessments provide critical information about clients' needs and circumstances as well as the steps needed for them to become self-sufficient. This information informs the development of the personal responsibility plan. After the client is approved, caseworkers have 45 working days to develop the PRP. After approval of the PRP, work activities are written into it and form the basis of the client's program.

Some focus group participants complained that the assessments are not enough, or that caseworkers have not been trained to do substance abuse and domestic violence assessments, a problem prevalent in much of Indian country in general, and specifically in the Navajo Nation. Nonetheless, principal caseworkers have recently gone through domestic violence training to become advocates for clients, and the program is taking strides to address these concerns when they arise.

**Case management approach: total caseload size, caseworker ratio.** In recent years, NNPSR has become increasingly focused on client development and the caseworkers' role in guiding clients to self-sufficiency. In the past, most staff had backgrounds in public administration. When the new director was hired, the philosophy changed and staff were provided training opportunities in human services. In addition, the new director began hiring caseworkers and program managers with backgrounds in social work; many now are licensed social workers. Case management now focuses more on work skills, career development, and addressing client barriers to self-sufficiency.

When clients are approved for assistance, they are immediately assigned to a caseworker at a field office of their choice. The caseworker conducts assessments, helps clients develop PRPs, and meets with clients monthly to refine the plan, monitor work activities, and refer clients to opportunities and trainings. Caseworkers go through intensive case management training on conducting assessments and developing PRPs.

The program staff have made efforts to keep caseload ratios low. They use a weighting system based on case type (child only, two parent, single parent) to determine workload, and these ratios have been going down over the years, despite funding cuts. Even so, NNPSR has not been replacing caseworkers who leave, and it was explained that additional caseworkers and senior caseworkers are needed. At one field office, each caseworker carries about 65 cases with whom he/she must meet monthly.

NNPSR recently created a new job called a principal caseworker, which focuses explicitly on more challenging cases. Typically these are clients who have been on the program for over 60 months. A principal caseworker has higher credentials (e.g., a bachelor's degree in psychology or social work) and receives more intensive training on case management and barriers such as domestic violence and substance abuse. Their caseload is lighter at 20 cases, but principal caseworkers check in weekly with each client.

At NNPSR, a Tribal TANF client's experience can be shaped largely by his or her caseworker. While some caseworkers work very closely with clients and provide a lot of support, others take a more hands-off approach. Some focus group participants said that some clients switch caseworkers, trying to find one with a more compatible approach. Participants in the focus group who spoke positively of their caseworkers emphasized the value of establishing a personal relationship with their caseworker. They appreciated their caseworkers going above and beyond the standard responsibilities of monitoring work activities and providing referrals to outside services. Some focus group participants said discussions with their caseworkers about barriers to self-sufficiency (e.g., substance abuse or domestic violence) have been particularly helpful. Other clients explained that they did not have the opportunity to have such personal conversations with their caseworkers and instead received training focused around money management and personal finance.

**Benefits and services provided.** NNPSR clients receive a range of benefits and services through the program. In addition to a monthly cash assistance benefit that is based on family size and other current income, families receive

- intensive case management from trained professionals,
- referrals to a range of other services,
- priority child care,
- job and life skills training, and
- employment referrals.

Additionally, there are examples of periodic in-kind benefits such as vouchers for school uniforms and gift cards for retail stores. Once clients secure full-time employment, they are provided transition assistance to ease them into self-sufficiency. This transition includes benefits that step down over

several months, from full assistance to zero. An innovative approach designed to support self-sufficiency is encouraging clients to open individual development accounts and incentivized savings accounts, which allow clients to begin building personal wealth.

Employment and training referrals are an important component of the NNPSR client development program. The program offers life skills training on personal budgeting, parenting, interviewing, and résumé writing. Work skills training includes CPR/first aid and fire safety, among other topics. Comprehensive training is available at seven training centers. One innovative program initiated a Child Care Academy in response to the area's high demand for child care professionals. Sixty NNPSR participants attended the Academy to get child development associate certificates. Those who completed the training and a local field practicum were linked to jobs at Head Start and are no longer Tribal TANF recipients. NNPSR program managers are looking into adapting this model to other employment sectors, such as health professions and teaching. However, this effort has confronted a barrier: a negative stereotype/perception of Tribal TANF recipients held by some prospective employers in the private sector. NNPSR program staff said they are combating such negative stereotypes through education efforts—telling prospective employers about the hard work, positive motivation, and resilience of Tribal TANF clients' drive for self-sufficiency.

**Activity requirements.** Upon approval of their application, NNPSR clients are provided training on how to complete a personal responsibility plan. The PRP includes work activities tailored to the client's experience, educational attainment, interests, and other factors identified in the intake and assessment process. The completed and approved PRP data are documented and entered into TAS, which is used to print time sheets for the client. These time sheets include only the approved work activities; clients complete these time sheets and submit them to report hours worked to their caseworker.

Each parent in an assisted household is required to participate in approved work participation activities for an average of 24 hours each week. The program is required to have at least 25 percent of households in compliance. According to the latest TFAP reports, NNPSR exceeds the requirement with 48 percent of households in compliance. If clients fall short on these hours, caseworkers use their own judgment to decide whether to sanction them. For child-only cases there is no work requirement.

The majority of approved work activities are education or job-readiness training. The most common activities include community service or volunteer work; job-readiness training, such as CPR/first aid; certifications for food handler, job safety, fire fighters, heavy equipment handling, and other vocational training; and paid employment.

The flexibility of Tribal TANF policies allows for inclusion of traditional practices to support self-reliance. These include history teachings; culturally relevant trainings, such as courses on ceremonial practice and Navajo language; and livestock management, one of the largest activities in the Navajo Nation economy. Another important focus is parental involvement with their children. Parents may attribute time working with children at home to a portion of their Tribal TANF work requirements. This is one example of how the program focuses on children's outcomes. Because most of the reservation is rural and sparsely populated, opportunities for paid work activities are limited. Thus, community service/volunteer work



hours are counted toward the work participation hours. In addition, clients enrolled in education or treatment programs off the reservation can count those hours toward their work requirements and receive NNPSR cash assistance while they are in school or treatment.

**Collaboration with and referrals to other programs.** Collaboration among the social service programs and organizations in the Navajo Nation happens both informally and formally. Often collaboration is dependent on personal relationships among staff in various entities. There is a broad system of referrals that NNPSR relies on to serve the needs of its clients. Within the Division of Social Services, agencies meet regularly to discuss administrative issues. While there are many partnerships and collaborative efforts, program managers noted that the Navajo Nation government bureaucracy and lack of interest can inhibit effective collaboration. NNPSR program managers described a desire to enhance collaboration with other agencies and programs; the plan focuses on building these partnerships through outreach and communications. Despite such plans and activities, however, it has been difficult to convert discussion of mutual interests into real collaboration.

The highest degree of procedural coordination can be found in the NNPSR's partnership with child support enforcement. Compliance with child support regulations is required to receive Tribal TANF assistance, and TANF caseworkers refer applicants to CSE for proof of compliance. CSE has an MOU with NNPSR to collaborate and cooperate in assisting custodial parents to comply with, and maintain compliance with, child support requirements.

NNPSR also links with the CCDF programs. TANF recipients are referred to CCDF and are given priority for space at child care providers within this network. NNPSR and SNAP refer applicants to each other's program and share documentation. To some extent, NNPSR collaborates with the Department of Workforce Development. NNPSR also collaborates with the state TANF programs and meets with the New Mexico and Arizona agencies regularly to address concerns and share updates.

The program has a job placement partnership with Head Start. Another major collaborative effort is with schools. Tribal TANF clients document their children's consistent school attendance in order to be in good standing in the program.

Generally, there seems to be a positive view of the Tribal TANF program from an organizational standpoint. Outside organizations and the Navajo Nation government see NNPSR as a model for its training procedures, collaborative initiatives, client-oriented services, internal reviews, and data collection and reporting.

**Outreach.** The NNPSR has a public outreach office headed by a public relations (PR) specialist. Many members of the community hold negative stereotypes about the Tribal TANF program, and outreach efforts have focused on changing this perception. The PR specialist creates public service announcements (in English and Navajo) to inform potential clients of the program as well as to improve public perception of the program. Besides radio, newspaper, and web site outreach, the PR specialist produces a regular newsletter that highlights NNPSR accomplishments. Formerly, when employment development specialists were part of the program staff, they would send invitation letters to employers

informing them of the program. Budget cuts have reduced the number of such specialists, however, and the program currently does little work creating partnerships with private employers.

**Use of IT in service delivery.** The NNPSR uses TAS to document all client records and activities. One way TAS is valuable to service delivery is that the PRP and work activities are incorporated into each client's TAS file, which is used to tailor monthly work activity time sheets. Such reports allow caseworkers and clients to efficiently record and track completion of approved work activities and progress toward self-sufficiency. Program managers conduct random assessments of client files to ensure the program is in compliance, to check work participation rates, and inform continuous quality improvement efforts.

**Integration of tribal culture.** Navajo culture and traditions are vibrant throughout the reservation, and the Navajo belief and value systems are deeply infused into the NNPSR and other programs. Navajo values of self-reliance, as captured in the phrase "T'áá hwó ájt'éego," are repeatedly incorporated into case management and training. The traditional growth cycle (Think, Plan, Do, Grow) defines the process by which the organization manages strategic planning and how clients are taught to develop their path to self-reliance.

Further, tribal affiliation and understanding is valued within the NNPSR. Many interviewees described the benefits of having similar culture and background and language of clients. This allows them to communicate on the same level with their clients in ways that non-Navajo people could not. Also, work activity requirements are flexible and can include traditional Navajo and Western medicine, community work, and other traditional practices. The relevance of culture within program operations is said to help motivate clients.

One other way tribal culture is incorporated is through alternative dispute resolution in marital, child support, and other conflicts. This is known as the Peacemaker Court. The decisions rendered by this court are accepted and followed by the child support agency.

### **Oneida Tribe of Wisconsin Tribal TANF Program**

Oneida Tribal TANF services are delivered from a single Oneida office building that also houses all other major support services. Tribal TANF cases are handled by two caseworkers, who also administer the FoodShare and BadgerCare programs.

**Application, intake, and assessment process.** Intake is centralized for all 12 community and economic support programs, including Tribal TANF, but individuals apply for specific programs. If an applicant does not qualify for the requested program, the intake coordinator may recommend other programs that provide similar support or services.

To apply to the Oneida Tribal TANF program, individuals must have proof of tribal enrollment, residency verification, and job search verification. Copies of the Tribal TANF application are available in the office, and applicants fill out their application on their own. They can work with the intake specialist to go over questions. The Oneida Tribal TANF program recently implemented drug testing for all individuals applying for cash assistance. When an applicant for Tribal TANF cash payment comes to the office, the

intake worker refers the client to the Behavior Health Department, which is located in the same building, for a drug test. Behavior health services provide applicants with their test results and refer them back to Tribal TANF. Applicants that test positive can still qualify to receive Tribal TANF but have to first get an alcohol and other drug assessment and follow the resulting treatment recommendations, which become part of the client's Tribal TANF employability plan. The Oneida Tribal TANF program can pay up to \$5,000 for substance abuse and other treatment services.

Applicants are required to do an upfront job search when they first submit their Tribal TANF application. After the application is submitted, applicants are assigned one of two caseworkers, and an appointment with their caseworker is scheduled to occur within seven business days. From the time of the application until the initial appointment, applicants are required to do two job searches a day. At the initial appointment, the caseworker conducts a client assessment, which takes about two hours. It includes a participation agreement, a statement of client rights and responsibilities, a survey on jobs the client is interested in, math and reading tests, a sample budget, and the rules of Tribal TANF. The budget includes local area resources and Tribal TANF program staff contact information. The budget is designed to help the client plan bill payments and other ways in which to spend the Tribal TANF cash payment.

**Case management approach: total caseload size, caseworker ratio.** To promote employment, the Oneida Tribal TANF program starts most applicants with “case management–only” Tribal TANF services, where clients do not receive a cash benefit. Caseworkers make the decision about whether to put a client on cash payment or case management only; typically, clients are not put on cash payment right away. About 10–15 percent of the total Tribal TANF caseload consists of case management–only cases. Each caseworker has about 180 clients on FoodShare and BadgerCare, including about 25 to 30 who also receive Tribal TANF case management or cash assistance. Tribal TANF crisis and diversion clients make up another 20 to 40 cases per caseworker. Caseworkers meet with their Tribal TANF clients once a month. In addition, clients must come to the Center for Self-Sufficiency to turn in their time cards once a week. Caseworkers expressed frustration about time and staffing constraints, explaining that they would like to have a separate caseworker who works only with Tribal TANF clients and would like to have the time to conduct more workshops and events for Tribal TANF clients.

According to ACF data for 2006 to 2010, the average monthly Tribal TANF caseload has fluctuated over the years. The peak average monthly caseload was recorded in 2006 at 66 cases. The lowest average monthly caseload, 35 cases, occurred in 2010, with fluctuations up and down in the years in between.

**Benefits and services provided.** Within the Oneida Tribal TANF program, an applicant can apply for three different types of services: cash payment, diversion services, or crisis services. Tribal TANF cash payment is the traditional monthly cash assistance program. Tribal TANF customers receiving cash payment may receive additional support services such as transportation assistance (bus passes, taxi fares, gas vouchers, car repairs, or car replacement), payment for work-related expenses (uniforms, work clothing, shoes, books/tuition, professional license or certification fees, or work tools), and other allowable expenses. Tribal TANF diversion services provide these same support services to individuals who are not receiving cash payments, to help them in maintain employment and avoid the need for cash assistance. Tribal TANF crisis services are for clients facing emergencies such as homelessness.

The Oneida Tribal TANF program can provide a \$250 incentive for GED completion and \$2,500 toward a replacement vehicle (if the client's vehicle is not worth fixing) after six months of consecutive employment. The program can also pay up to \$500 in traffic fines and the \$200 fee to get a client's license reinstated.<sup>12</sup> Tribal TANF program staff and clients cite the program's ability to pay these fees as a key support service in helping clients overcome a major barrier to employment: the lack of reliable transportation.

When Tribal TANF clients become employed and begin receiving earnings, monthly Tribal TANF cash payments go down, but case management stays in place for another six months. In this way, case managers can continue to provide support services to help the client maintain employment. Similarly, if clients are given case management-only services upon starting the program, their case managers are able to provide support services to facilitate work. Tribal TANF diversion services and crisis services, discussed previously, provide assistance to individuals who may not require monthly cash payments but who need assistance to maintain employment.

**Activity requirements.** The Oneida Tribal TANF program self-identifies as having one of the strictest work requirements for participants: clients are required to work 40 hours a week, although couples can share this requirement. Allowable work activities include work experience, job search (up to six weeks a year), behavioral health counseling, activities related to Head Start, GED classes, alcohol and drug treatment, and high school attendance if under 19 years old. Additionally, participation in certain classes with community partners, such as workshops on healthy relationships provided by the local native nonprofit Wise Women Gathering Place, can be counted as work activities. Clients may be exempt from the work requirement if they are in domestic violence counseling. Clients can also count domestic violence counseling toward their work activities. The program is required to have at least 35 percent of its non-exempt cash assistance clients engaged in allowable work activities, and tends to meet or exceed that rate. According to program staff, some months they have documented a 68 percent work participation rate. According to ACF data, the average work participation rate for the Oneida Tribal TANF program was 55 percent between 2004 and 2008.

**Collaboration with and referrals to other programs.** As part of Tribal TANF service delivery, case managers frequently provide referrals to the CSE division, behavioral health division, vocational rehabilitation, and other programs in the Center for Self-Sufficiency. The Oneida Tribal TANF program also has strong partnerships with many local community organizations and is able to work with these organizations to set up classes specifically for Tribal TANF clients or to enroll Tribal TANF clients in existing classes. For example, Wise Women Gathering Place offers classes on how to form healthy relationships with yourself, your children, and your partner. Tribal TANF clients can attend classes at Wise Women Gathering Place to satisfy their work requirement, and the program works closely with the Tribal TANF program to designate classes specifically available for Tribal TANF clients. Similarly, the

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<sup>12</sup> The Oneida Tribal TANF program received approval to pay for traffic fines as outlined in its TANF Plan. Traffic fines are a major barrier to employment for Oneida Tribal TANF clients; one staff member explained that having a valid driver's license enables clients to legally drive to look for work and participate in TANF activities and, therefore, is an essential work support. Clients can receive a traffic fine-related benefit once per lifetime.

Tribal TANF program has benefited from “planning ahead workshops” and car maintenance classes through collaboration with the University of Wisconsin–Green Bay and a local auto repair shop. The Oneida Community Education Center is another key community resource that the Tribal TANF program has partnered with. Through this relationship with the center, the Tribal TANF program provides computer classes, résumé classes, and more for Tribal TANF clients. In focus groups, Tribal TANF clients spoke positively about these classes and workshops, especially those offered through the Wise Women Gathering Place and the Community Education Center.

**Outreach.** Many of the Tribal TANF clients interviewed discussed initial confusion and difficulty finding out about the Oneida Tribal TANF program: “It took years to find out about this program;” “I was amazed that my tribe had all these programs that I didn’t know about.” Friends and family were often the sources of information that led clients to learn about and apply to Tribal TANF. Outreach was generally considered weak by the program participant focus group. Suggested improvements included posting more Tribal TANF fliers in the Center for Self-Sufficiency and the health center as well as setting up booths at various tribal functions. Several Tribal TANF program staff members reiterated the need for improved outreach, explaining that word of mouth is the primary means by which clients learn about Tribal TANF.

**Use of IT in service delivery.** Oneida Tribal TANF caseworkers have access to the state database on public benefits, enabling them to determine their client’s participation in state programs. In addition, the Tribal TANF program has “read only” access to data systems used by many other tribal departments. For example, Tribal TANF caseworkers can access the child support and unemployment database systems. The ability for Tribal TANF caseworkers to access various data systems was cited as a huge benefit. The Tribal TANF program uses the Eaglesun TAS to track client progress and activities. Program staff expressed interest in the development of a single, consistent, central database across Oneida social service programs to further enhance data sharing. According to the staff, another tribe is in the process of developing a similar central database system.

**Integration of tribal culture.** Within the Oneida Tribe, there is a growing movement to recover Oneida tribal culture and language, some of which has been lost over the years. Such efforts are expressed in the Tribal TANF and other programs. For example, clients can be granted work requirement exemptions for various culturally relevant commitments and activities, such as participating in ceremonies and funerals or serving as the fire keeper after someone dies. Further, if a customer were to bring a beading workshop or other cultural activity to their caseworker’s attention, it could be considered for inclusion in the client’s employability plan. Overall, Tribal TANF program staff highlight the value of running a Tribal TANF program separately from the state in terms of being sensitive to and supportive of tribal self-determination and self-governance as well as the history and circumstances of the tribe.

### **SPIPA Tribal TANF Program**

The SPIPA Tribal TANF program has five field offices. Three field offices are located on the Skokomish, Squaxin Island, and Nisqually reservations. The other two field offices are located in the city of Tacoma in Pierce County and in Bremerton in Kitsap County. The field offices range in number of program staff

and types of activities offered. Field offices located on reservations tend to be smaller with only a couple of case managers, while the urban locations serve more clients and have more program staff.

**Application, intake, and assessment process.** The application, intake, and assessment process varies slightly by field office. At most field offices, Tribal TANF applicants meet one on one with an intake specialist who assists the applicant in completing the application; at one of the smaller reservation field offices, a case manager helps the client complete the application. During the application process, the intake specialist goes over necessary documentation, which includes a birth certificate, Social Security card, pay stubs, school enrollment, tribal enrollment card, proof of residency, child support, and more, and the intake specialist will help the client secure any missing documentation.

Applications are processed differently across field offices. At larger field offices, a case manager coordinator reviews the application and assigns the case to a caseworker. At smaller field offices, the case manager usually serves as the application reviewer. Processing time between the application interview and initial appointment with a case manager can take up to two weeks. However, the Tribal TANF program does not need to wait until after the client's first meeting with the case manager; as soon as the application is approved, as needed, the program may generate initial grant check.

After a client's application is approved, she or he will have an initial appointment for a needs assessment. During the session, case managers review an assessment packet with the client to identify immediate barriers to self-sufficiency and develop educational and career goals and objectives. Clients also receive information about Tribal TANF program rules, available activities like GED classes, and requirements for reporting work activities. The needs assessment can take two to three hours and ultimately results in a family success plan, which outlines client work activities. If a client is under 55 years old and does not have a GED, the first work activity in the plan is generally GED classes.

**Case management approach: total caseload size, caseworker ratio.** The Tribal TANF program promotes a client-centered case management model where case managers take a wraparound approach to Tribal TANF service delivery. As part of this strategy, the program seeks to keep caseworker ratios low, with between 30 and 50 clients per case manager. The total Tribal TANF caseload across all five field offices averaged about 325 cases per month in 2011. ACF data on SPIPA Tribal TANF show that caseloads have fallen slightly from around 400 cases in the average month in 2006.

As part of its case management approach, the Tribal TANF program seeks to "provide a diversified base of case manager personalities" to best match the needs of clients. Case managers and clients alike emphasized personal connections as the key to SPIPA Tribal TANF case management and service delivery. Clients gave examples of the lengths to which case managers would go to help them obtain the services and support they need, stories of a case manager watching children in the Tribal TANF office while the parent attended GED classes or sending letters, making phone calls, and tracking the client down to make sure paperwork was completed. One case manager explained and others agreed, "It's that connection [with the client] that really makes each individual successful. We're showing them what they can do and how successful they really can be." From the program staff perspective, building this

supportive relationship with a client was a critical component of serving clients in Indian country, where there is a history of antagonism, conflict, and worse between tribal members and non-natives.

Consistent with the program mission and philosophy, case managers encouraged clients to “have a dream” and think more broadly about the types of employment they might find fulfilling. One commonly mentioned case management strategy was for clients to take the Myers-Briggs Type Indicator assessment, a personality test that case managers could use to identify potential career paths for their client’s personality type. In addition, case managers emphasize individual client needs and personal goals and striving for self-sufficiency. As one Tribal TANF program official explained: “Education and training is an area we try to make case managers strong in... rather than funnel people into GED classes, we want our services to be client driven. We want case managers to recognize when they’re pushing a client toward their own goals and not the client’s own goals.”

**Benefits and services provided.** The SPIPA Tribal TANF program provides monthly cash assistance and additional noncash support services to all eligible applicants. The program offers a wide variety of support services including vouchers for work tools, work clothes, school supplies, personal hygiene items, and clothing for children. To support clients who struggle due to lack of transportation, the program provides gas vouchers or bus passes to Tribal TANF recipients. The program also employs transportation specialists in their urban Tacoma field office who are able to pick clients up from their homes, drive clients’ children to school or day care, drive clients to work activities, and/or bring clients to the Tribal TANF office for appointments.

Various incentive programs exist as well. For example, clients can receive vouchers for baby supplies after participating in a parenting workshop or receive an incentive payment for providing documentation of their child’s vaccination record. Despite the many services in place to support clients on the path to self-sufficiency, program staff expressed frustration that they were unable to pay for clients’ traffic fines, which are a main barrier to self-sufficiency for their clients.

In addition to cash assistance and support services, the SPIPA Tribal TANF program provides emergency assistance, termed a non-recurring short-term benefit (NRSTB), to clients in crisis. For example, an NRSTB might cover food if a family has run out of food for the month. In order to receive an NRSTB, clients must complete a budget to document their own income and any other resources received and demonstrate the need for emergency assistance.

**Activity requirements.** The SPIPA Tribal TANF work requirement is 20 hours a week for a single parent and 30 hours a week for a couple. Child-only Tribal TANF cases have no work requirement. Allowable work activities include the Work Experience Program, subsidized employment, training, work search (limited to six weeks a year), GED classes, postsecondary education, SPIPA-sponsored classes, meetings with Tribal TANF program staff, doctor’s appointments, counseling, and alcohol or drug treatment. In addition, parents can count doctor’s appointments for children or school activities for children as work activities.

Culturally relevant work activities are also available for Tribal TANF participants. Many of the SPIPA-sponsored classes, such as the parenting or the women’s support group, incorporate tribal traditions

and values. In addition, Tribal TANF clients may use beading or carving as a work activity on their family success plan if they are able to earn money from the activity. One reservation field office offered Tribal TANF clients the opportunity to do seasonal work in the tribe's healing garden.

The Tribal TANF program is required to have at least 32 percent of its non-exempt cash assistance clients engaged in allowable work activities. Over time, the program has increased its work participation rate and greatly exceeds the requirement. ACF data show that in 2005 the SPIPA Tribal TANF program had a 46 percent work participation rate. By 2008, it had increased to 80 percent. Program managers stated that the current work participation rate is around 85 percent and often increases to the 90s.

**Collaboration with and referrals to other programs.** While available resources vary across site, SPIPA Tribal TANF case managers use a wide variety of state and local resources. Common referrals include community college, counseling services, work experience, vocational rehabilitation, Washington Women's Employment and Education, Work Source, and Washington State Community Action Partnership. Case managers described using local resources such as church community programs and Goodwill, which offers training in a range of areas from janitorial skills to computer skills to financial management.

Other reservations in the service area provide resources for the urban Tribal TANF field offices. Often, the collaboration between these tribes and the SPIPA Tribal TANF program is effective, according to program staff. However, in some cases a lack of resources may prevent the SPIPA Tribal TANF program from utilizing resources available through other tribes. For example, the SPIPA Tribal TANF program regularly refers clients to domestic violence providers for counseling, WIC, and medical assistance available at reservations in the service area that are not members of SPIPA. Yet, program staff noted tribal housing is not an area where collaboration is successful. In addition, certain tribes within the SPIPA Tribal TANF program's service have chosen to use the state's TANF program instead of SPIPA's.

The SPIPA Tribal TANF program benefits from the presence of a state Department of Health and Human Services liaison at certain Tribal TANF field offices, and availability by phone at others, who processes Tribal TANF clients' applications for SNAP and child care. Tribal TANF program staff and clients emphasized the greatly improved ease of applying for public benefits through the Department of Health and Human Services liaison. In addition, an agreement with the state allows individuals who qualify for Tribal TANF benefits to qualify for state medical assistance. Program staff have undertaken efforts to cultivate a strong relationship with the state. One program manager described meeting with state community service officers to discuss the SPIPA Tribal TANF program and educate state workers on the eligibility criteria for Tribal TANF benefits. Program staff emphasized the importance of maintaining a strong relationship with the state to facilitate Tribal TANF service delivery.

**Outreach.** Tribal TANF clients are frequently referred to SPIPA Tribal TANF by state officials when they are applying for TANF at the State Department of Health and Human Services office. Focus group participants described feeling rejected by the Department of Health and Human Services or forced to apply to SPIPA Tribal TANF, although they also felt that the services provided by SPIPA were far superior.



If not referred by the state, clients usually discover the program through word of mouth. Program staff felt that the quality of services offered led to a positive dialogue in the community around the program.

**Use of IT in service delivery.** The Tribal TANF program uses TAS software to facilitate service delivery. All five field offices use one server housed in SPIPA's administrative building, which creates frustrations over the speed and usability of the database. While service delivery staff expressed some dissatisfaction with the system, they explained that this was due to high usage of the main server by several program staff at the same time across the field offices. SPIPA Tribal TANF is in the process of addressing this issue. The field offices visited were all paper based; program staff manually enter information from completed paper forms into TAS. However, one urban field office described plans to transition to an electronic system.

As described earlier, SPIPA has a data-sharing agreement with the state that provides access to the state system for information on clients' benefits. This is helpful when examining requests for NRSTBs, for example, as the Tribal TANF program staff can verify which public benefits a client is receiving through the state.

**Integration of tribal culture.** Tribal TANF program officials and caseworkers were quick to point out that cultural activities cannot be funded through Tribal TANF or counted toward the work participation rate unless the cultural activities are directly related to one of the four purposes of TANF. Nonetheless, the Tribal TANF program has incorporated traditional cultural activities in creative ways. For example, when clients complete their GEDs, their success is celebrated in traditional ways. During a women's empowerment workshop (addressing issues of domestic violence), participants make traditional dream catchers. Likewise, a workshop on communication skills incorporated traditional beading, as well as listening to a tribal expert. On the Skokomish reservation, the TANF program helps clients become geoduck divers, a lucrative seasonal endeavor due to the high price of geoducks (a type of very large, saltwater clam), by providing financial assistance for dive suits and dive classes. According to case managers, many clients who take advantage of their tribal rights to otherwise restricted waters and become divers are able to become self-sufficient and transition off Tribal TANF.

Program managers made the case that engaging in cultural activities, even if they were not directly related to work activities, ultimately would help clients become self-sufficient. "If you don't know who you are and where you came from, you don't know where you're going," they said. One manager said she wished she could have Tribal TANF clients create scrapbooks or photo histories that also would include images of where they would like to be in the future. She explained, "The scrapbooking to us is like a visual ISP [individual success plan] because we're not a written culture."

### **TCC Athabascan Self-Sufficiency Assistance Project**

In Fairbanks, Alaska, TCC provides most major support services, including ASAP, in a single office building. In the Alaska villages, a single worker provides villagers with information and access to all support services. TCC combines case management of ASAP with the other support programs. The total number of ASAP cases declined from a monthly average of about 400 in 2006 to about 145 in 2011. The majority of these families live in Fairbanks.

**Application, intake, and assessment process.** TCC ASAP has developed a “one-stop” approach—a person applying for ASAP benefits completes a single application that covers multiple programs: TANF, Medicaid, SNAP, and others. As part of its efforts to improve program efficiency and provide a more holistic approach to meeting each client’s circumstances and needs, TCC is planning to expand the number of programs covered by the application to include education, employment and training, youth employment, Head Start, vocational rehabilitation, Denali Kid Care (CHIP), and energy assistance.

In the villages, applications are submitted to Tribal Council staff who forward them to the TCC headquarters in Fairbanks by fax or mail. There, the application is entered into the Harmony information system and reviewed by an eligibility specialist. The goal for this review and approval/rejection process is 30 days; however, on the average, the process takes 45 days. If the applicant needs immediate assistance, other services are available from TCC.

As part of the intake process, the eligibility specialist determines if the applicant’s income is within the guidelines set by the State of Alaska; by statute, all tribal TANF programs in Alaska must be comparable to the state TANF program in benefit levels, household composition, and eligibility.

ASAP program staff also send applicant information to the state CSE program to determine if the noncustodial parent contributes child support to the ASAP applicant. If not, the state seeks to enforce such child support. Any CSE funds so generated can be used by ASAP with some flexibility. On average, \$14,000 to \$20,000 in CSE funds are collected each month. Unlike the state child support program, which involves payments from the noncustodial parent, the tribal approach to child support can take the form of the noncustodial parent providing moose meat from subsistence hunting, cords of wood for heat, or other in-kind supports. Nevertheless, the State of Alaska recognizes that in some cases the custodial parent (generally a woman) may have good cause for failing to provide all CSE-required information. For example, in cases of actual or threatened domestic violence, the custodial parent may wish to keep secret the family’s location from the noncustodial parent. In such cases, the state CSE policy is to protect the safety and welfare of the family in question.

On being enrolled in ASAP, the client works with program staff to develop a family partnership agreement and/or family self-sufficiency plan that includes acceptable work activities. Each month, a participant is required to fill out a time sheet reporting time spent on work activities.

**Benefits and services provided.** TCC provides ASAP clients with cash assistance as well as a host of other supports and services under its broad 477 program. ASAP clients spoke of receiving energy assistance, one-time support for children’s clothing, and trainings in emergency spill response, CPR/first aid, and construction. A relative caring for an eligible child can receive TANF cash assistance on the child’s behalf (referred to as an “adult not included” case), although focus group participants complained that these benefits are less than those provided to licensed foster parents.

A highlight of the TCC program is its subsidized employment program called Gila, a mandatory program for some ASAP participants. “Gila” is an Athabascan word roughly translated as “let’s get going.” A critical component of the Gila is the expectation that the participant will be successful in securing employment. In addition, the Gila includes

- motivational activities designed to increase participant's expectation of success, confidence, and actual success in job seeking activities;
- assistance in résumé development;
- assistance in obtaining tools needed in specific jobs; and
- subsidized employment—the TANF program underwrites the initial wages paid to program participants hired by employers. As a rule, employers try to provide unsubsidized employment after the initial trial period.

As part of the Gila, ASAP participants are brought to Fairbanks for a two-day training program that includes work on developing a résumé, interviewing skills, work resources, and financial planning. Participants are matched with a job coach, recruited and trained by ASAP and paid an incentive. After completing the intensive Gila program, participants are expected to find a full-time job on their own within four weeks. ASAP subsidizes their wages at a pay rate of \$14 an hour, which is higher than the pay scale generally available in the region. The subsidy is provided for three months, during which time the participant must show up for work regularly. If the participant's employment lasts a minimum of 18 months, he or she receives a \$1,000 bonus.

The jobs secured in the Gila initiative are not community service; rather they are “real” private-sector jobs addressing the needs of the individuals and the businesses or organizations hiring the ASAP participants. Because the participants receive subsidized wages, instead of a welfare check, they can receive an EITC.

The highest number of clients participating in the Gila was 450; when family members are counted, the total people affected is approximately 1,200. About two-thirds of the Recovery Act funds used in the Gila initiative supported people living in the villages. Of the people who participated in the subsidized employment program, 62 percent are no longer on the TANF rolls, although a minority are employed.

The economic recession that began in 2007 in some ways had less of a negative impact on Native village residents than others in the United States. Relatively few of the rare unsubsidized jobs were lost. On the other hand, funds made available by the Recovery Act enabled TCC to expand and enhance its existing employment, training, and placement efforts, including the Gila initiative.

**Activity requirements.** ASAP participants are required to engage in work activities for 30 hours a week. If employment is not available, participants are required to contribute to the community in other ways, such as through elder care, subsistence activities, teaching subsistence to children, volunteering in the school, or providing child care. If a participant fails to meet the work requirements, benefits are cut by 40 percent; continued failure to meet the work requirements may result in loss of all ASAP benefits. ASAP program staff recertify clients every six months. Program staff review income and work requirements. The tribal workforce development specialist signs off on households' monthly reports. Because this program position is based in the villages, the tribal workforce development specialist knows if a participant has done what she or he says she has done.

**Collaboration with and referrals to other programs.** TCC has brought different programs (e.g., adult and family services, employment and training, child-focused programs) together in the same building and

often in the same work areas as a way of enhancing coordination, collaboration, and integration of services. Staff of different program components are encouraged to share information and contribute to the development of plans and services tailored to the customer's needs and circumstances. For example, if an ASAP client exceeds the 60-month TANF limit but no jobs are available, he or she is referred to staff handling general assistance for stopgap support. If clients choose to disclose that they have disabilities, caseworkers will inform them of the range of available services, including the TCC vocational rehabilitation program, which is not part of the 477 program. Some clients may choose not to apply for vocational rehabilitation because of the stigma associated with a disability.

The collaboration between ASAP and the child protection program has evolved over time. Initially, child protection staff worked with ASAP staff to identify children who had been removed from their homes or were at risk of being removed. Their goal was reuniting the family so the household could resume participation in the ASAP and "get back on track." A more recent approach is referred to as "parent and foster-care navigators." The Indian Child Welfare Act gives tribes authority over adoption and foster care to children of tribal members. Many families are state- and/or tribally licensed as foster parents. ASAP helps out when children are in custody and adults are caring for children from other families.

Limited resources affect collaboration among TCC programs. Some TCC programs and facilities are overloaded, especially health and behavioral health programs. There is a three-year wait for dental services. For mental health counseling, initial evaluation is available; however, there is often a wait for actual service delivery. In high-priority cases, ASAP refers clients to contract providers, when available. In emergencies, clients may be flown by air ambulance to locations where the needed services are available.

The TCC ASAP and other programs also collaborate with outside agencies, institutions, and organizations, such as

- Episcopal and Catholic churches (e.g., helped during the flooding emergency);
- Division of Public Assistance (a partner with Medicaid and food stamps);
- HUD Section 8 and Office of Native American Programs;
- Boys and Girls Club;
- FNE (a program that trains people to respond to natural emergencies);
- Women's and Children's Centers; and
- Doyen Burial Assistance.

**Use of IT in service delivery.** TCC uses the Harmony information system to manage applications and service delivery. When asked how ASAP could be improved, program staff said they could benefit from a database that could show if a person participating in the employment and training program also participates in ASAP or other TCC programs. Such a database could facilitate improvement of monitoring and assisting program participants. "We only learn about a client's participation in another program if the client signs a release form to allow sharing of information," one staff member said. In addition, incompatibility of information systems complicates collaboration between state and tribal programs. The TCC child support program uses the EIS system provided by the state. While the EIS and ASAP information systems can exchange data, duplication and related problems prohibit true system

integration. TCC administrators plan to enhance existing information systems to support more programs with a unified client intake, program management, and report preparation.

**Integration of tribal culture.** Program staff, managers, and customers all embrace the Athabascan value of self-sufficiency and have shared expectations, experiences, and understanding of the unique needs and circumstances of Native villages and peoples in central Alaska.

## IV. Outcomes for Tribal TANF Clients and Tribal Communities

This section describes the outcomes of the program for both clients and the larger tribal communities, including respondents' perspectives on whether and how the program has benefited clients, and how their communities would be different without the Tribal TANF program.

### Outcomes for Tribal TANF Clients

Data on outcomes for Tribal TANF clients are available to varying degrees from the four study sites, but generally are limited. Tribal TANF programs report quarterly to ACF on their caseloads and expenditures, and provide information needed to determine their work participation rates. While the Oneida Tribal TANF program does not collect or analyze additional data, and did not report plans to do so, the other three programs reported at least beginning to develop additional measures of client outcomes. The NNPSR Quality Assurance section said it is in the process of developing a set of measures, such as the share of clients getting jobs or attaining a GED or other certificate. TCC analyzed the outcomes for people participating in its subsidized employment program and found, for example, that 62 percent were no longer receiving cash assistance. SPIPA tracks the types of work activities in which clients are engaged, the types of supportive services clients receive, and reasons for case closure. This allows SPIPA to see, for example, that about one-third of its cases that are required to work have unsubsidized employment, about two-thirds are engaged in education-related activities, and almost all are also engaged in "other" work activities. Of the SPIPA cases closed, about one-third close due to earnings, although the share fluctuates month to month. Most cases are closed when the family voluntarily closes the case. The programs that have started to measure client and program outcomes said that expanding their ability to measure outcomes is a high priority. Currently, none of the programs truly measures what share of clients achieves self-sufficiency. Such data are necessary to describe how clients fare and to assess how their programs can better break the cycle of poverty. However, one program manager noted that tribes' limited IT infrastructure and resources create challenges for Tribal TANF evaluation, reporting, and continuous quality improvement efforts.

In the meantime, the clients and program staff interviewed shared their perspectives on the extent to which the Tribal TANF programs have helped clients. Discussing the outcome goals for clients, a NNPSR program manager described the greatest success of the Tribal TANF program as "getting people to get their education, get their careers in motion, and get off welfare." Another NNPSR program manager said further: "Customers in Navajo Nation get training. This is not a welfare program; it's temporary assistance. We try to make them aware that they need to become self-reliant. A lot of families are

transitioning into sustainable employment.” Oneida program managers said of their clients, “They want a job.” As a result of the TCC Gila event and the related Recovery Act–funded subsidized employment program, TCC ASAP data showed that of the clients who have participated in the subsidized employment program, 62 percent have since left Tribal TANF. Tribal program staff in the small Alaskan village of Huslia said that through the Tribal TANF trainings and required accountability, clients become more involved in the community and feel proud that they are working. “They feel uplifted,” one Huslia staff member said.

Stories of clients moving from homelessness to hopefulness, and on to self-sufficiency were shared throughout the site visits. Jobs in health care, child care, gaming, fishing/fisheries, and tribal government or industries were mentioned most frequently. The client success stories often included education on the way to employment. For example, the Navajo Child Care Academy trained 60 Tribal TANF clients who were subsequently employed by Head Start and CCDF child care programs. Many of the current Tribal TANF clients who participated in the study focus groups were in school at least part time. Education is important not only for the employment opportunities it can create, but also as an example to others. Both SPIPA and Navajo Nation Tribal TANF program managers shared stories of grandmothers (age 55 and 71), who completed their GEDs in part to set an example for the teenage grandsons they were raising. The SPIPA Tribal TANF program manager explained, “It has a twofold effect on the individual in that way. A lot of times culturally it’s not what you can do for yourself but what you can do for others. Getting your GED is a gift you can give yourself. But, it’s not just for you but for others too.”

The client success stories also frequently referred to both the accountability structure of the Tribal TANF program and the wide range of supports the Tribal TANF program provided that helped clients put together the various pieces of their lives. An Oneida Tribal TANF client said, “I went from being homeless to having a home, a vehicle, and a job. It took a while—9 months of the program.” A NNPSR client said: “This program really helps. This model of self-reliance will pass down to my kids.” A SPIPA client said: “They give you gas vouchers, bus passes, transportation, they help you with all that. They make sure you have everything available so there’s no excuse not come to school.” Another SPIPA client described how “They took every aspect of our life and gave us a goal.” When she first arrived at the Tribal TANF office, she explained her situation to the staff: “I’m pregnant. I have no money. My husband has no job. I have no job. We don’t have a car.” They helped her husband find a job and then helped her obtain a driver’s license. “That created a domino effect. I first got my license. Then I got work.” The program also helped the couple with car insurance, their first and last month’s rent, healthy relationship counseling, child care, and vouchers for clothing and personal care items. With these supports and the relentless guidance of program staff, this client was going to school part time studying business management and working part time at the time of the site visit. She said, “In about five years our credit will be situated, we can buy a house and I can open my [public relations] firm.”

However, employment is not always the way off Tribal TANF. Some clients leave for other reasons, such as increased income from spouses or child support. Many other clients are working but not earning enough to support themselves without Tribal TANF. In addition, the Oneida Tribal TANF program determines a client’s current eligibility based on his or her income from two months earlier. Therefore, when clients begin earning wages that make them ineligible for Tribal TANF, the program factors those

earnings into eligibility two months later. As a result, clients whose incomes increase continue to receive Tribal TANF for two months after the increase, at which point their new earnings may make them no longer eligible.

Although success stories abound in each Tribal TANF program in the study, such successes are not universal within these programs. Complete information on client outcomes is not available, so it is not possible to quantify how typical such successes are. One NNPSR case manager spoke frankly about the negative outcomes for some customers, who use Tribal TANF funds to help support a drug habit or who quit jobs to return to the program at the time customers are receiving a clothing allowance or school supplies. This manager said these supports “are good for people currently on the program, but it becomes an incentive to reapply,” and “The program helps those who are dedicated to their children and becoming self-sufficient. For those with drug habits, it can be destructive.”

Nonetheless, Tribal TANF representatives interviewed generally expressed pride and confidence in the outcomes of their clients. One NNPSR program manager said of the relative number of positive client outcomes: “No matter how few it is, I think that outweighs everything we don’t do. We have helped people become self-sufficient.” Asked whether the success stories were the exception, a SPIPA program manager replied: “I think what this shows is what this program can do if we have the opportunity and the program around to do it. I don’t think it’s an exception. I think it shows what we can do with the tools we have.” She added that it takes about four years for clients to become self-sufficient.

Putting their clients’ outcomes in perspective, several Tribal TANF program staff and clients shared how the experiences and outcomes would be different without Tribal TANF, often referring to how client experiences are different with the state TANF program or how things were before the Tribal TANF program began. An NNPSR program manager said:

Before, a lot of families were dependent on welfare. There were no requirements for setting goals. This program forces them to work towards goals. Without the NNPSR in Navajo, it would be a major setback. There would be dependency on the welfare system and no responsibility for parents providing for their children. We have worked to develop accountability in families.

A SPIPA client who had earlier turned to the state TANF program for assistance said:

I got all kinds of help since coming back on the [SPIPA Tribal TANF] program. I’ll tell you what—I have nothing good to say about the state helping you. I feel sorry for the people that are on the state program. I didn’t get any help. It didn’t matter if I was homeless. You’re a number and [hear] “This is what I can help you with. Now get out.”

A Tribal TANF manager at one of SPIPA’s reservation field offices recounted how, before Tribal TANF, clients had to walk five miles to the state TANF office. She said further:

Without Tribal TANF for our families, they would be forced to go to the county CSO office, and they would be met with a big, high desk, maybe behind a window, and have to pull a number. And, hopefully you’re watching when your number comes up on this little screen, and you never get to

know your case manager or the person who's actually determining your eligibility. So it would be totally different.

An Oneida Tribal TANF program manager provided a similar depiction of her community without Tribal TANF.

I think there'd be a lot of impact because without Tribal TANF they have to go to one of the two counties. That's not so bad for people locally, but those people who live out in Outagamie County, they have to travel 30 miles with poor transportation. You have to offer TANF here or go to the county, but they always want to come here. It's our people, our culture, and proximity.

Another Oneida Tribal TANF manager explained further:

If we were to go away, you would just have people shifting to other services. We exist because there was a time that county services were just negligent towards Indian people. I think that's changed. But for them to suck up the things we do, that'd be a strain for them.

**Work participation rates.** Tribal TANF programs are held accountable by ACF for their official work participation rates, which measure the share of non-exempt clients participating in allowable work activities for at least a minimum number of hours per week, on average. As described in greater detail earlier, the specific hours and activities required differ among the Tribal TANF programs according to their ACF-approved TANF plans. The Tribal TANF programs also have negotiated different work participation rate requirements. Table 6 shows the negotiated rate requirements and the actual calculated work participation rate for each of the selected programs in 2008, the most recent year for which this information is available from ACF.

**Table 6: Work Participation Rates for Selected Tribal TANF Programs, 2008**

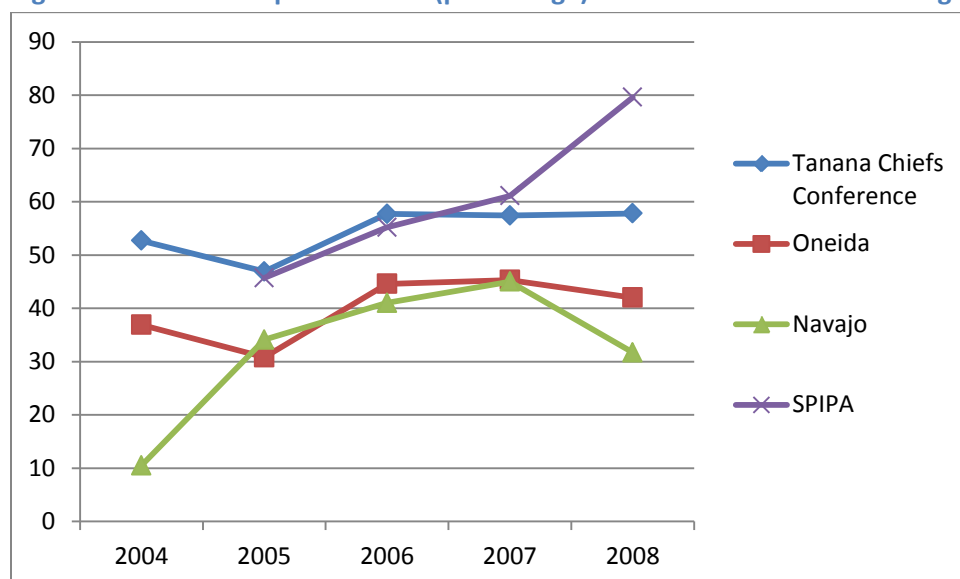
<b>Tribal TANF Program</b>	<b>Rate (percent) negotiated</b>	<b>Calculated rate</b>	<b>Met required rate?</b>
Navajo Nation	25	31.7	Yes
Oneida Tribe of Wisconsin	35	42.0	Yes
SPIPA	31	79.6	Yes
Tanana Chiefs Conference	35	57.8	Yes

Source: HHS/ACF.

Over time, the negotiated rates generally have increased, as have the actual calculated rates. Each of the four study programs has met its required rate since 2004 (the earliest year for which ACF has released data) with the exception of the Navajo Nation in 2004. Unofficial information provided by some study programs indicates that work participation rates have continued to rise. SPIPA's own calculations show a work participation rate well over 80 percent in late 2011 and early 2012. Oneida's own calculations have shown work participation rates over 60 percent in recent months. Figure 7 shows the official work participation rates for the selected Tribal TANF programs between 2004 and 2008. (The SPIPA program began in 2004, so a work participation rate was first reported for SPIPA in 2005.)



**Figure 7: Work Participation Rates (percentage) for Selected Tribal TANF Programs, 2004–2008**



Source: HHS/ACF.

## Outcomes for Communities

Tribal TANF programs affect not only the clients who receive cash assistance, but also the communities in which the clients live. Communities benefit economically as well as socially from the Tribal TANF programs, according to the program representatives interviewed.

“I see Tribal TANF as one of the most powerful economic development programs,” said one program manager. In addition to helping clients sustain employment and give back to their communities economically, Tribal TANF programs directly employ caseworkers and other program staff, and provide cash and vouchers that clients use in the community, indirectly helping the tribal gas station, the grocery store, and other community businesses.

Tribal TANF can be a positive social influence on the community in a number of ways. Tribal TANF clients engaged in work, school, and other activities can create a positive environment and set an example for others. One SPIPA program manager said: “It seemed like when I was growing up on the [reservation] there were a lot of adults home all day not working. But now it’s like they’re at work or at school, doing something.” By the same token, Tribal TANF can help prevent negative community outcomes. An NNPSR program manager explained that the flip side of Tribal TANF enabling the drug habits of some customers is that the program may limit drug-related crime. In some cases, clients use Tribal TANF payments to pay for drugs, and when these funds disappear, clients resort to stealing to satisfy their drug habits. She reported that a recent reduction in Tribal TANF benefit amounts was followed by an increase in stealing. In this way, the Tribal TANF assistance might reduce the incidence of such crimes.

Community members who do not receive Tribal TANF assistance directly can benefit from participation in Tribal TANF-funded programs, such as fatherhood and healthy marriage programs that are available to the broader community. An NNPSR program manager said: “We focus on healthy marriages. No other

program is promoting fatherhood, healthy marriage. I think the program is a valuable resource, even if they are not customers...They are taking an interest in the fatherhood program...It's a valuable resource for the community." SPIPA Tribal TANF program staff on one reservation mentioned an afterschool program provided for all children that was made possible by the enrolment and funding of children in families receiving Tribal TANF assistance.

Finally, Tribal TANF staff and former clients can serve as role models in their communities. One case manager said that a particular Tribal TANF supervisor was seen as a father figure in the community. Another said, "Perhaps some of these individuals have shown the community that Native Americans do have the ability to be successful and broken some of the stereotypes."

## V. Key Lessons

The selected tribes have used the flexibility of Tribal TANF to create diverse programs that reflect their unique circumstances, opportunities, and cultures. These programs generally have focused on self-sufficiency beyond the narrower goal of employment, which can be especially challenging on reservations where more than 50 percent of the adults are not employed. Program staff attributed many of their programs' perceived successes to their leaders' abilities to seize opportunities for innovation while maintaining program integrity. The challenges, promising practices, and other experiences of these four tribes point to the opportunity for shared learning and capacity building among existing and potential Tribal TANF programs.

**Flexibility allows Tribal TANF programs to thrive in diverse contexts.** The flexibility inherent in Tribal TANF appears vital to crafting programs that address the needs and the geographical, governmental, and cultural contexts of tribal communities. The study sites vary dramatically in their circumstances, from the Navajo Nation—a large, remote reservation with high unemployment and a strong, active native culture—to the Oneida Tribe of Wisconsin—a relatively small reservation with close ties to the economic and other opportunities of the nearby Green Bay area. Both the Tanana Chiefs Conference and the South Puget Intertribal Planning Agency include urban areas as well as rural areas, and much of the TCC area is extremely remote. The Navajo Nation is governed by a large national bureaucracy, while SPIPA is a nonprofit organization serving five small reservations and the TCC is a nonprofit organization serving 37 Alaska Native villages.

States vary, too, in their geographies, governments, and cultures, and states certainly have used TANF's flexibility to create diverse programs (Hahn, Golden, and Stanczyk 2012). But Tribal TANF programs have greater flexibility than state TANF programs in setting their work participation rates, establishing work hour requirements, and defining allowable work activities. The programs in the study have defined their allowable work activities to accommodate the economic realities and opportunities of their particular locations as well as to reflect their tribal cultural values. With the nearby economic opportunities of Green Bay and a history of administering the state TANF program on the reservation, the Oneida Tribal TANF program most closely resembles state TANF programs (of the programs in this study). Perhaps the least similar to a state TANF program is the TCC program in remote Alaska villages, where one part-time

employee helps needy residents access all available services, including Tribal TANF, and where subsistence activities like hunting and fishing are among the most viable options for achieving self-sufficiency.

**Integrating tribal culture fosters program relevance and client empowerment.** As one Tribal TANF program staff member said, “It’s hard to separate anything we do from tribal culture.” Elements of tribal culture were evident in the program design, the way program staff and clients interacted, the types of activities in which clients were engaged, and, in some cases, the language used. Grounding the program in tribal culture was empowering to clients, according to some of the staff and clients interviewed.

The value of self-reliance is included in the program names and is fundamental to the program design of both the Navajo Nation Program for Self Reliance and the TCC’s Athabascan Self-Sufficiency Assistance Partnership. The NNPSR incorporated this value in its motto, “T’áá hwó ájt’éego,” meaning exercising personal discipline and taking responsibility for one’s life. TCC buildings that house ASAP programs prominently display the “We Are Self-Sufficient” motto in both English and Athabascan. Participants from the TCC and Navajo Nation Tribal TANF programs said that the ability to ground their programs in their language, concepts, and values was critical for connecting with their clients and, ultimately, to making their programs successful.

The cultures of SPIPA’s founding tribes are fundamental to its program design, although SPIPA’s Tribal TANF program serves clients from many tribes, especially in its urban offices. A common identification as Native people is important. SPIPA focus group clients said, “Here they treat you the Indian way,” “You don’t feel like a stranger,” and “You feel like family.” Similarly, a SPIPA case manager said: “They know this is Indian people helping Indian people. They know that understanding is there.” That sentiment is evident in SPIPA’s renaming of the TANF program: Tribes Assisting Native Families.

The Oneida Tribal TANF program strives “to take care of our own people from a history and value standpoint consistent with [our] people.” As one Oneida participant explained: “There was a time when we were organizing ourselves around Western practices—we copied...other programs verbatim. In the last 20 years, there’s been a concerted effort to fold our cultural teachings and language in.”

In all four study sites, certain cultural activities can be included in clients’ self-sufficiency plans and count toward their work requirements. Other traditional cultural activities are not counted as work but can supplement other activities that do count toward the requirement. In all four programs, clients could also be exempted from work requirements to participate in traditional cultural activities such as funerals and tribal ceremonies.

Integrating tribal culture into the Tribal TANF program ties clients’ goals of self-sufficiency to their roots as Native people. As one SPIPA program manager said, “We...help them identify with and be proud of who they are.” A NNPSR program manager similarly explained that the Navajo program focuses on self-reliance “in a way that it’s not all Western-based teaching,” and that relevance is motivating the program’s clients. TCC staff also made this point.

While most Tribal TANF clients and staff interviewed spoke very positively about integrating tribal culture in their programs, some program staff identified areas where tribal culture conflicted with federal program rules. For example, one program manager wished that clients could engage in scrapbooking as a way of developing a self-sufficiency plan “because we’re not a written culture.” She explained:

Everything about being native is about attaching yourself to your heritage. One of the things that is referred to as “busy work” is scrapbooking. We’re limited in how we can use our funding for capturing those family oral histories. We’re an oral tradition. People need to capture who they are so they can move past and see who they want to be, and they can do it through scrapbooking.

**Self-sufficiency goal incorporates tribal values and economic realities.** Although sustainable employment (including self-employment) is an important goal and outcome for Tribal TANF clients, the programs in the study focused on the broader goal of self-sufficiency, reflecting both the economic realities of some tribes and an integration of tribal cultures. One NNPSR program manager explained: “The ultimate goal is to restore harmony, self-actualization. The focus is on taking care of basic needs first.” Consistent with this goal, some Navajo clients are able to count participation in counseling sessions toward their activity requirements. Similarly, some Oneida clients’ employability plans can include traditional forms of meditation and cleansing, as well as wellness activities prescribed by doctors for clients with diabetes. Activities related to personal wellness are not pursued instead of employment, but rather as necessary steps to sustainable self-sufficiency. Similarly, education is encouraged in each Tribal TANF program in the study as a necessary step for sustainable self-sufficiency, a way to set an example for children, and a matter of self-development.

The Tribal TANF programs in this study creatively help clients pursue self-sufficiency in ways that reflect both the challenges and opportunities of their culture and environments. Self-sufficiency through wages is not always realistic in the extremely remote and economically undeveloped areas that some Tribal TANF programs serve (e.g., TCC ASAP and NNPSR). As a result, each program in the study has some clients engaging in traditional subsistence activities or pursuing entrepreneurial opportunities. Programs closer to urban areas and with fewer transportation barriers (e.g., SPIPA and Oneida) are better able to help clients find non-subsistence employment.

**Program leaders seize opportunities for innovation.** Tribal leaders in these programs made the most of the flexibility allowed by the federal statutes and regulations. In nearly all the programs, the staff interviewed highlighted leaders’ vision and creativity as key assets of the program, even as each leader had taken his or her program in a somewhat different direction.

## Promising Practices

Identifying promising practices presents a particular challenge because of the diverse contexts in which the Tribal TANF programs operate. What works well for SPIPA may not work well for the Navajo Nation, and vice versa. Nonetheless, some practices in this study appear to have been so valuable that it would be worth investigating whether other Tribal TANF programs could adopt or adapt the practices.

**Data-sharing agreements with state governments.** Both the Oneida and the SPIPA Tribal TANF programs have extensive access to state data systems that allow them to readily obtain information they need to determine client eligibility and other matters. This access is likely to improve their administrative efficiency and their program integrity. It is particularly promising to see that these programs were able to develop data-sharing agreements from different starting points with their respective states. The Oneida program has a long-standing positive relationship with the state government. SPIPA, on the other hand, is an entity completely separate from the state government.

**Partnerships with community organizations.** As a small program with limited opportunities for economies of scale, Oneida Tribal TANF has leveraged its proximity to Green Bay into strong, effective partnerships with community organizations. Working with a community education center and the local university, the Oneida Tribal TANF program is able to provide classes and other services for its clients, whether designed specifically for Tribal TANF clients or simply facilitating access to existing classes and resources. The program has used this strategy to offer classes on healthy relationships, “planning ahead workshops,” and car maintenance classes, among others. While such strategies may be particularly vital for a small but suburban tribe like Oneida, the large and remote Navajo Nation Tribal TANF program has pursued a similar strategy of partnering with local educational institutions.

**TCC’s Gila event.** The Gila is an extraordinary event that invests intensive resources to move TCC Tribal TANF recipients into private-sector jobs (some of which are subsidized by the 477 program and other funds) that give them valuable work experience and create access to the earned income tax credit. The Gila and the related subsidized employment are an example of a practice that may not be easily transferrable to other Tribal TANF programs and may not be sustainable even for TCC, because it relied on Recovery Act funds that were available for a limited time. Yet, it is also an example of a Tribal TANF program seizing an opportunity to implement a positive practice for as long as it is possible.

**SPIPA’s Tribal TANF management structure and internal controls.** The SPIPA Tribal TANF program’s highly effective management structure and strong internal controls represent promising practices themselves, but they are the products of an even more promising practice of critical self-evaluation and program improvement. By contracting with the University of California, Davis (UC Davis) for an objective program evaluation and taking substantive actions to address shortcomings, SPIPA Tribal TANF took the first, critical step in developing into a model program. The changes addressed the program’s identified shortcomings while also setting up a system and establishing an orientation of ongoing self-evaluation and improvement. SPIPA’s particular management structure and internal controls may be best suited for a Tribal TANF of similar size to SPIPA, which allows for a flat organizational structure and constant communication among the management team. The broader orientation toward ongoing self-evaluation and improvement, however, would benefit any organization.

## **Opportunities for Shared Learning and Capacity Building**

The key lessons and promising practices highlight further opportunities for shared learning and capacity building among Tribal TANF programs. Each Tribal TANF program in this study was eager to share its strategies and to learn from others. Program staff appreciated the existing opportunities for sharing,

facilitated primarily through ACF and UC Davis, but indicated that these are not enough to satisfy their interest in both learning and sharing. The Tribal TANF programs in this study are but four of more than 60 programs, some of which may face similar contexts as one of the study sites and many of which may be less equipped to make the most of the flexibility that the Tribal TANF offers. Many study respondents noted the enormous hurdle of starting a Tribal TANF program, given the limited existing tribal infrastructure for providing services and complying with federal TANF law and regulations. More than one study participant suggested that planning grants for tribes starting new programs would greatly help.

## Areas for Future Research

Research involving federally recognized tribes should be conducted in the context of tribal sovereignty, self-determination, and self-governance, as well as done in a culturally competent fashion. Tribes, Native villages, and tribal consortia have increasingly sought to influence research agencies and to exercise the power to reject unwanted research on their lands. They have also been active in generating research and program evaluation. The findings of this study open questions for future research that, with their agreement and involvement, may benefit tribes, Native villages, and tribal consortia.

First, because the study was limited to four Tribal TANF programs voluntarily participating in the study, it raises questions about the diversity of the full range of Tribal TANF programs. The current study design requires the caveat that these four programs cannot be considered representative, nor the findings generalizable; nonetheless, the diversity among these four programs suggests an even greater diversity among Tribal TANF programs overall. For example, none of the Tribal TANF programs in this study is administered by small, individual tribes without prior experience administering a state TANF program. Do such tribes encounter different challenges, solutions, and opportunities in their Tribal TANF programs than the programs in this study? Are the four study sites typical or unusual, or is there such diversity among programs that there is no “typical” program? Understanding this larger context could make the lessons from the Tribal TANF programs even more useful.

Second, the limited data available on the outcomes for clients in these Tribal TANF programs raises additional questions about how to measure client outcomes and how to compare them with outcomes for clients of state TANF programs, particularly given the differences in flexibility between Tribal TANF and state TANF programs. At the same time, the flexibility and diversity inherent in Tribal TANF could allow for comparisons of outcomes for clients in programs with a range of approaches, provided other differences in program and context could be adequately controlled.

Finally, the study raises questions about how to enhance tribal capacity and opportunities for shared learning. Tribal TANF programs may be eager to share not only their program implementation experiences, but also their ideas about additional information and resources that would be useful and that they might help create.

## VI. Conclusions

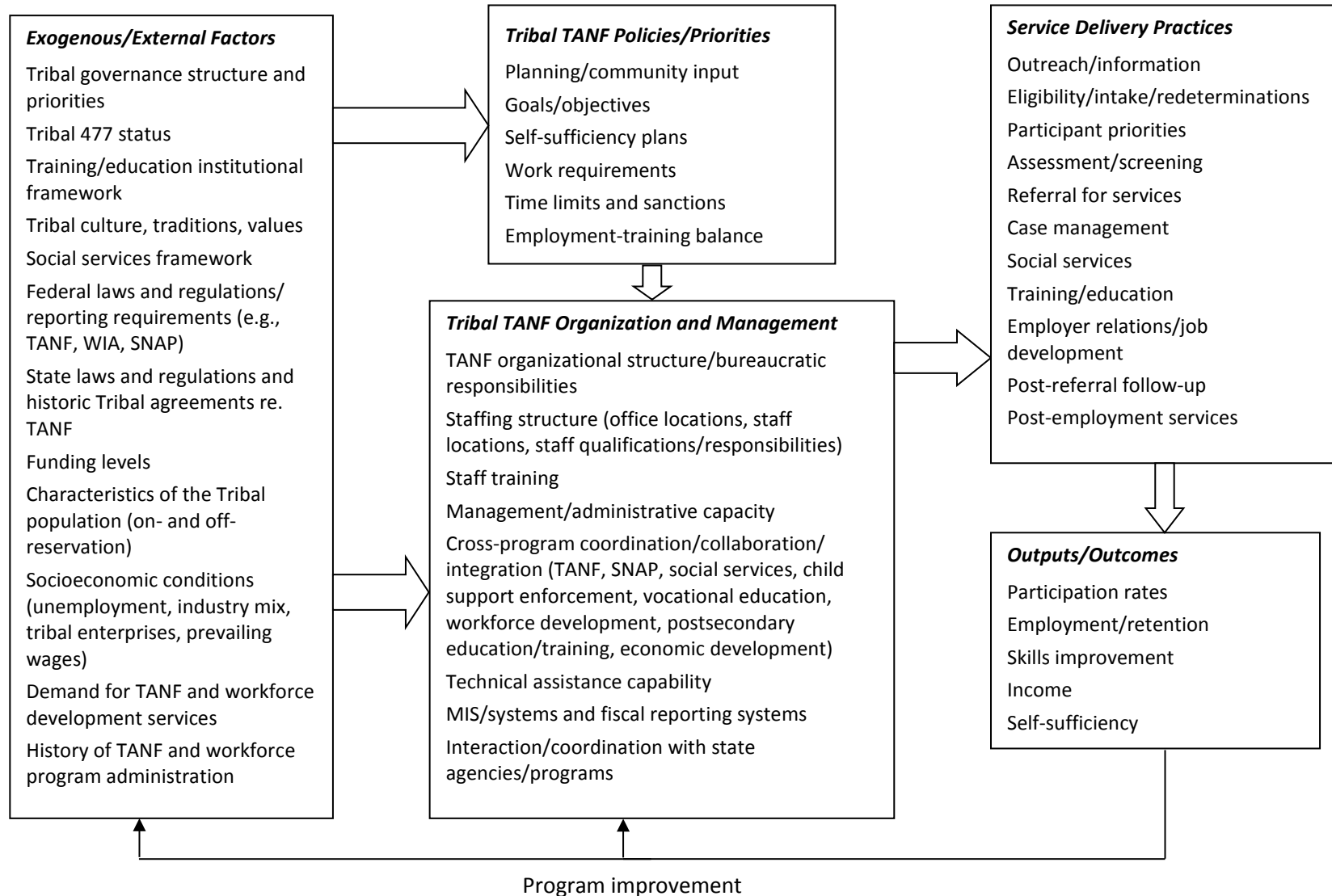
Tribal TANF offers tribes a valuable opportunity to design assistance programs that align with tribes' geographic, economic, and demographic circumstances and that are grounded in their unique cultural traditions. Each Tribal TANF program in this study provides a different example of how a tribe or group of tribes has seized this opportunity to benefit of their clients and communities. Operating Tribal TANF promotes business and economic development and creates jobs on the reservation. While Tribal TANF's flexibility creates opportunities, it also presents a challenge to tribal communities that may lack the infrastructure, resources, or visionary leadership necessary for making the most of the Tribal TANF opportunity. For some tribes, receiving TANF assistance through the state may make the most sense, while for others, administering Tribal TANF might be viable if the tribe can receive financial and technical assistance to develop capacity and learn from other tribes' examples. This study does not conclude what other tribes would need to initiate Tribal TANF programs, but it does describe how four diverse Tribal TANF programs have realized this accomplishment. For these four tribal communities, the ability to run a program that uniquely matches their cultural contexts has been critical to their perceived success.

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## Appendix 1: Conceptual Framework for Identifying Factors Related to Tribal TANF Implementation, Outputs, and Outcomes



## Appendix 2: Photos of Tribal TANF Sites

### Tanana Chiefs Conference



Fairbanks, Alaska; included in the TCC Tribal TANF service area.



Aerial view of TCC Tribal TANF service area land. Many sites are accessible only by plane.



Building in Huslia, Alaska.



TCC Tribal TANF Office in Huslia, Alaska.





Signs on the building that houses TCC Tribal TANF in Huslia, Alaska.



The value of self-sufficiency is evident in TCC buildings.

**South Puget Intertribal Planning Agency (SPIPA)**



Hood Canal, Puget Sound.



Squaxin Island's SPIPA Tribal TANF Office.





SPIPA administrative building on Squaxin Island Reservation land  
(Photo by Marilee Bittner-Fawcett, SPIPA's PR manager).



Waiting area, SPIPA Tribal TANF office, Tacoma, Washington.



"People of the River Healing Garden," Skokomish Reservation.



Beading done during a SPIPA Tribal TANF workshop.



## Oneida Tribe of Wisconsin



Waiting areas, Oneida Center for Self-Sufficiency.

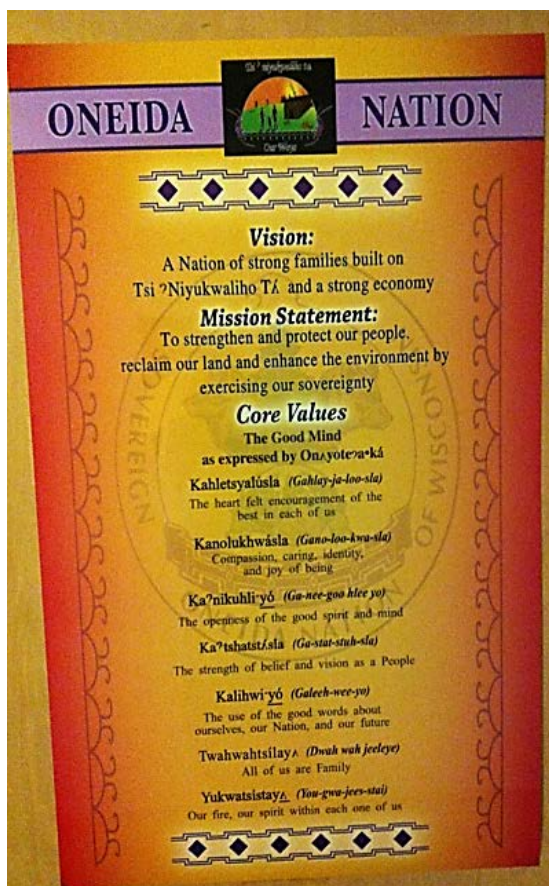


Job Center, Oneida Center for Self-Sufficiency.





Wise Women Gathering Place, a nonprofit native organization that provides healthy relationship-building classes to which Oneida Tribal TANF participants are frequently referred.

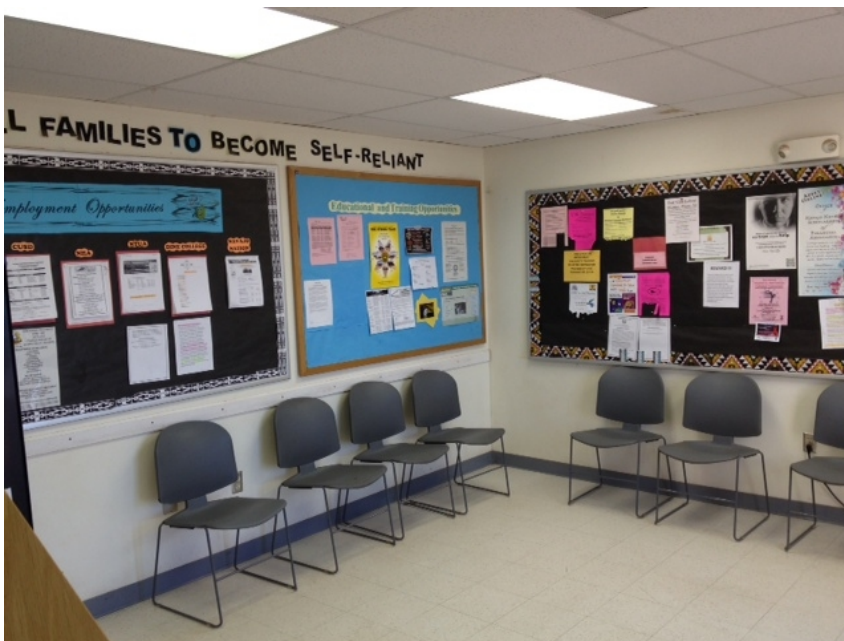


Poster displaying Oneida Nation vision, mission, and values; posted throughout the Center for Self-Sufficiency.

## Navajo Nation



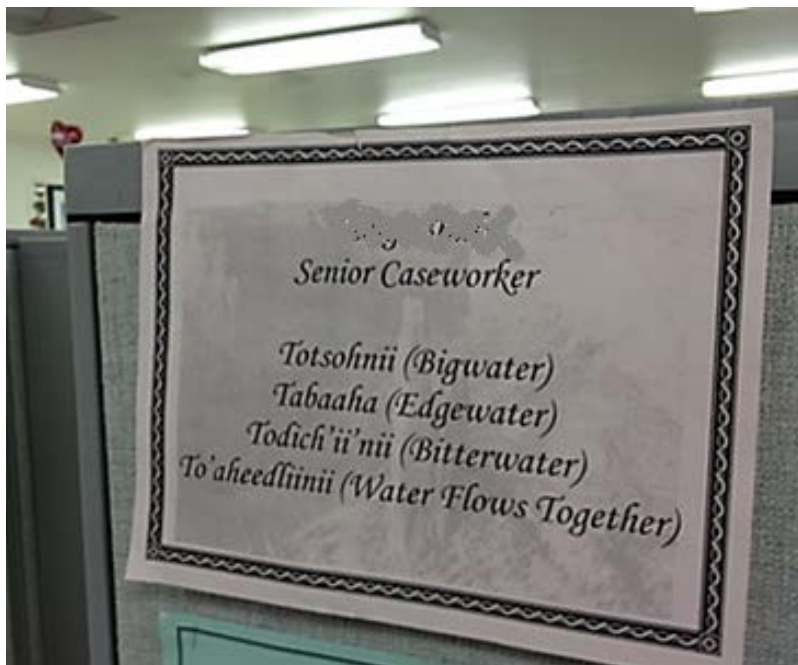
Navajo Nation land.



Waiting area, Chinle TANF Office, Navajo Nation.



Chinle TANF Office, Navajo Nation.



PSR senior caseworker name placard displaying family lineage (name withheld).